EQUAL OPERTUNITY POLICY

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REVISION HISTORY

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RED DUNE

Equal Opportunity Policy

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1. Purpose, Commitment & Scop

Purpose & Commitment

Red Dune Training Centre (Saudi Arabia) is unequivocally committed to equal opportunity. We operate a **zero-tolerance** stance toward discrimination, harassment, bullying, and victimisation in any form. Every learner, candidate, apprentice, visitor, staff member, contractor, and partner is entitled to be treated with **fairness**, **dignity**, **and respect**. This policy underpins all aspects of our work—recruitment and onboarding, teaching and learning, assessment and certification, facilities management, complaints and appeals, and day-to-day service delivery.

Our commitment is practical and measurable. We will:

- Design, deliver, and assess training so that outcomes are determined by merit and demonstrated competence, not by personal characteristics or background.
- Provide **accessible information** and reasonable adjustments where needed, ensuring assessments and learning activities remain valid, reliable, and fair.
- Maintain safe, healthy, and environmentally responsible learning environments, recognizing that inclusive practice is integral to quality (ISO 9001), occupational health and safety (ISO 45001), and environmental management (ISO 14001).
- Align with TVTC expectations and the equity standards required by international awarding bodies (e.g., NEBOSH, IOSH, Highfield, AOSH UK, OTHM, CQI-IRCA), including fair access to courses, unbiased assessment, and transparent routes for reasonable adjustments, special considerations, complaints, and appeals.
- Build staff **competence and awareness** through induction and CPD focused on inclusive pedagogy, unconscious bias, respectful communication, and exam integrity.
- Monitor performance using KPIs and evidence (admissions diversity, adjustment turnaround, appeals, satisfaction data), and use findings to drive **continuous improvement**.

Red Dune's leadership accepts accountability for enforcing this policy. Managers must model inclusive behaviours, resource accessible delivery, and remove barriers proactively. All staff share responsibility to challenge discrimination, report concerns promptly, and support learners in good faith. We will protect individuals who raise issues or participate in investigations from any detriment. Where breaches occur, we will act swiftly and proportionately through corrective and preventive actions, up to and including exclusion from sites, termination of contracts, or referral to relevant authorities where applicable.

This commitment extends to how we select and manage suppliers, venues, and partners. Our contracts and service levels will reflect equal opportunity requirements, including accessibility checks and minimum behaviours for representatives acting on Red Dune's behalf. We will communicate our stance clearly on our website (https://reddune.org/), in learner handbooks, at reception, and during staff and learner inductions.

Scope

This policy applies to **all** Red Dune Training Centre operations and delivery modes across Saudi Arabia, including but not limited to: face-to-face classes, blended and online learning, practical/workshop activities, simulated environments, and invigilated assessments. It covers every stage of the learner and staff journey:

• Outreach and Marketing: course promotion, published information, advice and guidance, and selection events.

- Admissions and Enrolment: eligibility checks, language and literacy support, fee transparency, and reasonable adjustments at the point of entry.
- **Teaching and Learning:** curriculum design, learning materials, classroom management, and the use of examples, language, and imagery that are culturally respectful and accessible.
- Assessment and Examination: assessment design, invigilation, special considerations, and the secure handling of personal and sensitive data connected to adjustments.
- Facilities and Logistics: site access, seating and exam layouts, rest areas, sanitation, PPE provision for practicals, emergency egress, and environmental considerations (e.g., heat, dust, noise) that may affect access or performance.
- **Employment and HR:** recruitment and promotion, role allocation, supervision, performance management, CPD, and grievance/disciplinary processes.
- **Third Parties:** external venues, subcontracted trainers/assessors, interpreters, agents, and service providers engaged by Red Dune.
- **Quality Assurance and Audit:** internal audits, IQA/standardisation, external quality assurance visits, and regulatory or awarding-body reviews.
- Complaints, Appeals, and Whistleblowing: EO-related concerns, safeguarding interfaces, and protection from retaliation.

Protected characteristics and non-discrimination grounds (including age, sex/gender, nationality, disability, religion/faith, marital/parental status, and language) are observed in line with local legal requirements and awarding-body conditions. Where conflicts arise between external expectations and local law, Red Dune will seek solutions that preserve learner safety, fairness, and compliance, escalating to the Head of Centre for a documented decision and communication plan. This scope ensures that equal opportunity is not a statement of intent but a **centre-wide operational standard** embedded in everything we do.

2. Definitions

The commitment that all learners, staff, and visitors at Red Dune Training Centre receive fair, dignified, and unbiased treatment in admissions, teaching, assessment, certification, employment, and services. EO means decisions are based on merit, competence, and relevant criteria—never on irrelevant personal characteristics.

