

Equity, Inclusion & Non-Discrimination

1. **Non-Discrimination, Equity & Inclusion (NDEI) Policy**
2. **Diversity, Equity & Inclusion (DEI) Policy**

Approved by: National Board

Updated: 2026-03-01

Review cycle: Annual (or earlier if legislation or practice changes)

Chapter 1. Non-Discrimination, Equity & Inclusion (NDEI) Policy

Related policies: Code of Conduct; Anti-Harassment & Bullying; Whistleblowing & Complaints; Data Protection/Privacy (GDPR); Accessibility & Reasonable Accommodation; Recruitment & Equal Opportunity; Child Protection & Safeguarding; SEA Prevention & Response; Procurement & Ethical Purchasing; Conflict of Interest (COI).

1) Policy Statement & Purpose

The Organization is committed to a safe, inclusive, and equitable environment for all staff, volunteers, partners, and beneficiaries. We prohibit discrimination, harassment, bullying, and retaliation in all operations, programmes, and employment practices. This Policy aligns with the Universal Declaration of Human Rights (UDHR), European Convention on Human Rights, the EU Charter of Fundamental Rights, and applicable laws of the Republic of Lithuania.

Objectives: (a) prevent discrimination and bias; (b) ensure equal opportunity in employment and services; (c) provide reporting and resolution mechanisms; (d) embed accessibility, reasonable accommodation, and inclusive culture.

2) Scope & Applicability

Applies to all associated with the Organization: employees (permanent/temporary), volunteers, interns, National Board members, consultants, contractors, suppliers, implementing partners, beneficiaries, and visitors.

Covers all activities: recruitment and hiring; onboarding and training; pay and benefits; performance and promotion; discipline and separation; access to services and programmes; communications and events; procurement and partnerships.

3) Definitions (Plain Language)

- **Protected characteristics** (non-exhaustive): sex, gender identity/expression, sexual orientation, age, disability, race/ethnicity, nationality, language, religion/belief, marital/family status, pregnancy/maternity, socioeconomic status, political opinion, health status, or other status protected by law.
 - **Discrimination: direct** (less favourable treatment) or **indirect** (rules/practices that disadvantage a group without objective justification).
 - **Harassment**: unwanted conduct related to a protected characteristic that violates dignity or creates a hostile, intimidating, degrading, humiliating, or offensive environment (includes **sexual harassment**).
 - **Bullying**: repeated, unreasonable behaviour creating risk to health/safety even if not tied to a protected characteristic.
 - **Victimisation/retaliation**: adverse treatment for reporting or participating in a complaint.
 - **Reasonable accommodation**: adjustments enabling equal participation for persons with disabilities, pregnancy-related needs, religion/belief, or other legitimate grounds unless **disproportionate burden**.
 - **Accessibility**: physical, digital, and communication access (e.g., WCAG 2.1 AA for web content).
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4) Roles & Responsibilities

- **National Board:** approves the Policy; receives annual equality reports; oversees serious incidents and corrective actions.
- **Executive Director (ED):** accountable for implementation; resources and training; ensures non-retaliation.
- **Ethics & Compliance Officer (ECO):** primary intake for complaints; maintains the **Equality Register**; coordinates investigations with HR/Legal; tracks corrective actions.
- **HR/People & Culture Lead:** ensures inclusive recruitment, fair pay practices, accommodations, and training.
- **Designated Safeguarding Lead (DSL/CPO) & PSEA Focal Point:** handle child/SEA-related cases intersecting with discrimination; coordinate with ECO.
- **Managers:** model inclusive behaviour; ensure team compliance; address issues promptly.
- **All personnel & partners:** follow this Policy; complete training; use inclusive language; report concerns in good faith.

Designated Contacts (to fill):

- **ECO (primary):** *Name, phone, email*
 - **HR/People & Culture Lead:** *Name, phone, email*
 - **DSL/CPO:** *Name, phone, email*
 - **PSEA Focal Point:** *Name, phone, email*
 - **Anonymous reporting:** *webform/box/hotline*
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5) Standards & Expectations

5.1 Equal Opportunity & Fair Practices

- Job descriptions use bias-free language; selection criteria are objective and relevant.
- Shortlists reflect fair consideration; diverse interview panels where feasible; decisions documented.
- Equal pay for equal work; salary bands published internally; promotion based on merit and transparent criteria.

5.2 Respectful Conduct & Inclusive Communication

- Use inclusive, non-derogatory language; avoid slurs, stereotypes, and jokes at others' expense.
- Respect pronouns and names; provide language support (interpretation/translation) where needed.
- Digital behaviour follows the same standards on official and social platforms when representing the Organization.

