

Document Control		
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Document Title: Equality, Diversity and Dignity at Work Policy	Date of Next Review: See BP23 Compliance Assurance Schedule	
Version: 2.9	Author: K. Smith	

Change Log				
Date:	Change Description:	Proposed:	Actioned:	Approved:
6 June 2016	<ul style="list-style-type: none"> Addition of Safety Register as a key tool Addition of reference to Capella Team Meeting Standard Agenda to prompt regular review Addition of reference to Objective Setting/Review process 		KS	<i>KSmith</i>
13 Jan 2017	<ul style="list-style-type: none"> Change to wording of Purpose Minor change to tools to reflect documented processes 		KS	<i>KSmith</i>
18/12/17	No change made – policy reviewed and reissued	K. Smith 18/12/17	K. Smith 18/12/17	<i>KSmith</i>
28/11/18	Cross reference to Code of Conduct.	K. Smith 28/11/18	C.Hughes 28/11/18	<i>KSmith</i>
08/07/19	Amends to meet RoATP re-application requirements	S. Baldry 03/07/2019	C. Hughes 08/07/2019	<i>KSmith</i>
16/01/2020	<ul style="list-style-type: none"> References to employees/staff removed to reflect Capella Organisation Structure Ref to apprentices being required to adhere to the policy removed Ref to the Log of Occurrences replaced by ref to Safeguarding Incident Log 	H.Lees 10/12/2019	H.Lees 16/01/20	<i>KSmith</i>
16/12/2020	<ul style="list-style-type: none"> Augmentation of policy to cover inclusion 	S.Cole 10/12/2020	H.Lees 16/12/2020	<i>KSmith</i>
07/01/2021	<ul style="list-style-type: none"> Updated to refer to Capella Policy with regards to employment of ex-offenders Updated drafting regarding Equality Impact Assessments Minor drafting changes 	K.Smith 04/01/2021	H. Lees 07/01/2021	<i>KSmith</i>
21/04/2021	<ul style="list-style-type: none"> Deletion of erroneous reference to ESP and some minor drafting changes 	K.Smith 11/03/2021	H.Lees 21/04/2021	<i>KSmith</i>
23/11/2021	<ul style="list-style-type: none"> Minor Drafting Changes arising from review against latest RoATP requirements 	K.Smith 05/07/2021	H.Lees 23/11/2021	<i>KSmith</i>
21/12/2021	<ul style="list-style-type: none"> Minor Drafting Changes arising from review against latest RoATP requirements – following external review 	K.Smith 21/12/2021	H.Lees 21/12/2021	<i>KSmith</i>

Purpose

The purpose of this policy is to set out the intentions and key tools that Capella will use to ensure that equal opportunity considerations are incorporated into all our business activities, and to build an inclusive and supportive environment where everyone is treated with dignity.

This policy complements Capella's Code of Conduct for Associates (PD/CoC) and the Code of Conduct for Apprentices/Delegates (CL14), with which all Associates and Apprentices/Delegates are required to comply. *See Capella's Code of Conduct for Associates and/or Capella's Code of Conduct for Apprentices/Delegates for further information.*

This Policy covers how we will:

- promote the policy
- get engagement and achieve commitment to the policy
- train our Associates in implementing the policy
- implement the policy when recruiting, delivering training and working with employers and apprentices/delegates.

The policy includes appendices outlining Capella's expectations of our Associates and the legislative context which defines the way we meet our responsibilities.

Owners

All Capella Associates will be aware of and work within this policy. The Managing Director will take lead responsibility for the deployment of this policy.

Intent

Capella aims to:

- create an inclusive culture in which we treat each other and everyone we meet with dignity, respect, courtesy and consideration regardless of their gender, age, marital status, disability, sexual orientation, race, religion or belief, offending background, ethnic or national origin, nationality or any other difference or protected characteristic.
- embrace and value differences and in doing so create an atmosphere of trust, where people feel free to speak up and where they know that their contributions are valued and that any concerns that they raise will be treated with appropriate confidentiality and seriousness.
- develop each apprentice's/delegate's sense of personal and cultural identity, and to encourage apprentices and delegates to be confident, open to change, receptive and respectful towards other identities.

- ensure that equality is an integral part of planning and decision making.
- regularly reiterate our principles and demonstrate our commitment to equality, diversity and dignity at work through our actions.
- recognise our human biases and make conscious decisions to act on them in a positive, inclusive manner.

Tools

Promotion of this policy

Capella will promote this policy through our:

- Onboarding resources and processes for apprentices and employers
 - Promotional materials
 - Capella website which includes our online handbooks
 - Commitment Statement
 - Induction
- Onboarding resources and processes for Associates
 - Promotional materials (*see Appendix 9 of Capella's Safeguarding and Prevent Policy for information regarding Capella's policy with regards to the recruitment of ex-offenders*).
 - Capella website
 - Contract schedule
 - Induction and training

Engagement and Commitment

We will get engagement and achieve commitment to the policy through:

