



## **Kaplan Learner Equality, Diversity & Inclusion Policy**

Our values (Act with Integrity, Grow Knowledge, Empower & Support, Create Opportunity, Drive Results Together) shape our ambition: to provide an environment which embraces diversity and promotes equality and inclusion to make Kaplan a great place where everyone can succeed.

We acknowledge that inequality, discrimination, prejudice and bias exist in our society, and that no individual or organisation - including Kaplan - is without biases. We are committed to ensuring that our leaders, managers and employees contribute to the prevention and detection of discrimination and actively embrace the principles of equality, diversity and inclusion (EDI) by embedding them in our working practices with our learners, colleagues and partners.

Through data and analysis, and by listening to our colleagues and customers, we will identify where inequalities exist within our organisation and implement strategies to address them.

### **Topics that you will find in this policy are:-**

- Purpose and scope
- Associated policies
- Definition of equality, diversity and inclusion
- Leadership & objectives
- Data gathering & analysis
- Recruitment & admission
- Terms and conditions
- Communication, training and development
- Breaches of this policy
- Raising formal and informal complaints:-
- Policy Review

### **Purpose and scope**

Kaplan UK is fully committed to providing a learning environment where everyone is treated fairly and equally and with respect and dignity. We aim to establish key principles, structures and monitoring procedures for all of our teaching locations and across all of our delivery channels. These principles and procedures apply to all of our staff and learners.

Kaplan UK recognises that an open and equal environment will allow each learner to achieve their educational goals and personal and social potential. We are proudly committed to being an equal opportunities organisation. Therefore, it is our policy that there will be no discrimination against or harassment of any learner, employee, job applicant, supplier or contractor either directly, indirectly or by association or perception, based on any of the nine protected characteristics under The Equality Act 2010:

- Race (including nationality & ethnicity)
- Sex
- Disability
- Gender reassignment
- Sexual orientation
- Religion or philosophical belief
- Age
- Marital or civil partnership status
- Pregnancy and maternity

This policy has been developed to:

- Ensure Kaplan UK fulfils its legal obligations
- Prevent and/or minimise the risk of any discrimination or unfair treatment to learners or employees
- Increase awareness of minimum acceptable standards amongst learners and employees
- Promote positive attitudes, behaviours and values concerning EDI for the health, well-being and benefit of learners, employees, employers and other stakeholders
- Share good and best practice which leads to continuous improvement through embedding EDI into all the policies, strategies and procedures
- Using insight to see whether we appropriately serve all sections of the community
- Ensure that we strive for equal outcomes and an inclusive learner experience

**Associated policies:-**

*A Safeguarding and Prevent Policy.* The drive for Inclusive Learning has succeeded in bringing into the system learners with a wide range of needs, including many who may be deemed 'vulnerable'. Personal safety is a fundamental precondition for effective and successful learning, and can only be felt in a safe learning environment. Our Safeguarding and Prevent Policy promotes wellbeing and security for all learners, especially those who are vulnerable.

*A Disability, Access and Fair Assessment Policy,* which is focused on providing guidelines for support to learners with a disability or special need, by identifying an appropriate solution to potential barriers to learning.

*Careers Information, Advice and Guidance policy*, which highlights Kaplan's aim to fully support the concept of lifelong learning that enables individuals to make informed choices about learning and work, including training and personal development opportunities. The policy sets out the objectives in offering individuals impartial careers advice and outlines how this will be monitored.

*The Additional Learning Support* process empowers our teams with guidance on how to provide learners with the right tools, personal support and encouragement to help them onwards to their individual successes.

**Definition of equality, diversity and inclusion:-**

Equality is the notion of individuals being treated equally, fairly, with dignity and free from discrimination, but not always necessarily being treated the same. There may be occasions (for example in the case of disability) where an unequal effort is required to ensure the principle of equality is met. It is also the notion of individuals being given access to the same opportunities in employment, education and services.

Diversity is about valuing and embracing the differences in people and reaping the benefits of a varied learner population. We encourage and support ALL learners to strive for success, regardless of their personal characteristics.

Inclusion is about embracing all people in a community irrespective of their background, characteristics or disability. The aim is to give equal access and opportunities and remove discrimination and intolerance.

**Leadership & objectives:-**

The publication of this policy enables Kaplan UK to send a strong message of commitment (both internally and externally) to our ultimate goal of establishing a diverse learner population who feel part of Kaplan and have every chance of succeeding. However, although the policy is a fundamental part of Kaplan's Equality, Diversity and Inclusion Strategy, it will be brought to life only if it is reinforced by senior level support and focused structured objectives. Overall responsibility for learner EDI lies with Kathy Walton (Chief Operating Officer, Kaplan UK) and Michael Smith (Director of Kaplan Publishing and Commercial Director), with operational responsibility being taken by Sarah Powell (Quality and Equality Manager).

Every Kaplan UK learner and employee is required to work and study within the framework of this policy and assist the organisation in meeting its commitment to provide equal opportunities and avoid unlawful discrimination. All forms of oppressive behaviour (such as denying freedom of speech; intolerance of differing beliefs & faiths; and lack of mutual

respect), bullying and harassment should be challenged at all times and reported appropriately in line with this policy.

All learners are responsible for:-

- giving equal consideration to their fellow learners and members of staff and recognise that diversity adds to, not detracts from their learning experience.
- reading and understanding Kaplan UK's Equality, Diversity and Inclusion Policy and observing both the content and spirit of the Policy,
- respecting the personal rights, freedom and integrity of fellow learners and staff; behaving in a way that ensures that fellow learners and staff are not isolated or belittled.
- recognising safeguarding issues and that harassment, which includes deliberate or unconscious humiliation, causes offence or distress.
- recognising that consistent teasing, comments about personal characteristics and bullying is a hostile act.
- understanding that anyone who suffers from or witnesses an incident of harassment has a duty to report such behaviour.

