



National Audit Office

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watchdog

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Date 28 March 2025

STAFF, TRAINING, AND PROCUREMENT: EQUALITY, DIVERSITY, AND INCLUSIVITY

Thank you for your FOI request to the National Audit Office (NAO) dated 28 February. You asked for information about staff roles, training courses, networks and procurement practices within the NAO that relate to the issues of equality, diversity and inclusion. Your request has been handled under the terms of the Freedom of Information Act 2000 (FOIA).

We have checked our records and can confirm that we hold the information you requested. Your specific request is set out in **Annex A** where we have provided our response to each question. A small amount of personal information has been withheld under section 40(2) of the FOIA. Details of this exemption and how it applies to your request can be found in **Annex B**.

Our policy is to respond to requests as helpfully and promptly as possible. I hope this information is helpful and you are happy with the way we have handled your request. If you are not happy with this response, you can ask for an internal review within 40 working days by writing to the NAO FOI Team at FOI@nao.org.uk. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The primary way of escalating your concerns to the Information Commissioner is at: <https://ico.org.uk/foicomplaints>.

Yours sincerely,

NAO FOI Team

Annex A

Your FOI request is in italics and our response below

I wish to make a freedom of information request and would be grateful if you could supply the following information within 20 working days:

1) The number of roles across all components of your operations, directorates and management structures, expressed in numbers of full-time employees (FTE), that are mainly or exclusively focussed on issues of equality, diversity, or inclusivity. This information should encompass all roles based in central offices, as well as any based elsewhere

Roles meeting this description could include (amongst other guises) "Equality, Diversity and Inclusion Officer" (EDI) or "Diversity and Inclusion Project Managers". Please break down, if possible, the number of roles per component part of your operations.

For all roles meeting this description, please also provide, in order of preference, either a) the salary of these roles, b) the pay band of these roles, or c) the combined total salary of these roles. Please provide the information that is most in accordance with your data processing practices.

Please also advise if there are any plans to hire further staff in these areas within the next 18 months, and the roles/pay bands that they are likely to occupy.

While there are 4 full-time employees in the Equality, Diversity and Inclusion Team they all also undertake other work and may also do work in: recruitment, employee relations, training, and people strategy. The roles are based in our People Team. To put this in context in terms of our overall headcount, we have 1,109 employees.

The salary bands for the roles are as follows:

- **£72,861 to £97,770**
- **£55,416 to £67,557**
- **£47,865 to £58,348**
- **£38,346 to £45,941**

We have no plans to recruit further staff into the team.

2) With the same criteria as above, please provide the number of internal training courses attended by staff which pertain to the issues encompassed by equality, diversity or inclusivity. Please include the name of the courses, the number of attendees, and the duration of the course.

As you have not given us a timeframe, we have used the 12 months to 31 March 2025 as the timeframe for this question. During this period, the following internal training courses were provided:

- **Anti-bullying and harassment workshop - 19 attendees, 3 hours duration.**
- **Taking action against bullying workshop - 20 attendees, 2 hours 15 mins duration.**
- **Preventing harassment workshop - 26 attendees, 1 hour 30 mins.**
- **Associated anti-bullying and harassment e-learning - 34 people completed, 30 mins duration.**

3) Please, if possible, provide details of any internal EDI practices and networks, including the number of individuals who are members of such networks.

We have the following internal diversity networks:

- **disAbility**
- **Carer's network**
- **Ethnic minorities network**
- **Generations network**
- **LGBTQ+**
- **Neurodiversity network**
- **Religion and Belief**
- **Social Mobility**
- **Women's network**

These networks are open to all employees. We don't keep central membership records and information on the number of members is therefore not held.

Executive Directors, People Development Directors and 15 Diversity and Inclusion Change agents voluntarily sponsor the networks and support on the NAO's Diversity and Inclusion Strategy alongside their day jobs.

4) Please provide details of any external contractors brought in by the organisation to conduct training, advice, or guidance on issues relating to EDI. Where applicable this should include costs and associated manhours.

As you have not given us a timeframe, we have used the 12 months to 31 March 2025 as the timeframe for this question.

Contract Name	Cost
Dementia Action Week keynote speaker - withheld under s40(2)	£1,746
Black History Month 2 session fee - withheld under s40(2) -	£800
Skills session for Access Accountancy work experience students 2024	£1,200
Indiverse - Inclusive leadership initial work	£5,160
2024 disability week keynote speaker - withheld under s40(2)	£1,800
Women's Network Masterclass - withheld under s40(2)	£1,200

Information on associated hours is not held.

5) Please provide details of how equality, diversity and inclusivity is included in your procurement practices, the relative weight afforded to these considerations, and the current value of contracts in which EDI considerations was a part of the procurement process.

In line with Procurement Policy Note (PPN) 06/20, the NAO includes weighted social value questions where the requirements are related and proportionate to the subject-matter of the contract. We apportion a minimum weighting of 10% to social value which includes EDI in line with the PPN. We take guidance from the [Social-Value-Model-Edn-1.1-3-Dec-20.pdf](#) and also our internal policies to develop our questions.

We do not hold a list of contracts where EDI was considered as part of the evaluation but can confirm that they were included on tenders where the requirements were related and proportionate to the subject-matter of the contract.

Annex B

This annex sets out the exemptions that we have applied to your request.

Section 40, Freedom of Information Act 2000 – Personal information

Section 40, paragraphs 1-4, of the Freedom of Information Act 2000 (FOIA) provides that:

- (1) Any information to which a request for information relates is exempt information if it constitutes personal data of which the applicant is the data subject.*
- (2) Any information to which a request for information relates is also exempt information if—*
 - (a) it constitutes personal data which does not fall within subsection (1), and*
 - (b) the first, second or third condition below is satisfied.*
- (3A) The first condition is that the disclosure of the information to a member of the public otherwise than under this Act—*
 - (a) would contravene any of the data protection principles, or*
 - (b) would do so if the exemptions in section 24(1) of the Data Protection Act 2018 (manual unstructured data held by public authorities) were disregarded.*
- (3B) The second condition is that the disclosure of the information to a member of the public otherwise than under this Act would contravene Article 21 of the GDPR (general processing: right to object to processing).*
- (4A) The third condition is that—*
 - (a) on a request under Article 15(1) of the GDPR (general processing: right of access by the data subject) for access to personal data, the information would be withheld in reliance on provision made by or under section 15, 16 or 26 of, or Schedule 2, 3 or 4 to, the Data Protection Act 2018, or*
 - (b) on a request under section 45(1)(b) of that Act (law enforcement processing: right of access by the data subject), the information would be withheld in reliance on subsection (4) of that section.*

Reasons why we have applied section 40(2):

We are not obliged, under section 40(2) of the FOIA, to provide personal information if releasing it would contravene the UK GDPR and Data Protection Act 2018. In this instance we believe the release of the names of individuals of who gave keynote talks would contravene the first data protection principle which requires the processing of personal data to be lawful, fair and transparent. In this instance we do not believe it is necessary or fair to the individuals to disclose this personal information.