Equity in UK Grant Making

Analysis of data from the DEI Data Standard and recommendations for future practice

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Foreword

The distribution of grant funding in the UK has been inequitable and this is a reflection of the inherent power imbalances of philanthropy, itself a product of an economic system which originates from wealth accrued through unequal labour and power structures. The monocultural nature of foundation trustees has been well documented, with research from 2025 detailing that 94% of charity foundation trustees are white, that men outnumber women 3:2 and that 60% are over 65.

The lack of diversity on trust and foundation boards which control over around £8bn is reflected in the unequal funding landscape we continue to exist in. While there is a clear consensus that grant funding is not distributed equitably, in order to take effective action to remedy this inequity, robust data is required. Funders had been individually collecting data on the organisations they fund, but each funder was doing so in their own unique way, and often in ways that were not robust, or using language, terminology or approaches that many organisations found problematic.

The DEI Data Standard was created as a shared framework for funders to capture data on funding for groups who experience structural inequity. Structural inequity as a societal phenomenon refers to systemic disadvantages experienced by particular groups as a result of historical injustices, discriminatory policies, and embedded power imbalances within social, economic, and political systems—barriers that operate regardless of individual intent or merit. The work built on the Funders For Race Equality Alliance Audit, a tool launched in 2020 to help funders assess what proportion of their funding was going to race equity organisations, but was intended to enable an intersectional approach to understanding the equitability of funding. Esmée Fairbairn Foundation and the DEI Coalition (now dissolved), brought together a group of nearly twenty funders, and, together with the The National Community Lottery Foundation, commissioned 360Giving and The Social Investment Consultancy to create the framework for the Standard through a process of consultation with sector specialist organisations with lived experience.

The last five years have seen big shifts in cultural and political attitudes towards DEI, and there is a risk that progress towards equity and inclusion is being pushed back. Corporations are axing DEI programmes, there has been a noted rise in antisemitism as part of the fallout from Israel's military operations in Gaza and Iran, a rise in islamophobia and a growing anti-migrant sentiment and hostile environment. There is a real and present risk that what progress has been made around DEI and the equitability of funding the UK will be pushed back in the face of shifts in the dominant political culture.

It is essential, at this juncture, that we work together to consolidate and build on what progress has been made, to advocate with funders to do more to improve their practices, and to maintain the ambition of building an equitable funding landscape in the UK.

Josh Cockcroft, Chair of the DEI Data Group, 2026.

Executive Summary

Four years after its creation, the DEI Data Standard has been adopted by over fourteen funders and engaged 181 people through training workshops. This report presents research commissioned by Esmée Fairbairn Foundation, Paul Hamlyn Foundation, City Bridge Foundation, and Henry Smith Foundation, analysing data from 9,083 applications across four funders, alongside qualitative insights from three case studies and twenty interviews.

The DEI Data Standard was created based on the belief that without an effective framework to capture equity data, there can be no effective action to identify and target funding to address structural inequalities. The drivers were for individual funders to improve their own processes and performance, as well as supporting sector-wide analysis, and to enable sector-wide analysis through the collection of comparable data.

The research reveals that when funders engage seriously with DEI data, it exposes systemic patterns in where funding flows and who it excludes - but also can monitor the impact of initiatives to address this. The Standard provides the methodology for progress, but the question remains whether the funding sector will move beyond measurement to meaningful action—shifting power dynamics and centring the voices and leadership of communities experiencing structural inequity.

Key Research Findings

This analysis of equity data from four funders over a specific time period demonstrates how diversity and equity in funding can be examined. The findings from this dataset of a total spend of £444.2m show the potential for testing assumptions and surfacing biases across the sector using a wider dataset in future.

Organisations that are both *led-by-and-led-for* specific communities often showed higher, not lower, success rates than those not *led-by-and-led-for*, particularly for Women & Girls and Communities Experiencing Racial Inequity. This challenges assumptions about systemic disadvantage and highlights the need for nuanced, evidence-based analysis. This also reflects that some of the funders included in this study had specific programmes prioritising these groups, and demonstrates that when intentional about funding practices, inequity can be addressed.

Organisations *led-by* specific communities are less likely to receive funding: Organisations *led-by* different communities had significantly different outcomes, and organisations whose leadership was drawn from a specific community (such as Black/African/Caribbean/Black-British) had success rates below organisations who were not led-by any specific community, but organisations whose leadership was drawn from across a broad Population Group (such as Communities Experiencing Racial Inequity) had a success rate *greater* than organisations which were not led-by any group.

Combinations of characteristics had complex impacts on outcomes, which is obscured by aggregation: Organisations *led-by* Women & Girls had success rate of 35%, but organisations led-by Older Women had a success rate of 15%. These findings demonstrate that aggregated analysis obscures crucial disparities, that funders must treat different communities as unique, and the importance of applying an intersectional lens to analysis.

Grant sizes did not show statistically significant differences based on leadership or service user characteristics, but were primarily determined by the overall organisation income, even while success rates varied significantly by community characteristics,

Community Interest Companies (CICs) had a success rate of 45% lower than registered charities. CICs account for 7% of led-by organisations.

The Standard has been implemented successfully by multiple funders. Case studies from City Bridge Foundation, Henry Smith Foundation, and Esmée Fairbairn Foundation demonstrate successful implementation by funders of different sizes using varied approaches. Each has used data to identify portfolio gaps, inform strategic decisions, and drive specific changes including targeted funding programmes, revised assessment criteria, and transparent reporting. Their experiences also highlight practical challenges: balancing granularity with usability, achieving sufficient response rates, and ensuring accurate self-reporting.

Funders apply the Standard inconsistently. The qualitative research exposes significant barriers to effective sector-wide analysis, with mixed data quality and legality of collection, and in some cases prohibiting data sharing. This variation limits comparability and undermines the Standard's future potential for sector-level insights, despite genuine commitment from most funders.

Key recommendations for funders

Understand that different communities face different barriers: The inequities and barriers to funding facing different communities vary significantly, and funding processes, data collection and strategies must acknowledge that in order to give communities the support they need.

Use equity data as a driver for change: Funders should publish results, analyse internal DEI data transparently, reflect on funding patterns to understand root causes, ensure assessment criteria are inclusive, and tailor reporting requirements appropriately.

Embed DEI in strategy and governance: Make DEI a standing agenda item for Boards and Senior Leadership Teams, integrate into grant criteria where appropriate, appoint senior champions, and establish external advisory boards.

Strengthen sector collaboration: Participate in peer networks, engage in shared learning, and undertake training on the Standard and intersectional data analysis.

Implement consistently: Apply the Standard as published, collect data at application stage where possible, ensure GDPR compliance, share findings publicly, and make data available for sector aggregation.

This analysis provides an insight into the funding decisions made by a specific set of four funders at a specific period of time and in a particular context, each with their own specific strategy. As there is no comparable data to an earlier period, it is impossible to say whether this is a change from previous practice, but this analysis now provides a benchmark for comparison over time going forward, accepting that this study represents only a proportion of grant expenditure in the period.

Next Steps

The Standard will strengthen guidance and implementation support through new online resources, practical toolkits, clearer applicant guidance, and case studies demonstrating value.

Technical implementation will be simplified through partnerships with database providers, including integration with UK Community Foundations' Salesforce system. A funder pledge will be introduced asking organisations to commit to consistent application, annual reporting, and data sharing for sector analysis.

Context

About this research

Over four years after the first publication of the DEI Data Standard, this report sets out to share an update on progress and adoption of the DEI Data Standard, and make recommendations for its improvement and sustainability. This report is primarily aimed at funders who are using, or considering using, the DEI Data Standard to understand and improve the equity of their funding. It should also be useful to infrastructure or membership organisations that are working to influence or improve philanthropy.

In 2024, Esmée Fairbairn Foundation, Paul Hamlyn Foundation, City Bridge Foundation and Henry Smith Foundation co-commissioned research from the VCSE Observatory at Nottingham Trent University, bringing together the findings from three years of operation of the DEI Data Standard. The aim was to use a mixed methodology approach to analyse funders' use of the DEI Data Standard, using a literature review, qualitative interviews and bringing together the quantitative data collected through the Standard. The research process was insightful - it laid bare the difficulties of funders meaningfully aligning their practices and the resulting difficulties of aligning rich, complex data across different collection mechanisms. This internal report provides one of the key inputs into this paper, along with case studies from funders and other sources.

About the DEI Data Standard

The DEI Data Standard was created based on the belief that without an effective framework to capture equity data, there can be no effective action to identify and target funding to address structural inequalities. The drivers were for individual funders to improve their own processes and performance, as well as supporting sector-wide analysis, and to enable sector-wide analysis through the collection of comparable data.

The DEI Data Standard is designed to monitor the performance of the funders and not to judge applicants. It is also designed to reduce the burden on charities of collecting data by having binary responses, and by asking questions in a consistent way. It monitors the equity of the decision-making by funders and not the diversity of charities. It is a snapshot at the time the data was collected/ application made, and not dynamic data.

The creation of the DEI Data Standard was funded by the Esmee Fairbairn Foundation and the National Community Lottery Fund in 2020 following a proposal from 360Giving and discussions between a group of UK funders on the need for improved insight into the equity in grant giving. It was created by 360Giving working with The Social Impact Consultancy, and development of the Standard was overseen by a working group of UK based foundations. The taxonomy was created in consultation with sector lived experience organisations, and is designed to reflect the structure of charities and the communities they work with.

The Standard is governed by the DEI Data Group, voting membership of which is open to grant making organisations in the UK, and the DEI Data Standard Steering Committee, which includes DEI Data Group members and individuals working in the social sector. More information and a full description of the Standard can be found on the Funders Collaborative Hub DEI Data Standard page.

It is a shared framework (classification, language and approach) aiming to categorise organisations as *led-by*, targeting and/or supporting groups experiencing structural inequity.

There are three elements to this framework:

1. The taxonomy which is the classification system – i.e. the groupings of charitable organisations that we might use when asking questions or reporting on results. The taxonomy is generic and can be applied to different contexts.
2. The approach to applying those groupings to organisations and projects, i.e. whether the categories relate to the project being funded, the organisation, or the leadership of the organisations, and the definitions of those areas. This is the context for use of the taxonomy.
3. Guidance to support the consistency of funders' application of the framework. Asking questions in a similar way will make it easier for applicants to grant programmes and for funders to benchmark and compare their programmes.

Any framework that seeks to classify groups and communities is inherently problematic and can never capture the nuance of people's individual identities. However, if we don't have a standardised way to report and monitor information, we will not have the data needed to identify and address structural inequality. Therefore, this challenge was acknowledged and the framework sought to overcome it by focusing on self-identification, and by including a free-text option for "identity or experience" which is not included in the structured taxonomy.

It is also important to note that it was designed to describe organisations and not individuals, unlike other frameworks. It reflects the structure of charities and the people they support, and the groupings of the classifications needed to be relevant for this purpose.

Funders can use the Standard to ask applicants/grantees about their organisation in three dimensions:

- Who are the participants and people the work is intended to serve or people receiving primary benefits? (Is it "*led-for*"?)
- What is the Mission and purpose of the organisation?
- Who are the Leadership of the organisation? (Is it "*led-by*"?)

In asking about whether the organisation is *led-by* and/or *led-for*, funders ask as a binary (Yes/No) whether the organisation has met a specified threshold.

The DEI Data Standard was designed to prevent the need for additional data collection by charities, allow an element of self-identification and intention, and to support sensitivity and GDPR compliance.

Table 1. DEI Data Standard definitions

Area	Description	Definition/criteria
People receiving primary benefits/ service users	The people who benefit from the project or the organisation	Over 75% of participants of the project or organisation/those receiving support or are intentionally being targeted
Mission and purpose	There is a specific community that the organisation was created to serve, or that their existing work explicitly and proactively engages a specific community	Referenced in the organisation's governing documents, constitution or Charity Commission registration, where relevant and/or be clear in their public facing materials
Leadership	The Board of Trustees, Directors, Management Committee and the Senior staff of the organisation. Key decision-makers	Self identify as being *led-by* a specific community or identity. As an indication, 75% or more of the Board/Management Committee AND 50% of senior staff which share a particular identity or experience, where staff exist. Where a project within an organisation has a separate steering group with autonomous decision-making within this group, the threshold should apply to this unit.

Funders can choose how many levels of the taxonomy they use, as well as which dimensions about the organisations they ask about. Funders can also choose when in the process to ask organisations - either during the application, or when grants are awarded - although it is recommended that it is done during the application to monitor the process and to enable comparison of rates of approval.

Taxonomy

The DEI Data Standard taxonomy includes groups experiencing structural inequity (see Table 2, DEI Data Standard Population Groups, below). There are additional free text fields for "other lived experience" outside the structured taxonomy for other identities or experience (e.g. care experienced) and geographical specific targeting such as specific housing estates. Crucially, respondents can make multiple selections to reflect intersecting identities.