#### **Data gathering & analysis:-**

Kaplan UK acknowledges that barriers, stereotypes and prejudices do exist in the community and that we cannot just assume that a learner or employee from a particular section of the community is treated less favourably than others. In order to prevent and/or minimise the risk of this occurring, we are therefore committed to:

- Striving for equal outcomes and creating an inclusive learner experience by using insight to see whether we serve all sections of the community
- Analysing the data to understand the current composition of our learner population and how this compares with society itself
- Identifying where there are disparities or under represented groups and determining what strategies we can deploy to close the gap
- Benchmarking our EDI monitoring data against sector companies, demographics and best practice standards
- Agreeing with the EDI steering group a set of aspirational targets for the learner community composition over a five-year period
- Working with our employers to encourage them to look for diversity in their recruitment and to share with them how we might work together to create an equal chance of success for all learners
- Identifying where barriers or disadvantages may exist to certain groups of learner applicants in relation to recruitment, general terms and conditions, progression, or retention, and taking action to address these barriers or disadvantages

- Without engaging in what is known as 'positive discrimination', introducing a range of measures and initiatives to actively encourage individuals from under-represented groups
- Monitoring Apprentice achievement and success through internal and published Qualification Achievement Rates. This will look at gender, ethnicity, disabilities and difficulties, different standards and levels and those from disadvantaged areas to identify any significant differences in achievement between these groups. This will be supported through the use of annual learner surveys, learner voice and focus groups to gain further information from apprentices and assess their perception of Kaplan's provision.

### **Recruitment & admission:-**

Recruitment and admission must be carried out in accordance with the UK Visas and Immigration (UKVI) Regulations and Partner Regulations and Terms and Conditions, but having due regard for this as follows:

- Kaplan UK will ensure that the recruitment and admission of students are conducted in a professional, timely and responsive manner and in compliance with current Legislation, UKVI Regulations and Partner Regulations and Terms and Conditions.
- Kaplan UK will make appropriate training, development and support available to those involved in the recruitment and admission activities to meet this principle. Any member of staff involved in the admission of learners will be appropriately trained and can comply with the requirements of this policy and procedure.
- Kaplan UK will ensure that all learner applicants and enrolled learners are treated fairly, equitably and efficiently, with respect and courtesy, aiming to ensure that the learner experience is positive, irrespective of the outcome
- Kaplan UK will advise employers who take on apprentices about fair recruitment practices.

### **Terms and conditions:-**

Kaplan UK will not treat any learner applicant or enrolled learner less favourably than others in respect to their terms and conditions of admission and enrolment based on any of the protected characteristics.

### **Communication, training and development:-**

Kaplan UK will ensure that internal and external messages, imagery, graphics and materials are compliant and inclusive to recognise the diverse nature of our apprentices, learners and provision, and promote EDI.

Kaplan UK will communicate and promote the key equality, diversity and inclusion aspects to learners, employers and other stakeholders and suppliers as appropriate.

Training is recognised as an integral part of promoting equality, diversity and inclusion and ensuring that individuals have a clearly developed understanding of relevant issues. Training in equal opportunities will be available to all learners through the learner onboarding and induction process to help all to understand their rights and responsibilities concerning EDI and what they can do to help create a working environment free of bullying and harassment.

Kaplan UK will not treat any learner less favourably than others in respect of access to learning and development based on any of the protected characteristics.

### **Breaches of this policy:-**

Acts of discrimination, harassment, bullying or victimisation against fellow learners, employees or customers are disciplinary offences and will be dealt with under the Student Disciplinary Procedure.

Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to summary expulsion.

### **Raising formal and informal complaints:-**

We strive to achieve the best possible experience for our learners, but we understand that there may be times when a learner wishes to make a suggestion or raise a concern informally. You are welcome to do so via our Student Services team or via your tutor or talent coach.

If you consider that you may have been unlawfully discriminated against, bullied or harassed, you may follow [Kaplan UK's Formal Complaints Procedure](#) to make a formal written complaint. The organisation will take any complaint seriously, will investigate them thoroughly and as a matter of priority, and will seek to resolve any grievance that it upholds.

You will not be penalised for raising a grievance, even if your grievance is not upheld unless your complaint is untrue and made in bad faith. Where complaints are found to be malicious, they may be dealt with as misconduct under the disciplinary procedure. Any vexatious, malicious, trivial or excessively unreasonable complaint will not be heard under the Formal Complaints Procedure. Any learner who feels unfairly treated as a result of raising a complaint should raise it as part of the original complaint and not as a new complaint wherever possible.

**Policy review:-**

Policies will be reviewed on an annual basis in line with legal requirements, UKVI Regulations, business objectives, operational needs, and for other reasons that may arise.

Kaplan UK will endeavour to notify learners of some key changes; however, it is the responsibility of all learners to keep themselves up to date with the current versions of policies. Please, therefore, revisit all learner policies at regular intervals, and refer to relevant policies as and when the need arises. If you require any further information on Kaplan Policies and Procedures or any other information, advice and guidance you should speak to your Talent Coach, Tutor or Student Services. They will support you in providing you with this information or impartial advice and guidance to meet your needs. Your Talent Coach will also regularly discuss and review a number of these topics as part of your progress reviews and other contacts.