Equity

Providing the specific support, adjustments, or resources individuals need to achieve comparable outcomes. Equity recognises that different people may require different measures to access learning and assessment fairly.

Inclusion

Creating learning and working environments where everyone feels respected, safe, able to participate, and able to succeed. Inclusion is demonstrated through accessible materials, respectful language, and barrier-free processes.

Direct Discrimination

Less favourable treatment of a person explicitly because of a protected characteristic (e.g., refusing a reasonable adjustment because of disability).

Indirect Discrimination

A rule, criterion, or practice that appears neutral but puts people with a protected characteristic at a particular disadvantage and cannot be justified as necessary, proportionate, and legitimate.

Harassment

Unwanted conduct linked to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment—this includes verbal, written, visual, or digital behaviour.

Victimisation

Detrimental treatment of someone because they made, supported, or were believed to have made/support a complaint, appeal, or disclosure related to discrimination, malpractice, or safety.

Bullying

Persistent or significant behaviour—whether overt or subtle—that demeans, undermines, or abuses a person's dignity or position. Bullying may occur among learners, between staff, or across roles, in person or online.

Reasonable Adjustments

Proportionate changes to delivery, assessment, or environment to remove barriers for learners with long-term or significant needs (e.g., extra time, assistive technology, accessible venues). Adjustments must not compromise assessment validity, safety, or awarding-body/TVTC requirements.

Special Considerations

Post-assessment allowances for temporary, unexpected circumstances (e.g., acute illness, bereavement) that materially affected performance. These are applied according to awarding-body rules and evidence standards.

Protected Characteristics

Personal attributes that must not be used as a basis for unfair treatment, including (as applicable in the

Saudi context and awarding-body requirements): disability, age, sex/gender, pregnancy/parental status, marital status, nationality, language, religion/faith, and other locally recognised statuses.

Bias (Conscious/Unconscious)

Attitudes or assumptions that influence decisions outside objective evidence. Bias can affect recruitment, teaching, marking, and verification; staff must mitigate bias through training, standardisation, and evidence-based decisions.

Accessibility

The design of facilities, communications, technology, and assessments to be usable by as many people as possible, with or without adjustments.

Confidentiality

The safeguarding of personal and sensitive information relating to EO, adjustments, and special considerations, shared strictly on a need-to-know basis and stored under controlled conditions.

3. Legal & Local Context

Red Dune Training Centre operates in the Kingdom of Saudi Arabia and upholds equal opportunity within the framework of applicable Saudi laws and regulations, TVTC oversight requirements, and the conditions of approval set by international awarding bodies. This section explains how those obligations shape our practice.

1) Saudi legal framework (education & employment)

- We comply with national labour and civil regulations governing fair recruitment, nondiscriminatory terms and conditions, dignified treatment at work, and protection from harassment.
- We recognise the Kingdom's provisions supporting people with disabilities and commit to reasonable accommodations that enable equal access to learning, assessments, and services, provided safety and competence standards are maintained.
- Arabic is the authoritative language for statutory communications; where English materials are used for international qualifications, we ensure accurate translation and equivalence.
- Personal data connected to equal opportunity, reasonable adjustments, or special considerations is handled lawfully, securely, and only by staff with a defined need to know.

2) TVTC obligations (regulator of training providers)

- We meet TVTC licensing conditions, provider bylaws, and audit expectations related to learner access, admissions transparency, facilities suitability, assessment integrity, and complaint/appeal handling.
- Our marketing and admissions processes avoid misleading claims and use criteria that are objective, published, and applied consistently.
- We maintain accessible, safe training environments; any restrictions (e.g., site safety, PPE, medical fitness) are risk-based and proportionate, never used to exclude unfairly.
- TVTC has escalation authority; learners may seek TVTC review after our internal processes are concluded, and we will cooperate fully with any directives.

3) Awarding-body conditions (international programmes)

- Where an awarding body's requirement is more specific or stringent than our baseline policy, the higher standard prevails (unless it conflicts with Saudi law, in which case we will notify the awarding body and apply a lawful, equivalent control).
- All assessment security and invigilation measures are applied in an impartial manner. Decisions on adjustments are evidence-based, time-bound, and recorded.

4) Governance & assurance

- The Head of Centre owns this section; the Quality Lead monitors compliance through audits, KPI reviews, and standardisation.
- Material legal or regulatory updates trigger prompt policy review, staff briefing, and document re-issue under our controlled document procedure.