Table 2. DEI Data Standard Population Groups

Population Group: name	Population Group: description
Communities experiencing racial inequity	*Communities that experience inequity as a result of their race or ethnic group, which may be related to their national/geographical origin, skin colours, and other identities. This is often referred to as "Black, Asian and Minority Ethnic" or BAME.*
Disabled people	*Including those that identify as Disabled and those that have impairments which have a long-term impact on quality of life, and experience injustice as a result of social, political or physical barriers to participation*
Faith communities	*Active observers/believers of a religious faith or spiritual belief*
LGBT+ People	*People with gender, sex and relationship diversity including but not limited to Lesbian, Gay, Bisexual, Transgender, Queer, Questioning, Intersex, Asexual, Agender people*
Migrants	*Groups who are first generation and/or recent migrants to the UK*
Older people	*Typically those 60 or over*
Children and young people	
People who are educationally or economically disadvantaged	*Identify as from an economically and/ or educationally disadvantaged background, including working class backgrounds, with long-term impact on their life outcomes; also people currently experiencing financial hardship*
Women and girls	
Welsh Language Speaking	*Applicable for Wales only*
Community background	*Applicable for Northern Ireland only*

The taxonomy has three levels - Population Groups (e.g. "Communities Experiencing Racial Inequity"), Categories (e.g. "Black / African / Caribbean / Black British" and Sub-categories (e.g. "Caribbean") - the full taxonomy can be seen here. The Standard can be implemented to different levels by funders.

Data collection legal compliance

The DEI Data Standard is designed to support compliance with required regulations around data collection, including GDPR. The Standard is used to collect organisational, not personal data, but this approach retains an element of risk of exposing personal data of individuals on the boards or leadership of organisations with a small number of trustees and senior leaders. Collecting information directly from organisations about how they self-identify and providing the

indicative thresholds is a way to reduce this risk, however, the funder using the Standard must ensure they include opt-out where organisations do not feel comfortable providing the data or it being shared externally.

Governance and updates

The Standard is published on the Funders Collaborative Hub, maintained through a Governance Framework (Appendix IV), a change-request process, and is available for use through an open license.

Research findings

Quantitative research findings

A core aspect of this report was analysing DEI data captured by funders under the DEI Data Standard. This process involved data cleaning, transformation and analysis to create a data visualisation dashboard. Sixteen funders, identified by the Funders Collective Hub, were contacted via email and asked to provide DEI data collected from funding applicants under the DEI Data Standard, ideally in a comma-separated value file. Funders were also asked to provide links to their online data collection tool or a copy of the form used for collecting this data from grantees; seven funders responded to the request with data. Approximately 12,000 records were received across the seven funders, of which data from four were usable. Three of the funders who submitted data anonymised the data, meaning it was not possible to use the organisation identifiers to see where the same organisation had been funded by more than one funder, meaning that their data had to be excluded.

In total, 10,714 applications were received across the four funders, with 9,083 applications used for general analyses, excluding 1,631 where the outcome of the applications was undecided, or due to incomplete data. This was added to by data from 360Giving of grants received by those organisations to enable analysis of grant sizes.

An initial analysis of the data looking at the numbers of approved and declined applications, the success rates and the total amounts awarded indicated considerable differences, such as between organisations who were led-by Communities Experiencing Racial Inequity with a success rate of 39%, compared to those led-by Older People, with a success rate of 18%. Table 3 summarises this data for the Population Groups. Due to the intersecting nature of identities - and that applicants can select multiple Population Groups - the applications are counted in multiple Groups where multiple Groups were selected (for example a charity whose service users are reported as Migrants Women will appear in the data for both Migrants and Women).

Table 3. Counts and amounts approved by Population Group

			None	Communities experiencing racial inequity	Disabled people	Faith communities	LGBT+ People	Migrants	Older people	Children & young people	People who are economically or educationally disadvantaged	Women & girls	Community Background (Northern Ireland)	lived experience
Service users	**Count**	**Approved**	635	738	682	92	170	153	180	842	943	431	6	136
		Declined	2059	1216	1437	183	375	383	410	1664	2321	1038	36	239
		Total	2694	1954	2119	275	545	536	590	2506	3264	1469	42	375
		Success rate	24%	38%	32%	33%	31%	29%	31%	34%	29%	29%	14%	36%
	Sum	**Approved**	£94,582,090	£112,112,341	£109,258,506	£12,841,188	£27,771,637	£17,918,415	£35,703,891	£131,945,786	£137,632,313	£65,429,348	£771,200	£19,443,713
	Average	**Approved**	£148,948	£151,914	£160,203	£139,578	£163,363	£117,114	£198,355	£156,705	£145,952	£151,808	£128,533	£142,968
	Funding as % of total		12.36%	14.65%	14.27%	1.68%	3.63%	2.34%	4.66%	17.24%	17.98%	8.55%	0.10%	2.54%
Leadership	**Count**	**Approved**	1637	336	259	105	81	154	44	29	125	535	4	89
		Declined	3846	613	645	284	212	361	199	112	386	1179	35	159
		Total	5483	949	904	389	293	515	243	141	511	1714	39	248
		Success rate	30%	35%	29%	27%	28%	30%	18%	21%	24%	31%	10%	36%
	Amount	**Approved**	£259,090,365	£50,105,680	£31,726,311	£16,904,586	£12,707,957	£23,201,763	£6,149,333	£4,380,393	£15,158,797	£77,243,949	£306,000	£13,141,532
	Funding as proportion of total		50.79%	10%	6%	3%	2%	5%	1%	1%	3%	15%	0%	3%

We created network diagrams of the numbers of applying organisations of the different community groups for leaderships and service users, to visualise the degree of intersection between different identities. In the diagrams, the size of the nodes indicates the number of organisations whose service users (Fig 1) or leadership (Fig 2) identified with that individual community, and the thickness of the connecting lines indicates the number of organisations which share identities of service users (Fig 1) and leadership (Fig 2) as a proportion of the data set. Thus, the diagrams show a high organisations whose service users are both Children & Young People and People who are economically or educationally disadvantaged, and very few organisations whose service users are Older People who are also from Faith Communities.

Fig 1. Service user identity intersections

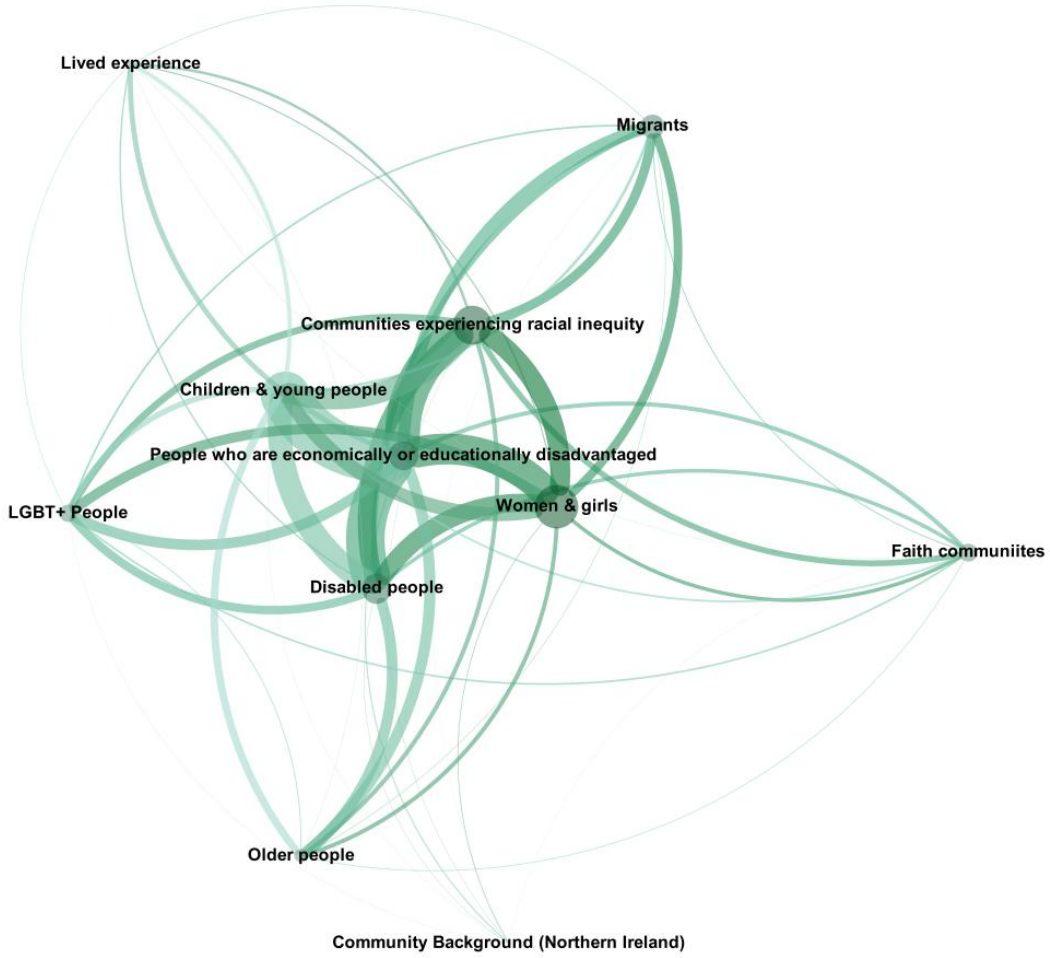
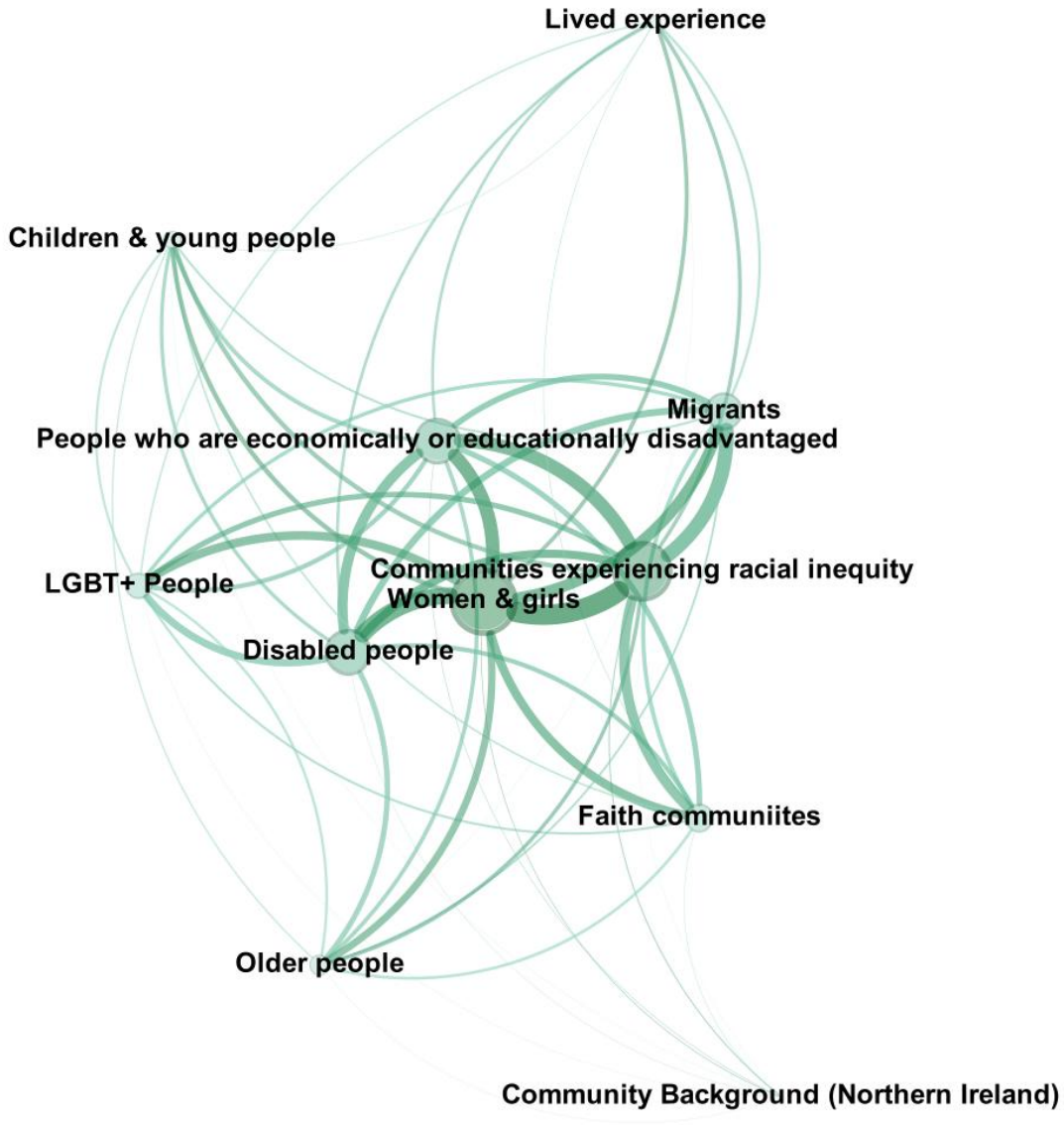


Fig 2. Leadership identity intersections



The network diagrams in Figures 1 and 2 show the reported intersecting identities between population groups among service users and leadership respectively.

The patterns differ between the two diagrams, reflecting that organisations serving particular communities are not always led by people from those same communities. Among service users, the most common intersecting identities appear between Children & Young People and People who are Educationally or Economically Disadvantaged. Leadership patterns show different configurations, though these should be interpreted cautiously given the varying numbers of organisations reporting each characteristic and that many service users who identify as Children & Young People - which describe service users under 26 - can't be in leadership positions.

