



Equity, Diversity and Inclusion (EDI) Policy

Pocket Money Adventures CIC

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About this policy

We are committed to being an equitable, diverse and inclusive organisation. This means:

- being fair, impartial and providing equal opportunities
- recognising, respecting and celebrating our differences
- creating an environment where everyone feels welcomed and valued.

This policy helps us put this commitment into practice. It sets out:

- definitions for key terms used throughout the policy
- the law on equity, diversity and inclusion
- our commitment to prospective and current team members (including staff, contractors and volunteers)
- your responsibilities when representing Pocket Money Adventures
- how we work with children, families, schools, service users, suppliers and others
- how we raise concerns, investigate issues and agree outcomes
- how we monitor and review this policy.

This policy applies to all directors, employees, workers, volunteers, contractors, freelancers, and anyone acting on behalf of Pocket Money Adventures CIC (including delivery in schools, events, online spaces and partner settings).

If your concern involves bullying or harassment, follow the process in this policy under "Raising concerns, investigation and outcomes". We treat all reports seriously and confidentially.

Definitions

Protected characteristics

A protected characteristic is a human characteristic that is safeguarded against discrimination by law. There are nine protected characteristics under the Equality Act 2010:

- age
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- gender reassignment
- race (including colour, nationality, and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

Types of unlawful discrimination

- Direct discrimination is where someone is treated less favourably because of a protected characteristic. Direct discrimination may be lawful when a particular protected characteristic is essential for a role (when it is an occupational requirement). For example, a refuge for women who have experienced domestic violence might advertise for female support workers.
- Indirect discrimination means putting in place a rule, policy, or way of doing things that has a worse impact on someone with a protected characteristic than someone without one (and this cannot be objectively justified).
- Harassment is where someone experiences unwanted behaviour related to a protected characteristic that violates their dignity or creates a hostile, degrading, humiliating or offensive environment. This counts as harassment regardless of whether the person responsible intended harm.
- Sexual harassment is where someone experiences unwanted behaviour of a sexual nature. Employers have a duty to take reasonable steps to prevent sexual harassment of employees within the workplace.
- Associative discrimination is where someone experiences discrimination because of their association with someone who has a protected characteristic (for example, the parent of a disabled child).
- Perceptive discrimination is where someone experiences discrimination because they are perceived to have a protected characteristic.
- Third-party harassment is where a person is harassed by someone who comes into contact with the organisation due to a protected characteristic. Examples of third parties include service users, suppliers and staff from partner organisations.
- Victimisation is where someone is treated less favourably because they have taken action relating to the Equality Act or are suspected of doing so (for example, supporting a complaint or raising a grievance). People are not protected from victimisation if they act maliciously or make or support a false complaint in bad faith.
- Failure to make reasonable adjustments is where an organisation fails to remove or reduce the barriers someone faces because of a protected characteristic. Under the Equality Act, workplaces are legally required to make reasonable adjustments for people with disabilities. It is best practice to provide similar support for people with other protected characteristics too. Examples include introducing gender-neutral toilets and allowing time to pray during the working day.

Reasonable adjustments

A reasonable adjustment is a change to remove or reduce the effect of:

- a person's disability so they can do their role
- a job applicant's disability when applying for a role.

What is deemed reasonable will depend on the circumstances of each case. Examples of reasonable adjustments include:

- making changes to someone's physical working environment
- changing the ways things are done
- providing extra equipment or assistance.

When deciding whether an adjustment is reasonable, we will consider:

- how effective the change will be in reducing the disadvantage the person would otherwise experience
- its practicality
- the cost
- our resources and size
- the availability of financial support.

As far as possible, we will aim to remove or reduce any substantial disadvantage a disabled person faces, which would not be faced by a non-disabled person.

The law on equity, diversity and inclusion

It is unlawful to discriminate directly or indirectly during recruitment or engagement because of a protected characteristic.

Discrimination after employment can also be unlawful. For example, it is unlawful to refuse someone a reference for a reason linked to a protected characteristic.

It is also unlawful to discriminate against or harass a member of the public or service user when providing services or goods, or to fail to make reasonable adjustments.

Our commitment to prospective and current team members

We will avoid unlawful discrimination in all aspects of engagement, including:

- recruitment and selection
- promotion and progression opportunities
- opportunities for training and development
- pay and benefits
- discipline and performance management
- selection for redundancy or ending an engagement

As part of this commitment, we will avoid including unnecessary requirements (anything unrelated to effective performance) in our role descriptions and person specifications.

