

Equality Diversity and Inclusion Policy

Pocket Money Adventures CIC | Version 2.2

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Current operating requirements

Zero Child Data applies to routine learning, access and evaluation: no child names, accounts, personal finances, individual tracking or school-held match-code keys are collected by PMA. Standard PMA sessions do not involve PMA photographing or filming identifiable children. Necessary safeguarding, accident or legal records are an exception and are minimised, protected and shared lawfully. Pseudonymised codes are not automatically anonymous. Research beyond safe aggregates requires a separately approved protocol, lawful basis, privacy information and ethics arrangements before collection.

Maximum planned session headcount: 50 people in both school and community settings, including every child, accompanying adult, host or school staff member, volunteer, observer and PMA facilitator. Use the lower of 50, the venue safe capacity and the assessed number supported by competent staff. This is a ceiling, not a supervision ratio or insurance confirmation. Reduce numbers, add support or split groups where necessary.

Use the exact routine Tap. Tap. Pause. and Save some. Spend some. Share some if you can. Participation may be verbal, pointing, drawing, partner-supported, watching or passing; no physical tap, fixed pause duration or speaking requirement is imposed. Collect functional adjustment information, not routine child diagnoses or names.

Detailed policy and procedures

Equality, Diversity and Inclusion Policy

Registered office: 68 Nottingham Road, Eastwood, Nottingham, NG16 3NQ Company No. 16994988 • ICO Registration No. ZC124930 Asset lock body: The Money Charity (Charity No 1106941) General contact: hello@pocketmoneyadventures.co.uk Safeguarding contact: safeguarding@pocketmoneyadventures.co.uk Data Protection contact: dpo@pocketmoneyadventures.co.uk Designated Safeguarding Lead: Nathan Waldron Deputy DSL: Bernadette Houlton (appointed 22 April 2026)

1. Purpose

Pocket Money Adventures CIC (PMA) is committed to equality, diversity and inclusion in how we govern the organisation, recruit and manage people, design and deliver programmes, work with schools and families, and choose sponsors, funders and partners. The purpose of this policy is to set out the standards PMA will follow, the responsibilities attached to those standards, and the processes used to prevent, identify and respond to discrimination, exclusion and unfair treatment.

2. Scope

This policy applies to PMA directors, employees, associates, facilitators, volunteers, contractors, creative collaborators and anyone acting on PMA's behalf. It also applies to all PMA activities, including recruitment, induction, programme design, marketing, school relationships, family engagement, sponsor and funder relationships, procurement and complaints handling.

3. Policy statement

PMA believes all children should be able to access high-quality, age-appropriate financial education and wellbeing support without stigma, shame or exclusion. We will not unlawfully discriminate on the basis of any protected characteristic. We will take reasonable steps to identify and remove avoidable barriers to participation, and we will review our practice where data, feedback or concerns suggest that particular groups are experiencing poorer access or outcomes.

4. Principles

- Inclusion is designed in from the start; it is not added afterwards.
- Children and families must not be shamed because of income, background, literacy level, language, family structure or support need.
- Adjustments should be practical, timely and proportionate, with the child's best interests and safety at the centre.
- Decisions affecting people must be fair, explainable and recorded where they carry material impact.
- Concerns raised in good faith will be taken seriously and will not result in retaliation.
- Monitoring should be useful and proportionate; PMA will collect only the data needed to improve access, participation and outcomes.

5. Legal and regulatory context

This policy is grounded principally in the Equality Act 2010 and covers the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. PMA is also informed by relevant safeguarding guidance, data protection law, and good practice in inclusive education and community delivery. Where PMA works in school settings, we will align delivery practice with the school's safeguarding and accessibility arrangements.

6. Roles and responsibilities

Responsibility for this policy is shared, but not equally:

- The Director is accountable for policy approval, annual review, significant decisions, serious complaints and the EDI action log.
- Anyone delivering or representing PMA is responsible for following this policy, raising concerns, and completing required training and induction.
- Project leads and facilitators are responsible for identifying likely barriers to participation in advance and agreeing adjustments with the school where needed.
- Partner schools remain responsible for their own statutory duties to pupils and for site-specific arrangements; PMA will work with schools, not around them.
- Where an independent non-executive director or equivalent oversight contact is appointed, that person will provide a secondary escalation route for concerns relating to the Director.

7. Recruitment, employment and engagement of

people

PMA will recruit, appoint and engage people on the basis of role requirements, capability, conduct and values alignment. PMA will:

- use role descriptions and selection processes that are relevant, proportionate and non-discriminatory;
- offer reasonable adjustments in recruitment and during engagement where requested or where a need is known;
- provide a working environment free from unlawful discrimination, bullying, harassment and victimisation;
- make decisions on pay, fees, progression, work allocation and ending of engagement on fair and recorded grounds;
- investigate concerns promptly and proportionately, keeping an appropriate written record.