5.3 Accessibility & Reasonable Accommodation

- Provide adjustments upon request (work schedules, workspace, assistive tech, religious observance, pregnancy/lactation).
- Accessible premises (ramps, signage, toilets) and information (plain language, alternative formats).
- Digital accessibility (web/app/docs) aligned to WCAG 2.1 AA; captions for videos where feasible.

5.4 Programmes & Services

- Admission and service delivery free of discrimination; outreach to under-represented groups; alternative arrangements where barriers exist.
 - Vendors/partners must uphold equivalent non-discrimination standards (contract clauses & due diligence).
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6) Prohibited Conduct (non-exhaustive)

- Direct or indirect discrimination; instruction to discriminate.
- Harassment (incl. sexual), bullying, hate speech, hate symbols, microaggressions when persistent or severe.
- Retaliation/victimisation against complainants, witnesses, or investigators.
- Discriminatory employment practices in hiring, pay, promotion, training, or termination.
- Exclusionary policies without objective justification and proportionality.

7) Reporting & Resolution (Confidential; Good-Faith)

7.1 Duty to Report & Protection

All personnel and participants should report witnessed or experienced incidents. **Good-faith reporters are protected** from retaliation.

7.2 Timeline & Process

- Acknowledge within 2 working days; triage within 5 working days (risk, interim measures).
- Investigation by trained, conflict-free personnel; target 30–45 days with documented extensions.
- Outcome & actions communicated as appropriate; confidentiality maintained on a need-to-know basis.
- Appeal on process grounds to Board Focal Point within 10 working days.

7.3 Interim Measures & Support

- Adjust duties/schedules, separation of parties, or temporary relocation to ensure safety.
 - Offer access to counselling or support services as available.
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8) Data Protection & Records

- Maintain an Equality Register of cases; store files securely with restricted access; process personal data per GDPR.
 - Retention: keep case files for 5 years after closure (or longer where legally required).
 - Report any data breach immediately to the DPO/ECO.
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9) Training, Culture & Communication

- Induction for all new staff/volunteers; refreshers every 24 months; targeted training for managers and recruiters.

- Inclusive culture activities (toolbox talks; observance of international diversity days; employee resource groups where feasible).
 - Display poster text with reporting channels in offices/venues; publish a summary on the website; provide translations (LT/RU/EN).
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10) Monitoring, KPIs & Review

- Track metrics: recruitment pipeline diversity, pay equity, promotion rates, training completion, complaints/resolution times, retention.
 - Conduct periodic climate surveys and accessibility audits; integrate findings into action plans.
 - Provide an annual anonymised equality report to the National Board; review this Policy at least annually.
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11) Enforcement & Sanctions

- Breaches may result in coaching/training, written warning, reassignment, suspension/termination, contract remedies for partners, and/or referral to authorities for criminal conduct.
 - Good-faith reporters are protected; malicious or knowingly false allegations may themselves be disciplined.
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Annexes (Templates)

Annex A — Equality/Non-Discrimination Complaint Form

- Complainant (name/role/contact or anonymous code)
- Incident date/time/place; parties involved; description (facts)
- Protected characteristics implicated (if any)
- Witnesses/evidence (screenshots, emails)
- Immediate risks/support needs
- Preferred resolution/outcome
- Signature/date (if not anonymous)

Annex B — Reasonable Accommodation Request Form

- Name/role/programme
- Accommodation requested; reason/need (disability, pregnancy, religion, other)
- Suggested adjustments; timeframe
- HR assessment; decision; implementation plan; review date
- Signatures (requester/HR/manager)

Annex C — Inclusive Language & Behaviour Quick Guide

- Respect names/pronouns; avoid stereotypes; use person-first language; accessible formats; meeting etiquette (turn-taking, captions, breaks).

Annex D — Accessibility Checklist (Office/Event/Digital)

- Entrance/ramps; lifts/handrails; toilets; signage; lighting/acoustics; seating; emergency procedures; web/doc accessibility (WCAG 2.1 AA).

Annex E — Investigation ToR Outline (Equality Cases)

- Scope; roles; confidentiality; methodology; timeline; reporting lines; conflicts declarations.

Annex F — Poster Text (Report Discrimination Confidentially)

Everyone has the right to dignity, equality, and respect.

Chapter 2. Diversity, Equity & Inclusion (DEI) Policy

Related policies: Non-Discrimination, Equity & Inclusion (NDEI); Code of Conduct; Anti-Harassment & Bullying; Whistleblowing & Complaints; Data Protection/Privacy (GDPR); Accessibility & Reasonable Accommodation; Recruitment & Equal Opportunity; Child Protection & Safeguarding; SEA Prevention & Response; Procurement & Ethical Purchasing; Conflict of Interest (COI).

