

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: 3.1	Author: K. Smith	

Change Log (For Changes Prior to 2020 see the Historic Change Log at the end of this policy)				
Date:	Change Description:	Proposed:	Actioned:	Approved:
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>K.Smith</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>K.Smith</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>K.Smith</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>K.Smith</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>K.Smith</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>K.Smith</i>
27/09/2022	Updated following a review of the DfE's guidance for schools on the Equality Act 2010 – includes a new Appendix 2 (Unlawful Behaviour); Appendix 3 (Protected Characteristics) ; Appendix 4 (Bullying); Appendix 5 (The Curriculum) and Appendix 6 (Equality Impact Assessment Template)	H.Lees 21/06/2022	H.Lees 21/06/2022	<i>K.Smith</i>
15/08/2023	Updated to reflect information published by the Equality and Human Right's Commission information regarding Protected Characteristics Updated following review of Citations "Improving Equality, Diversity and Inclusion in the Workplace" document	K.Smith 30/03/2023	H.Lees 08/08/2023	<i>K.Smith</i>

Purpose

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

This policy complements Capella's Code of Conduct for Associates (PD/CoC) and the Code of Conduct for Apprentices/Delegates (see Appendix 2 of Capella's Attendance Policy), 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 (see Appendix 1)
- the four kinds of Unlawful Behaviour that are defined within the Equality Act 2010 (see Appendix 2)
- information regarding Protected Characteristics (see Appendix 3)
- information regarding Bullying (see Appendix 4)
- information regarding the Curriculum (see Appendix 5)
- the legislative context which defines the way we meet our responsibilities (see Appendix 6)
- an Equality Impact Assessment Template (see Appendix 7)

Owners

All Capella Associates will be aware of and work within this policy. The Managing Partner 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 (*see Appendix 3 for further information regarding Protected Characteristics*).
- 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 Capella's planning and decision making, and that we assess whether decisions or actions that we are planning to make or take could have any particular implications for people with protected characteristics. Such an assessment may involve the completion of an Equality Impact Assessment (*see Appendix 7 for a copy of Capella's Equality Impact Assessment Template*).
- ensure that we have due regard to the need to:
 - eliminate discrimination and other conduct that is prohibited by the Equality Act 2010
 - advance equality of opportunity between people who share a protected characteristic and people who do not share it
 - foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it
- 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/delegates and employers
 - Promotional materials
 - Capella website

- Commitment Statement
- Induction
- Onboarding resources and processes for Associates
 - Promotional materials (*see Appendix 8 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 obtain engagement and achieve commitment to the policy through:

- Annual review of this policy.
- Annual communication of this policy to all Capella Associates, Advisory Board Members and Training Delivery Contractors/Sub-Contractors in order to reinforce its importance, and to obtain their engagement with the policy and to ensure that they all understand their responsibilities with regards to Equality, Diversity and Inclusion.
- Requiring all Capella Associates, Advisory Board Members and Training Delivery Contractors/Sub-Contractors to confirm that they have read this policy each time it is issued to them.
- 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*).

- When requested to provide references for current, or previous, Capella apprentices/delegates Capella will ensure that these references do not discriminate, harass or victimise the apprentice/delegate.
- Alerting the Managing Partner to any instances of discrimination or other concerns as soon as they are recognised (*see Appendix 2 for further information regarding discrimination*). 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 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.
- Encourage Associates to complete training on Equality, Diversity and Inclusion eg LGBTQ+ training
- Include Equality, Diversity and Inclusion topics in Standardisation meetings to upskill in key areas e.g. learning needs.
- Identify and share 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.

Review and Updates

This policy will be reviewed annually.

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 Partner 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 Partner 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 Partner 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 – Unlawful Behaviour

The Equality Act 2010 defines four kinds of unlawful behaviour:

1. Direct discrimination occurs when someone treats an individual unfairly because of a protected characteristic(s) eg their age, sex or race. Direct Discrimination describes the most clear-cut and obvious examples of discrimination. An example of Direct Discrimination is if an employer were to refuse to promote an employee because of their sexual orientation or because they were trans.

2. Indirect discrimination occurs when a “provision, criterion or practice” is applied generally but has the effect of putting people with a particular characteristic at a disadvantage when compared to people without that characteristic. For example, holding a meeting on a Friday evening could make it difficult for observant Jews to attend.

It is a defence against a claim of indirect discrimination if it can be shown to be “a proportionate means of achieving a legitimate aim”. This means both that the reason for the rule or practice is legitimate, and that it could not reasonably be achieved in a different way which did not discriminate.