- Annual review of this policy.
- Annual communication of this policy to all Capella Associates in order to reinforce its importance, to obtain Associates engagement with the policy and to ensure that all Associates understand their responsibilities with regards to Equality, Diversity and Inclusion.
- Inclusion of "Equality, Diversity and Inclusion" as a Standing Agenda Item on our Leadership Team Meeting Template Agenda and our Advisory Board Meeting Template Agenda.
- Requiring all Associates to follow the expectations set out in Appendix 1 and to comply with Capella's Code of Conduct for Associates.
- Working with employers to support equality, diversity and inclusion in apprenticeship/delegate recruitment and onboarding through the sharing of relevant information and through including questions relating to Equality, Diversity & Inclusion in the H&S Checklist that employers are required to complete as part of the Contracting stage.
- Identification and sharing of appropriate learning resources suitable for apprentices/delegates and employers to support deployment of this policy. Capella's Apprenticeship Support Resources, which are available on the Capella website

(<https://capellaassociates.freshdesk.com/support/home>) contain information regarding a wide variety of topics including British Values, Bullying and Harassment and Equality and Diversity.

- Reviewing the progress of apprentices/delegates at regular Programme Review meetings in order to ensure that all apprentices/delegates have an equal opportunity to achieve their full potential. Where it is identified that apprentices/delegates require additional support in order to be able to achieve their full potential, ensuring that appropriate action is taken (eg provision of Delegate Support, provision of special considerations at EPA etc) (See *Capella's Delegate Support Policy for further information*).
- Alerting the Managing Director to any instances of discrimination or other concerns as soon as they are recognised. All incidents of discrimination etc. involving apprentices/delegates or Associates will be recorded in Capella's Safeguarding and Prevent Concerns and Issues Log. (See *Monitoring of the Policy below*).
- Taking appropriate action to address any instances and concerns raised, following the guidelines in Appendix 1 and 2 of the Safeguarding and Prevent Policy. This forms part of our Safeguarding reporting and recording of incidents process, which may include informing the apprentice's/delegate's employer or raising a Safeguarding or Prevent Duty concern.

Training

To train our Associates in implementing the policy, we:

- Conduct discussions during the Induction to address questions arising from the policy review.
- Complete an assessment of current knowledge, skills and behaviours and discuss training needs, plus plans to address these, as part of the Capella Skills Matrix completion (BP17). This is completed during induction and then updated annually as part of the Contract Review.
- Complete Observations of Trainers and agree actions to address any learning needs and check to ensure improvements have been made.
- Share learning from observations through tailored workshops and standardisation meetings.
- Inclusion of Equality, Diversity and Inclusion topics in Standardisation meetings to upskill in key areas e.g. learning needs.
- Identification and sharing of appropriate resources including general information available on the Capella website (<https://capellaassociates.freshdesk.com/support/home>) which contains information regarding a wide variety of topics including British Values, Bullying and Harassment and Equality and Diversity.

Monitoring of the policy

We use our Ofsted Self-Assessment Record (SAR) to assess how well we achieve commitment to this policy and meet its requirements.

In addition:

- we regularly analyse our data (such as apprentice/delegate results, apprentice/delegate completion rates, Safeguarding & Prevent Concerns) in order to identify any equality/diversity/inclusion issues that may require action to be taken.
- we look at the equal opportunities afforded to our Associates as part of the monitoring process.

If monitoring shows that Capella is falling short of its commitment and stated actions to meet the policy, we will devise an action plan to address and mitigate the issues. Such actions may include a review of teaching, learning and assessment in the case of apprentices/delegates. Results may be entered into the Capella Changes and Opportunities Register (continuous improvement), which is regularly reviewed by senior managers.

Review and Updates

This policy will be reviewed every 12 months as a minimum.

Appendix 1 - Expectations: Associates

- All Associates must contribute to building an atmosphere of mutual trust and respect.
- Any form of direct or indirect discrimination, harassment, victimisation or bullying will not be tolerated. This includes jokes, banter, language and behaviour, as well as micro aggressions where someone is made to feel uncomfortable.
- If an Associate feels able, they should address a concern directly with the offending person to explain why their actions have caused concern. They may be unaware that their actions have caused offence.
- If an Associate has handled a concern directly and the concern re-occurs, the Managing Director should be alerted as soon as possible.
- If it is not possible to resolve a concern directly with the offending person, or support on handling the situation is required, the Managing Director should be contacted as soon as possible.
- It is the responsibility of Associates to report incidents where the behaviour of apprentices or delegates falls short of our standards around equality, diversity and dignity at work to the Managing Director who will immediately make clear the unacceptability of such behaviour and attitudes and take appropriate action. This may include informing the apprentice's/delegate's employer. Where an incident may give rise to a Safeguarding or Prevent Duty concern about an apprentice or delegate the safeguarding reporting procedure will be invoked (see *Capella's Safeguarding and Prevent Policy for further information*).

See also Capella's Code of Conduct for Associates (PD/CoC), which all Associates are required to confirm that they will comply with upon their appointment and annually thereafter.

Appendix 2 – Legislative Context

Capella will adhere to its duties under all relevant legislation including but not limited to the following:

- Equality Act 2010
- Equality Act 2006
- Employment Act 2002
- DBS Code of Practice
- Rehabilitation of Offenders Act 1974
- The statutory special educational needs and disability (SEND) system for children and young people aged 0 to 25, 2014