1) Policy Statement & Purpose

The Organization is committed to diversity, equity, inclusion, and belonging across all operations, programmes, and employment practices. We aim to ensure that people of all identities and backgrounds can participate fully, are treated fairly, and can thrive. This Policy sets out our principles, governance, goals, and practical measures to advance DEI in a measurable and sustainable way.

Objectives: (a) embed DEI in strategy and culture; (b) eliminate structural barriers; (c) ensure equitable processes and outcomes; (d) track progress via KPIs and transparent reporting.

2) Scope & Applicability

Applies to all associated with the Organization: employees (permanent/temporary), volunteers, interns, National Board members, consultants, contractors, suppliers, implementing partners, beneficiaries, and visitors. Covers hiring, pay and benefits, development and promotion, performance management, workplace conduct, programme design and delivery, communications, events, and partnerships.

3) Definitions (Plain Language)

- Diversity: the presence of different identities, backgrounds, experiences, and perspectives.
- Equity: fair treatment, access, and opportunity, recognising different needs and addressing systemic barriers (different supports to achieve fair outcomes).
- Inclusion: practices and behaviours that ensure people feel respected, safe, and valued (belonging).
- Intersectionality: overlapping identities (e.g., gender, race, disability, migration status) that shape experiences of privilege and discrimination.
- Reasonable accommodation: adjustments that enable equal participation (unless disproportionate burden).

- Accessibility: physical, digital, and communication access (e.g., WCAG 2.1 AA for web content).
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4) Principles & Commitments

1. Equity over equality: tailor supports to needs to achieve fair outcomes.
 2. Zero tolerance for discrimination, harassment, bullying, and retaliation (see NDEI and Code of Conduct).
 3. Participation & voice: involve diverse staff and community members in decision-making.
 4. Transparency & accountability: publish goals and progress; invite feedback.
 5. Data ethics & privacy: collect DEI data voluntarily, store securely, and report aggregated results only.
 6. Accessibility by design: integrate accessibility into facilities, tools, and content.
 7. Continuous learning: invest in training and leadership development.
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5) Governance, Roles & Responsibilities

- **National Board:** approves DEI strategy and annual goals; receives annual DEI report; oversees risks and resources.
- **Executive Director (ED):** accountable for implementation; assigns budget; removes barriers; champions culture change.
- **HR/People & Culture Lead:** integrates DEI into people processes (recruitment, pay, performance, promotion); runs accommodation workflow; tracks KPIs.
- **Ethics & Compliance Officer (ECO):** ensures alignment with NDEI/Whistleblowing; protects good-faith reporters; maintains **DEI Register** of plans/metrics.
- **DEI Council** (cross-functional, diverse membership): co-creates annual DEI Plan; reviews progress quarterly; advises on initiatives.

- **Managers:** model inclusive leadership; set team goals; ensure fair processes; address issues promptly.
- **All personnel & partners:** complete DEI training; use inclusive behaviours; provide feedback and ideas; report concerns in good faith.

Designated Contacts (to fill):

- **HR/People & Culture Lead:** *Name, phone, email*
 - **ECO (DEI oversight):** *Name, phone, email*
 - **DEI Council Chair:** *Name, email*
 - **Anonymous feedback/reporting:** *webform/box/hotline*
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6) Strategy & Annual DEI Plan

- Develop an **Annual DEI Plan** with **SMART** goals, owners, timelines, and budget; approve by **Q1** each year.
 - Base goals on data: baseline assessment (workforce composition, pay equity, promotion, recruitment funnel, retention, engagement, accessibility).
 - Prioritise **high-impact** actions that address root causes; include community and beneficiary perspectives where relevant.
 - Publish a summary internally and update quarterly.
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7) Inclusive Recruitment & Advancement

- **Job design & adverts:** bias-aware language; essential vs desirable criteria; flexible/remote options; transparent pay ranges.
- **Outreach:** advertise across diverse channels; partner with NGOs/universities that reach under-represented groups.
- **Selection:** structured applications; **skills-based** tasks; **structured interviews with scoring rubrics**; diverse panels where feasible; accommodation on request.
- **Onboarding & probation:** inclusive induction; early check-ins; tailored support plans.