3. Harassment has a specific legal definition in the Equality Act 2010, with this being it is “unwanted conduct, related to a relevant protected characteristic, which has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person”. This covers unpleasant and bullying behaviour, but potentially also extends to actions which, whether intentionally or unintentionally, cause offence to a person because of a protected characteristic (*See Appendix 3 for further information regarding Protected Characteristics*).

4. Victimisation occurs when a person is treated less favourably than they otherwise would have been because of something they have done (“a protected act”) in connection with the Equality Act 2010.

A protected act might involve, for example, making an allegation of discrimination or bringing a case under the Act, or supporting another person’s complaint by giving evidence or information. It includes anything that is done under or in connection with the Act.

Even if what a person did or said was incorrect or misconceived (for example because it was based on a misunderstanding of the situation or of what the law provides), they are protected against retaliation unless they were acting in bad faith.

The reason for this is to ensure that people are not afraid to raise genuine concerns about discrimination because of fear of retaliation.

If an apprentice/delegate has himself or herself done a protected act – such as making a complaint of discrimination against a trainer – then the apprentice's/delegate's own good faith will be relevant. For example, if the complaint is based on information from the apprentice/delegate and the apprentice/delegate was deliberately lying, it is not victimisation for the training provider to discipline the apprentice/delegate in the same way as it might do any other dishonest apprentice/delegate.

Appendix 3 – Protected Characteristics

It is unlawful for a Training Provider to discriminate against an apprentice/delegate or a prospective apprentice/delegate by treating them less favourably because of their age, sex, race, disability, marital status (marriage or civil partnership), religion or belief, sexual orientation, gender reassignment, pregnancy or maternity.

It is also unlawful to discriminate because of:

- the age, sex, race, disability, marital status (marriage or civil partnership), religion or belief, sexual orientation or gender reassignment of another person with whom the apprentice/delegate is **associated**.
- a characteristic which you think the apprentice/delegate has, even if you are mistaken (**perception**).

Positive Action provisions allow Training Providers to target measures that are designed to alleviate disadvantages experienced by, or to meet the particular needs of, apprentices/delegates with particular protected characteristics. Such measures must be a proportionate way of achieving the relevant aim.

Further information regarding the Protected Characteristics is provided below.

Age

Age Discrimination occurs when someone is treated differently because of their age. The treatment could be a one-off action or as a result of a rule or policy based on age. The treatment does not have to be intentional to be unlawful.

There are some circumstances when it is lawful to treat someone differently due to their age. For further information regarding these exceptions please refer to the following website: [Age discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/age-discrimination)

Race

The definition of race includes colour, nationality and ethnic or national origins.

Training Providers need to make sure that apprentices/delegates of all races are not singled out for different and less favourable treatment from that given to other apprentices/delegates.

Segregation of apprentices/delegates by race constitutes direct discrimination. Claims that segregated treatment is “separate but equal” cannot be sustained where race is concerned.

Training Providers can take positive action to deal with particular disadvantages affecting apprentices/delegates of one racial or ethnic group, where this can be shown to be a proportionate way of dealing with such issues.

Religion or belief

The Equality Act 2010 defines “religion” as being any religion, and “belief” as being any religious or philosophical belief. A lack of religion or a lack of belief are also protected characteristics.

To benefit from protection under the Act, a religion or belief must have a clear structure and belief system, and should have a certain level of cogency, seriousness and cohesion, and must not be incompatible with human dignity.

“Religion” will include for example all the major faith groups and “belief” will include non-religious worldviews such as humanism.

Religion will also include denominations or sects within a religion, such as Catholicism or Protestantism within Christianity. It is not however intended to include political beliefs such as Communism or support for any particular political party.

Discrimination because of religion or belief means treating a person less favourably than another person is or would be treated, because of their religion or belief, or the religion or belief they are perceived to have, their lack of religion or belief, or the religion or belief, or lack of it, of someone else with whom they are associated.

Unlawful religious discrimination can include discrimination against another person of the same religion or belief as the discriminator. This is to ensure that any potential discrimination between, e.g. Orthodox and Reform Jews, or Shia and Sunni Muslims, would also be unlawful.

The Equality Act 2010 does not allow a trainer to discriminate against an apprentice/delegate because of his/her own personal religious views about homosexuality or the role of women for example.

Marriage and Civil Partnership (Marital Status)

Discrimination on the grounds of Marriage and Civil Partnership occurs when someone is treated differently because they are married or in a civil partnership. There are certain circumstances in which an employer can refuse to employ

someone because they are married or in a civil partnership however, for example if the work is for the purposes of an organised religion such as a Catholic Priest.

Pregnancy and maternity

It is unlawful for a Training Provider to treat an apprentice/delegate less favourably because she becomes pregnant or has recently had a baby, or because she is breastfeeding.