8. Inclusive programme design and delivery

8.1 Socio-economic inclusion

PMA's programme must be safe and inclusive for children from a wide range of financial circumstances. PMA will use non-stigmatising language, avoid assumptions about household income and consumption, and design activities so that no child is made to feel lesser because of what their family can or cannot afford.

8.2 Accessibility and reasonable adjustments

PMA will make reasonable adjustments where needed to support participation. This may include alternative formats, differentiated resources, adapted facilitation, changes to group size, additional processing time, adjusted instructions, or alternative ways for children to participate. Requests or identified needs will be logged, considered with the school, and responded to in a timely and practical way. Where an adjustment cannot reasonably be provided by PMA alone, PMA will work with the school to identify a suitable alternative approach.

8.3 SEND, EAL and communication needs

PMA will design and adapt delivery with Special Educational Needs and Disabilities (SEND), English as an Additional Language (EAL), and communication differences in mind. Where appropriate and proportionate, PMA may offer accessible digital formats, symbol-supported resources, high-contrast materials, simplified instructions, and multiple participation formats, for example verbal, drawn or written responses. Translation or interpretation support may be arranged with the school where needed and practicable.

8.4 Representation and content review

PMA will aim for diverse and respectful representation across its materials and communications. Programme content will be reviewed at least annually, and sooner where concerns arise, to identify language, examples or imagery that may exclude, stereotype or stigmatise children or families.

9. Partner schools, families, communities and

sponsors

In external relationships, PMA will:

- treat schools, families, partners and communities fairly regardless of school type, geography, size, faith status, funding route or Ofsted category;

- seek to communicate in clear, accessible language and in formats that support family participation where possible;
- prioritise outreach where evidence suggests children have lower access to financial education or higher exposure to disadvantage;
- apply an ethical screen to sponsors and decline funding from organisations whose products, conduct or reputation are materially inconsistent with children's wellbeing or PMA's purpose;
- record sponsor or partner concerns and escalate higher-risk decisions to the Director and, where available, independent oversight.

10. Data, monitoring and learning

PMA will monitor equality, diversity and inclusion in a useful and proportionate way. This may include participation data, accessibility requests, complaints, partner feedback and, where lawful, high-level subgroup analysis. PMA will only collect personal data that is necessary, will minimise individual-level data where possible, and will use aggregated reporting wherever appropriate.

- An EDI action log will be maintained and reviewed at least annually.
- Material complaints, incidents or access barriers will be logged and reviewed for themes.
- Where outcome data is reviewed by subgroup, PMA will do so only where sample size and data quality make the exercise meaningful and proportionate.
- Where monitoring identifies a likely gap in access or outcomes, PMA will record the issue, the action taken and the review point.

11. Training and confirmation

All PMA personnel must receive this policy as part of induction. Anyone delivering or representing PMA must confirm in writing that they have read and understood it. Refresher training or re-confirmation will take place at least annually, and sooner where there are material changes to the policy or to PMA's operating model.

12. Concerns, complaints and escalation

Anyone may raise an equality, diversity or inclusion concern with PMA, including staff, contractors, volunteers, schools, families, partners or members of the public. Concerns should be raised as early as possible so they can be resolved quickly and safely.

- Concerns about day-to-day delivery should normally be raised with the PMA project lead or facilitator first.
- Formal concerns or complaints should be raised through PMA's Complaints Policy and logged appropriately.
- Concerns relating to the Director's own conduct should not be investigated solely by the Director.
- Where an independent oversight contact is in place, concerns about the Director should be escalated there.
- Until such an independent contact is appointed, concerns about the Director may be raised to the Deputy DSL for logging and triage, with signposting or escalation to the appropriate external route where necessary, including the school's complaints route, ACAS, the ICO, the police, or other relevant authority depending on the nature of the concern. No person raising a concern in good faith will be disadvantaged for doing so.

13. Breach of this policy

Breaches of this policy may result in action proportionate to the seriousness of the issue, which may include training, supervision, changes to role, removal from delivery activity, termination of engagement, or referral to an external authority or regulator where appropriate.

14. Review and approval

This policy will be reviewed at least annually and sooner if there is a significant legal, safeguarding, operational or organisational change. The review will consider complaints, feedback, accessibility requests, monitoring data, delivery learning and any incidents relevant to equality, diversity and inclusion.

Appendix A - Current PMA inclusive-design

commitments

At the time of adoption, PMA's current inclusive-design commitments include:

- using non-stigmatising programme language, including wording that avoids shaming children whose families cannot easily save, share or spend in the same way as others;
- reviewing stories, examples and illustrations for socio-economic sensitivity and inclusive representation;
- offering multiple ways for children to participate in pupil voice and feedback activities;
- working with schools on practical adjustments for SEND, EAL and communication needs;
- keeping accessibility under review as PMA materials evolve.

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.