- **Development & promotion:** fair access to training, mentoring, and acting roles; publish criteria for advancement; regular calibration to reduce bias.
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8) Pay Equity & Benefits

- Maintain salary bands and job architecture; publish ranges internally.
 - Conduct **annual pay equity analysis** (gender, disability, nationality, etc.) and correct unjustified gaps.
 - Offer benefits mindful of diverse needs (family, disability, mental health, migration status, caregiving).
 - Ensure equitable access to allowances, stipends, and travel opportunities.
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9) Inclusive Workplace & Culture

- **Psychological safety:** encourage respectful challenge and feedback; no retaliation.
 - **Language & communication:** use inclusive, plain language; provide interpretation/translation when needed.
 - **Events & meetings:** accessible venues; hybrid options; inclusive dietary choices; prayer/lactation spaces.
 - **Employee Resource Groups (ERGs):** support voluntary, staff-led ERGs with charters and executive sponsorship.
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10) Accessibility & Accommodation

- Provide timely **reasonable accommodations** for disability, pregnancy/lactation, religion/belief, and other legitimate needs (process in **Annex F**).
- **Facilities:** ramps, signage, accessible toilets; assistive tech where needed.
- **Digital:** websites, docs, and tools aligned to **WCAG 2.1 AA**; captions and alternative text for media; accessible templates.

11) Learning & Capability Building

- **Mandatory induction** plus **refresher every 24 months** for all staff; modules on bias awareness, inclusive leadership, bystander intervention, disability confidence, trauma-informed practice.
 - Managers receive advanced training on inclusive hiring, feedback, and conflict resolution.
 - Track completion and impact.
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12) Data, Privacy & Reporting (GDPR)

- Collect DEI data **voluntarily** with privacy notice and consent where required; store securely with role-based access.
 - Report **aggregated/anonymised** results; avoid small-n disclosures.
 - Retain data per schedule (see Annex K) and delete securely when no longer needed.
 - Coordinate with the Data Protection Officer on cross-border transfers and DPIAs where relevant.
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13) Supplier Diversity & Ethical Partnerships

- Aim to increase spend with **local SMEs, social enterprises, and women/minority-led vendors** where compliant and value-for-money.
 - Include DEI criteria in **supplier due diligence** and **Supplier Code of Conduct**; monitor performance and address non-compliance.
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14) Feedback, Concerns & Non-Retaliation

- Encourage ideas and concerns via managers, HR, ECO, DEI Council, and anonymous channels.
- For discrimination/harassment, use the **NDEI** or **Whistleblowing** procedures.

- **Good-faith feedback and reports are protected**; retaliation is prohibited and sanctioned.
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15) KPIs, Monitoring & Transparency

- Track and review at least quarterly: workforce composition, recruitment funnel diversity, pay equity gaps, promotion and retention rates, accommodation SLAs, training completion, accessibility audits, ERG participation, supplier diversity spend.
 - Share a **summary dashboard** with the National Board and staff; publish highlights where appropriate.
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16) Enforcement & Consequences

- Persistent non-compliance with DEI requirements, obstruction of initiatives, or retaliation may result in coaching/training, formal warnings, reassignment, or **disciplinary action up to termination**, and contract remedies for partners.
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17) Review & Continuous Improvement

- Annual review of this Policy and the DEI Plan; incorporate lessons from surveys, audits, and cases; update goals and resources accordingly.
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Annexes (Templates)

Annex A — Annual DEI Plan (SMART Goals)

- Priorities; baselines; targets; owners; milestones; budget; risks; measures of success.

Annex B — DEI KPI Scorecard

- Metrics list; data sources; definitions; review cadence; RACI.

Annex C — Inclusive Job Description Template

- Role purpose; essential vs desirable criteria; inclusive language; pay range; accommodations statement.

Annex D — Structured Interview Rubric

- Competencies, weighted scores, behavioural questions, red-flag guidance; panel notes.

Annex E — Pay Equity Audit Checklist

- Data fields; cohort definitions; regression/controls; remediation steps; communication plan.

Annex F — Accommodation Workflow & Request Form

- Request intake; assessment; decision; implementation; review; escalation.

Annex G — Inclusive Events & Meetings Checklist

- Venue access; signage; hybrid setup; dietary/religious needs; safety and conduct.

Annex H — ERG Charter Template

- Purpose; membership; leadership; sponsor; activities; support needs; success indicators.

Annex I — Inclusive Communications Style Guide

- Person-first language; pronouns; imagery; translation; alt-text/captions; readability.

Annex J — Supplier Diversity Tracking Sheet

- Vendor category, ownership type, location, value, compliance notes.

Annex K — DEI Data & Privacy Notice

- Lawful bases; voluntary participation; storage; retention; rights; contact for questions.

Annex L — DEI Dashboard Fields

- Workforce composition; hiring funnel; pay gap metrics; promotion/retention; accommodations; training; accessibility; supplier diversity.