




CAPTIVA
LEARNING

EQUALITY AND DIVERSITY POLICY

Captiva Learning Limited

Last Review Date:	16 th August 2021	By:	Jason Oster Captiva Chief Operating Officer
Approval Date:	23 rd August 2021	By:	Captiva Governance Board
Next Review Date:	22 nd August 2022		
Signed:		Jason Oster Captiva Chief Operating Officer	

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This document will be reviewed annually unless a change of policy or regulation necessitates an interim review. The review will be led by a member of the senior leadership team, or a senior manager, and will involve external advisors or experts where required. The updated document will be reviewed by the senior leadership team initially, then by the Captiva Governance Board before being authorized for publication by the Chair of the Board.

Purpose & Principles

Captiva Learning Limited (Captiva) celebrates the diversity of its apprentices and staff team and is fully committed to securing equality of opportunity for everyone. The company has a documented commitment to prevent discrimination or unfair treatment against staff or learners, and to eliminate it wherever it is found.

We are fully committed to ensuring our policies, procedures and practices comply with all relevant legislation, including the Equality Act 2010 and will always strive to exceed the minimum expectations specified by the existing statutory framework. The act introduced a new single public sector duty for people who share the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnerships
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

The Equality Act 2010 includes prohibited conduct, as well as requirements regarding adjustments required for disabled persons and regulations as set out below:

Prohibited conduct

- Discrimination
- Direct discrimination
- Combined discrimination: dual characteristics
- Discrimination arising from disability
- Gender reassignment discrimination: cases of absence from work
- Pregnancy and maternity discrimination: non-work cases
- Pregnancy and maternity discrimination: work cases
- Indirect discrimination

Adjustments for disabled persons

- Duty to make adjustments
- Failure to comply with duty

Regulations

Discrimination: supplementary

- Comparison by reference to circumstances

- Irrelevance of alleged discriminator's characteristics
- References to particular strands of discrimination

Other prohibited conduct

- Harassment
- Victimisation

Captiva is committed to fostering a culture where everyone is treated fairly and with respect and that prejudicial behaviour of any sort is not tolerated and is treated as a matter of the upmost importance.

Our Commitment

Marketing

- Our marketing and advertising materials will be designed to encourage applications from all sections of the community and will be available in alternative formats where necessary.
- Our recruitment processes will be focussed on making the experience as accessible as possible to all learners and removing all unnecessary barriers.
- We have a commitment to widening participation from underrepresented, disadvantaged or excluded groups.
- Our commitment to equality will be made explicit in all our marketing materials including those promoting events.
- Equality data will be collected as part of our review of recruitment and induction processes and used to inform decisions on Captiva's future approach to recruitment.

Learning Environment

- All our learning environments, whether in the workplace or at residential sessions, will be a welcoming and safe place for learners.
- All our training venues will be accessible to all learners, regardless of any disabilities they may have.
- Where necessary, Captiva is committed to a multi-agency approach that meets the targets and obligations identified in the "Keeping Children Safe in Education" strategy. Captiva will apply the principles to potentially vulnerable adult learners.
- All of Captiva's learning environments will feature materials to raise awareness of equality and diversity legislation, this policy, company procedures and best practice.

Teaching, Learning & Assessment

- All learning resources will be written to avoid bias, stereotyping or discrimination of any kind.
- Delivery teams will take every opportunity to embed equality and diversity into the teaching and learning process.
- Equality and diversity will be included as an important part of the induction process for all learners and reviewed regularly throughout the learner journey.
- Robust initial assessment processes will ensure that learners identified as having a recognised language need, a disability or learning difficulty will be provided with all the necessary support to meet their learning goals.
- Delivery teams will carry out regular reviews of the curriculum to ensure that it remains accessible to all learners.
- Captiva will also include the views of learners, employers and delivery staff in the annual self-assessment and curriculum review processes.

