NAPA Equality, Diversity and Inclusion Policy

Owner	Finance and Operations Manager	**Approval**	CEO on behalf of the NAPA Trustees
Version	1.0	**Effective date**	30 September 2026
Evaluate	Annual	**Review**	30 September 2029

Purpose

NAPA is committed to equality, diversity and inclusion in every aspect of its work. We aim to provide a working and volunteering environment in which everyone is treated with dignity and respect, individual differences are valued, and unlawful discrimination, harassment and victimisation are prevented and addressed.

This policy explains: the standards expected of everyone working for or representing NAPA; NAPA's responsibilities as an employer and charity; how concerns can be raised; how NAPA will prevent and respond to discrimination and harassment; and how NAPA will monitor and improve equality, diversity and inclusion.

Scope

This policy applies to: employees, including full-time, part-time, fixed-term and temporary employees; trustees and other volunteers; contractors, consultants, associates and agency workers; applicants for employment or volunteer roles; and anyone acting for or representing NAPA. It applies during work and volunteering activities, including: recruitment and selection; pay, benefits and contractual terms; induction, training and development; appraisal, promotion and career progression; allocation of work and access to opportunities; flexible and home working; sickness, family and other leave; disciplinary, grievance and capability processes; redundancy and termination; meetings, conferences, training, travel and social events; email, messaging, video meetings and social media; and interactions with members, beneficiaries, donors, suppliers, partner organisations and the public.

Conduct outside work may fall within this policy where it has a genuine connection to NAPA or its work.

Legal framework

NAPA will comply with the Equality Act 2010 and other applicable employment, data-protection and charity-law requirements. The Equality Act protects people against unlawful treatment connected with: age; disability; gender reassignment; marriage

and civil partnership; pregnancy and maternity; race, including colour, nationality and ethnic or national origin; religion or belief; sex; and sexual orientation.

NAPA also recognises that people's experiences may be affected by a combination of characteristics and circumstances.

Definitions

Direct discrimination occurs when someone is treated less favourably because of a protected characteristic.

Indirect discrimination can occur when a rule, practice or requirement applied to everyone puts people sharing a protected characteristic at a particular disadvantage and cannot be objectively justified.

Discrimination arising from disability occurs when a disabled person is treated unfavourably because of something arising from their disability and the treatment cannot be objectively justified.

A failure to make reasonable adjustments occurs where NAPA does not take reasonable steps to remove or reduce a substantial disadvantage experienced by a disabled person.

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment is unwanted conduct of a sexual nature that has that purpose or effect.

Victimisation occurs when a person is subjected to a detriment because they have carried out, or are believed to have carried out, a protected act, such as raising a discrimination complaint or supporting another person's complaint.

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates or harms another person. Bullying may breach NAPA's standards even where it is not unlawful discrimination.

NAPA's commitments

NAPA will: make employment and volunteering decisions fairly and using objective, role-related criteria; provide equal access to employment, training, development and progression; make reasonable adjustments for disabled applicants, employees and volunteers; provide accessible ways to participate in NAPA's work and services; promote a culture in which people can raise concerns without fear of retaliation; take complaints seriously and address them promptly and fairly; provide appropriate equality, diversity, inclusion and anti-harassment training; assess equality risks when

introducing or changing policies and working practices; monitor relevant information to identify inequality or disadvantage; protect equality-monitoring information appropriately; and review the effectiveness of this policy and associated action plans at least annually.

Lawful positive action may be considered where evidence shows disadvantage, under-representation or different needs. Positive action will be distinguished from unlawful positive discrimination.

Preventing sexual harassment

NAPA recognises its legal duty to take reasonable steps to prevent sexual harassment of workers, including reasonably foreseeable harassment by third parties. NAPA will take proactive measures that include: carrying out and regularly reviewing a sexual-harassment risk assessment; considering risks arising from remote work, messaging platforms, conferences, travel, overnight stays, social events, alcohol and third-party contact; communicating that sexual harassment is unlawful and will not be tolerated; providing practical training for employees, trustees, volunteers and managers; maintaining accessible reporting routes; acting on warning signs and patterns of inappropriate behaviour; setting standards for members, suppliers, contractors and other third parties; taking reasonable steps to protect a person from further harassment; monitoring complaints, outcomes and preventive actions; and reviewing whether preventive measures remain effective.