The data was used to test a number of hypotheses, that:

1. Success rates will vary depending on the characteristics of the leadership and service users.
2. L*ed-by* organisations have lower success rates than organisations that are not *led-by*
3. L*ed-by and for* organisations have a lower success rate
4. The size of grants awarded will be affected by the characteristics of the leadership or service users
5. *Led-by* organisations have fewer funders than those that are not *led-by*
6. Non-charitable organisations are less likely to receive grants, and that *led-by* organisations are more likely to be non-charities.

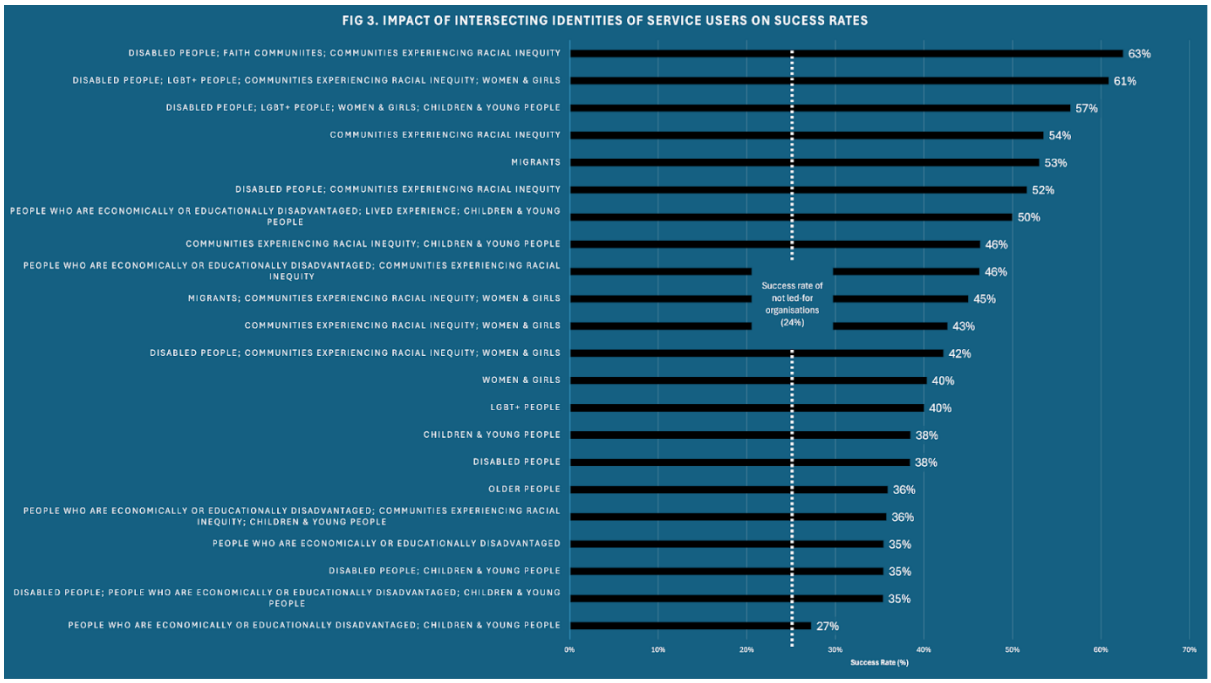
We used a combination of statistical tests to analyse whether the data supported these hypotheses - an explanation of our approach can be found in Appendix II.

Hypothesis 1. Success rates will vary depending on the characteristics of the leadership and service users

Table 3 confirms that success rates vary depending on the characteristics of leadership and service users at Population Group level, with success rates varying between 38% and 14% for different characteristics of service users against a baseline success rate of 24%, and 36% and 10% for leadership characteristics against a baseline success rate of 30%, which are substantial variances.

Our statistical tests indicated that 40% of the intersecting identities of service users for which sufficient data was available (20 applications or greater) had a statistically significant impact on success rates. Fig 3. visualises the success rates of organisations led-for different communities, compared to organisations that not led-for any community which had a success rate of 24%.

Fig. 3 Impact of intersecting identities of service users on success rates

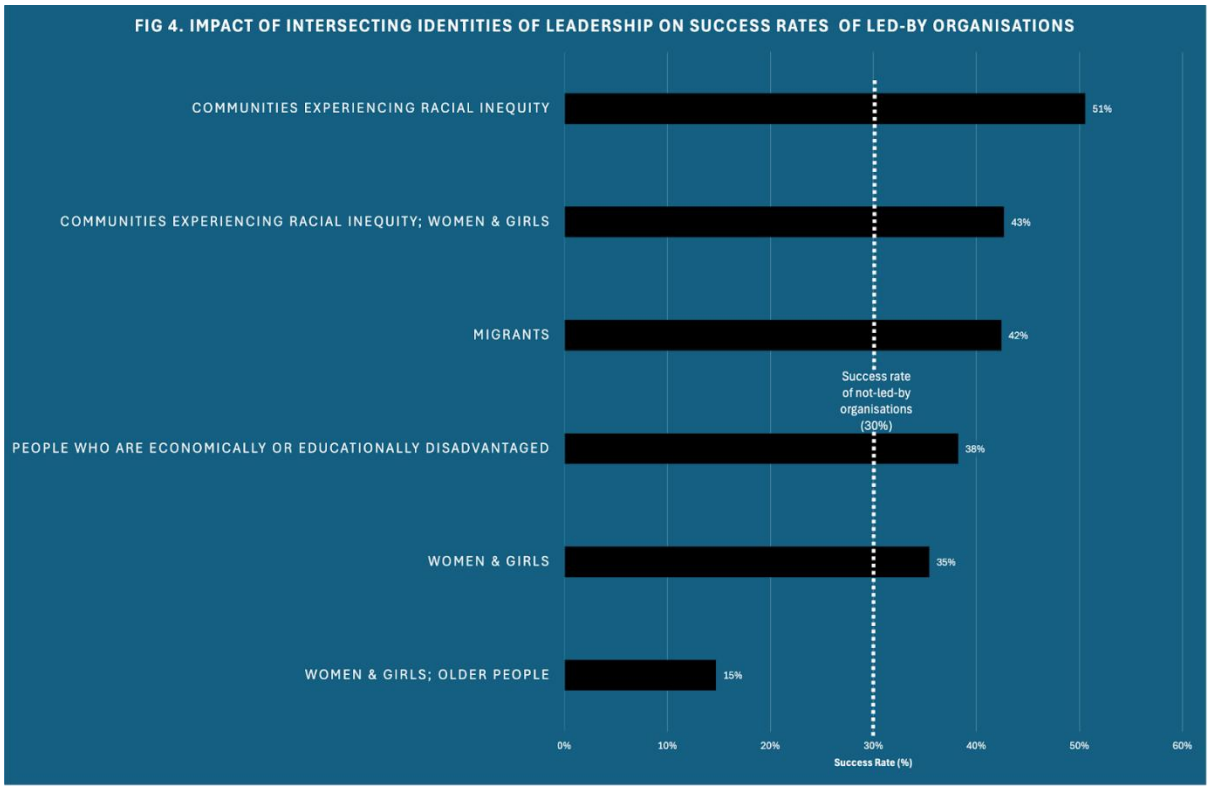


That the identities of service users has a significant impact is to be expected and is likely to reflect focus in funder's strategies. It would be expected that over time, as strategies and priorities change, so would the success rate of applying organisations focused on supporting different communities of service users.

Organisations led-by Communities Experiencing Racial Inequity more likely to receive funding.

Analysing the impact of the intersecting identities of leadership indicate that certain intersections of identities as seen in Fig 4., and individual identities in Fig 5. reinforce that some identities of leadership have a statistically significant effect on the outcomes of grant applications, with Communities Experiencing Racial Inequity being particularly affected, with both sets of tests indicating that organisations with those leadership characteristics are more likely to receive funding compared to organisations who are not led-by.

Fig. 4 Impact of intersecting identities of leadership on success rates of led-by organisations versus not led-by organisations (30%)

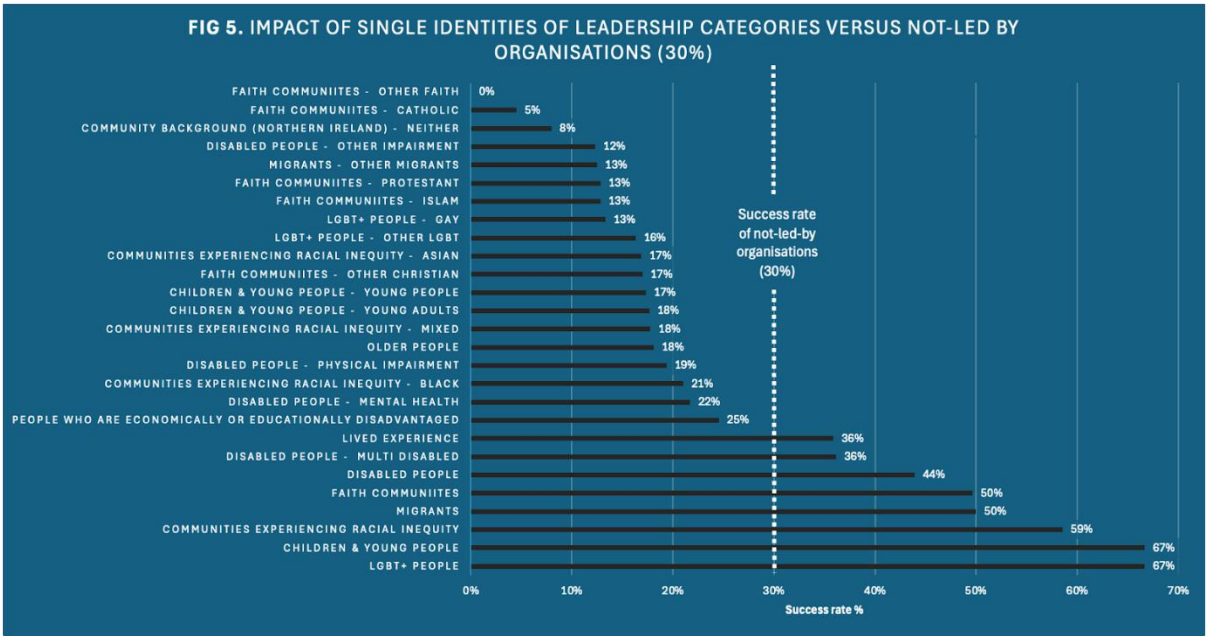


Hypothesis 2. Led-by organisations have lower success rates than those not led-by organisations

We analysed the success rates of *led-by* applications by testing both single characteristics and combined sets of characteristics. Of the 55 potential categories of identity that could be chosen, 27 had a statistically significant impact on the success rate of the application, some positively and some negatively, as shown in Fig 5, which graphs the success rates for those identities where findings were statistically significant, in comparison to organisations not led-by a specific community.

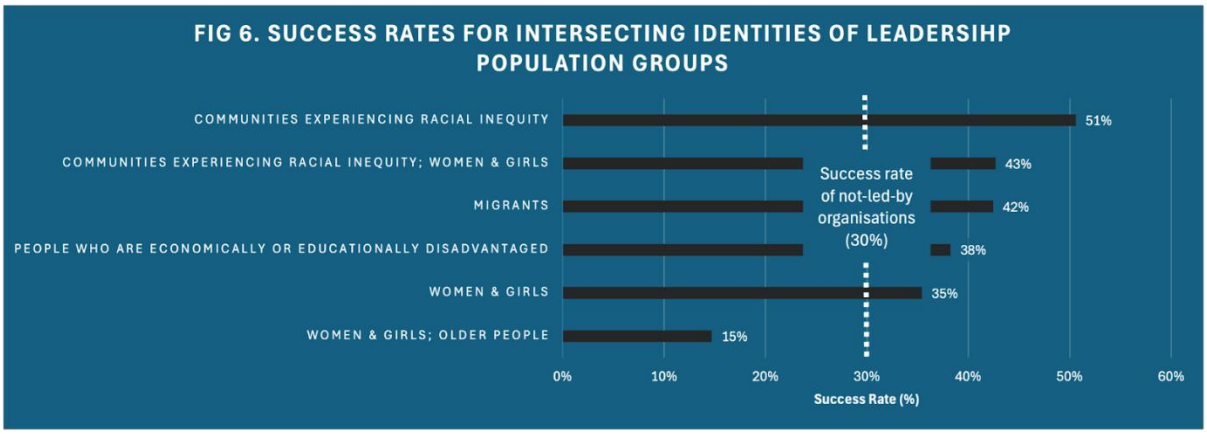
The analysis performed indicates significant differences in success rates not just between the high level Population Groups, but within them as well, and indicates that while the success rate for organisations *led-by* a cross sector of a community (e.g. Communities Experiencing Racial Inequity with a success rate of 67%, 37 percentage points *above* not-led by organisations if an organisation is *led-by* a specific community, such as Asian/Asian British with a success rate of 17%, 13 percentage points *below* not led-by organisations), the success rate is below baseline.