4. Protected Characteristics & Non-Discrimination Grounds

Red Dune Training Centre is committed to fair access, respectful conduct, and unbiased assessment. We do not tolerate discrimination, harassment, or victimization on any protected ground. This section aligns with TVTC expectations, and the principles required by international HSE awarding bodies, and is embedded within our ISO 9001/14001/45001 management system.

Protected Characteristics (as applicable to our context)

- Age No unfair barriers in admission, teaching, or assessment based on age.
- **Sex/Gender** Equal access to programmes, facilities, PPE, and practical activities; privacy and dignity respected.
- Nationality Training, assessment, and services are available without prejudice; immigration status checks (where required by law) are handled respectfully and confidentially.
- **Disability** We provide reasonable adjustments (e.g., extra time, accessible rooms, assistive technology) without compromising assessment integrity or safety.
- **Religion/Faith** Timetabling, facilities, PPE, and fieldwork are planned with respect for faith needs where practicable and safe.
- Marital/Parental Status Pregnancy, maternity, paternity, or caregiving responsibilities must not disadvantage learners or staff; flexible arrangements considered where feasible.
- Language Clear information on language of delivery/assessment; language support and plain-English/plain-language materials where possible; interpreters used only where permitted.
- Socioeconomic Status Marketing, admissions, pricing, and payment plans avoid indirect bias; bursary or support information is transparent where available.
- Other Relevant Grounds Includes ethnicity, cultural background, and any status protected by Saudi law or awarding-body rules.

Prohibited Conduct

Direct and indirect discrimination, harassment (including sexual harassment), bullying, and victimization are prohibited in classrooms, workshops, sites, online platforms, assessments, interviews, and breaks/transport.

Practical Controls

- Admissions & Marketing: Criteria are published and applied consistently; decisions are recorded and reviewable.
- Learning & Assessment: Risk assessments consider inclusive access (heat, noise, dust, ergonomics). Assessment instruments are screened for bias; invigilation is impartial.
- Facilities & PPE: Safe access/egress for all; suitable sizes and fits; modesty options where appropriate.
- **Reasonable Adjustments:** Clear request route, defined evidence, timescales, confidentiality, and escalation to awarding bodies when required.
- **Staffing:** Equal opportunity in recruitment and CPD; bystander expectations and swift escalation of concerns.

Reporting & Remedies

Concerns may be raised to the Centre Manager or via our complaints route. We protect reporters from victimization, investigate promptly, apply corrective actions, and communicate outcomes as appropriate.

Monitoring & Improvement

We track access, adjustment turnaround, appeals, and satisfaction data. Findings inform our Quality Review Meetings and drive corrective and preventive actions, ensuring continuous improvement and sustained compliance.

5. Anti-Harassment & Dignity at Study/Work

Red Dune Training Centre maintains a zero-tolerance stance on bullying, harassment, victimization, and discrimination. Everyone—staff, learners, contractors, and visitors—has the right to study and work with dignity and respect. This section supports TVTC expectations, and the fairness principles required by international awarding bodies and aligns with ISO 9001/14001/45001 (risk-based, documented, and continually improved controls).

What counts as harassment

Harassment includes unwanted conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. It covers verbal/physical abuse, sexual harassment, cyber-harassment, intimidation, exclusion, and **microaggressions** (subtle slights, stereotypes, or repeated "jokes" that undermine individuals). One serious incident or a pattern of lower-level behaviors can constitute harassment.

Bystander responsibilities

All members of the Centre community share a duty to act:

- If safe, challenge the behavior (e.g., "That's not appropriate here").
- Offer support to the affected person and signpost reporting routes.
- Report concerns promptly, even if you are not the target.

How to report (safeguarding/escalation)

- Informal option: speak to the Tutor, Centre Manager, or HSE Officer for quick resolution.
- Formal report: email <u>complaints@reddune.org</u> (or the Centre Manager if confidentiality is critical). You will receive an acknowledgement within 2 working days and a plan for next steps.
- **Safeguarding risk:** where safety is at risk, staff must escalate immediately to the Head of Centre; emergency services are contacted if required.

Investigation & outcomes

A trained, impartial investigator will gather statements and evidence, respecting confidentiality and data-minimisation. Findings, conclusions, and actions (e.g., mediation, mandatory training, removal from class, disciplinary measures) are documented. Retaliation against reporters, witnesses, or affected persons is strictly prohibited.

Support

We provide access to pastoral support, reasonable adjustments, and alternative learning/assessment arrangements where necessary.

Prevention & competence

Mandatory inductions and periodic CPD address respectful conduct, unconscious bias, microaggressions, bystander techniques, and online etiquette. Supervisors model expected behaviors and intervened early.

