

ZEN COMBAT ACADEMY LTD

EQUALITY, DIVERSITY & INCLUSION POLICY

Fair access, dignity, reasonable adjustments and an inclusive martial arts environment for everyone



Organisation	Zen Combat Academy Ltd
Policy title	Equality, Diversity & Inclusion Policy
Version	1.0
Issue date	25 September 2026
Review date	September 2027 or sooner if required
Applies to	Students, parents/carers, employees, coaches, instructors, volunteers, contractors, visitors and other participants
Policy basis	Equality Act 2010 and current UK Government / Equality and Human Rights Commission guidance

This is a Zen Combat Academy Ltd policy and should be read alongside the Academy safeguarding, complaints, disciplinary, whistleblowing, safer practice and code-of-conduct policies.

1. Equity statement

Zen Combat Academy Ltd is committed to a culture in which people are treated with dignity and respect, barriers to participation are identified and reduced, and discrimination, harassment, bullying and victimisation are not tolerated.

The Academy recognises its legal responsibilities under the Equality Act 2010 and aims to go beyond minimum compliance by creating an environment in which children, adults, disabled people, neurodivergent people and people from different backgrounds can participate, learn, work and develop safely.

Our principle

Equality does not always mean treating everyone identically. Fair participation may require different support, reasonable adjustments, adapted communication, additional time or other proportionate measures so that people can access the same opportunity safely and meaningfully.

2. Scope

This policy applies to all activities delivered, organised or overseen by Zen Combat Academy Ltd, including classes, one-to-one sessions, gradings, competitions, fight-team activity, events, trips, online activity, recruitment, employment and volunteering.

It applies to directors, managers, employees, coaches, instructors, assistant instructors, volunteers, contractors, students, parents/carers, spectators, visitors and anyone acting on behalf of the Academy.

3. Legal and guidance framework

This policy is informed by the current law and official guidance applicable in England and Great Britain, including:

- Equality Act 2010, including protection from direct and indirect discrimination, harassment and victimisation;
- the duty to make reasonable adjustments for disabled people in relevant employment, service and association contexts;
- lawful positive action provisions where a protected group is disadvantaged, has particular needs or is under-represented;
- the employer duty to take reasonable steps to prevent sexual harassment, together with further strengthening provisions as they come into force;
- current Equality and Human Rights Commission codes and guidance for services, public functions, associations and employment;
- relevant safeguarding, health and safety and data protection duties where equality issues overlap with safety, welfare or confidentiality.

This policy does not create a right to any adjustment, competition category or exception that is prohibited by law. Where a legal or sporting rule is complex, Zen Combat Academy Ltd will seek appropriate advice rather than make assumptions.

4. Protected characteristics and wider inclusion commitment

The Equality Act 2010 identifies nine protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Zen Combat Academy Ltd also aims to treat people fairly regardless of other circumstances that may affect participation, including caring responsibilities, socio-economic background, communication needs, educational needs, neurodivergence, appearance, experience level and other visible or non-visible differences. These additional matters are part of the Academy's inclusion commitment even where they are not, by themselves, separate protected characteristics under the Equality Act 2010.

5. What equality, diversity and inclusion mean at Zen

Principle	What it means	What Zen will do
Equality	Fair access to opportunities, services and work.	Avoid unlawful discrimination and apply clear, consistent decision-making.
Equity	Recognising that some people need different support to achieve fair access.	Use reasonable adjustments and proportionate support where appropriate.
Diversity	Valuing different backgrounds, identities, experiences and abilities.	Create a culture where difference is respected rather than treated as a problem.
Inclusion	Ensuring people can participate, contribute and belong.	Identify barriers, adapt where reasonable, and involve the person in decisions affecting them.

6. Positive action

The Academy may use lawful positive action where permitted by the Equality Act 2010, for example to reduce disadvantage, meet particular needs or encourage participation by groups that are under-represented. Positive action will be targeted and proportionate and will not be used as a substitute for fair selection or as unlawful positive discrimination.