Sex/Gender

Training Providers need to make sure that apprentices/delegates of one sex are not singled out for different and less favourable treatment from that given to other apprentices/delegates.

A positive action initiative specifically to help one sex/gender would not necessarily be unlawful but the Training Provider would need to be able to show that this was a proportionate way of dealing with a specific disadvantage experienced by that sex/gender and connected to their gender.

Gender reassignment

It is unlawful for Training Providers to treat apprentices/delegates less favourably because of their gender reassignment.

Gender reassignment is defined in the Equality Act 2010 as applying to anyone who is undergoing, has undergone or is proposing to undergo a process (or part of a process) of reassigning their sex by changing physiological or other attributes. This definition means that in order to be protected under the Act, an apprentice/delegate will not necessarily have to be undertaking a medical procedure to change their sex but must be taking steps to live in the opposite gender or proposing to do so.

The protection against discrimination because of gender reassignment matches the protection because of sexual orientation. That is protection from direct and indirect discrimination and victimisation, which includes discrimination based on perception and on association.

Training Providers need to make sure that all gender variant apprentices/delegates are not singled out for different and less favourable treatment from that given to other apprentices/delegates. Training Providers should check that there are no practices which could result in unfair, less favourable treatment of such

apprentices/delegates. For example, it would be unlawful discrimination for a trainer to single out an apprentice/delegate undergoing gender reassignment and embarrass him in front of the class because of this characteristic.

Sexual orientation

Training Providers need to make sure that all gay, lesbian or bi-sexual apprentices/delegates are not singled out for different and less favourable treatment from that given to other apprentices/delegates.

It should not be unlawful for a trainer to express personal views on sexual orientation provided that it is done in an appropriate manner and context (for example when responding to questions from apprentices/delegates). However, it should be remembered that trainers are in a very influential position and their actions and responsibilities are bound by much wider duties than this legislation.

A trainer's ability to express his or her views should not extend to allowing them to discriminate against others.

It should be noted that many people's views on sexual orientation/sexual activity are grounded in religious belief.

Disability

The Equality Act 2010 defines disability as when a person has a '*physical or mental impairment which has a substantial and long term adverse effect on that person's ability to carry out normal day to day activities.*' Some specified medical conditions eg HIV, multiple sclerosis and cancer are all considered as disabilities, regardless of their effect. Long term is defined as lasting, or likely to last, for at least 12 months.

The disability provisions in the Equality Act are different from those for other protected characteristics in a number of ways.

The overriding principle of equality legislation is generally one of equal treatment - i.e. that you must treat a black person no less well than a white person, or a man as favourably as a woman. However, the provisions relating to disability discrimination are different in that you may, **and often must**, treat a disabled person more favourably than a person who is not disabled and may have to make changes to your practices (reasonable adjustments) to ensure, as far as is

reasonably possible, that a disabled person can benefit from what you offer to the same extent that a person without that disability can.

Failure to make a reasonable adjustment cannot be defended as justified. The fact that it must be reasonable provides the necessary test.

The duty to make **reasonable adjustments** applies only to disabled people. The duty is summarised as follows:

- Where something a Training Provider does places a disabled apprentice/delegate at a disadvantage compared to other apprentices/delegates then the Training Provider must take reasonable steps to try and avoid that disadvantage.
- Training Providers will be expected to provide an auxiliary aid or service for a disabled apprentice/delegate when it would be reasonable to do so and if such an aid would alleviate any substantial disadvantage that the apprentice/delegate faces in comparison to non-disabled apprentices/delegates. Examples of what may be considered an auxiliary aid could be; hearing loops; adaptive keyboards and special software.

Factors a Training Provider may consider when assessing the reasonableness of an adjustment may include the financial or other resources required for the adjustment, its effectiveness, its effect on other apprentices/delegates, and health and safety requirements.

See Capella's Delegate Support Policy for further information regarding the support that Capella provides to delegates.

In addition to the above, the following should be noted:

- Direct Discrimination cannot be justified in any circumstances.
- A Training Provider must not treat a disabled apprentice/delegate less favourably simply because that apprentice/delegate is disabled.
- A Training Provider must not do something which applies to all apprentices/delegates but which is more likely to have an adverse effect on disabled apprentices/delegates only, unless they can show that it is done for a legitimate reason, and is a proportionate way of achieving that legitimate aim.
- A Training Provider must not discriminate against a disabled apprentice/delegate because of something that is a consequence of their disability.
- A Training Provider must not harass an apprentice/delegate because of their disability – for example, a trainer shouting at the apprentice/delegate

because the disability means that the apprentice/delegate is constantly struggling with class-work or unable to concentrate.