Fig 5. Impact of single identities of leadership categories versus not-led by organisations (30%)



Comparing the impact of intersections of leadership identities (Fig 6) additional complexities emerge. While organisations **led-by** Women & Girls had a success rate of 35%, organisations whose leadership self-identified as Women & Girls *and* Older People had a success rate of 15%, fifteen percentage points less likely than not-led by organisations, and organisations whose leadership self-identified as Women & Girls *and* Communities Experiencing Racial Inequity had a success rate of 43%, thirteen percentage points more than led-by organisations.

Fig 6. Success rate for intersecting identities of leadership population groups



Overall, there is significant evidence that the leadership of organisations does impact success rates. The analysis indicates that organisations whose leadership are composed of individuals from specific communities, such as Asian/Asian British, are negatively impacted, but that if leadership is drawn from a cross-sector of the broader population group, such as Communities

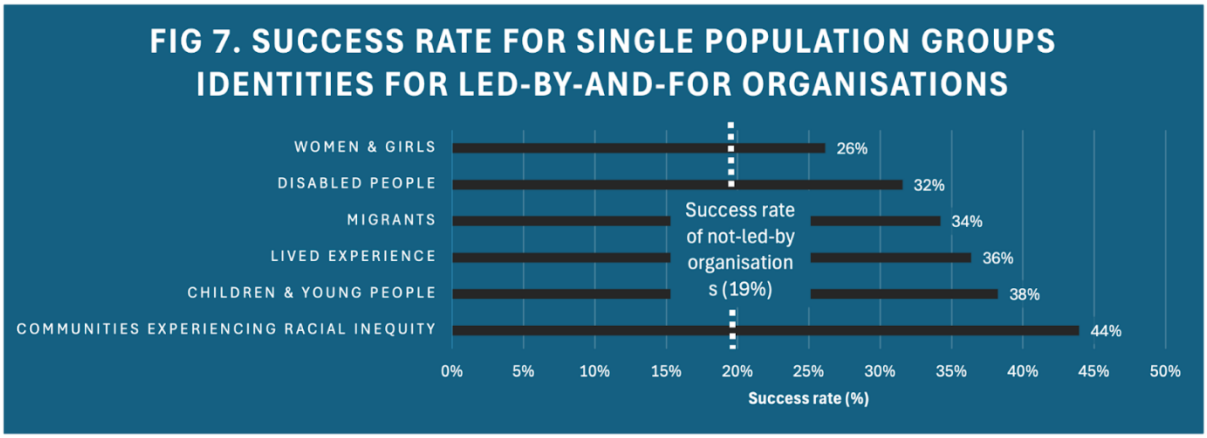
Experiencing Racial Inequity, that the success rates are positively affected. This finding is consistent across the different Population Groups. There is also significant variation between characteristics within population groups, such those whose leadership self-identify as Black (30% below baseline), versus those who self-identify as Asian (43% below baseline). However, further studies are recommended on whether there are other causes, such as a relationship between lower organisation turnover and being led-by specific communities due to historical structural underfunding, could be the underlying cause of this finding.

Hypothesis 3: Led-by-and-for organisations have a lower success rate

We define organisations which are **led-by-and-for** as those which have self-identified as having leadership and service users from the same community. Of all the applications, just 111 were defined as **led-by-and-for**, 1.1% of the total applications.

Analysing the impact of single characteristics and the combinations of characteristics for **led-by-and-for** organisations indicated that of the eleven Population Groups, six characteristics significantly and positively affected the success rate of organisations applying for funding compared to organisations not led-by-and-for, which had a success rate of 19%. The differential is significant, with the biggest being for organisations **led-by-and-for** Communities Experiencing Racial Inequity, and the smallest for organisations **led-by-and-for** Women & Girls.

Fig 7. Impact of single characteristics of Led-by-and-for organisations on success rate



The data does not support the hypothesis that **led-by-and-for** organisations have lower success rates than baseline, and that there is evidence that suggest that **led-by-and-for** organisations for particular communities have higher success rates than organisations which are not **led-by-and-for**. However, further studies with larger data sets is recommended due to the relatively small number of organisations led-by-and-for to further test this hypothesis.

Hypothesis 4. The size of grants awarded will be affected by the characteristics of the leadership or service users

Our analysis confirmed that while the overall income of the organisations impacted grant size, the characteristics of leadership and service users did not statistically affect grant size. We tested the impact of leadership or service users on the size of grants received through a regression analysis, controlling for variables including income size and organisation type. We further tested this hypothesis by analysing the size of grants given to organisations in the dataset which were available through 360Giving, however, no statistically significant findings

were found. We recognise that organisations led-by or led-for historically underfunded communities are likely to have lower incomes.

Hypothesis 5: Led-by organisations have fewer funders that that are not led-by

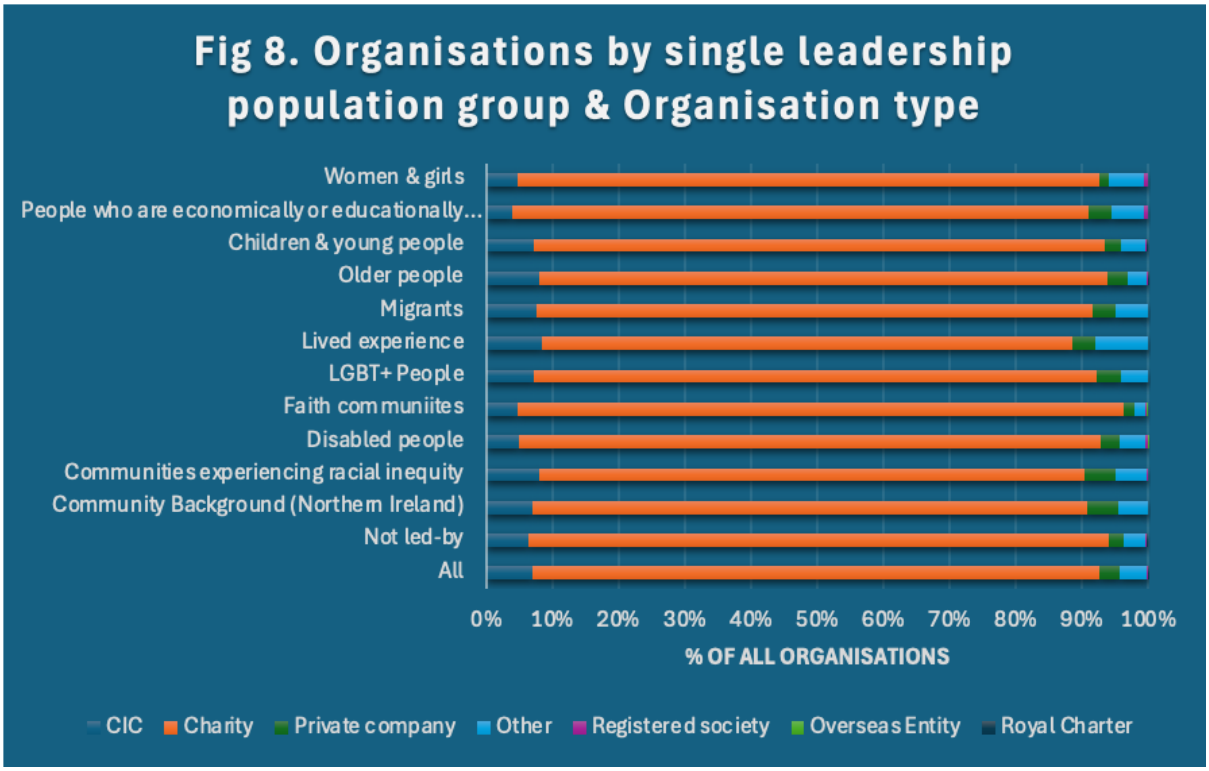
We found no statistically significant relationship between whether organisations were led-by and the number of funders supporting them, based on data published to the 360Giving Data Standard.

Hypothesis 6. Non-charitable organisations are less likely to receive grants, and that non-charitable organisations are more likely to be led-by.

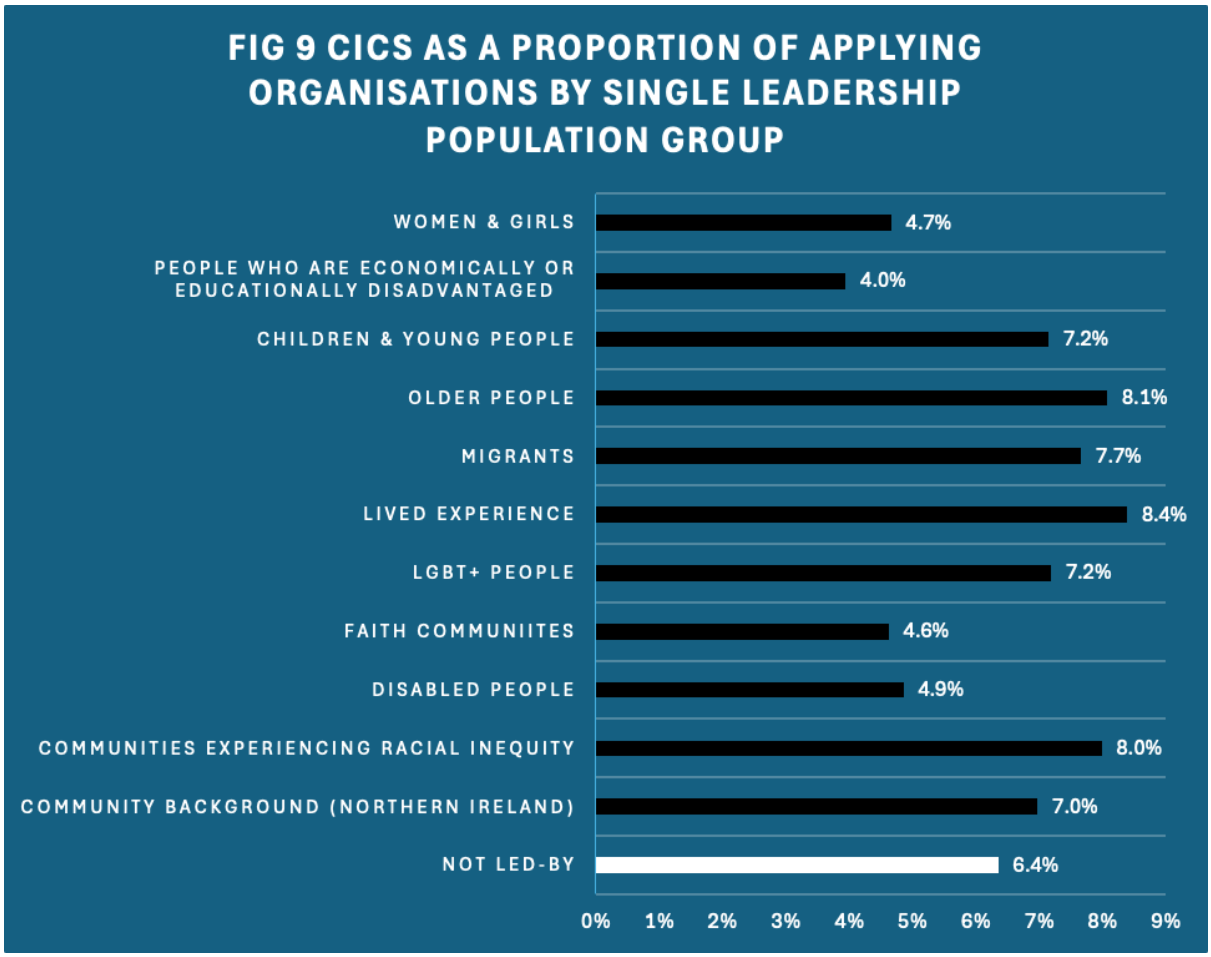
Our tests indicated that CICs' were statistically less likely to be awarded grants with a success rate of 14%, 45% lower than the success rate for charities which was 26%. The dataset contained a number of organisation types, including Community Interest Companies (CICs), Private Companies, Registered Societies, and those with Royal Charters.

The significance of this finding in the context of exploring the equitability of funding depends on the hypothesis that there are a high proportion of CICs which are **led-by**. In the dataset, 7% of **led-by** organisations were CICs, with significant variance shown between the different leadership characteristics, as can be seen in Fig 8.

Fig 8. Applying organisations by single leadership characteristic/organisation type



While 8.0% of organisations **led-by** Communities Experiencing Racial Inequity were CICs, just 4.0% of organisations **led-by** People who are economically or educationally deprived were CICs (Fig 9).



The proportion of applying organisations which are CICs is not negligible, and is a significant proportion of applying organisations for some population groups, including Communities Experiencing Racial Inequity, Older People, Lived Experience and Migrants. Overall, however, the proportion of **led-by** organisations which are CICs is not significantly different to those which are not **led-by.**

Analysis of Quantitative findings

The core analysis of the DEI data captured by the participating funders, which included 9,083 usable applications from four funders, reveals a complex relationship between the characteristics of service users and leadership and the success rates of funding applications.

Initial analysis confirmed the hypothesis that success rates vary depending on the characteristics of leadership and service users. However, there is significant nuance: while a large number of intersecting identities of Service Users had a statistically significant impact on success rates (**Fig 3**), only a small number of intersecting identities of Leadership characteristics did (**Fig 4**). This indicates that the composition of the group being served influences outcomes differently than the composition of the organisation's leadership.

