



EQUALITY, DIVERSITY, INCLUSION AND ANTI-HARASSMENT POLICY

Policy reference UKV-QA-26 | Version 3.0

UK Versity Online Limited | BAC Accredited College | UKPRN 10052768

Policy reference	UKV-QA-26
Version	3.0
Status	Updated
Effective date	1 October 2026
Next review	September 2027
Policy owner	Principal
Author	Director of Education
Approved by	Principal (Ramanjeet Singh), on behalf of the Academic Board
Approval date	1 October 2026

Equality, Diversity, Inclusion and Anti-Harassment Policy

UK Versity Online Limited | ATHE 889 | Pearson 07737 | OTHM DC1506132 | Ascentis 3286 | NCFE 8465520 | IFA Direct 283334

Document control

Title	Equality, Diversity, Inclusion and Anti-Harassment Policy
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Version	3.0
Status	Updated
Effective date	1 October 2026
Next review	September 2027 (annual), or earlier if required
Owner	Principal
Author	Director of Education
Approval authority	Academic Board, chaired by the Principal (Ramanjeet Singh)
Approval date	1 October 2026
Applies to	All UK Versity learners, applicants, staff, tutors, assessors, contractors, agents and partners
Supersedes	Equality and Diversity Policy QA-14 (August 2014, next review November 2023)
Summary	Sets out UK Versity's commitment to equality and inclusion and how it prevents and responds to discrimination, bullying, harassment and sexual misconduct for learners and staff.

Compliance mapping

BAC College Scheme 2023 standards	16.5; 16.6
UK Quality Code 2024 (voluntary)	Principle 10
OfS conditions (benchmark only; not OfS registered)	E6 (benchmark)
Awarding organisations	ATHE; Pearson; OTHM; Ascentis; NCFE; IFA Direct
Legislation and regulation	Equality Act 2010; Worker Protection (Amendment of Equality Act 2010) Act 2023; Employment Rights Act 2025; Protection from Harassment Act 1997; UK GDPR and Data Protection Act 2018

Version history

Version	Date	Change
1.0	August 2014	First issue (Equality and Diversity Policy QA-14)
3.0	October 2026	Full rebuild: inclusion and anti-harassment added, sexual misconduct and staff-learner relationships, Worker Protection Act 2023 and Employment Rights Act 2025 duties, BAC mapping and version control

1. Purpose

This policy sets out how UK Versity Online Limited (trading as UK Versity) makes sure that no learner, applicant or member of staff is treated unfairly because of who they are, and how it prevents and deals with bullying, harassment and sexual misconduct. It explains what behaviour is expected, how to report a problem, and what UK Versity will do in response.

UK Versity is a fully online college. Most contact between learners and staff happens on Moodle, in live Zoom sessions, by email and in official WhatsApp groups. This policy applies in all of these spaces as it would in a physical classroom. It meets BAC standard 16.6 (anti-discrimination and abusive behaviour, including cyberbullying).

2. Scope

This policy applies to:

- all learners and applicants, on every qualification and with every awarding organisation;
- all staff, including employed staff, self-employed tutors, assessors and Internal Quality Assurers (IQAs), and contractors;
- agents, partners and anyone acting on UK Versity's behalf;
- all UK Versity activities and communication channels, including personal social media where the conduct is connected to UK Versity or its learners or staff.

3. Definitions

- **Protected characteristics** (Equality Act 2010): age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- **Direct discrimination:** treating someone less favourably because of a protected characteristic.
- **Indirect discrimination:** applying a rule or practice to everyone that puts people with a protected characteristic at a particular disadvantage, without objective justification.
- **Discrimination arising from disability and failure to make reasonable adjustments:** unfavourable treatment because of something connected to a disability, or failing to take reasonable steps to remove a disadvantage.
- **Harassment:** unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- **Sexual harassment:** unwanted conduct of a sexual nature with that purpose or effect.
- **Victimisation:** treating someone badly because they have made, supported or given evidence about a complaint of discrimination or harassment.
- **Bullying:** repeated unreasonable behaviour that intimidates, undermines or harms someone.
Cyberbullying is bullying through messages, posts, images or other digital means.
- **Sexual misconduct:** any unwanted sexual behaviour, including sexual harassment, sexual assault, sharing intimate images without consent, and coercive or exploitative conduct.

