

National Rifle Association

Equality Policy

Adopted by Council on 16 October 2021

Amended by Council on 6 June 2025

1. Policy Objectives

- 1.1 The National Rifle Association is fully committed to the principles of equality of opportunity and is responsible for ensuring that no job applicants, employees, consultants, volunteers, members or participants (referred to in this document as "Stakeholders") are unlawfully discriminated against because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation (referred to in this document as "Protected Characteristics").
- 1.2 The National Rifle Association recognises that we live in a diverse society and will endeavour to ensure that all Stakeholders are given the same opportunities regardless of their socio-economic backgrounds.
- 1.3 The National Rifle Association will encourage partner organisations, including suppliers and sponsors, to adopt and demonstrate their commitment to the principles and practice of equality as set out in this Equality Policy.
- 1.4 The National Rifle Association recognises that, in some cases, to further the principle of equality, an unequal distribution of resources may be required. If appropriate and proportionate, The National Rifle Association will consider positive action or may introduce special measures to assist any group with a Protected Characteristic which is currently underrepresented within any group of Stakeholders.

2 Purpose of the Policy

- 2.1 The National Rifle Association recognises that individuals (and/or certain groups in our society who share one or more Protected Characteristics) may not have been able to participate equally and fully in sports related activities or the management and organisation of sport.
- 2.2 This Policy has been produced to try to prevent and address any unlawful discrimination or other unfair treatment, whether intentional or unintentional, direct or indirect, against Stakeholders that may preclude them from participating fully in sports related activities or the management and organisation of sport.

3 Legal Requirements

- 3.1 The National Rifle Association is required by law not to unlawfully discriminate against its Stakeholders and recognises its legal obligations under, and will abide by the requirements of, the Equality Act 2010, and any equivalent legislation (as amended) in any UK jurisdiction, Jersey, Guernsey or the Isle of Man and any later amendments to such legislation or subsequent equality related legislation that may be relevant to The National Rifle Association.
- 3.2 The National Rifle Association will seek advice each time this Policy is reviewed to ensure it continues to reflect the current legal framework and good practice.

4 Discrimination, harassment, bullying and victimisation

4.1 The National Rifle Association recognises the following as being unacceptable:

4.1.1 *Unlawful discrimination* which can take the following forms:

- (a) Direct Discrimination:* treating someone less favourably than you would treat others because of a Protected Characteristic; or
- (b) Indirect Discrimination:* applying a provision, criterion or practice which, on the face of it, applies equally to all but which, in practice can disadvantage individuals with a particular Protected Characteristic. Such requirements or conditions are lawful only if they can be objectively justified.

4.1.2 *Harassment:* engaging in unwanted conduct relating to a relevant Protected Characteristic or unwanted conduct of a sexual nature where the conduct has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient, or any other individual affected by such conduct. The National Rifle Association is committed to ensuring that its Stakeholders are able to conduct their activities free from harassment.

4.1.3 *Bullying:* the misuse of power or position to criticise persistently or to humiliate and undermine an individual's confidence.

4.1.4 *Victimisation:* subjecting someone to a detriment because he or she has in good faith taken action under the Equality Act 2010 (or equivalent legislation) by bringing proceedings, giving evidence or information in relation to proceedings, making an allegation that a person has contravened the Equality Act 2010 (or equivalent legislation) or doing any other thing for the purpose of or in connection with the Equality Act 2010 (or any equivalent legislation).

4.2 The National Rifle Association regards discrimination, harassment, bullying or victimisation, as described above, as serious misconduct. All complaints will be taken seriously and appropriate measures including disciplinary action may be brought against any Stakeholder who unlawfully discriminates against, harasses, bullies or victimises any other person.

5 Reasonable Adjustments

5.1 When any decision is made about an individual, the only personal characteristics that may be taken into account are those that are consistent with any relevant legislation and are relevant to the substance of the decision being made.

5.2 The National Rifle Association recognises that it has a duty to make reasonable adjustments for disabled persons. The National Rifle Association will consider all requests for adjustments and where possible will accommodate reasonable requests and will work with disabled Stakeholders to implement any adjustments that will enable them to participate more fully in activities organised or conducted by the National Rifle Association or in the management of such activities.

6 Transgender Equality

6.1 The National Rifle Association will at no time discriminate nor tolerate discrimination against people on the grounds of their gender identity or gender expression. Where

this section refers to 'trans people', it has in mind a broad range of people whose gender identity is not expressed in ways that are typically associated with their assigned sex at birth. This includes those who have non-binary, non-gender or genderfluid identities and individuals who may not identify as trans but who are impacted by matters covered under this policy.