Monitoring & improvement

Trends, root causes, and corrective/preventive actions are reviewed at Quality Review Meetings. Lessons learned inform updates to this policy, assessment conduct rules, site/classroom risk controls, and staff training. All records are controlled per our Document Control and Data Protection procedures.

6. Teaching, Learning & Support

To ensure every learner can participate and succeed through inclusive pedagogy, language and literacy support, culturally respectful content, accessible learning environments, and clear conduct standards consistent with TVTC expectations and the principles required by international awarding bodies and ISO 9001/14001/45001.

Inclusive Pedagogy

Tutors plan lessons that recognise different starting points, learning styles, and workplace backgrounds. Delivery blends demonstration, discussion, practice, and assessment rehearsal. Practical tasks mirror real HSE contexts while avoiding cultural bias. Lesson plans signpost reasonable adjustments and safety controls for all activities.

Language & Literacy Support

Primary delivery is in clear professional English with Arabic support where appropriate; glossaries of key Qualification terms are provided. For cohorts that require it, pre-session primers, bilingual handouts, and extended reading time are offered. Tutors check understanding using short knowledge checks rather than relying only on fast verbal responses. Learners who disclose additional needs receive a support plan aligned with awarding-body and TVTC rules.

Culturally Respectful Examples

Case studies, imagery, and scenarios reflect diverse workplaces in Saudi Arabia and the wider region. Materials avoid stereotypes and are reviewed each term to ensure relevance, respect, and neutrality. Religious observances and local customs are accommodated in timetables and breaks without reducing required learning time.

Accessible Classrooms & Materials

Rooms are arranged to support visibility, audibility, and safe movement; seating and lighting can be adjusted. Digital materials are screen-reader friendly; videos include captions where feasible. Practical activities include PPE sizing options and heat-stress controls. Any physical or environmental barriers identified in risk assessments are addressed before delivery.

Safe & Respectful Conduct

All sessions begin with a brief on dignity, equality, and safety. Bullying, harassment, discriminatory language, and unsafe behaviour are prohibited. Concerns can be raised confidentially to the Tutor, Centre Manager, or Quality Lead. Breaches are managed under our Behaviour and Complaints procedures, with support offered to affected learners. Continuous feedback informs improvements to curriculum, materials, and tutor CPD.

7. Work-Based/Practical Activities

To guarantee fair, safe, and equitable access to all practical learning, simulations, and site-based tasks without discrimination, consistent with TVTC expectations and the intent of ISO 9001 (quality), ISO 45001 (OH&S), and ISO 14001 (environment).

Scope

Applies to workshops, labs, field drills, plant/site visits, and assessments requiring tools, machinery, or PPE, whether delivered on Red Dune premises or partner locations.

Fair Access Planning

- Learning plans are designed so no learner is excluded due to language, disability, cultural needs, pregnancy, or temporary injury. Reasonable adjustments and special considerations are available on request, with decisions recorded and communicated before activities begin.
- Rotes ensure equal opportunity for high-value tasks (e.g., operating equipment, leading a drill). Where numbers exceed capacity, we use transparent rotation and make-up sessions.

PPE Fit and Availability

- Red Dune issues appropriate PPE in a range of sizes and designs (e.g., gloves, eye/face protection, hearing protection, footwear, coveralls, respiratory protection).
- Fit checks are performed for items where seal or fit matters (e.g., RPE). Alternative models are sourced if standard items do not fit a learner's size, hair, or religious attire, provided safety is not compromised.
- PPE is replaced promptly if damaged or unsuitable; no learner is charged for mandatory items required by the activity.

Risk Controls That Don't Exclude

- Risk assessments consider inclusivity from the start. Controls will prioritise engineering and administrative measures before personal exclusion.
- If a restriction is unavoidable (e.g., specific medical contraindications), the Centre Manager approves an equivalent learning outcome via simulation, alternative equipment, or supervised demonstration.

Environmental Factors Managed Equitably

- Heat, dust, noise, lighting, and access/egress are managed to safe levels. For hot conditions, we use shaded areas, hydration breaks, heat-stress monitoring, and task rotation. For dusty tasks, we provide extraction and appropriate RPE. For noise, we implement exposure limits and hearing protection plans.
- Environmental stewardship (spill control, waste segregation) is integrated into tasks to model sustainable practice.

Conduct, Reporting, and Review

- Tutors ensure respectful conduct, equal speaking time, and unbiased task allocation.
- Concerns about fairness, fit, or access can be raised to the Office Coordinator or Quality Lead; issues are logged, investigated, and actioned.
- KPIs: adjustment turnaround, participation parity, incident/near-miss trends, and learner feedback. Findings feed the PDCA cycle and CPD. Outcomes and changes are communicated transparently to learners and staff.