

REACHING ALL PEOPLE TRUST CIC

Company No. 10349786

EQUALITY, DIVERSITY, INCLUSION & ANTI-DISCRIMINATION POLICY

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Policy status: This controlled v1.0 policy establishes RAP Trust's equality, diversity, inclusion and anti-discrimination framework across employment, volunteering, governance, commissioning and service delivery. It is designed around the Equality Act 2010 while also recognising forms of disadvantage that may fall outside the Act's protected-characteristic framework.

1. Statement of Commitment

Reaching All People Trust CIC is committed to dignity, fairness, inclusion and freedom from unlawful discrimination. RAP Trust will seek to identify and remove avoidable barriers in its employment, governance and service delivery and will challenge discriminatory conduct rather than treating equality as a statement of intent alone.

2. Core Principle

Equal treatment does not always mean identical treatment. Fair practice requires us to recognise difference, remove avoidable barriers and make reasonable adjustments where required.

3. Purpose

This policy is designed to:

- Prevent unlawful discrimination, harassment and victimisation.
- Support inclusive employment and volunteering practices.
- Ensure services are accessible and responsive to diverse communities.
- Embed reasonable-adjustment duties into practice.
- Strengthen culturally competent and trauma-informed delivery.
- Provide routes for challenge, complaint, reporting and organisational learning.

4. Scope

This policy applies to directors, employees, workers, volunteers, contractors, applicants, participants, service users and others engaging with RAP Trust. It applies across recruitment, employment, volunteering, training, programme delivery, procurement, partnership working, communications and organisational decision-making.

5. RECOGNISE → INCLUDE → ADJUST → CHALLENGE → RESPOND → RECORD → LEARN

RAP Trust's framework is: **Recognise** difference and barriers; **Include** people in decisions and opportunities; **Adjust** practice where required; **Challenge** discriminatory behaviour; **Respond** to concerns; **Record** material action appropriately; and **Learn** from patterns, feedback and outcomes.

6. Equality Act 2010

The Equality Act 2010 provides the principal statutory framework for protection against discrimination in Great Britain. RAP Trust will apply its obligations according to the relationship and circumstances involved, including employment and the provision of services.

7. Protected Characteristics

The Equality Act protected characteristics are:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race.
- Religion or belief.
- Sex.
- Sexual orientation.

8. Different Statutory Coverage

Not every prohibition or duty applies identically to every protected characteristic or every context. RAP Trust will avoid oversimplifying the Equality Act and will obtain appropriate advice where a complex legal question arises.

9. Direct Discrimination

Direct discrimination generally involves treating a person less favourably because of a protected characteristic, subject to the statutory provisions and limited exceptions that may apply in particular contexts.

10. Indirect Discrimination

Indirect discrimination can arise where an apparently neutral provision, criterion or practice places people sharing a protected characteristic at a particular disadvantage and cannot be objectively justified where the relevant statutory test applies.

11. Harassment

Harassment can include unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, subject to the Equality Act's specific provisions.

12. Sexual Harassment

Sexual harassment is prohibited. RAP Trust will respond seriously to unwanted conduct of a sexual nature and will apply appropriate preventive, safeguarding, disciplinary and reporting arrangements.

13. Employer Duty to Prevent Sexual Harassment

Employers have a statutory duty to take reasonable steps to prevent sexual harassment of employees in the course of employment. RAP Trust will treat prevention as an active organisational responsibility rather than relying only on complaints after harm occurs.

14. Victimisation

A person must not be subjected to unlawful detriment because they have carried out, or are believed to have carried out, a protected act under equality law, such as making a discrimination allegation or supporting relevant proceedings.

15. Discrimination by Perception or Association

Equality protections can apply in circumstances involving perception or association, depending on the type of discrimination and protected characteristic. Personnel should not assume that protection exists only where an individual personally holds the characteristic.

16. Disability

RAP Trust recognises disability in accordance with applicable equality law and will avoid relying on stereotypes about visible or invisible impairment, capability or support need.

17. Reasonable Adjustments

Where the statutory duty applies, RAP Trust will take reasonable steps to avoid substantial disadvantage experienced by disabled people. Adjustments may relate to provisions, criteria or practices, physical features, or auxiliary aids, depending on the circumstances.