7. Disability, SEN, neurodiversity and reasonable adjustments

Zen Combat Academy Ltd will consider reasonable adjustments for disabled people and will not assume that a diagnosis, impairment, neurodivergence or support need automatically prevents participation. The person, and where appropriate their parent/carer or support worker, should be involved in identifying what support is helpful and safe.

Reasonable adjustments may include, depending on the individual and the activity:

- clearer instructions, demonstrations, visual prompts, written information or alternative communication methods;
- additional processing time, rest breaks, gradual introduction to contact, reduced sensory load or a quieter position in the training area;

- adapted techniques, equipment, drills, grading methods or training intensity where the learning objective can still be met safely;
- one-to-one or smaller-group support where appropriate and available;
- accessible facilities or practical changes to how a service is delivered;
- support for carers, communication partners or personal assistants where this is safe and compatible with safeguarding arrangements.

Safety and inclusion work together

An adjustment does not have to remove an essential safety requirement. Where a requested adjustment would create an unacceptable risk, Zen will discuss alternatives and try to identify a safer way for the person to participate rather than simply excluding them.

Information about disability or support needs will be handled respectfully and shared only where necessary for safety, safeguarding, reasonable adjustments or another lawful purpose.

8. Inclusive martial arts practice

Coaches and instructors are expected to create training environments that are challenging without being humiliating, discriminatory or abusive. Differences in ability, fitness, disability, age, size, experience or communication must be considered when pairing students and selecting drills.

- No student should be mocked, isolated or deliberately embarrassed because they require an adjustment or learn differently.
- Contact intensity, partner selection and training demands must be appropriate to the participant and the discipline.
- Age, size, experience and other safety factors may justify different groups, drills or pairings where these are proportionate and genuinely connected to safety or development.
- Reasonable support should be offered without lowering expectations unnecessarily or assuming what a person cannot do.
- Instructors should use respectful, person-centred language and respond promptly to discriminatory comments, slurs, jokes, gestures or exclusionary behaviour.

9. Recruitment, employment and volunteering

Recruitment, selection, training, promotion, allocation of work, discipline and termination decisions will be based on legitimate role requirements, conduct, qualifications, performance and other relevant factors rather than unlawful discrimination.

- Job and volunteer requirements should be necessary and proportionate.
- Reasonable adjustments should be considered for disabled applicants and workers.
- Selection decisions should be recorded where appropriate and should use consistent criteria.
- Staff and volunteers must not be subjected to harassment, victimisation or discriminatory treatment.
- Zen Combat Academy Ltd will take proactive steps to prevent sexual harassment in the workplace and will respond to concerns promptly.

10. Pregnancy, maternity and caring responsibilities

Pregnancy and maternity are protected by the Equality Act 2010. Zen will make appropriate adjustments to work or training where required by law or reasonably necessary for safety. Caring responsibilities are not a separate protected characteristic in the same way, but the Academy will seek to respond fairly and flexibly where practicable.

11. Competition, gradings, team selection and sporting categories

Martial arts may legitimately use categories or eligibility rules connected with matters such as age, weight, experience, sex, disability classification or competition format where permitted by law and the rules of the relevant event. Such rules must not be used as a pretext for prejudice or unnecessary exclusion.

The Equality Act 2010 contains specific provisions relating to sport. Zen Combat Academy Ltd will apply any competition or selection restriction only where it is lawful, proportionate, genuinely connected with fair or safe competition, and consistent with the current rules governing the event concerned.

- Training access and competition eligibility are different questions and should not be confused.
- Where an external competition organiser sets eligibility rules, Zen will explain those rules clearly and will not present them as Academy preferences if they are external requirements.
- Age, weight, contact level and experience categories may be used for participant safety and fair matching.
- Where the law or guidance is changing or uncertain, management will seek current advice before making an exclusionary decision.

12. Discrimination, harassment, bullying and victimisation

Zen Combat Academy Ltd will not tolerate conduct that amounts to unlawful discrimination, harassment or victimisation, or bullying that breaches Academy standards.