We aim to attract applicants with the knowledge, skills and experience required for the role, irrespective of their background. Having a diverse team helps us better understand the needs of our diverse range of stakeholders.

Because of this, we may take positive action (appropriate steps to improve the diversity among our staff, contractors or volunteers). We may also take steps to anonymise applications before shortlisting.

We will base decisions on objective criteria. We will make reasonable adjustments in recruitment as well as in day-to-day work.

We will provide information and guidance to people involved in recruitment or other roles where equal opportunities issues are likely to arise. We are committed to helping people in these roles understand their responsibilities and avoid the risk of discrimination.

Your responsibilities

Everyone representing Pocket Money Adventures is responsible for supporting our commitment to equity, diversity and inclusion. If you see or experience something you disagree with, please raise it promptly (see “Raising concerns, investigation and outcomes”).

Reporting discrimination

If you believe you have been discriminated against, you should report this to your line manager or the PMA Director/Designated Lead, in line with our grievance or complaints process.

If you witness something you believe is discrimination, you should report it to your line manager or the PMA Director/Designated Lead as soon as possible.

We take every report seriously. You will not be penalised for raising a concern unless it is false and made in bad faith.

Personal liability

Individuals can be held personally liable, as well as (or instead of) the organisation, for acts of unlawful discrimination. People who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation are treated as misconduct and may result in action up to and including termination of engagement, in line with our conduct expectations for staff, contractors and volunteers.

Service users, suppliers and others

We will not discriminate unlawfully against children, families, schools, service users or anyone seeking to use our services.

If you are bullied or harassed by a service user, supplier, contractor, visitor or others, or if you witness someone else being bullied or harassed, you should report this promptly using the reporting route below. We will take appropriate action.

Raising concerns, investigation and outcomes

Reporting route

We want everyone to feel safe to speak up. You can report EDI concerns by email to support@pocketmoneyadventures.co.uk.

For delivery in schools, you can also raise concerns via the school's Designated Safeguarding Lead (DSL) if the issue relates to a child's welfare or safety. You may also report directly to Pocket Money Adventures using the email above.

Reports will be acknowledged promptly and handled fairly, without retaliation.

Investigation process

We will assess reports promptly and proportionately. The approach will depend on the nature and severity of the concern and may include:

- an initial fact-finding discussion with the person raising the concern
- gathering relevant information (for example, messages, dates, witnesses)
- speaking to any witnesses where appropriate
- speaking to the person who is the subject of the concern to understand their account
- liaising with the relevant school/setting where the incident occurred (where applicable)
- considering whether safeguarding or external reporting is required.

We will keep written records of the concern, the steps taken, and the outcome. We will handle information sensitively and share it only with those who need to know to address the concern.

Outcomes and actions

Possible outcomes may include one or more of the following (depending on what is reasonable and appropriate):

- informal resolution and agreed behaviour expectations
- additional supervision, coaching or training
- changes to delivery arrangements or roles (including removing a person from delivery activities)
- contractor or volunteer engagement ended
- formal disciplinary action for employees (up to and including dismissal)
- a referral to a school/setting process, safeguarding process, or external body where required by law or safeguarding duties.

Support and confidentiality

We understand that raising a concern can feel difficult. We will support those involved and aim to manage the process with care, fairness and respect.

We will treat reports confidentially as far as possible. In some cases, we may need to share information to safeguard children, comply with legal obligations, or conduct a fair investigation.

Monitoring and reviewing this policy

We will monitor this policy periodically and update it if the law changes. We will also report any actions we take to improve equity, diversity and inclusion to our Board of Directors.

We will use any information job applicants and team members provide for monitoring purposes only and handle it in line with data protection legislation.

Further guidance on equality, diversity and inclusion is available from Acas.

PMA approach to reasonable adjustments

We will make reasonable adjustments to remove barriers for staff, volunteers, participants and families, including accessibility needs, neurodiversity, language needs and cultural considerations.

Adjustments are agreed with the setting (for example, a school) and recorded. Where adjustments relate to a child, we will follow the school's processes and safeguarding guidance.

Related documents and contacts

Related policies and procedures (available in the Pocket Money Adventures Policy Pack):

- Safeguarding and Child Protection Policy
- Complaints Policy
- Code of Conduct
- Whistleblowing / Speaking Up Policy
- Data Protection and Confidentiality Policy

If you have questions about this policy, email: support@pocketmoneyadventures.co.uk.