4. Policy statement and principles

1. UK Versity will not discriminate against, harass or victimise anyone because of a protected characteristic, or because of their social or economic background, nationality or where they live.
2. Admission, assessment, recruitment, promotion and treatment of learners and staff are based on relevant merit, ability and the published entry requirements.

3. Bullying, harassment, sexual misconduct and abusive behaviour are not acceptable in any UK Versity space, online or in person. They are dealt with as disciplinary matters for learners and staff.
4. UK Versity takes proactive steps to prevent harassment, not only to respond when it is reported.
5. Nobody will be treated less favourably for reporting a concern in good faith, or for supporting someone who does.
6. It is a condition of admission for learners, and of engagement for staff and contractors, that they follow this policy. UK Versity will review any relationship with an agent or partner whose practice conflicts with it.

5. Inclusive admissions, teaching and materials

1. Entry requirements, admissions decisions and fees are applied consistently under UKV-QA-05 Recruitment and Admission Policy. Applicants are asked at enrolment whether they have a disability or support need, so support can be planned from the start.
2. Course materials on Moodle are designed to be accessible: clear headings, readable fonts, captions or transcripts for video where available, and documents that work with screen readers. The Course Coordinator reviews new and revised materials against these points under UKV-QA-13.
3. Live sessions are recorded and uploaded to Moodle so that learners with caring responsibilities, work commitments, health conditions or time-zone differences are not disadvantaged.
4. Teaching materials, case studies and examples reflect a range of backgrounds and avoid stereotypes. Tutors challenge discriminatory comments in sessions and forums.
5. Religious observance is respected when scheduling live sessions and deadlines where this is practical. Learners can ask for an extension under UKV-QA-18.

6. Reasonable adjustments

UK Versity has a duty to make reasonable adjustments for disabled learners and staff. For learners, support and adjustments to teaching (for example alternative formats, assistive technology or adjusted live-session arrangements) are agreed in a Learning Support Plan under UKV-QA-32 Supporting Learners with Additional Needs and Disabilities Policy, which also sets out what a distance learning college can and cannot provide. Adjustments to assessment and awarding organisation approval are decided under UKV-QA-18 Reasonable Adjustments, Special Consideration and Mitigating Circumstances Policy. For staff, adjustments to equipment, hours or duties are agreed with the Principal. UK Versity does not charge for reasonable adjustments.

7. Anti-bullying, including cyberbullying

1. Examples of unacceptable behaviour include insults or ridicule based on a protected characteristic, jokes that target someone's identity, abusive or threatening messages, excluding someone from group work, spreading rumours, sharing someone's images or personal information without consent, and repeated unwanted contact.
2. This applies in tutorials, Moodle forums, email, WhatsApp, social media and anywhere else connected to UK Versity study or work.
3. Tutors and the Course Coordinator moderate forums and group chats and remove offensive content. Evidence (screenshots with dates) is kept for any investigation.
4. Further rules for online conduct are in UKV-QA-30 Acceptable Use, E-Safety, Email and Social Media Policy.

8. Harassment and sexual misconduct

8.1 Prevention

UK Versity takes all reasonable steps to prevent harassment, including sexual harassment, of learners and staff. These steps include:

- this policy, explained to learners at induction and to staff at induction;
- training for all staff on recognising and responding to harassment and sexual misconduct, refreshed at least every 2 years;
- clear rules on professional boundaries and online contact (section 8.5 and UKV-QA-25);
- an annual risk assessment by the Principal of where harassment could occur, including harassment by third parties such as learners, agents or contractors, with actions recorded;
- review of every report for lessons learned.