The hypothesis that **led-by** organisations have lower success rates than not **led-by** organisations was found to be simplistic. Most significantly, organisations **led-by** specific

community groups, such as Asian/Asian British or Disabled People with a physical impairment, had lower success rates than if the leadership was composed from a broader cross-sectional community, such as Communities Experiencing Racial Inequity, or Disabled People as a broad group.

While 50% of characteristics/combinations of characteristics of leadership were shown to have a statistically significant impact, some of these led to an increase in success rates, while others a decrease (**Fig 5 & Fig 6)**. The different success rates for different intersecting leadership identities added significant complexity to the picture. While, for example, organisations **led-by** those who self-identified as Older People who are Women & Girls were significantly less likely to be awarded grants than organisations not led-by, those organisations which were **led-by** those who self-identified as Women & Girls from Communities Experiencing Racial Inequity were significantly more likely to be successful than organisations not led-by (**Fig 6**).

The analysis did not support the hypothesis that **led-by-and-fo**r organisations have lower success rates than baseline. Rather, the data indicates that **led-by-and-for** often have higher success rates (**Fig 7**). This positive differential was significant across six of the eleven Population Groups when looking at single characteristics, with the largest increase for organisations **led-by-and-for** Communities Experiencing Racial Inequity. Analysing the impact of combinations of characteristics confirmed this positive impact particularly for organisations **led-by-and-for** Women & Girls and organisations **led-by-and-for** Communities Experiencing Racial Inequity.

In contrast to the varied success rates, the analysis on the size of grants awarded, using both the data from the funders and additional data from 360Giving did not provide evidence that the characteristics of Service Users or Leadership affected the size of the grants awarded, even controlling for organisational type. The analysis did confirm, however, a statistically significant relationship between the overall income of the organisation and the size of grant. For historically under funded organisations, this means that they are continuing to receive small grants in proportionate to their overall income, limiting their potential to grow.

Finally, the analysis supported the hypothesis that non-charitable organisations are less likely to be awarded grants, and that non-charities, particularly CICs, make up of 13% of applying organisations, significant proportion of applicants (**Fig 9**), and that organisations **led-by** Older People, Communities Experiencing Racial Inequity and Migrants are slightly more likely to be CICs than across the data.

Discussion

Intersectionality examines how a person's identities, such as their gender, ethnicity, and sexuality, affect their access to opportunities and privileges. First coined by Kimberlé Crenshaw to define the exclusion faced by Black women, academic Patricia Hill Collins latterly introduced the theory of "the matrix of domination". The matrix describes how social classifications like ethnicity, gender, age, and religion are interconnected, and that people can experience oppression in a variety of ways related to their combinations of classifications. In this framework, discrimination against Black women cannot be explained as a simple combination of misogyny and racism, but as a more complicated product of both.

The findings from the analysis indicate that the impacts on the outcomes of applications are subject to this same framework. The analysis has shown that different intersecting identities of the leadership of organisations have a statistically significant impact on the outcomes of the

awards. The hypothesis was that these impacts would be predominately negative, however the analysis indicated that the success rates for organisations **led-by** Communities Experiencing Racial Inequity and Women & Girls, as well as Women & Girls and Older People, were higher than baseline; other combinations did not have a statistical significance, in part due to too few applications in the dataset for the many different permutations of combinations of characteristics of leadership of organisations.

A analysis indicates that organisations whose leadership self-identify as being drawn from across a Population Group, such as Communities Experiencing Racial Inequity, had higher success rates than non led-by organisations, but that organisations whose leadership was drawn from a specific community, such as Black/African/Caribbean/Black British had a success rate below organisations which were not led-by.

The specific case study of Henry Smith Foundation below provides further detail on these effects. It highlights that the highest success rates were found in applications related to **Women & Girls, People who are educationally or economically disadvantaged, and Disabled People.** However, the report also details granular disparities within broader categories. For example, within organisations **led-by** Communities Experiencing Racial Inequity, the success rate was 16%, but this figure masks significant differences. Applications **led-by** *Black/African/Caribbean/Black British* communities had a success rates of 10% while those **led-by** *Asian/Asian British* communities had a success rate of 22% This quantitative detail underlines the importance of disaggregated data to reveal the nuances of inequity, and that importance of analysing data both at a per-funder level, as well as in aggregate.

There are a number of key takeaways for Funders from this analysis:

- Applying organisations *led-by* specific communities are less likely to be successful than applying organisations *led-by* a broader Population Group, this may reduce support for organisations which are likely to be deeply embedded in specific communities.
- That combinations of characteristics have nuanced impacts on success rates that must be taken into account when making strategic and grant-level decisions
- That while led-by organisations are not significantly more likely to be non-charities than
- That funders are less likely to award grants to non-charitable organisations, and that 7% of led-by organisations are non-charities, which may be acting as a barrier to supporting some organisations.

This analysis provides an insight into the funding decisions made by a specific set of four funders at a specific period of time and in a particular context, each with their own specific strategy. As there is no comparable data to an earlier period, it is impossible to say whether this is a change from previous practice, but this analysis now provides a benchmark for comparison over time going forward, accepting that this study represents only a proportion of grant expenditure in the period.

The data used in this analysis represented approximately 4.5% of total UK grant expenditure by trusts and foundations in the period 2023-2024, a significant amount but far from the total. In the period, an estimated 83,503 grants were made by UK trusts and foundations, and the sample size of 9,083 is a significant proportion allowing for robust analysis, however to truly extrapolate the relationships, data from more funders is required. Due to the rich nature of the data, the number of organisations/applications in each category can be small, and to deep dive

into specific combinations of characteristics requires a greater volume of data to ensure statistical robustness.

This analysis represents the first cross-funder analysis of the data gathered through the DEI Data Standard. The process has exposed some of the complexities of implementing a data standard on sensitive data across independent organisations, but also the necessity of it, and the insights which are only possible when data is collected in parallel and pooled together. We intend to repeat this study in future years, for which this research will provide a baseline.

Qualitative research findings

As part of the research conducted by Nottingham Trent University, 20 funders were interviewed and 18 funded organisations completed an online survey. The funders expressed a strong and genuine commitment to Diversity, Equity, and Inclusion (DEI), acknowledging the historical power imbalances inherent in the funding sector. Their motivations were rooted in a desire to address systemic inequities and move toward more equitable grant-making practices. The interviews revealed that many funders felt a sense of responsibility to ensure their wealth is used to counter, rather than perpetuate, inequality. The DEI Data Standard was seen as a tool to help them understand if their funding was reaching organisations **led-by** and for communities experiencing structural inequity. Interviews with applicants indicated the importance of funders providing a clear explanation of how they will use the data collected. A lack of clarity on how applicants' data will be used - whether for assessment, portfolio analysis and whether any findings would be re-shared - could impact response rate, data quality and how applicants feel about funders.

There were a small number of survey participants so responses are not necessarily representative, but are aligned to findings of other research in the literature review about what meaningful DEI in funding could look like. Some participants called for more than just data collection, advocating for deeper structural changes within the funding landscape. Key themes included:

- **Understanding Depth vs. Breadth:** Organisations working with marginalised groups often work with smaller numbers of people but achieve a higher impact per person. They felt that funders often prioritise funding new projects or those that reach a large volume of people, which puts them at a disadvantage.
- **Long-Term Funding:** A desire for more sustained and long-term funding for existing, successful projects was a recurring theme. Organisations felt they were constantly under pressure to secure funding for new initiatives, even when their existing work was demonstrably effective.
- **Representation and Lived Experience:** Funded organisations called for funders to have more diverse staff, particularly in key decision-making roles like grant relationship managers. They emphasised the importance of lived experience and understanding the nuances of different communities, beyond just broad categories.

Both funders and funded organisations recognised the importance of DEI, but the research found a disconnect between the intentions and priorities. While funders are committed to addressing inequity, they face challenges in consistent data collection and application.

Case studies

Three funders, City Bridge Foundation, Henry Smith Foundation and Esmée Fairbairn Foundation, have provided case studies relating to their implementation and use of the DEI Data Standard, providing specific examples of how the Standard can be implemented by different organisations, and its impact.

City Bridge Foundation

"A common approach to collecting DEI data from applicants was never going to be simple, but we wanted to be part of it"

At City Bridge Foundation we are committed to being a truly inclusive, anti-racist organisation with a robust, progressive and proactive approach to Equity, Diversity and Inclusion. As such, we have been supporters of and subscribers to the DEI (Diversity, Equity and Inclusion) Data Standard virtually from the beginning.

A common approach to collecting DEI data from applicants was never going to be simple, but we wanted to be part of it – supporting applicants and the sector to trial and implement a joined-up way of data collection.

The Standard itself is relatively straightforward – with four questions about the organisation, its mission and make-up, and an opt-in to sharing the answers anonymously – but where the theory hits reality it's been another matter. It's no secret that grant administration isn't straightforward, with no one size fits all solution.

We've now implemented the Standard on both Blackbaud Grantmaking and Salesforce databases, hitting similar issues both times – how do we encourage the right data entry whilst discouraging applicants from 'tick boxing' multiple options, and how do we ensure that the data truly represents the work and focus of an organisation? First we mistakenly set it up so that organisations could only choose one single option. And then once we'd fixed it to allow multiple options, we had the same issue all over again on the next platform!

However, once the Standard was finally implemented properly, data collection could begin. We also included the questions on our Impact & Learning forms for our funded organisations for a year, to get a faster picture of the impact of our live grants. Once enough data had been collected from applicants we could meaningfully analyse their responses.

The most useful question for our own operations has been asking whether the organisation's leadership is intentionally drawn from a specific community of identity. We used this information in evaluating our last strategy – Bridging Divides - to benchmark our approval rates across equity groups versus non-led-by organisations, finding some discrepancies that we have been able to address within the development of our new strategy, Standing with Londoners.

Analysing this data hasn't been easy though. The Standard's three-level system allows a very granular response with up to three tiers of identity - for example Disabled People / physical impairment / speech impairment. Allowing applicants to select more than one option means that it's very tricky to get a definitive picture of equity. In analysing this data and presenting it back to leadership it became very clear that the level of granularity in the Standard is much more detailed than is either of use or of interest at a strategic level, particularly when we are a funder of a wide range of groups.

We're now at the stage of reviewing our use of this data, and seeing how it can best serve both us and our applicants. We launched our new funding policy – Standing with Londoners – in March 2025, and are opening the first round of Access to Justice funding in October 2025, so we're deciding now what's the best way to use the Standard to support our data needs for evaluating the successes of the policy.

We'll definitely keep asking at least three of the questions – leadership, mission and area of impact - but we will probably only be asking for top-level data. This is proportionate to how we use the data but we will continue to monitor comments to ensure that organisations feel they can appropriately identify themselves as they would like. The DEI Data Standard isn't a silver bullet, but it's a great start!

Henry Smith Foundation

"the Standard influenced our practice. Implementation raised organisational awareness and our new mission focuses on exclusion more explicitly"

Henry Smith Foundation exists to support people who face exclusion and adversity, and we know that inequity is often built into the systems around us. We're working to build a foundation that is more inclusive, equitable and transparent.

That started with internal work—a DEI Working Group and Inclusion Audit in 2020 and a Racial Justice Audit of our Main Grants programmes with findings published in 2021—before we joined the cross-funder DEI Data Standard working group to help shape and test a common way of collecting equity data.

Our reasons for adopting the Standard were to better understand our application pipeline and grant portfolio—not to assess individual applications. Our aims were to see who applies and succeeds from communities experiencing inequity, inform strategy, and be transparent in our reporting (quarterly to Board/Senior Leadership and in our Annual Report published externally). Participation for applicants was voluntary.

Our Implementation

Our DEI Data Standard journey looked like this: survey development and database integration across 2021–2022; live implementation in Main Grants from July 2022 to July 2024; new strategy development in 2023–24 and a new strategy that introduces DEI Impact Assessments into our funding programme design process. We launched the new strategy in June 2025 including a Domestic Abuse Fund that backs **led-by-and-for** organisations supporting people from marginalised communities who've experienced domestic abuse.

Implementation wasn't frictionless. We had to balance application volumes, the complexity of the Standard, multiple programmes and applicants serving a variety of communities, branching-logic gaps in our database, clashes with an internal coding system, and strategic uncertainty about what actions to take using the data during a time of strategy renewal.

A key decision was to separate the survey from our application form in an effort not to increase complexity of the application form and the burden on applicants.

Our process was as follows:

- After an applicant submitted their Stage 1 written application, we sent them a separate invitation to complete the DEI Data Standard survey (with a four-week response window). We emphasised this was voluntary and would not influence our assessment of their application.
- We published a sample form on our website, adapted wording with clear DEI definitions and step-by-step examples
- We focused questions on service users, leadership, and mission (we didn't ask about geography or lived experience because we already captured those data elsewhere) and invited additional comments.
- We used taxonomy levels 1–2 as our database limitations did not allow for further branching and we felt this provided sufficient granularity

Our Learning

Overall, 58% of applicants responded (1,812 of 3,131) which we felt was a healthy response rate for a voluntary survey separated from the application form.

In terms of the data, we learned that among the 309 successful applicants who submitted a survey, 90% supported one or more Service user groups experiencing inequities, compared to 55% of all applicants.

