TWISTFIZZ C.I.C.

EQUALITY, DIVERSITY AND INCLUSION POLICY

Fair access. Dignity. Belonging.

Document control	Details
Policy owner	Board of Directors
Operational lead	Managing Director / nominated Equality Lead
Applies to	Directors, employees, workers, coaches, volunteers, contractors, applicants, participants, members, customers, visitors and delivery partners
Effective date	October 2026
Next review	October 2027, or sooner following legal or operational change
Version	1.0

Purpose
To make equality, dignity and inclusion part of TwistFizz employment, governance and the design and delivery of community tennis and pickleball services.

1. Commitment

TwistFizz C.I.C. is committed to equality of opportunity, valuing diversity and creating an inclusive environment in which people are treated fairly and with dignity and respect. We will challenge unlawful discrimination, harassment, sexual harassment, bullying and victimisation in our workplace and in the services, facilities, programmes and partnerships we provide.

As a community social enterprise managing public tennis facilities and delivering coaching, outreach, schools activity, volunteering and events, we aim to remove avoidable barriers so that our workforce and services better reflect and respond to the communities we serve.

2. Scope

This policy applies to recruitment, employment, volunteering, contracting, governance, training, promotion, pay and benefits, performance and conduct, dismissal and redundancy, as well as membership, booking, coaching, competitions, events, outreach, communications, digital services and access to facilities. It applies at TwistFizz venues, partner sites, schools, online, during work travel and at work-related social events.

3. Legal and regulatory framework

This policy is designed for TwistFizz operations in England and should be read in line with current legislation and statutory guidance, including:

- Equality Act 2010, including its employment, services and public functions provisions
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Employment Rights Act 2025 provisions coming into force on 30 October 2026 concerning harassment prevention and third-party harassment
- Human Rights Act 1998 where relevant to public-service delivery
- Rehabilitation of Offenders Act 1974 and Exceptions Order, where relevant to recruitment and safeguarding
- Data Protection Act 2018 and UK GDPR when equality information is collected or used
- Public Sector Equality Duty considerations where TwistFizz carries out a public function or supports a public authority contract

Legal note
This policy supports compliance but is not legal advice. Legal requirements and statutory codes change. TwistFizz will check current official guidance when handling a complex case or reviewing this policy.

4. Protected characteristics

The Equality Act 2010 protects people in relation to nine protected characteristics:

Protected characteristic	Policy application
Age	Includes people of different ages and age groups. Different treatment must only occur where lawful and objectively justified or covered by an exception.
Disability	Includes physical and mental impairments meeting the statutory definition. TwistFizz will consider and make reasonable adjustments where required.
Gender reassignment	Protection applies to a person proposing to start, starting or having completed a process to reassign sex.
Marriage and civil partnership	Protected in employment. It is not generally a protected characteristic for services under Part 3 of

Protected characteristic	Policy application
	the Act.
Pregnancy and maternity	Includes relevant protection during pregnancy and the statutory maternity period.
Race	Includes colour, nationality, ethnic origin and national origin.
Religion or belief	Includes religious and philosophical beliefs and lack of religion or belief.
Sex	Protection applies against unlawful discrimination because of sex.
Sexual orientation	Includes orientation towards people of the same sex, opposite sex, or either sex.

Protection may also apply where treatment is connected with someone else's protected characteristic, where a person is perceived to have a characteristic, or where they carry out a protected act under the Equality Act.

5. Unacceptable and unlawful conduct

5.1 Discrimination

- Direct discrimination: less favourable treatment because of a protected characteristic.
- Indirect discrimination: applying a provision, criterion or practice that disadvantages a group sharing a protected characteristic and cannot be objectively justified.
- Discrimination arising from disability: unfavourable treatment because of something arising from disability that cannot be justified.
- Failure to make reasonable adjustments for disabled people.
- Pregnancy and maternity discrimination.
- Unlawful instructions to discriminate, causing or inducing discrimination, or helping another person to contravene the Act.

5.2 Harassment, sexual harassment and bullying

Harassment related to a protected characteristic, sexual harassment, and less favourable treatment because a person rejected or submitted to sexual conduct are prohibited. Bullying may not always meet the legal definition of harassment, but it is contrary to this policy and may be managed under the disciplinary or other relevant procedure.

Unacceptable conduct may be verbal, physical, written, visual or digital. It may be a single incident or a pattern and may involve a colleague, manager, coach, contractor, volunteer, participant, parent, customer, spectator, supplier or other third party. Describing behaviour as banter does not make it acceptable.