18. Anticipatory Service Duty

For service provision, the reasonable-adjustment duty is anticipatory. RAP Trust should consider barriers affecting disabled people generally rather than waiting in every case for an individual to encounter a barrier and complain.

19. Cost of Adjustments

Where RAP Trust is responsible for a reasonable adjustment under the Equality Act, the disabled person must not be required to pay the cost of that adjustment.

20. Adjustment Process

Adjustment decisions should consider the person's circumstances, effectiveness of the proposed adjustment, practicability, resources, disruption, health and safety and other relevant factors. Dialogue with the individual will often be important.

21. Neurodiversity

Neurodivergent people may require different communication, processing time, environment, instructions or learning methods. Whether a person is legally disabled depends on the statutory test; RAP Trust should nevertheless seek inclusive practice without requiring unnecessary disclosure or diagnosis.

22. Dyslexia and Literacy

Written ability should not be confused with intelligence, insight or capacity. Where appropriate, RAP Trust should consider accessible formatting, verbal explanation, additional processing time, assisted completion or other reasonable approaches.

23. Communication Needs

Communication should be adapted where reasonably practicable for language, literacy, disability, learning need, age, neurodiversity or other relevant factors. Important decisions should not depend on a person pretending to understand information they cannot meaningfully access.

24. Race

RAP Trust prohibits unlawful discrimination based on race, including colour, nationality and ethnic or national origins as defined by equality law.

25. Racism

Racist language, stereotyping, hostility or discriminatory decision-making is unacceptable. RAP Trust will examine both interpersonal behaviour and organisational practices that may create unjustified racial disadvantage.

26. Racial Disproportionality

Justice and community contexts may contain racial disproportionality. RAP Trust should be willing to examine differential access, engagement, sanction, referral and outcome patterns where data and context permit, without assuming that disparity alone proves unlawful discrimination.

27. Cultural Competence

Cultural competence is not achieved by assuming that everybody from the same community thinks, behaves or experiences systems in the same way.

28. Cultural Humility

Practitioners should remain open to correction and avoid positioning professional knowledge as complete knowledge of another person's cultural experience. Curiosity should be respectful rather than intrusive.

29. Religion or Belief

RAP Trust will respect religion, religious belief, philosophical belief and absence of belief within the Equality Act framework. Reasonable practice should consider worship, dress, dietary requirements and observance where relevant and practicable.

30. Faith-Based Identity

Where RAP Trust or associated programmes draw on faith-informed values or activity, participation requirements and service access must be communicated transparently. People must not be subjected to unlawful discrimination or coercion because of religion, belief or absence of belief.

31. Sex

RAP Trust will prevent unlawful sex discrimination and consider where sex-specific needs are relevant to safety, privacy, trauma, service design or lawful positive action.

32. Gender Reassignment

People protected under the Equality Act characteristic of gender reassignment must be treated with dignity and without unlawful discrimination. Personal information concerning gender history should be handled sensitively and lawfully.

33. Pregnancy and Maternity

Pregnancy and maternity protections will be respected in employment and relevant service contexts. Pregnancy-related health, safety, attendance or adjustment needs should not be treated as inconvenience or lack of commitment.

34. Sexual Orientation

RAP Trust prohibits unlawful discrimination, harassment or exclusion because a person is lesbian, gay, bisexual, heterosexual or otherwise within the statutory characteristic of sexual orientation.

35. Age

Age should not be used as a proxy for capability, maturity, risk or relevance without a defensible basis. Age-specific services or treatment may sometimes be lawful or necessary, particularly where programme purpose or safeguarding requires it.

36. Marriage and Civil Partnership

RAP Trust will apply the statutory protection relating to marriage and civil partnership in the contexts in which the Equality Act provides it and will not assume its coverage is identical across all services and employment situations.

37. Intersectionality

People may experience overlapping forms of discrimination or disadvantage. RAP Trust should consider how characteristics and circumstances interact rather than forcing complex lived experience into a single category.

38. Socioeconomic Disadvantage

Poverty and socioeconomic status are not themselves protected characteristics under the Equality Act 2010. RAP Trust nevertheless recognises that poverty, housing insecurity, digital exclusion and material deprivation can create substantial barriers to participation and opportunity.