8.2 How to report

You can report harassment, bullying or sexual misconduct, whether it happened to you or you saw it, to:

- the Student Administrator and Welfare Officer (Hygerta Kurti);
- the Quality Manager (Shazia Khan);
- your tutor or any member of staff, who must pass it to the Welfare Officer or Quality Manager the same working day;
- admin@ukversity.co.uk or 0161 273 4745.

You can also make a formal complaint under UKV-QA-24 Complaints Policy and Procedure. Staff can use the staff grievance procedure (see UKV-QA-27) or the Whistleblowing Policy (UKV-QA-28). Anonymous reports are accepted and acted on as far as possible, although anonymity can limit what UK Versity can investigate.

If you are in immediate danger, call 999. If a report suggests a learner under 18 or an adult at risk may be at risk of harm, it is handled first under UKV-QA-25 Safeguarding and Prevent Policy.

8.3 Support

When a report is made, UK Versity will:

1. contact the person who reported within 3 working days to listen, explain the options and agree support;
2. offer practical support, such as a change of tutor or assessor, moving the learner to a different online group, blocking contact on UK Versity platforms, or deadline extensions under UKV-QA-18;
3. signpost to specialist services, such as Samaritans (116 123), NHS 111 or local sexual violence support services;
4. explain that the person can report a crime to the police, and support them to do so. UK Versity will not pressure anyone to report to the police, unless there is a safeguarding risk to others.

8.4 Investigation and outcomes

1. Formal reports are investigated by the Quality Manager, or by the Principal where the Quality Manager is involved or has a conflict of interest. Where the Principal is involved, the Quality Manager investigates and reports to the Academic Board.
2. The investigation follows the timescales in UKV-QA-24: acknowledgement within 3 working days and an outcome within 20 working days, unless both parties are told in writing why more time is needed.

3. Both the person reporting and the person reported are told what is alleged, can give their account and can be accompanied by a person of their choice at any meeting. The standard of proof is the balance of probabilities.
4. Interim measures (such as suspending the person reported from live sessions or learner contact) may be taken while the investigation is under way. They are not a finding of fault.
5. Outcomes can include a written warning, a behaviour agreement, removal from group activities, suspension or withdrawal of a learner, or disciplinary action (including dismissal or termination of contract) for staff.
6. Both parties are told the outcome in writing, as far as data protection allows, and how to request a review.

8.5 Staff and learner relationships

1. Staff must not enter into an intimate or sexual relationship with a learner they teach, assess, quality assure or support, or over whom they have any academic or pastoral responsibility.
2. Any member of staff who has an existing relationship (including a family relationship) with a learner, or with an applicant, must declare it in writing to the Principal before any contact in their UK Versity role. The Principal will make sure the staff member has no role in teaching, assessing, quality assuring or supporting that learner. Declarations are also recorded under UKV-QA-21 Conflict of Interest Policy.
3. Any sexual relationship between a member of staff and a learner under 18 is prohibited in all circumstances and will be reported under UKV-QA-25.
4. Breach of this section is a disciplinary matter and may lead to dismissal or termination of contract.

8.6 Confidentiality agreements

UK Versity will not use non-disclosure or confidentiality agreements to prevent anyone from reporting or speaking about harassment, sexual misconduct, discrimination or abuse, whether to UK Versity, the police, a regulator, a professional adviser or anyone else.

9. Duties to staff

UK Versity is an employer and must take reasonable steps to prevent sexual harassment of its employees in the course of their employment (Worker Protection (Amendment of Equality Act 2010) Act 2023, in force 26 October 2024). The Employment Rights Act 2025 strengthens this duty to "all reasonable steps" and adds protection from harassment by third parties, such as learners or contractors, from October 2026. UK Versity meets these duties through the prevention steps in section 8.1, applied equally to staff. Staff who raise a concern about sexual harassment are also protected under UKV-QA-28 Whistleblowing Policy.