5.3 Victimisation

No person will be subjected to a detriment because they made, supported or gave evidence about an equality complaint, alleged a breach of the Equality Act, or did another protected act in good faith. Knowingly false or malicious allegations may be addressed separately after fair investigation; an allegation that is not upheld is not, by itself, malicious.

6. Responsibilities

Role	Responsibilities
Board of Directors	Approve the policy; set the tone; ensure resources and oversight; consider equality implications in significant decisions; review material risks and trends.
Managing Director / Equality Lead	Implement the policy; maintain procedures; arrange training; oversee complaints and adjustments; monitor actions; escalate serious concerns.
Managers and programme or venue leads	Apply fair decisions; assess barriers; respond promptly to concerns; implement adjustments; challenge inappropriate behaviour; keep appropriate records.
Employees, coaches, workers and volunteers	Treat others with dignity; follow this policy; complete training; challenge or report concerns safely; co-operate with investigations and adjustments.
Contractors and delivery partners	Meet contractual equality requirements; provide inclusive services; report concerns; co-operate with investigations and corrective action.
Participants, members, parents, carers and visitors	Respect others, follow codes of conduct and report discrimination, harassment or barriers to access.

7. Inclusive employment and volunteering

- Use clear role descriptions and selection criteria linked to genuine role requirements.
- Advertise opportunities through proportionate channels and welcome applications from under-represented groups using lawful positive action where appropriate.
- Offer reasonable adjustments during recruitment, induction, training and employment.
- Base selection, pay, access to training, progression, performance decisions and termination on fair, relevant and consistently applied criteria.
- Avoid assumptions based on protected characteristics, caring responsibilities, working patterns or personal background.
- Make decisions about criminal records lawfully, proportionately and consistently with safeguarding requirements.
- Provide inclusive induction, role-appropriate equality training and clear standards of behaviour.
- Consider flexible working requests and religion or belief, disability, pregnancy, menopause and caring-related needs fairly and individually.

8. Inclusive services and public facilities

TwistFizz will design and deliver services so that people can participate safely and with dignity. We will consider accessibility at the planning stage rather than relying only on individual complaints.

- Provide clear, accessible information about programmes, prices, eligibility, venue access and support.
- Use proportionate, transparent criteria for membership, booking, coaching groups, competitions, concessions and programme eligibility.
- Consider reasonable adjustments to policies, practices, communication and physical features, and provide auxiliary aids where the legal duty applies.

- Ask about access needs respectfully and focus on the adjustment required rather than unnecessary medical detail.
- Plan inclusive coaching through adaptable equipment, session formats, communication and reasonable flexibility.
- Avoid stereotypes in publicity and use representative, respectful language and imagery.
- Provide an accessible route for feedback, complaints and requests for adjustments.
- Work with local-authority and venue partners to identify ownership of physical-access issues and track action.

Sport and age-based activity

Some age-banded or targeted sport activity may be lawful because of a statutory exception, objective justification or lawful positive action. Any restriction must have a clear purpose, use proportionate criteria and be reviewed rather than assumed.

9. Reasonable adjustments

TwistFizz will not wait for every disabled person to experience disadvantage before considering accessibility. For services, the reasonable-adjustment duty is anticipatory; for workers and applicants, individual needs will also be considered. What is reasonable depends on the circumstances, including effectiveness, practicability, cost and available resources.

- Alter a policy, practice or procedure that creates substantial disadvantage.
- Provide information in an accessible format or adjust communication methods.
- Adapt equipment, coaching method, timing or location where effective and safe.
- Provide an auxiliary aid or additional support where reasonable.
- Address a physical feature or provide a reasonable alternative means of access where the duty applies.
- Record agreed workplace adjustments and review them when needs or duties change.

A disabled person will not be charged for a reasonable adjustment required under the Equality Act.

10. Positive action and targeted programmes

TwistFizz may take lawful, proportionate positive action where evidence reasonably indicates disadvantage, different needs or disproportionately low participation connected with a protected characteristic. This may include targeted outreach, encouragement, training or activities. Positive action is not the same as positive discrimination. Recruitment or promotion decisions will follow the specific legal rules and be based on merit.

11. Preventing harassment and sexual harassment

TwistFizz will take a proactive, risk-based approach. From 30 October 2026, this policy is to be applied on the basis that the organisation must take all reasonable steps required by the amended law to prevent sexual harassment, including relevant third-party risks.