39. Care Experience

Care experience is not currently one of the nine protected characteristics in the Equality Act 2010. RAP Trust nevertheless recognises that care-experienced people may face structural disadvantage and will consider this within inclusive service design where relevant.

40. Justice Involvement

Criminal or justice-system involvement is not itself an Equality Act protected characteristic. RAP Trust nevertheless rejects degrading or discriminatory treatment based solely on stigma attached to offending history or institutional status.

41. Dignity in Justice Settings

A person's offending history, sentence, risk classification or institutional status does not remove their right to dignity, fairness and protection from unlawful discrimination.

42. Rehabilitation and Stigma

Where lawful and consistent with safeguarding, RAP Trust will support rehabilitation and avoid unnecessarily defining people by past offending. Risk information should be used for legitimate safety and service purposes rather than moral labelling.

43. Trauma

Trauma is not itself a protected characteristic. Its effects may, in some circumstances, interact with disability or other legal protections. RAP Trust will apply trauma-informed practice without assuming every participant has the same trauma history or response.

44. Positive Action

Equality law permits certain forms of positive action where statutory conditions are met. RAP Trust may consider lawful, proportionate measures to address disadvantage, particular needs or disproportionately low participation, but positive discrimination outside lawful exceptions is not permitted.

45. Targeted Programmes

A programme designed for a particular group may be legitimate where there is a lawful and evidence-based rationale. Targeting should be distinguished from arbitrary exclusion and should be reviewed against programme purpose and equality obligations.

46. Recruitment

Recruitment should focus on role requirements, competence, safeguarding suitability and lawful criteria. Job descriptions, advertising, shortlisting and interviews should avoid unjustified barriers.

47. Safer Recruitment

Equality and safer recruitment operate together. RAP Trust may undertake lawful criminal-record, reference, identity or safeguarding checks where relevant without treating protected characteristics as indicators of risk.

48. Criminal Records

Decisions concerning criminal history should comply with applicable rehabilitation, safeguarding and DBS requirements. A criminal record should not automatically exclude a person unless law, role risk or a defensible assessment requires it.

49. Employment Decisions

Pay, training, supervision, promotion, discipline, grievance and termination decisions should be based on legitimate organisational factors and should not be unlawfully influenced by protected characteristics.

50. Flexible Working and Adjustments

Requests concerning working patterns should be considered through applicable statutory and organisational processes. A flexible-working request and a disability reasonable-adjustment request may engage different legal considerations and should not automatically be treated as the same process.

51. Volunteers

Volunteers do not necessarily have the same statutory employment status or protections as employees. RAP Trust nevertheless expects inclusive, respectful and non-discriminatory treatment and will assess legal status accurately rather than assume employment law applies identically.

52. Contractors

Contractor status does not remove all equality obligations. RAP Trust should ensure procurement and working arrangements do not facilitate discriminatory conduct and should clarify relevant contractual standards.

53. Service Access

Eligibility criteria should relate to legitimate programme purpose, funding, risk, age group, geography or other defensible requirements. Criteria should be reviewed where they create unintended exclusion.

54. Waiting Lists and Prioritisation

Where demand exceeds capacity, prioritisation should use transparent and relevant criteria. Informal preference, personal familiarity or stereotypes must not determine access.

55. Participant Behaviour

Participants are expected to respect the dignity and safety of others. Discriminatory or abusive behaviour should be challenged proportionately while considering risk, age, trauma, learning need and the purpose of intervention.

56. Challenging Language

Practitioners should not ignore discriminatory language merely to preserve rapport. Challenge should be safe, proportionate and developmentally appropriate and may itself form part of reflective or restorative intervention.

57. Restorative Responses

Where appropriate and safe, restorative approaches may help address discriminatory harm by supporting accountability, understanding impact and repair. Restorative practice must not pressure a harmed person into dialogue or replace necessary safeguarding or disciplinary action.

58. Harassment by Third Parties

RAP Trust should take reasonable and appropriate action where staff or participants experience discriminatory or sexual harassment from third parties. Employer sexual-harassment prevention responsibilities should be considered where applicable.

59. Hate Incidents

Hate-related incidents should be taken seriously and assessed for safeguarding, criminal, disciplinary or support implications. The person's own perception and experience should be heard while facts and appropriate response are established.