- Direct discrimination: treating someone less favourably because of a protected characteristic.
- Indirect discrimination: applying a provision, criterion or practice that disadvantages people sharing a protected characteristic and cannot be objectively justified where the law requires justification.
- Harassment: unwanted conduct related to a protected characteristic that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- Sexual harassment: unwanted conduct of a sexual nature that has that purpose or effect.
- Victimisation: subjecting someone to a detriment because they have done a protected act, such as making or supporting a discrimination complaint.
- Bullying: offensive, intimidating, malicious, insulting or humiliating behaviour, including misuse of power, whether or not it falls within the statutory definition of harassment.

13. Examples of unacceptable behaviour

Examples may include, depending on the circumstances:

- racist, sexist, homophobic, transphobic, disablist or religious slurs;
- mocking a person's disability, communication, appearance, accent, age or support needs;
- sexual comments, unwanted touching, sexual jokes, images or messages;
- excluding someone from training or opportunities for a discriminatory reason;
- deliberately refusing a reasonable adjustment without proper consideration;
- repeatedly using humiliating language or so-called banter after it is known to be unwelcome;
- retaliating against a person because they raised or supported an equality concern;
- online posts, group-chat messages or social-media content connected with Zen that harasses or targets another person.

A single incident may be serious enough to amount to harassment. Conduct does not become acceptable merely because it was intended as a joke or because similar language has been used previously without complaint.

14. Responsibilities

Directors and management

- lead by example and ensure this policy is implemented;
- consider equality when developing services, rules, recruitment and major decisions;
- ensure concerns are handled fairly and conflicts of interest are managed;
- provide appropriate training and review patterns of concern or exclusion;
- ensure breaches are addressed through the appropriate safeguarding, complaints or disciplinary route.

Coaches, instructors, staff and volunteers

- treat people with dignity and challenge discriminatory or degrading behaviour;
- consider adjustments and seek help where unsure how best to support someone;
- avoid assumptions about capability based on diagnosis, disability or identity;
- report safeguarding concerns immediately where discrimination or harassment also creates a welfare risk.

Students, parents/carers and visitors

- follow Academy codes of conduct and treat others respectfully;
- raise concerns promptly and provide relevant information where an adjustment or support plan is needed;

- respect other people's privacy and do not question or disclose personal information unnecessarily.

15. Raising an equality, bullying or harassment concern

A person may raise a concern verbally or in writing to a coach, instructor, director, manager or other appropriate senior person. If the concern involves a child or adult at risk, or suggests abuse, exploitation or immediate danger, the safeguarding procedures take priority and the Designated Safeguarding Lead must be informed.

Where appropriate and where the person feels safe to do so, an informal resolution may be considered. No one is required to confront the person complained about, and serious allegations should not be diverted into informal resolution merely to avoid formal action.

1. Listen and take the concern seriously. Do not dismiss it as banter or oversensitivity.
2. Record the key facts, including dates, people involved, witnesses and any supporting messages or documents.
3. Identify any immediate safety, safeguarding or support needs.
4. Decide whether the matter should be handled under the complaints, disciplinary, safeguarding or whistleblowing procedure, or a combination of them.
5. Keep information as confidential as reasonably possible while allowing a fair review or investigation.
6. Protect the person raising the concern and witnesses from retaliation or victimisation.
7. Communicate the outcome or next steps as far as confidentiality permits.

Emergency or criminal conduct

If there is immediate danger, serious violence, sexual assault, hate crime or another suspected criminal offence, contact the police or emergency services as appropriate. Internal procedures must not delay urgent protection.

16. Complaints about decisions or adjustments

If a person believes they have been treated unfairly, denied a reasonable adjustment, excluded without proper justification or subjected to discrimination, they may use the Academy complaints procedure. Workers may also use the relevant grievance procedure. Whistleblowing may be appropriate where the concern is in the public interest and relates to serious wrongdoing rather than a personal dispute.