Tutors and staff who are harassed by a learner in a live session, by email or in messages should end the contact where needed, keep the evidence and report it to the Quality Manager the same day. The learner will be dealt with under this policy.

10. Equality data and monitoring

1. Learners and staff are asked to give equality information (for example age, sex, disability and ethnic group) at enrolment or appointment. Giving it is voluntary, and it is held as special category data under UKV-QA-29.
2. The Quality Manager analyses anonymised data each year on applications, enrolments, achievement, withdrawals, complaints, appeals, malpractice cases and reported harassment by protected characteristic, where numbers are large enough to protect identities.
3. The results and any action plan are reported to the Academic Board at least annually.

11. Training

All staff complete equality, diversity and inclusion training, including harassment and sexual misconduct, at induction and at least every 2 years. Staff involved in investigating reports receive additional guidance before they investigate. Learners are introduced to this policy at induction on Moodle.

12. Roles and responsibilities

Role	Responsibility
Principal and Director of Education	Owns this policy; carries out the annual harassment risk assessment; investigates reports where the Quality Manager is involved; handles relationship declarations
Quality Manager	Investigates formal reports; analyses equality data; keeps training records; reports to the Academic Board
Student Administrator and Welfare Officer	First point of contact for learners; arranges support; passes safeguarding concerns to the DSL
Course Coordinator	Makes sure Moodle materials are accessible; moderates forums
Registrar	Collects equality and support-need information at enrolment
Tutors, assessors and IQAs	Apply inclusive practice; challenge discriminatory behaviour; report concerns the same working day; keep professional boundaries
Learners	Treat others with respect in every UK Versity space; report concerns
Academic Board	Reviews the annual equality report and action plan

13. Related policies and legislation

- UKV-QA-05 Recruitment and Admission Policy
- UKV-QA-13 Online and Distance Learning and Course Materials Policy
- UKV-QA-18 Reasonable Adjustments, Special Consideration and Mitigating Circumstances Policy
- UKV-QA-21 Conflict of Interest Policy
- UKV-QA-24 Complaints Policy and Procedure
- UKV-QA-25 Safeguarding and Prevent Policy
- UKV-QA-27 Staff Recruitment, Induction and Development Policy
- UKV-QA-28 Whistleblowing Policy
- UKV-QA-29 Data Protection and Records Retention Policy
- UKV-QA-30 Acceptable Use, E-Safety, Email and Social Media Policy
- Equality Act 2010
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Employment Rights Act 2025
- Protection from Harassment Act 1997
- UK GDPR and Data Protection Act 2018
- Office for Students condition E6 (harassment and sexual misconduct), used as a voluntary benchmark only; UK Versity is not registered with the Office for Students
- BAC College Scheme 2023, standards 16.5 and 16.6

14. Monitoring and review

The Quality Manager keeps a confidential log of all reports of discrimination, bullying, harassment and sexual misconduct, with actions and outcomes, and reports anonymised figures and equality data to the Academic Board at least annually.

This policy is reviewed at least annually, and earlier if legislation (including commencement of further Employment Rights Act 2025 provisions), awarding organisation requirements, BAC standards, an inspection or EQA action, or a significant incident requires it. Each version is recorded in the Policy Register (UKV-QA-REG v3.0). Records of reports and investigations are kept for at least 3 years after the case closes, in line with complaints records under UKV-QA-29.

Approval and review

Stage	Name and role	Date
Prepared by	Director of Education	30 September 2026
Checked by (policy owner)	Principal	30 September 2026
Approved by	Ramanjeet Singh, Principal and Director of Education, on behalf of the Academic Board	1 October 2026
Next review due	Quality Manager (Shazia Khan) to schedule through the Policy Register UKV-QA-REG	September 2027