- Assess risks across coaching, lone working, customer-facing roles, changing or storage areas, travel, events, online messaging, social media, power imbalances and contact with third parties.
- Set and communicate standards through induction, codes of conduct, contracts, participant terms and venue notices where appropriate.
- Provide meaningful refresher training for the workforce and additional training for managers handling concerns.
- Provide more than one safe reporting route and respond promptly, fairly and confidentially as far as possible.
- Take proportionate steps to protect workers from harassment by participants, parents, customers, contractors and members of the public.
- Monitor concerns, near misses, informal reports and cultural warning signs, and review whether controls are effective.

12. Reporting concerns and complaints

A person may raise a concern with their line manager, programme or venue lead, the Managing Director, the nominated Equality Lead or another Director where the usual contact is involved. Participants and members of the public may use the TwistFizz complaints and feedback route. Safeguarding concerns must also be referred under the Safeguarding Policy.

- Listen respectfully and make an objective record.
- Consider immediate safety, welfare, adjustment and anti-victimisation measures.
- Confirm the appropriate process, which may be informal resolution, grievance, disciplinary, complaints, safeguarding or contractor management.
- Investigate fairly, without prejudging the outcome, and give relevant people an opportunity to respond.
- Communicate the outcome and any review or appeal route where the applicable procedure provides one.
- Take proportionate action, which may include support, mediation where freely agreed and suitable, training, adjustment, formal sanction, removal from activity or termination of engagement.

No forced informality

Serious concerns, sexual harassment, safeguarding matters or potential criminal conduct will not be diverted into informal resolution merely because a formal process is inconvenient. Police or another authority may be contacted where appropriate.

13. Confidentiality, records and equality monitoring

Information will be shared only where there is a legitimate need to know, subject to legal, safeguarding and procedural requirements. Absolute confidentiality cannot be promised. Equality and health information may be special category personal data and will be collected only where there is a clear purpose and lawful basis, kept secure, minimised and retained in line with TwistFizz data-protection arrangements.

Where proportionate and sufficiently confidential, TwistFizz may use voluntary equality monitoring, participation information, complaints, adjustment requests and feedback to identify barriers and evaluate action. Small-number data will not be published or used in a way that creates an unreasonable identification risk.

14. Public contracts and equality considerations

TwistFizz is not automatically subject to every element of the Public Sector Equality Duty merely because it contracts with a public authority. Where TwistFizz exercises a public function, supports a contracting authority's equality duties or has contractual equality obligations, it will co-operate with proportionate equality analysis, information requests, objectives and monitoring relevant to that function or contract.

15. Breaches

A breach by an employee may lead to disciplinary action. A breach by a worker, contractor, coach, volunteer, participant, member, parent, visitor or partner may lead to remedial action, restrictions, removal from a venue or programme, termination of engagement or contract, or referral to a governing body, statutory agency or police where appropriate. Any action will follow the relevant procedure and applicable law.

16. Implementation and review

Action	Minimum expectation
Communication	Policy available to the workforce and relevant service users; key standards included in induction and codes of conduct.
Training	Role-appropriate induction and refreshers; enhanced training for managers and complaint handlers.
Accessibility	Access needs considered in programme planning, digital communication and venue liaison.
Harassment prevention	Documented risk review and preventative action, including third-party risks.

Action	Minimum expectation
Monitoring	Board receives proportionate information on significant issues, themes and overdue actions without unnecessary personal detail.
Review	At least annually and sooner after significant legal change, serious incident, evidence of ineffective controls or material organisational change.

17. Related TwistFizz policies

- Safeguarding Policy
- Complaints and Feedback Policy
- Disciplinary Policy and Procedure
- Grievance Procedure
- Health and Safety Policy
- Data Protection and Privacy Policies
- Recruitment and Safer Recruitment arrangements
- Code of Conduct and Social Media Policy

18. Approval

Approval field	To be completed
Approved by	Board of Directors
Name	
Signature	
Date	October 2026
Next review	October 2027

Appendix 1: Practical equality check for new or changed activity

- ☐ What is the purpose of the decision, programme or rule?
- ☐ Who may benefit and who may be disadvantaged?
- ☐ What evidence, feedback or participation data is available?
- ☐ Could criteria, timing, price, location, communication or facilities create a barrier?
- ☐ What reasonable adjustments or inclusive alternatives have been considered?
- ☐ Is targeted action lawful, evidence-based and proportionate?
- ☐ Have affected people or relevant partners been consulted where practicable?
- ☐ Who owns each action and when will effectiveness be reviewed?

Appendix 2: Official guidance

- GOV.UK - Equality Act 2010 guidance
- Legislation.gov.uk - Equality Act 2010
- EHRC - 2026 statutory services code
- Acas - Equality, diversity and inclusion policy template
- Acas - Preventing sexual harassment

- GOV.UK - Public Sector Equality Duty guidance