Regarding their Mission, 85% of successful applicants had a focus on one or more groups experiencing inequities, while 58% reported leadership intentionally drawn from one or more communities—with Women & Girls, people educationally or economically disadvantaged, Communities Experiencing Racial Inequity and Disabled People most frequently represented.

Success rates for applicants naming groups were similar to those not focused on any groups across all three question areas. We also saw a high share of "by-and-for" organisations supporting LGBTQI+ people and Women & Girls. Black-led organisations showed lower success rates than organisations **led-by** people from other Communities Experiencing Racial Inequity, while success rates were highly variable by community or group.

We also surfaced challenges. Data validity needed care: 10%+ of applicants selected four or more groups, which risked a "diversity, not equity" signal and analysis of respondent feedback indicated that some organisations did indeed wish to demonstrate diversity.

Programme design mattered: a deprivation criterion for one of our programmes unintentionally inflated the broad "educationally and economically disadvantaged" category. And while "by-and-for" organisations featured in results, they still represented a limited share of total funding—except for organisations *led-by* and for Women & Girls. These issues, plus strategic ambiguity, constrained how much change we could drive immediately.

Even so, the Standard influenced our practice. Implementation raised organisational awareness and our new mission focuses on exclusion more explicitly. We have embedded a DEI Impact Assessment into our programme development, introduced an access support grant for applicants requiring additional assistance. We are delivering a led-by-and-for programme, and have the ambition to "advance equity" in our grant-making.

Our takeaways for other funders: be explicit about your strategic intent; identify mechanisms to act on findings; explain the purpose of the survey to applicants (particularly that this isn't a diversity survey); consider asking the questions in a lighter-touch application stage to lift response rates; let applicants specify priority groups they support; revisit the Standard's

thresholds so smaller organisations aren't excluded; and control for organisation size and other factors in analysis.

Esmée Fairbairn Foundation

"Collecting DEI data has been a game-changer for internal and external accountability at Esmée"

As a funder, Esmée Fairbairn Foundation has made grants to many significant organisations seeking to tackle injustice and inequity over many years, like Southall Black Sisters, The Traveller Movement, and Graeae Theatre Company. However, when we launched a new strategy in 2020 with an organisational commitment to Diversity, Equity, and Inclusion (DEI), we found that our diversity data was limited.

When organisations applied for grants, we used to ask if they were "Service user-led", "disabled-led" or "BAME-led", without further defining these. This meant that most organisations said that they were Service user-led, and that we lacked specific or intersectional data on which organisations were genuinely **led-by** people with lived experience of the issues they were trying to tackle. This lack of data also made it harder for us to understand where inequity or bias might show up in our own funding practice.

After working with Funders for Race Equality Alliance on their first audit, we co-funded the development of the DEI Data Standard, as a way to build a robust long-term framework for measuring equitability of funding. We also started using the Standard ourselves in 2021, asking every applicant to share headline DEI data on the communities or people facing structural inequity that featured as a majority in their service users, leadership, or mission.

We collect data from every applicant so that we can understand who is applying to Esmée, and what their success rates are in gaining funding. We also ask organisations we fund to check and update their data once a year, using a pre-filled form showing their previous responses. We publish a summary of the DEI data on our website, with 2024 marking our third year of sharing this https://Esméefairbairn.org.uk/latest-news/who-our-funding-is-reaching-2024/.

Collecting DEI data has been a game-changer for internal and external accountability at Esmée. We can see that we have delivered on our commitment to fund more organisations that are *led-by* and for the communities they serve across our strategy: an increase from 47% of grants in 2021, to 54% in 2024 (based on organisations submitting DEI data – now 87% of grantees).

DEI data also helped us identify and address structural inequity in our funding practice, contributing to our decisions to:

- Run a New Connections fund to find and support organisations *led-by* and for Communities Experiencing Racial Inequity or migrants who could not, or would not, usually apply to Esmée. Our DEI data reflected the findings of sector research that these organisations were underfunded and less likely to meet our turnover (£100k) or governance requirements.
- Commission and fund DEI Initiatives in the environment sector, including the RACE report, and scoping for a Senior Leadership Development programme for People of Colour in the Environment sector.

So what challenges has Esmée faced in implementing this? Applicants have two main concerns: the high threshold of 75% of Board and senior management sharing a characteristic, especially among small boards; and the lack of ability to share the diversity of the leadership team or communities on the DEI form. Internally, some funding managers worry about the accuracy of the data, with both over- and under- reporting noted in a few instances.

These concerns point to a key facet of the DEI Data Standard – it is not designed to measure diversity of individual grants or programmes, but as a tool to ensure equity on a wider scale. Through using the Standard, Esmée has improved its understanding of the different structural barriers facing organisations – including the ones we put in their way - but it is not the only tool we use to ensure Diversity, Equity and Inclusion in our work.

Funder engagement with the DEI Data Standard to date

The UK funding sector has significantly engaged with the DEI Data Standard through workshops and guidance provided by 360Giving and the DEI Data Standard. 181 people have attended the Intro to the DEI Data Standard workshops run by 360Giving - with 93% of respondents to the evaluation survey reporting increased knowledge and confidence as a result. 360Giving have also done 26 1-1 sessions with people providing specific guidance around data collection.

To date, at least 14 organisations have been confirmed as implementing the DEI Data Standard in their application processes. However, it is likely that more have implemented the Standard more recently or in other ways, such as one off surveys of their existing grantees, or are not publishing the data. 360Giving are working with UK Community Foundations to build the DEI Data Standard into the Salesforce implementation used by their membership which will be live from November 2025, and Hyphen8 and Blackbaud have also engaged with the Standard and have supported foundations to implement it.

The DEI Data Standard has been the most popular page on the Funders Collaborative Hub - with more engagement than all the other collaborations put together - averaging 6.7k views/3k users per year - a significant number in the scale of the UK funding sector.

Implementation

Funders are using the DEI Data Standard mainly to collect consistent equity information at the application stage, and to use that data for monitoring, learning and strategy rather than to decide individual grants. Many early adopters have embedded the questions in their application forms. The working group supporting the adoption of the Standard meets regularly and shares materials via the Funders Collaborative Hub.

Implementation is intentionally proportionate to the nature of the funding and the grantees. Some funders ask only at the highest taxonomy level - Population Group - to keep forms simple and avoid unusable small splits where they do not have a large volume of grants for this analysis to be meaningful. Others only ask about “project service users” or “mission” rather than both where most grants are unrestricted or where applicants are very small organisations and the response is likely to be the same. These choices are intended to reduce burden while still enabling sector-level analysis, but present some difficulties for aggregated analysis.

The choices to tailor data collection to the nature of funding programmes and grantees add to the complexities in analysing this data across multiple funders, but this was compounded by inconsistencies in implementation by some funders.

Some funders had explicitly stated on data collection that the data would not be shared outside of the organisation, despite this being the intention of the Standard, and other funders had ethical concerns about sharing data from organisations they supported. Some used different approaches to collecting the data, including bands of percentages in each category or asking the questions in a different way which changed the consistency of the data points. Together these variations limit comparability between funders, increasing the difficulty of building a cohesive dataset to measure equity across the funding landscape.

The research therefore characterises implementation maturity as uneven, with reactive collection practices and non-standard forms creating a barrier to sector-wide insights—even as most funders express genuine commitment to the aims of the framework and many had benefited from the approach to understand the equity of their own grant-making.

Thresholds are a recurrent tension point. The Standard defines **"**led-for**"** as *over 75% of service users intentionally targeted* and "led-by*"* as *self-identified leadership* with an indicative threshold of ≥75% of trustees/committee and ≥50% of senior staff from the relevant community (or an equivalent project steering group). These thresholds were set by the sector as part of the initial consultation process to design the Standard with some communities having strong views about the 75% threshold being the minimum to be considered *led-by* rather than just having diverse board representation. However, some foundations have been concerned that this threshold is too high, and that the threshold should be lowered in order to include a higher number of applicants. This concern is possibly driven by many funders' concern for the reputational risk that being perceived as non-equitable carries. There is an additional concern reported anecdotally that organisations, seeking to present themselves to funders in the best possible light, will respond that they meet the threshold, even though they do not, as organisations seek to inform funders about their diversity but lack the opportunity elsewhere in the application process to do so.

Recommendations for funders

The DEI Data Standard is a tool to drive change, support transparency and encourage openness. Data is not the end unto itself, but a methodology and approach we can use to improve practice and outcomes. By implementing the Standard funders can meaningfully monitor how their funding is distributed, inequities in their funding practices and how they can improve. While it is recognised that these recommendations will not 'solve' the problem of inequity in funding practices, they are intended to contribute to incremental changes towards more systemic change.

The following recommendations came from a roundtable workshop of funders and equity organisations in May 2025 organised as part of the Nottingham Trent University research.

Using DEI data as a driver for change

Funders should consider the DEI Data Standard 'a process for change' that will create a more equitable and inclusive funding system.

- Funders should share results publicly to reinforce accountability and build trust with stakeholders.
- Funders should collect and analyse internal DEI data, be transparent about the findings, and take data-informed action.
- Funders should reflect on discrepancies in their patterns of funding, and try to understand the root causes
- Internal use of the DEI Data Standard should be accompanied by critical reflection on how organisational practices align with DEI goals and where improvements are needed.
- Funders should consider whether their assessment criteria are inclusive, and do not create additional barriers to entry for newer or community-led organisations.
- Funders should consider tailoring reporting requirements for organisations that are led-by versus led-for marginalised communities, recognising their different roles and capacities.

Embedding equity in strategy and governance

To ensure equity is prioritised at all levels, it should be embedded within governance structures and strategic planning.

- Make DEI a standing item on Board and Senior Leadership Team agendas, incorporating equity outcomes into the organisation's risk register, and considering practice grantmaking approaches that are explicitly informed by DEI priorities.
- Funders should explore integrating equity into headline grant criteria and consider the use of positive action where appropriate.
- Funders should consider appointing a senior leader, at Director level or above, to champion DEI and ensure sustained focus.
- Funders should align equity initiatives with the organisation's mission and values and explore establishing external advisory boards to provide oversight and challenge.

Strengthening Sector Collaboration and Learning

Increased peer learning, knowledge sharing and collaboration are essential to advancing good DEI practices across the funding sector.

- Funders should actively participate in peer support networks, such as the DEI Data Group and FREA, and engage in shared learning opportunities, e.g., legal advice on key issues.
- Funders should also participate in training initiatives, such as those offered by 360Giving on the DEI Data Standard and intersectional data analysis, to help build internal capacity and reinforce alignment on inclusive standards.

Increasing representation and inclusion in philanthropy

Addressing underrepresentation within boards and across the funding sector requires deliberate and sustained action.

- Funders should identify opportunities to support capacity building for organisations *led-by* marginalised communities and facilitate connections between Trustees or senior leaders of these organisations.
- Funders should seek opportunities to diversify Trustee recruitment and increase outreach to underrepresented communities.

Implementation

Funders should apply the DEI Data Standard consistently. The collection of data is not a neutral act, nor are all methods of collection equal. The collection of data from applicants by funders can be extractive, onerous and if uninformed, can be in breach of data privacy laws. The DEI Data Standard is designed to make the collection of DEI data equitable and straight forward as possible and support legal compliance.

One of the often repeated issues by applicants is that funders ask for DEI data inconsistently, requiring multiple different forms of data collection or interpretation of different requirements. Having a consistent Data Standard across funders reduces the burden on applicants applying for funding.

The DEI Data Standard was designed with GDPR and data privacy laws in mind, to ensure that the data structures and methodologies are compliant. Personal identity data is special category data which has strict requirements around processing. The DEI Data Standard is designed to collect organisational level data, without enabling inference of personal identifiable information that people do not wish to directly share. Crucial to this is the 75% threshold for leadership, combined with options to not provide responses or to not have the data shared if it is provided, which ensures that personal identifiable information is not inadvertently shared.

We would recommend that funders collect data at the point of application, where possible, to ensure a higher response rate and to enable internal monitoring of funders' own funding processes through different stages.

Funders should analyse and use the data that has been collected. It is easy to collect the data and tick the box of doing something about DEI without actually using the data. Making changes as a result of findings requires robust analysis. Funders who do not have capacity internally should collaborate with the DEI Data Standard who can support with analysis. The DEI Data Standard has published a draft template reporting framework which funders can use as a basis for reporting.

Funders should share their analysis of their DEI Data. Capturing data from applicants and neither publishing an aggregated analysis or the underlying data itself is extractive and further entrenches inequity. Funders should communicate DEI findings with grantees through regularly publishing an analysis of their data on their website and demonstrate how these insights inform tangible actions, such as new funding streams or a commitment to increase perspectives from marginalised communities.

Funders should also ensure that at point of collection, they inform applicants that this data may be used for research purposes to improve equitable practice, including sharing with other organisations to enable sector wide analysis. Where this data may be published on an individual basis, for example with 360Giving Data Standard data, this should also be clear and provide organisations with an option for the data to not be published - for example where the number of trustees is small and the individuals maybe identifiable.