17. Investigation and fairness

- The person complained about should be told the substance of the allegation where appropriate and given a fair opportunity to respond.
- Investigations should be proportionate to the seriousness of the concern and undertaken by a person without a material conflict of interest.
- Evidence should be assessed objectively and records kept securely.
- Reasonable adjustments should be offered to anyone participating in the process who needs them.
- Where allegations are not upheld, this does not mean the original concern was made in bad faith.

Knowingly making a false allegation with malicious intent may itself be a disciplinary or conduct matter. A concern raised honestly but not upheld will not, by itself, result in action against the person who raised it.

18. Confidentiality, records and data protection

Equality and inclusion information can be sensitive. Records will be limited to what is necessary, stored securely and accessed only by people who need the information for a legitimate purpose. Information

may be shared without consent where this is necessary for safeguarding, legal obligations, investigation of serious misconduct or another lawful basis.

19. Monitoring and learning

Zen Combat Academy Ltd may review anonymised information about participation, complaints, adjustments, incidents and outcomes to identify patterns or barriers. Monitoring will be proportionate and will not be used to label individuals or make assumptions about them.

Learning from concerns may lead to changes in coaching practice, communication, premises, equipment, staff training, policies or support arrangements.

20. Breaches of this policy

Discrimination, harassment, bullying, victimisation or deliberate refusal to follow lawful equality requirements may lead to action under the relevant disciplinary, safeguarding, complaints or membership procedures. Serious misconduct may result in removal from duties, suspension, exclusion or referral to an external authority where appropriate.

21. Review

This policy will be reviewed at least annually and sooner if there is a significant change in law, official guidance, Academy activities, safeguarding requirements or learning from an incident or complaint.

Reference framework

The policy is designed to be read with current official sources rather than relying on outdated sporting-organisation wording. Key references include:

- Equality Act 2010 - protected characteristics, prohibited conduct, reasonable adjustments, positive action and sport provisions;
- UK Government guidance: Discrimination - your rights and Equality Act 2010 guidance;
- Equality and Human Rights Commission 2026 Code of Practice for services, public functions and associations, including reasonable adjustment guidance;
- Equality and Human Rights Commission guidance on sexual harassment and harassment at work;
- Worker Protection (Amendment of Equality Act 2010) Act 2023 and relevant 2026 Employment Rights Act provisions as they take effect.

Quick response guide

Issue	First action	Route
Discriminatory comment / bullying	Stop or challenge it safely; check impact on the person.	Coach/manager; complaints or conduct route.
Harassment / sexual harassment	Protect the person; preserve evidence; avoid forced confrontation.	Manager/director; disciplinary or grievance route.
Child or adult at risk	Prioritise welfare and record the concern.	Designated Safeguarding Lead / safeguarding procedure.
Reasonable adjustment request	Discuss the barrier and what would help.	Coach/manager; support plan if useful.
Immediate danger / crime	Protect life and safety first.	999 / police / emergency service as appropriate.
Retaliation after complaint	Record and report promptly.	Management; victimisation may itself be a serious breach.

Appendix A - Equality, Inclusion, Bullying or Harassment Concern Record

Use this form to record a concern. Do not delay urgent safeguarding or emergency action in order to complete paperwork.

Name of person raising concern	
Contact details	
Person(s) affected	
Date / time / location	
People involved / witnesses	
What happened? (facts and words used where possible)	
Protected characteristic / inclusion issue (if known)	
Immediate safety or safeguarding risk?	
Action already taken	
Desired outcome / support requested	
Supporting evidence / messages / documents	
Name and signature of person completing record	
Date	

Appendix B - Reasonable Adjustment / Inclusion Support Plan

This optional record may be used where a participant, worker or volunteer would benefit from an agreed support arrangement. It should be proportionate and reviewed when needs or activities change.

Name	
Role / class / activity	
Barrier or support need identified	
What the person says would help	
Adjustment(s) agreed	
Any safety / safeguarding considerations	
Who needs to know?	
Review date	
Person / parent-carer agreement (where appropriate)	
Coach / manager signature	

Policy approval

Approved by	Zen Combat Academy Ltd Management / Directors
Signature	
Date approved	
Next scheduled review	September 2027