Recruitment and Staff Development

- Captiva is committed to creating and maintaining an environment that is safe for all our staff, where individuals are treated with respect, dignity and are free from bullying, harassment or victimisation.
- We are committed to developing a workforce that is representative of the communities in which we work.
- We will work hard to ensure that opportunities for career progression and development are open to all and awarded fairly.
- Any applicant for a role with Captiva will not be treated any less favourably based on disability, age, gender, race, religion or belief, pregnancy or maternity, marriage or civil partnership, gender reassignment and sexual orientation.
- Captiva is committed to operating within the statutory duty imposed by the Equality Act 2010, which includes:
 - Eliminating discrimination, harassment and victimisation and any other conduct prohibited by the Act,
 - Advance equality of opportunity between those that have a protected characteristic and those that do not,
 - Foster good relations between those who share a protected characteristic and those that do not.

Promotion of the Policy

- The policy will be distributed to all new employees at induction and as part of their employee handbook. Any updates will be emailed electronically to all staff as required, and the policy will be routinely covered through the staff appraisal process.
- Learners and employers will also be provided with a copy of this policy at the start of an apprenticeship programme.

- A copy of the policy will be uploaded to the e-portfolio system so that learners are able to access the document online.
- A copy of this policy will be included on our website: www.captivalearning.com.

Achieving Commitment

- Training on equality and diversity will also be provided to all new staff as part of their induction process as well as to learners commencing an apprenticeship programme.
- Staff are required to commit to supporting this policy as part of their contract.
- Learners and Employers are required to commit to supporting this policy as part of their Commitment Statement.
- Refresher training will be required for all staff annually or following an update to the policy, to ensure that awareness of the current policy framework is maintained.
- Equality and diversity will be a standing agenda item at all Delivery Group, Apprenticeships Governance Board and Executive Leadership Team Meetings to ensure awareness of the issues are maintained.
- The HR Manager will be the Equality and Diversity Champion, and will attend the above meetings as required to present updates.
- This policy will be distributed to all staff and available on our website: www.captivalearning.com.

Policy Implementation & Impact

Implementing Our Policy

- We will carry out an annual review to monitor the success of different learner groups and identify any areas for improvement.
- We will conduct an annual audit of our performance in respect of Equality & Diversity Impact Measures (EDIMS).
- Where we identify any disparity between the engagement or achievement of learner groups we will ensure that this is not due to unfair or unequal access, treatment or opportunity.
- We will ensure that where possible we adapt our products and services to make them accessible to all staff and apprentices.
- We will ensure that all contractors and service providers are aware of this policy and adhere to its principles.
- We will ensure that we take every opportunity to effectively promote British values throughout our organisation, including with staff, their employers, stakeholders and apprentices. This policy will sit alongside and compliment the Safeguarding and PREVENT Policies.

- Any individual, be they a learner, parent, employer, staff member or stakeholder can raise concerns about equality and diversity with the HR Manager by phone on 0208 221 9081 or by email: HR@captivalearning.com.

Recruitment of Apprentices

- Apprenticeship vacancy adverts will explicitly outline our commitment to equality and diversity and encourage applications, regardless of any protected characteristics.
- All advertisements will use neutral language and avoid the use of gender specific terminology.
- Application forms will be produced to ensure access to all and will only seek personal information that is relevant to the role.
- Our initial assessment processes for apprentices are designed to identify learners with additional needs at the earliest opportunity and specialist staff will be provided to ensure extra support is provided where necessary.

Equality & Diversity in the Learner Journey

- We are committed to making reasonable adjustments to our delivery model to accommodate learners with learning difficulties or disabilities and ensure equality of opportunity for all.
- Staff will be appropriately training to provide advice and guidance to learners on issues around equality and diversity and to identify and respond to inappropriate behaviour including harassment, victimisation and discrimination.
- Staff will explicitly address issues around equality and diversity from the start of the employer and learner journey, and during every documented progress review with learners and employers and record how this was covered.
- Equality and diversity will sit alongside Safeguarding and PREVENT and will be an integral part of all learning delivery.
- Staff will promote British values throughout the learner journey by contextualising to the learner role and employer environment and seeking to develop understanding from both learner and employer throughout their time on programme.
- Staff will ensure that appropriate advice on next steps is provided at the end of the programme to ensure that all learners are given the opportunity to progress onto further education or training regardless of any protected characteristics.