Appendix 4 – Bullying

The Equality Act 2010 deals with the way in which Training Providers treat their apprentices/delegates and prospective apprentices/delegates: the relationship between one apprentice/delegate and another is not within its scope.

Although the relationship between one apprentice/delegate and another is not within the scope of the Equality Act 2010, Training Providers need to ensure that all forms of prejudice-motivated **bullying** are taken seriously and dealt with equally and firmly.

See Capella's Safeguarding & Prevent Policy for further information regarding bullying.

Appendix 5 – The Curriculum

The content of the curriculum has never been caught by discrimination law, and the Equality Act 2010 states that it is explicitly excluded. However, the way in which a Training Provider provides education (their delivery of the curriculum) is explicitly included.

Training Providers need to ensure that the way in which issues are taught does not subject individual apprentices/delegates to discrimination.

Valid complaints that the curriculum is being delivered in a discriminatory way might well arise in situations such as the following:

- In class discussions, black apprentices/delegates are never called on and the trainer makes it clear that they are not interested in their views
- Females are not allowed to undertake certain activities/courses or males are discouraged from doing certain activities/courses

Appendix 6 – 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

Appendix 7 – Capella’s Equality Impact Assessment (EIA) Template

The EIA should be used to identify likely impacts on:

- Disability
- Sex/Gender (including gender identity and gender reassignment)
- Race
- Age
- Religion or belief
- Sexual orientation
- Pregnancy and Maternity
- Marriage/Civil Partnership

Aims

- Ensure our policies, practices, services and functions do not inadvertently disadvantage anyone and, where possible, that they proactively advance equality, diversity and inclusion.
- Ensure the decisions we take do not unfairly discriminate against or prejudice apprentices/delegates because of their protected characteristics.
- Ensure our training programmes are designed in such a way as to minimise any disadvantage that may be experienced by apprentices/delegates with protected characteristics.

Equality Impact Assessment (EIA) Process (based on Plan, Do Study, Act principles)

The Capella Advisory Board will commission/approve and review/scrutinise all EIAs, which shall be completed on the EIA Template overleaf.

Equality Impact Assessment (EIA) Template

Date Completed:

Process Steps	EIA Details
Identify who is responsible for completing the EIA.	
Name of the proposed new or changed policy, strategy, project or service being assessed	
Identify scope of the EIA and what the main aim or purpose of the proposed new or changed policy, strategy, project or service and what are the intended outcomes	<p>Scope</p> <p>Aim</p> <p>Intended Outcomes</p>
Detail the existing sources of information that will be used to help identify the likely equality impact on different groups of people? <i>(Eg statistics, survey results, complaints analysis, customer feedback, policies, other documents from external sources)</i>	
Consider whether there are any gaps in information that make it difficult or impossible to form an opinion on how the proposals might affect different groups of people? If so, what are the gaps in the information and how could these gaps be filled?	
Complete a review of existing EIA, data collection / research / engagement exercises to identify learning and any relevant content.	

Process Steps	EIA Details
<p>Develop data collection and analysis plan including equality data (quantitative and qualitative) and where to get this from, considering national/local published reports and data, feedback, complaints, recommendations from inspections / audits, consultations (e.g. interviews with relevant protected groups to understand impacts we've not identified and whether they have any suggestions for how any negative equalities impacts could be removed or reduced).</p>	
<p>Collect and analyse data to assess impact on different groups of people and ensure any specific questions/aims have been addressed. Data analysis must also consider how characteristics such as gender and ethnicity intersect (e.g. a Black female will have different experiences to a Black male).</p>	
<p>Having analysed the information is there any evidence that the proposed changes will have a positive impact on any of these different groups of people and/or promote equality of opportunity?</p>	
<p>Is there any evidence that proposed changes will have an adverse equality impact on any of these different</p>	

groups of people?	
Is there any evidence that the proposed changes have no equality impacts ?	
Process Steps	EIA Details
Draw conclusions and make recommendations.	Conclusions Recommendations
Develop and implement an action plan ensuring any disproportionate impact is addressed.	
Monitor the impacts and evaluate whether the actions in the EIA action plan have been implemented and are effective. Where actions have not been effective, they must be revisited and revised accordingly.	

Historic Change Log (For Changes from 2020 onwards see the Change Log at the start of this policy)				
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>K. Smith</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>K. Smith</i>
18/12/17	No change made – policy reviewed and reissued	K. Smith 18/12/17	K. Smith 18/12/17	<i>K. Smith</i>
28/11/18	Cross reference to Code of Conduct.	K. Smith 28/11/18	C. Hughes 28/11/18	<i>K. Smith</i>
08/07/19	Amends to meet RoATP re-application requirements	S. Baldry 03/07/2019	C. Hughes 08/07/2019	<i>K. Smith</i>