Next steps for the DEI Data Standard

Learning, iterating and improving interventions is an essential process for all initiatives seeking to make meaningful change. Drawing together the learnings from the DEI Data Standard over the past four years, together with the quantitative and qualitative research, there are a number of changes that the DEI Data Standard will be taking:

Strengthening Guidance and Implementation

A recurring challenge has been inconsistent application of the Standard, often stemming from a lack of clear, accessible guidance. To address this, we will:

- Create a new online resource to enable high quality guidance and ease of navigation through resources.
- Publish revised guidance for funders, including explanations of key design features (such as thresholds).
- Creation of a practical toolkit for funders
- Develop practical use cases and case studies to demonstrate the value of the Standard in action, encouraging uptake among funders not yet using it.
- Provide clearer applicant guidance, including examples of how thresholds (e.g., the 75% rule) should be interpreted
- Recommend data collection at the point of application, to improve response rates and strengthen funders' ability to analyse their own practices.
- A more developed communications and engagement campaign for the DEI Data Standard so it becomes more embedded
- Continue to work with grantmaking database providers to make it easier to implement, such as generic/template modules or forms to support the technical implementation.
- Work with funders to aggregate data to enable regular cross-sector reporting.
- Work closely with aligned initiatives such as Funders for Race Equality Alliance (FREA), the Young Trustees Movement, and Ten Years' Time, to maximise collective impact.

Updates to Standard

The DEI Data Standard approved a series of revisions to the Standard at the end of 2025, which will be implemented and published in early 2026.

In order to address concerns that the DEI Data Standard does not enable organisations to share the **diversity** of their organisation to funders, we are proposing an addition to the DEI Data Standard - a set of questions regarding organisations' approach to diversity. The draft questions have been piloted by the Co-op Foundation with positive feedback from respondents as well as the Foundation. These questions can be found in Appendix III.

Exploration of alternative governance structures and barriers to funding

While many new civil society leaders are looking at alternative governance structures, many funders still will not fund organisations not registered as charities. We will work with

organisations such as the Young Trustees Movement on a paper exploring real and perceived governance issues in alternative governance structures.

Publication of data collection guidance

The collection of DEI and equity data has significantly increased in recent years, in part due to the efforts of the DEI Data Standard and the Funders for Race Equality Alliance (FREA). The DEI Data Standard is specifically designed to enable funders to collect data in a way which is compliant with GDPR, ensuring that the data collected is not personal identifiable information, and that organisations can opt out where providing data may reveal protected characteristics of their leadership team. Funders who make changes to the way the Standard is implemented away from the advised guidance can risk being in breach of GDPR. We will seek to help funders with best practice on DEI data collection for use across their work, or when providing data for other cross-funder collaborations. This will include publishing a best practice guide to DEI data collection, in collaboration with the Funders for Race Equality Alliance (FREA).

This guidance will:

- Provide sector-wide guidance on GDPR compliance, data minimisation, and transparency, ensuring applicants understand how their data will be used.
- Reinforce the principle that data collected should not be extractive, but should be shared back in aggregate form and used to drive change.

Governance and membership structure

After a period of being hosted by a single foundation (Esmée Fairbairn Foundation) the Standard is now transitioning to being hosted by Funders Together. Governance of the Standard will remain with the DEI Data Group, and as part of these changes the DEI Data Standard has revised the governance framework (see Appendix IV) and is introducing a pledge for funders, asking them to commit to a consistent application of the Standard, annual check-ins, and public reporting of aggregated DEI data.

Conclusions

The quantitative analysis of 9,083 applications from four funders reveals a complex and nuanced picture of how organisational characteristics affect funding success rates. The research demonstrates that different characteristics and combinations of characteristics lead to markedly different outcomes—some positive, some negative—making it impossible to generalise about "marginalised communities" as a homogenous group. The case studies from individual funders demonstrate that the Standard can be implemented effectively by funders of different sizes and with varying approaches. Each funder has used the data to identify gaps in their portfolios, inform strategic decisions, and drive specific changes—from creating targeted funding programmes to reviewing assessment criteria, and to take actions to improve the equitability of their funding. Their experiences also highlight the practical challenges: balancing granularity with usability, achieving sufficient response rates, ensuring consistent data collection, and determining how best to act on findings.

The Standard has also demonstrated the potential of collective action. For the first time, funders can see inequities in their own portfolios through a shared lens. This has already driven shifts in practice—new funding streams, targeted initiatives, changes to internal processes to improve outcomes, and more transparent reporting. It has shown that consistent, comparable data is not a technical exercise, but a foundation for accountability and change.

The work is not without challenges - there is a continuing need to ensure that implementation is consistent, ethical, and legally compliant. The feedback from funders and funded organisations alike is that data must be used with care: not as a blunt instrument to judge applicants, but as a mirror for funders to examine their own practices and to make them fairer.

Looking ahead, the DEI Data Standard must be embedded as part of the sector's core infrastructure. That means strengthening governance, refining the taxonomy, and providing clear guidance for implementation. It also means funders committing not only to collect data but to act on it—publishing findings, engaging with grantees, and making changes where inequities are revealed.

The next phase of this work will require courage and collaboration. Courage from funders to confront uncomfortable truths about where their money goes, and collaboration across the sector to build a funding landscape that reflects and supports the diversity of the UK's communities.

If we can sustain momentum, align our practices, and ensure that the voices of marginalised communities remain central, the DEI Data Standard has the potential to be more than a reporting tool. It can be a driver of systemic change—reshaping philanthropy so that it not only acknowledges inequality, but actively works to dismantle it.

Appendices

Appendix I: Rapid Evidence Assessment

1. Power Imbalance

The most prominent theme from the REA related to how philanthropy perpetuates power imbalance, appearing in 70% (n=24) of documents. Philanthropy is widely considered inherently unequal, often originating from 'wealth accrued through unequal labour and power structures', which can be 'traced back to historical injustices and exploitation', creating the 'very problems' funders now seek to address. Scholars have highlighted 'elite' philanthropy, which arises from neoliberal political- economic and ideological shifts and disproportionately impacts the racialised poor. It is also noted that some communities may be targeted as 'attractive investment sites' (for example, charitable tax incentives, targeted for artistic practices and merits, helping to meet political policy incentives, etc.), driven primarily by a predominantly 'white philanthropic base'.

Similarly, research across the US and UK suggests that capital may extend control of the economic, social and political domains through power dynamics and self-interest in the prestige of elite philanthropy. Such instances perhaps demonstrate how even 'well-intentioned' funding efforts may be seen to reinforce inequities as power imbalances limit a funder's comprehension of issues they aim to address.

This issue is further evidenced throughout discussions around the concept of an 'inclusive environment' and how this is often predicated on the assumption that equal opportunities for participation exist by default. Consequently, the notion of inclusion paradoxically demands that individuals be 'different' or possess 'a useful characteristic'. An example of this can be seen in elite occupations, where individuals from working-class backgrounds are expected to cultivate a sense of belonging, necessitating appropriate sensibilities and, in some cases, abandoning their authentic identity. In short, working-class voices and identity are lacking, especially in top roles and notably in the UK charity sector, where they are less likely to be hired, according to reports.

2. Underrepresentation in the Charity Sector Workforce

Underrepresentation in the charity sector workforce emerged in 58% of documents (n=20). The REA findings show that the UK charity sector faces an underrepresentation of minority ethnic employees, particularly in decision-making and leadership roles. For example, DEI strategies and policies are essential for attracting and retaining diverse workforces, but more research is needed to understand their impacts fully. Indeed, research indicates that the sector hires fewer people from groups facing structural inequalities, including communities experiencing racial inequity and people who identify as working class. the sector hires fewer people from groups facing structural inequalities,compared to the national average across the UK workforce,with previous statistics suggesting that the gap is widening for many popuation groups.

In 2025, an Charity Commission report exploring DEI across charitable foundations found boards are 'predominantly homogeneous' with 92% being White, 57% male, and 55% aged over 65. Indeed, this disparity is reflected in further questions around the issue of governance with an equitable lens and whether organisations could do more to appoint members of underrepresented groups to positions of influence.

3. An Unequal Funding Landscape

The unequal funding landscape theme was present in just under 56% of documents (n=19). Several publications have noted that despite the longstanding acknowledgement of inequalities within the UK's charity sector, substantial challenges remain to fully appreciate and support the range of backgrounds and experiences that strengthen communities nationwide. Organisations have collectively stressed the need to prioritise 'deep, long-term investment and care in the most affected communities'. For instance, FREA (2023) describes 'helpful' but 'uncomfortable' trends throughout the funding practices of justice work and support in communities impacted by racial inequalities.

Headlines from an audit of 23 funders (of mixed sized, including generalists and specialists) by FREA (2023) and 1,857 grants include:

- Grants designed to benefit communities experiencing racial inequity are on average longer and larger than grants that are not designed to benefit communities experiencing racial inequity.
- Grants for racial justice receive proportionally fewer capital grants than others - that's investment in buildings, land or equipment.
- Grants to race equality organisations tend to receive longer grants, but receive similar amounts of funding per year in comparison to non-race equality organisations.
- Different 'by and for' race equality organisations show distinct grant patterns:
    - Asian-led 'by and for' organisations receive shorter grants on average (18 months), but receive a similar award amount per year (£41.5k).
    - Black-led 'by and for' organisations receive slightly shorter grants (21 months) and a slightly lower award amount per year (£39.3k).
    - Other 'by and for' organisations supporting communities experiencing racial inequity have longer grants (25 months) and similar annual funding (£41.2k).
    - Migrant focused organisations received 12% of overall grants and made up 33% of race equality organisations. These grants were longer and had a higher overall award amount on average.
    - The proportion of grants to race equality organisations has fallen compared to the 2024 Racial Justice Audit.
    - 61% of grants designed to benefit communities experiencing racial inequity focus on addressing the consequences of racism, while 37% target root causes. In general grants designed to benefit communities experiencing racism in this cohort had a higher proportion of campaigning grant activities, and less service provision than the other grants audited.

These FREA (2023) audit findings are supplemented by investigations such as the London Community Forum's strategic report on barriers to funding, which details how the current landscape can be challenging for Muslim-led and Black-led organisations. Several Muslim-led organisations described not being aware that grant funding exists, instead often relying on

community fundraising. Indeed, some even confused grants with loans, assuming funds would need to be returned. Additionally, many organisations lacked the resources (time, capacity, and experience) needed for grant applications. Taking the example of COVID-19, Black and minority-led infrastructure organisations quickly responded to the pandemic despite insufficient resources, which stresses the importance of greater support for these organisations from funders. A lack of sustainable funding beyond emergency responses is a concern shared throughout the sector.

It was also noted that many charities are struggling with skills gaps, limited capacity to undertake training and that most staff and volunteers must prioritise frontline work alongside personal and work responsibilities. Funders seemingly overlooked some religious connotations. For example, Muslim-led organisations expressed further barriers around uncertainty regarding funding origin and concerns around the origin of funding in terms of banking and gambling, where funding origins were not always forthcoming or apparent. Gambling (Maisir) is forbidden in Islam, so transparency on the origin of where funding has come from is essential. Further, organisations expressed anxiety around monitoring processes and intense levels of scrutiny, which were viewed as off-putting to smaller grassroots groups who were 'worried about how time-consuming the impact monitoring requirements would be'. Critically, some organisations (particularly those new to the funding process) expressed concern over revealing information on vulnerable service users and a broad lack of clarity on the need for DEI data collection. Overall, this study illustrated a perception that funders lack understanding and empathy for their organisational needs.

4. Terminology Ambiguity and Complexity

The ambiguity and complexity of DEI terminology were captured in 29% (n=13) of documents. For example, more broadly in organisational contexts (which is relevant as funders and charities are also considered organisations), inclusion is a 'process fraught with ambivalence and ambiguity and one that goes hand in hand with exclusionary dynamics'. Indeed, the term 'inclusion' itself is seen to have 'augmented the use of diversity', which has resulted in 'the emergence of "diversity and inclusion" as a standing term, with other terms, such as "equality" and "equity" currently less frequently used'.

This discussion is present in the context of diversity and inclusion management, where it is further suggested that a disconnect exists between policy and practice due to a lack of understanding and appreciation of intersectionality across terminologies and their applications. This disconnect includes DEI conceptualisations across policy and practice, where terms may be seen to move interchangeably, sometimes meaning that, at best, they lose meaning and, at worst, have undesired and unintended consequences. For instance, diversity sometimes shifts between a political anti-discrimination project and a business case based on economic arguments. However, a recent examination of structural racism in the charity sector highlighted the experiences of organisations *led-by* and working for groups facing structural inequities in the UK, particularly in the wake of funders' responses to COVID-19. Indeed, it is also important to acknowledge how specific terminology can become contested by those within the communities they claim to describe. For example, the use of BAME (Black, Asian and Minority Ethnic), a term which, despite its apparent 'voluntary' use by some Black and minoritised people led organisations, has become contentious and even 'pernicious', as it is seen as to dismiss the 'underlying structural issues that persist' since its introduction.

While the current research generally appreciates these challenges, there is a practice gap in ensuring that communities are fully represented—that all voices are captured, nuances are fully explored and appreciated, and power imbalances are not supported. As processes evolve, organisations must ensure care when applying DEI conceptualisations, which should be informed and driven by the voices within the communities they claim to represent.