Sexual harassment by a member, donor, supplier, attendee or other third party will be addressed through proportionate protective action. This may include warnings, changes to contact arrangements, exclusion from an event, termination of a relationship or referral to an appropriate authority.

Reasonable adjustments and accessibility

Applicants, employees and volunteers may request a reasonable adjustment through their line manager or the Finance and Operations Manager.

A request does not need to use the words “reasonable adjustment.” When NAPA becomes aware that a person may be placed at a substantial disadvantage, it will discuss their needs sensitively and without unnecessary delay.

Adjustments may include changes to: equipment or technology; working hours or location; communication methods; duties or working arrangements; recruitment and assessment processes; training or supervision; access to premises or events; and policies or procedures.

Medical or other specialist advice may be sought where appropriate and with proper regard for confidentiality and data protection. Decisions and agreed adjustments will be documented and reviewed.

Individual responsibilities

Everyone covered by this policy must: treat others with dignity and respect; avoid discrimination, harassment, sexual harassment, victimisation and bullying; cooperate with reasonable adjustments; challenge or report inappropriate conduct where it is safe and appropriate to do so; complete required training; cooperate honestly with investigations; and maintain appropriate confidentiality.

Managers must additionally:

- model inclusive behaviour;
- act promptly when concerns are raised or inappropriate behaviour is observed;
- avoid promising absolute confidentiality;
- seek advice where necessary;
- implement agreed reasonable adjustments;
- prevent retaliation; and
- ensure decisions are evidence-based and consistently documented.

Raising a concern

A person may raise a concern informally or formally with: their line manager; the Finance and Operations Manager the CEO: the Chair of Trustees.

A concern involving the person's line manager should be raised through another route. A concern involving the CEO should be raised with the Chair. A concern involving the Chair should be raised with the vice-chair.

A person may also use NAPA's Grievance, Whistleblowing or Safeguarding procedure where appropriate.

Employees may be accompanied at a formal meeting in accordance with the applicable procedure. Reasonable adjustments and communication support will be provided.

Responding to concerns

NAPA will: acknowledge a formal report normally within five working days; conduct an initial assessment promptly; consider immediate protective or safeguarding action; appoint an impartial person to investigate where necessary; explain the process and likely timescale; keep the parties appropriately informed; give each party a fair opportunity to provide relevant information; reach findings based on the information reasonably available; communicate the outcome in writing, subject to confidentiality; and explain any applicable review or appeal route.

Protective measures will be considered case by case and should not unnecessarily disadvantage the person who raised the concern.

An informal resolution will be used only where appropriate and agreed. Mediation will not be required where it would be unsafe or inappropriate.

Confidentiality and protection from retaliation

Information will be shared only with people who reasonably need it to address the concern or meet a legal, regulatory or safeguarding obligation. NAPA cannot promise absolute confidentiality.

No person will be disadvantaged for raising a genuine concern, supporting another person, giving evidence or participating in an investigation.

Any suspected victimisation or retaliation should be reported immediately through one of the routes in section 9.

A complaint that is not upheld will not result in action against the complainant merely because it was mistaken or could not be substantiated. Deliberately false and malicious allegations may be considered under the appropriate conduct procedure following a fair investigation.

Outcomes

Where a concern is upheld, action may include: an apology or correction; training, coaching or supervision; reasonable adjustments or changes to working arrangements; changes to policies, systems or risk controls; disciplinary action against an employee; restriction or ending of a volunteer or contractor relationship; governance action involving a trustee; action concerning a member or third party; or referral to a regulator, safeguarding authority or the police. Any disciplinary action involving an employee will follow NAPA's Disciplinary Procedure.

Monitoring and data protection

NAPA may collect voluntary equality-monitoring information to assess representation, access, outcomes and the effectiveness of this policy. Monitoring information will: be collected for specified purposes; be kept securely with restricted access; be analysed and reported in an appropriately anonymised form; not be used to make unfair decisions about individuals; and be retained only as long as necessary.

The Board will receive appropriate anonymised information about trends, material risks and actions.