



EQUALITY, DIVERSITY AND INCLUSION POLICY

Captiva Learning Limited

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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 through Inclusivity. 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

Captive 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.

This policy also draws upon the guidance of the 2018 UK Quality Code of Higher Education issued by the Quality Assurance Agency for Higher Education, which states:

- Common practices (...) will be applied by providers in line with (...) the needs of their students
- The provider has a reliable, fair and inclusive admissions system.
- From admission through to completion, all students are provided with the support that they need to succeed in and benefit from higher education.
- The provider supports all students to achieve successful academic and professional outcomes.
- The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience.
- The provider has sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience.

Strategy and key terms

The Disability Discrimination Act(s) (DDA) 1995 and 2005, and the Special Educational Needs Disability Act (SENDA) 2001 as amended by the Equality Act 2010 places a duty to make Reasonable Adjustments and to ensure that reasonable steps are taken to ensure that learners with Additional Learning Needs (ALN) are not placed at a substantial disadvantage in comparison to other learners.

Codes used in this Policy

ALN: Additional Learning Need

DDA: The Disability Discrimination Act(s)

EDI: Equality, Diversity and Inclusion

PLM: Professional Learning Mentor

SENDA: Special Educational Needs Disability Act

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 focused 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, diversity and inclusion 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, diversity and inclusivity into the teaching and learning process.
- Equality, diversity and inclusion 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. Braille copies will be made available as necessary.
- 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, diversity and inclusion 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, diversity and inclusion 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.
- The Learning Support manager will update the Head of Apprenticeship Operations on a regular basis
- 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 collect and report Equality and Diversity Impact Measures (EDIMs) in line with DfE and Ofqual requirements. The information will also be used to help meet Ofsted's expectations of Leadership and Management. Annual EDIMs data will be submitted to governance for review.
- 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, diversity and inclusion 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, diversity and inclusivity 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.

Reasonable Adjustments: Additional Learning Support

Learners are supported throughout their learning journey by a professional learning mentor (PLM). Learners with additional needs are able to access additional support. This is overseen by our Learning Support Manager (LSM) and can involve the process of claiming funding to cover the cost of reasonable adjustments and the provision of additional support. This can be a one-off provision of a specialist piece of equipment or ongoing, through regular support meetings. The process is detailed below, but in summary involves:

1. Identification of learner need e.g. what the need is.
2. Confirmation of Reasonable Adjustments e.g. what support will be given and how often, to ensure the learner is able to meet the requirements of the course onto which they are enrolled.
3. Dated and signed documentation of this, with regular review through an ongoing evaluation cycle of assess-plan-do-review.

All reasonable adjustments made must comply with current DfE guidance on funding and support for learners with learning difficulties and disabilities. Staff must ensure support planning aligns with the SEND Code of Practice and evidences the assess-plan-do-review cycle.

The Process

An initial assessment is undertaken to determine the learner's area of need. As part of the assessment, a screening exercise for learning support is undertaken between the learner and LSM. Where potential learning difficulties and / or disabilities, and before a claim for learning support funding can be made, we may undertake a further detailed assessment that directly impacts their ability to complete the apprenticeship on the course which they are enrolled. As an outcome, a support plan will be discussed and agreed.

The purpose of a support plan is to map additional support to an apprentice who has a learning difficulty or disability, enabling them to complete the requirements of the apprenticeship course on which they are enrolled. Learning support will be reviewed on a regular basis and all parties informed of any changes.

Reasonable Adjustments: End Point Assessment (EPA)

Learners may request Reasonable Adjustments and/or Special Considerations as part of the EPA process.

1. ALN Reasonable Adjustments

Requests **must be** supported with evidence confirming the area/s of need. Examples include a formal report, assessment, medical letter, or details of how the learner has received additional learning support, throughout the apprenticeship learning journey.

Requests must specify the support required. It is important to specify individual requirements, depending upon the area of need.

2. Special Considerations

- Requests for **Special Considerations** can be applied prior, during or after an assessment if there is a reason that the apprentice may have been disadvantaged during the assessment period due to an event outside of their control. Examples could be temporary illness, bereavement or any circumstances that may adversely affect the apprentice's performance during the assessment period.
- **Special Considerations also apply** to apprentices who have moved past Gateway into the EPA period and need to apply for an extension to an end-point assessment deadline - please ensure that the 'Extension to End Point Assessment Deadline Request' option is selected on the application form on the CMI website.
- Learners may wish to talk through a request for **Special Considerations** with their Professional Learning Mentor (PLM).

Reasonable Adjustments: Submission of Module Assignments

Learners may request additional time. To request this, please contact your PLM or our Learning Support Manager carol.laker@captivalearning.com.

Your request **MUST** be supported with formal evidence. For example, a dyslexia report, medical assessment, letter or report, confirming your area of need.

Reasonable Adjustments: Marking of Written Assignments

We employ a Yellow Box marking strategy. This means that we mark our learners to their ability to demonstrate an understanding of the course materials, using an appropriate academic style.

Rationale for Yellow Box Marking

We are committed to ensuring that all learners with literacy-based additional learning needs e.g. dyslexia are not left at an unfair disadvantage. The aim of Yellow Box Marking is therefore to provide a clear and accessible policy framework relating to the marking and assessment of work submitted by learners with ALN.

Applicability and Scope

Yellow Box marking does not aim to encourage leniency; should not compromise academic standards; and does not replace marking criteria for individual modules. This policy applies to learners who have informed us of their formal diagnosis and date of this. Not every learner with ALN will want, or require, the use of Yellow Box marking.

Learner Responsibilities

The learner will complete the Yellow Box section on the cover sheet before it is submitted for marking. To ensure anonymous marking, learner details are not included before the work is passed to staff for marking.

Marker Responsibilities

The marking team will:

- focus on the clarity of discussion/argument rather than the details of expression.
- learners will not be penalised for poor spelling, grammar or awkward sentence structure where the meaning of the work is clear and there is no inference in the reader's ability to understand what is written.

In all cases, learners will be informed if the standard of their written work needs improvement.

Feedback will:

- be given in a straightforward and accessible manner, with positive and constructive comments to facilitate understanding and improvement.
- use clear, explicit English avoiding ambiguity and complex sentence structure.
- include the opportunity to discuss feedback on a one-to-one basis.