- 6.2 The National Rifle Association celebrates and values the diversity of its Stakeholders and will treat all individuals with respect and seek to provide a positive environment free from discrimination, harassment or victimisation. The National Rifle Association recognises that protection under the Equality Act 2010 is extended to trans individuals from the moment they indicate their intention to transition. Stakeholders will not be denied fair and equal treatment because of their gender identity or because they propose to or have transitioned.
- 6.3 The National Rifle Association will respect the confidentiality of all trans Stakeholders and will not reveal information without the prior agreement of the individual. Requests to change name and gender on records will be handled promptly and sensitively. The National Rifle Association will provide a supportive environment for Stakeholders who wish their trans status to be known. However, it is the right of the individual to choose whether they wish to be open about their gender identity, trans status or trans history.
- 6.4 The National Rifle Association promotes a zero tolerance approach to transphobia. Transphobia includes discriminatory language or behaviour directed towards anyone who comes under the umbrella term of transgender; in addition it may be towards a transsexual person's friend or supporter, or anyone that may be perceived to be a transsexual person (whether they are transsexual or not). The behaviour may include a reluctance or refusal to provide access to services to the same extent as that provided for a non-transsexual person. The National Rifle Association will ensure that any unacceptable behaviour and language is addressed effectively and appropriately. Transphobic abuse, harassment or bullying such as name-calling, derogatory jokes, unacceptable or unwanted behaviour, intentional misgendering and/or intrusive questions are serious disciplinary offences and will be dealt with under the appropriate disciplinary procedure.
- 6.5 Following the decision of the Supreme Court in *For Women Scotland Ltd v The Scottish Ministers*, the National Rifle Association will treat a transsexual person as belonging to the sex in which they were born for the purposes of events that are organised as "woman-only" events.

7 Responsibility, implementation and communication

- 7.1 The following responsibilities will apply:
 - 7.1.1 The Council of The National Rifle Association is responsible for ensuring that this Equality Policy is implemented, followed, and reviewed when appropriate and that this Equality Policy is enforced and any breaches are dealt with appropriately
 - 7.1.2 The National Rifle Association will ensure that equality is included as an agenda item at Council meetings when appropriate and that the Board takes equality issues into consideration when making decisions;
 - 7.1.3 The Secretary General has the overall responsibility for the implementation of this Equality Policy;
 - 7.1.4 The Secretary General shall designate a member of staff as the Equality Officer, that person will have the overall day-to-day responsibility for the

implementation of this Equality Policy and for achieving any equality-related actions resulting from it. The Equality Officer's work programme will take this into account. If required, an equality group involving volunteers, staff or a combination of both will be created to provide additional support; and

- 7.1.5 All Stakeholders have the responsibility to respect, follow and promote the spirit and intentions of this Equality Policy. Individual work programmes for National Rifle Association staff will be amended to include equality related tasks where appropriate.
- 7.2 This Equality Policy will be implemented immediately following Council approval. Implementation requires the following actions:
 - 7.2.1 Job applicants and employees will be required to abide by this Equality Statement and the National Rifle Association Equal Opportunities and Bullying and Harassment Policies which are contained in the Employee Handbook and which will be regularly reviewed by the National Rifle Association together with employment practices to ensure continuing compliance with relevant legislation, and where possible good practice. All job packs sent out by the National Rifle Association will contain a policy statement similar to the following:

"The National Rifle Association is committed to providing equal opportunities for all [and is committed to following best practice in the welfare of young people and vulnerable adults]. For further information please consult www.nra.org.uk
 - 7.2.2 No applicant for any post (including job applicants, consultant advisers and suppliers) will be placed at a disadvantage by requirements or conditions which are not necessary to the performance of the job or which constitute unlawful discrimination.
- 7.3 Trustees, employees and consultants (including contractors, advisers and where appropriate suppliers) to The National Rifle Association will be required to abide by this Equality Policy and it will be referred to in any agreements or contracts issued by The National Rifle Association which will be reviewed by The National Rifle Association as appropriate from time to time.
- 7.4 Volunteers and participants and will be required to abide by this Equality Policy which will be reviewed by The National Rifle Association as appropriated from time to time.
- 7.5 This Equality Policy will be communicated in the following ways:
 - 7.5.1 The Policy will be referred to in:
 - (a) the NRA Employee Handbook. (Note: This Equality Policy is for guidance only and will not form part of any contract of employment with any employees of The National Rifle Association); and
 - (b) the National Rifle Association Consultancy Agreement;
 - 7.5.2 The Policy will be highlighted in all employee inductions; and
 - 7.5.3 A copy of this Equality Policy will be publicly available for all Stakeholders on the NRA website and copies in other formats will also be available from the NRA office (info@nra.org.uk).
- 7.6 Council will consult Stakeholders in relation to any substantive changes of this Policy. Following consultation, a notice of the changes being made will be publicly

available and a direct communication will be sent to all those who contributed to the consultation process (subject to Data Protection provisions).

8 Monitoring and Evaluation

This Equality Policy will remain in force until it is amended, replaced or withdrawn. Council will review this Equality Policy as and when required, but not less than once every three years.

9 Complaints Procedures

- 9.1 To safeguard individual rights under this Equality Policy, any Stakeholder who believes they have suffered inequitable treatment within the scope of this Equality Policy may raise the matter through the appropriate procedure.
- 9.2 Appropriate disciplinary action may be taken against any NRA Stakeholder who violates this Equality Policy under the relevant NRA disciplinary procedures.
- 9.3 An individual raising a grievance or complaint will not be penalised for doing so unless it is untrue and not made in good faith.
- 9.4 As with all grievances, complaints and disciplinary procedures, there will be the right of appeal as set out in the relevant procedure.