5. DEI Data Collection Suspicions and Absence of Trust in Funders

The final theme discussed in this report is DEI and data collection suspicions and absence of trust in funders, which emerged in 29% (n=13) of documents. The Diversity Data Project Report highlights several implications for social investment in the UK, including issues around trust and legitimacy in how funders collect and use DEI data. Between September 2023 and May 2024, the Diversity Forum worked with its partners to improve diversity across the social investment sector to drive change in DEI. The ideal outcome is establishing a standardised internal diversity data collection method for social investment organisations, which could be scaled for data collection from social enterprises. However, when providing feedback on their participation, social entrepreneurs lacked trust in funders. Reasons broadly centred around past negative experiences of sharing data (in funder and non-funder settings) and perceptions that current methods were illegitimate – with participants noting a 'fine line between diversity and tokenism'.

Indeed, the fallout and negative impact of previous experiences of systematic abuse on the perceptions of funders and policymakers is well documented. Research on the effectiveness of equality policies for LGBT+ community sports organisations across England observed 'partial stasis' at policy level, which may help explain suspicions around the current strategy for many organisations. Partial stasis is 'gesturing towards change but failing to implement it concretely'. This process is referred to as 'equality-proofing', whereby 'just enough' is done at policy level to 'gesture' toward positive transformation, signalling an urgent need to address policy failures and systemic inequalities across multiple sectors.

The findings from the REA indicate that the UK's charity sector faces challenges in addressing inequalities, particularly in funding justice initiatives and supporting communities affected by racial disparities. The literature highlights several critical themes, including an unequal funding landscape, concerns regarding data collection, eroded relationships, a general lack of trust in funders, and complications arising from ambiguous and complex terminology. These issues reflect broader societal concerns that impact the wider VCSE sector and extend globally, such as power imbalances and underrepresentation within the workforce.

Research on the effectiveness of equality policies suggests the need to move beyond partial stasis at the policy level and to strengthen relationships with communities, mainly to ensure their voices are better represented in decision-making processes. While some organisations in this area have made notable efforts, more is needed to avoid reproducing exclusions and maintaining the status quo, which continues to disadvantage groups experiencing structural inequity. The existing research also highlights an apparent disconnect between policy and practice. It demonstrates a need for improved understanding and appreciation of intersectionality while maintaining caution across aspects such as terminologies and their applications.

Appendix II: Quantitative methodology

In order to meaningfully ascertain the impact of these labels on the distribution of funding we applied a combination of Fisher Exact Tests and Ordinary Least Squares Regression.

Fisher's Exact Test is designed for situations with small numbers and tells us whether the differences of outcomes we see between groups are likely to reflect a real pattern or could have happened just by chance.

For each comparison, we arranged the data in a simple 2×2 table: how many organisations applications were approved versus not approved for each grouping, compared against applications who reported being neither *led-for* (benefiting specific communities) or by (for leadership). Fisher's exact test then calculates the exact probability of seeing a difference at least as large as the one in our data if, in reality, there is no true difference between the groups. A small probability (p-value) means that such a difference would be very unlikely to occur by chance alone, suggesting there may be a real difference between the groups. We only conducted Fisher Exact Tests on data where there were at least 20 applications for a particular combination of intersecting identities. For the purpose of this paper, we are considering p-values of lower than 0.1 indicative of statistical significance.

A significance threshold of $p < 0.1$ was used given the modest sample sizes for many intersectional categories. In this context, we prioritised sensitivity to potential inequities. However, these findings should not be interpreted as definitive proof of systematic bias.

We also used a method called ordinary least squares (OLS) regression to look at how several factors are related to our outcome at the same time. This approach is useful when the outcome is measured on a numerical scale (for example, grant size), and we want to see how it changes dependent on the characteristics of the leadership.

OLS regression works by drawing a straight line through the data that best fits the observed values. "Best" here means the line that makes the overall distance between the actual data points and the values predicted by the line as small as possible. Each factor in the model has a coefficient, which shows how much the outcome is expected to increase or decrease when that factor changes, while keeping all the other factors in the model the same. For example, a positive coefficient means the outcome tends to be higher in that group or at higher levels of that variable; a negative coefficient means it tends to be lower.

Methodological limitations

This analysis is observational and cannot establish causality. Differences in success rates or grant sizes should therefore be interpreted as associations rather than evidence of differential treatment. While regression models controlled for organisational income and legal form, other potentially relevant factors — including programme fit, application quality, geographic focus, prior funding relationships and funder strategy — were not available and may partly explain observed differences.

The dataset covers four funders over a defined period and represents approximately 4.5% of UK trust and foundation grant expenditure in 2023–2024. Participating funders may be more engaged in DEI practice than the wider sector, which limits generalisability. In addition, due to anonymisation by some funders, it was not possible to identify repeat applications by the same organisation across funders, meaning observations may not be fully independent.

Many intersecting identity categories contain relatively small numbers of applications. Although Fisher's Exact Test is appropriate for small samples, effect estimates in these categories are inherently unstable. The large number of statistical tests conducted across multiple identity groups and intersections also increases the probability that some statistically significant findings occurred by chance.

A significance threshold of $p < 0.1$ was adopted to reduce the risk of overlooking potentially meaningful disparities in smaller subgroups. Findings at this level should therefore be interpreted as indicative rather than definitive.

Identity data are self-reported by organisations and may reflect variation in interpretation of thresholds or strategic self-presentation.

In addition, applications are clustered within funders, and funding decisions may reflect funder-specific strategies and assessment processes. The analysis did not adjust standard errors to account for clustering at funder level, which may result in understated uncertainty around some estimates. The regression analysis of grant size also assumes a linear relationship and constant variance in residuals; if grant distributions are skewed or heteroskedastic, coefficient estimates remain unbiased but standard errors may be affected.

Finally, analysis of grant size reflects awards among successful applicants only and does not capture earlier stages of the funding pipeline, such as eligibility screening or invitation processes, which may also shape equity outcomes.

Appendix III: Diversity questions

These questions aim to find out more about the approach to diversity in your organisation, and [will not]/[will] be considered as part of the assessment process for your application. The information provided will not be shared externally. These questions were developed with reference to the DEI Data Standard, Funders for Racial Equity Audit and Foundation Practice Rating but are separate from them.

These questions are to find out more about the diversity of your leadership team. By leadership, we mean your board of trustees (or your Management Committee) as well as your senior management team.

1. Do the people who lead your organisation reflect/come from the communities that you serve? (yes/no)
2. Does your leadership team include: (yes/no):
    a. People from different racial or ethnic communities
    b. People of different genders
    c. Disabled People
    d. People from Faith Communities
    e. People from economically or educationally deprived backgrounds
    f. LGBT people
    g. Older People
    h. Younger people
    i. Different Communities (Northern Ireland only)
    j. Lived experience of the issue/communities you serve
3. Please let us know if there is anything you wish to share about the diversity of your leadership team or any additional context. [free text box]

These questions are to find out more about our organisation's approach to diversity and inclusion.

4. Does your organisation publish a DEI policy?
5. Does your organisation publish diversity monitoring information, such as a breakdown of the diversity of its staff and/or trustees?
6. Does your organisation work directly with individuals with lived experience of your work to inform decisions?
7. Does your organisation have a policy and approach for recruitment for trustees and staff that includes supporting equity and diversity?

Please let us know if there is anything you wish to share about your approach to diversity and inclusion [free text box]

Potential answers:

a. Yes
b. Partially/some
c. No
d. Not applicable
e. Prefer not to say
f. Not sure

Appendix IV: Governance Terms of Reference

1) Purpose and scope

This governance document sets out how the DEI Data Standard is overseen, maintained, and improved so that it remains relevant, practical, and responsive to the needs of UK funders, charities and other stakeholders. It operationalises the Steering Committee Terms of Reference (ToR), defines decision-rights, and describes transparent, open processes for change, publication and accountability. The document governs the Standard itself (taxonomy, guidance, versioning, change control); implementation by individual funders remains voluntary and context-specific.

2) Governance principles

The Steering Committee will apply these principles when making decisions: **Openness**, **Equity & Inclusion**, **Transparency**, and **Balance** (simplicity vs. nuance). Changes should be backward-compatible where possible, with clear versioning and rationale for decisions.

3) Governance bodies & roles

3.1 DEI Data Group (membership body)

Open to any funder working with or considering DEI data. It elects the Chair and, through votes where required, approves significant, technical or contentious changes to the Standard.

3.2 Steering Committee — authority & remit

Purpose. Provides strategic oversight; reviews proposed changes; conducts enquiries and consultations; recommends changes based on evidence; and sets future priorities for the Standard. It may decide on non-technical or non-contentious matters (see 6.3) by vote without escalation. It refers technical, significant or potentially contentious matters to a vote of the DEI Data Group membership. It approves decision rationales for publication and reports back to the membership.

Composition. Minimum four members drawn from funders and charities; at least half are funders who are members of the DEI Data Group. Members serve two-year terms, renewable. New members are elected by the Steering Committee by simple majority.

Standing advisors (non-voting). 360Giving and the Director of the DEI Data Standard hold permanent advisory seats; if the Director is also the Chair, they may vote.

Chair. The Chair of the DEI Data Group chairs the Steering Committee. The Chair is elected by the membership for a two-year term; must be a board member or employee of a grant-giving organisation.

Secretariat. Accountable to the Director, organises meetings, agendas, papers and records, and maintains the change log and public webpages.

Link to membership body. The Steering Committee is accountable to the DEI Data Group membership and will escalate decisions as per 6.4 and publish rationales per section 8.

3.3 External reference & implementation partners

The DEI Data Group may draw on specialist infrastructure organisations and sector experts with lived experience for consultation on taxonomy, language and implementation. Implementation in 360Giving Data Standard DEI Extension is governed by 360Giving's processes.

4) The DEI Data Standard — what is governed

a. **Taxonomy** (population groups, categories, sub-categories),

b. **Application areas** (Led for / Mission & Purpose / Led by) and definitions,

c. **Guidance** (collection, timing, use, accessibility), and

d. Supporting resources (FAQs, reporting templates).

5) Meetings & operations

a. **Frequency.** Steering Group meets as needed in response to change requests or strategic needs. DEI Data Group meets at least bi-annually.

b. **Quorum.** A majority of voting members, including the Chair or a delegated deputy.

c. **Decision-making.** Aim for consensus; otherwise decide by simple majority of members present (Chair has a casting vote).

d. Records. Secretariat issues agendas (5 working days in advance where practicable), papers, decisions and published rationales; maintains an auditable change log and version history.

6) Decision rights & thresholds

6.1 Types of proposals for change

- **Editorial:** clarity, minor corrections, help text; normally Chair, Secretariat and 360Giving sign-off.
- **Minor (non-technical):** small taxonomy wording updates, guidance clarifications; Steering Committee decision.
- **Major (technical/substantive):** structural taxonomy changes; potentially contentious changes, thresholds; data model or guidance that affect comparability; version increments; refer to membership vote after Steering Committee review.

6.2 "Non-contentious" test

All of the following must hold: (i) Steering Committee unanimous; (ii) issue not recently subject to public campaigns; (iii) change will not significantly impact organisations that have already implemented the Standard.

6.3 Escalation to membership vote

Refer when significant change in scope or taxonomy, or potentially contentious. The Steering Committee will present options and rationales; votes are by simple majority of members voting.

7) Change management & appeals

- **Submission.** Requests via the public form on the Funders Collaborative Hub page or by email; Secretariat logs all requests and schedules them for the next Steering Committee meeting.
- **Publication.** Responses are published within 28 days after approval.
- **Appeals.** If a request is declined, the requester may submit additional evidence. Two DEI Data Group members not on the Steering Committee review the appeal; they may seek external advice. If upheld, they may recommend a change directly to the Steering Committee for decision or to the membership where appropriate.

8) Transparency & accountability

- **Open governance.** Summaries of decisions and rationales are published, except where doing so would create risk of harm.
- **Public artifacts.** Current version of the Standard, guidance, FAQs, governance, and change log are published on the Funders Collaborative Hub page.
- **Learning orientation.** Decision notes should include how the change advances equity and usability, reflecting sector feedback and evidence on equitable funding practice.

9) Publication, versioning & IP

- **Authoritative source.** The Funders Collaborative Hub hosts the official version; prior versions are retained in an archive with clear labelling and changelogs.
- **Version identifiers.** All artifacts (taxonomy, guidance, FAQs) carry explicit version numbers and dates; releases indicate compatibility impacts for implementers.
- **Licensing.** Published under CC BY 4.0; contributors agree to transfer copyright in their contributions so the Standard can be held in trust.
- **Interoperability.** Where implemented through the 360Giving Data Standard DEI Extension, the 360Giving Data Standard's processes apply; data must state the DEI Data Standard version used.

10) Stakeholder engagement

- **Consultation routes.** Structured engagement with funders, charities, and specialist infrastructure/lived-experience organisations when changes affect taxonomy, language or thresholds.
- **Sector communications.** Updates shared via the Hub page and mailing lists; invitations to pilot and give feedback prior to major releases.

11) Review & continuous improvement

- **Monitoring usage.** The Secretariat will monitor usage of the pages and guidance on the Funders Collaborative Hub, and references to the DEI Data Standard in media, research and communications.
- **Monitoring impact.** The Secretariat will monitor evidence of sector implementation and equity outcomes to recommend improvements (e.g., clarity of thresholds, simplification, shared access infrastructure).