60. Safeguarding

Discrimination may itself create or compound safeguarding risk. Equality concerns involving abuse, exploitation, harassment or significant harm should be escalated through safeguarding procedures where appropriate.

61. Complaints

People may raise equality or discrimination concerns through RAP Trust's complaints arrangements. Complaints should be accessible and should not result in retaliation or reduced service because a person challenged discriminatory treatment.

62. Grievances

Employees should be able to raise employment-related discrimination concerns through appropriate grievance arrangements without prejudice to statutory rights.

63. Whistleblowing

Serious systemic discrimination or concealment of unlawful practice may, depending on circumstances, engage whistleblowing arrangements. Personnel should be able to raise genuine concerns without retaliation.

64. Recording

Material equality complaints, adjustments, incidents and decisions should be recorded appropriately. Records should distinguish allegations, findings, actions and learning.

65. Confidentiality

Equality concerns can involve highly sensitive personal information. Disclosure should be limited to those with a legitimate need, while ensuring confidentiality is not used to prevent safeguarding, investigation or lawful reporting.

66. Data Protection

Equality monitoring frequently involves special-category personal data. Collection and analysis must have an appropriate lawful basis and condition, clear purpose, security, minimisation and transparency.

67. Equality Monitoring

RAP Trust may collect proportionate equality information to understand workforce or participant access and outcomes where lawful and useful. Monitoring should not become intrusive data collection without a clear purpose.

68. Small Cohorts

Small programme cohorts may make individuals identifiable even where names are removed. Equality reporting should manage re-identification risk and avoid publishing granular demographic information where unsafe.

69. Analysis

Differences in participation or outcomes should prompt enquiry rather than automatic conclusions. RAP Trust should consider sample size, referral pathways, programme eligibility, external factors and participant experience before interpreting disparity.

70. Procurement

Supplier selection should not unlawfully discriminate. Relevant contracts may require suppliers to meet equality, accessibility and anti-harassment standards appropriate to the services they provide.

71. Partnership Working

RAP Trust should challenge discriminatory practice encountered within partnership arrangements where appropriate. Financial or institutional power should not prevent legitimate professional challenge.

72. Communications and Images

Public communications should seek to represent people with dignity and avoid stereotypes, tokenism or exploitative use of trauma. Consent and safeguarding remain essential where identifiable participants are featured.

73. Accessible Information

Key information should be made accessible through reasonable formats or communication support where needed and practicable. Accessibility should be considered at design stage rather than solely after exclusion occurs.

74. Training

Personnel should receive equality, inclusion and anti-discrimination learning proportionate to role. Training should connect legal duties with real decision-making, bias, cultural competence, professional boundaries and service accessibility.

75. Leadership

Directors and managers are responsible for modelling inclusive conduct, responding to concerns, scrutinising patterns and ensuring equality expectations operate in practice rather than only in policy.

76. Accountability

Breaches of this policy may lead to safeguarding, disciplinary, contractual or governance action depending on the circumstances and the person's status. Allegations should be handled fairly and without predetermined findings.

77. Continuous Improvement

RAP Trust should use complaints, participant voice, workforce feedback, monitoring, quality assurance and partnership learning to identify barriers and strengthen inclusive practice.

78. Policy Review

This policy will be reviewed at least annually and earlier following material changes to equality law or statutory guidance, significant discrimination or harassment incidents, commissioner requirements, organisational restructuring or evidence of systemic barriers. The planned annual review date is September 2027.

Document Control

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Related governance: Safeguarding and Child Protection; Recruitment & Safer Recruitment; Staff Conduct, Capability, Disciplinary & Grievance; Complaints; Whistleblowing & Speaking Up; GDPR & Data Protection; Partnership Working, Information Sharing & Multi-Agency Collaboration; Quality Assurance, Monitoring, Evaluation & Continuous Improvement; Accessibility and reasonable-adjustment arrangements.

Implementation note: Equality law is context-specific. This policy intentionally distinguishes the nine Equality Act protected characteristics from other important forms of disadvantage recognised by RAP Trust, including poverty, care experience and justice involvement. Where a complex legal issue arises, the organisation should obtain current specialist advice rather than relying on a simplified policy interpretation.