

# What makes a good Diversity and Inclusion Action Plan?

Guidance on how to produce an effective Diversity and Inclusion Action Plan (DIAP) for organisations in the sport and physical activity sector





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# Background

Diversity and Inclusion Action Plans (DIAPs) set out the ambitions and practical steps organisations commit to take to achieve greater diversity and create inclusive cultures. DIAPs aim to improve representation and inclusion on boards, in senior leadership teams and throughout the wider organisation.

Publishing and reviewing a DIAP are key Tier 3 Requirements in [A Code for Sports Governance](#) (the Code) which was revised and re-issued in 2021. The Code sets high standards of governance for the sport and physical activity sector and is mandatory for organisations in receipt of investment from Sport England and/or UK Sport. Tier 3 generally applies to organisations receiving substantive, strategic investment. The Code contains three DIAP-related Requirements for Tier 3 organisations with some explanatory commentary.

The commentary is not prescriptive in terms of what should be included in a DIAP but provides an initial framework to help shape a DIAP to an organisation’s needs and ambitions.

This guidance booklet aims to supplement that initial commentary.





The three Requirements in the Code and accompanying commentary are as follows:

**Requirement 2.1**

Each organisation shall publish clear ambitions to ensure its leadership represents and reflects the diversity of the local and/or national community (as appropriate). These ambitions shall be centred on each organisation committing to achieving greater diversity in all its forms on its board and senior leadership team, as well as where possible cascading this ambition.

**Commentary**

This Code requires organisations to be ambitious in achieving greater diversity in all its forms, not only on their boards but also on their senior leadership teams, as well as the wider workforce and membership. Discussions around the organisation’s ambitions should include and go beyond the nine protected characteristics in the Equality Act 2010, including how to recruit, retain and develop people with different lived, regional and socio-economic experiences.

Ambitions for increasing diversity and inclusion should be informed by organisational data, priorities and individual contexts, while also taking into account wider sector and societal impact.

The approach used to achieve these aims should be shaped by a commitment to recognise the importance of lived experience and the diversity of an individual’s identity.

When setting their ambitions, boards should consider a range of factors and any legal obligations in this area. This includes but is not limited to gender, race and ethnicity, disability, LGBTQ+ and socio-economic and regional equality, thus reflecting the diversity of wider society. Organisations should also seek to recruit and retain individuals with diverse upbringings, education, wealth, social status and professional backgrounds.

**Requirement 2.2**

Each organisation shall create a Diversity and Inclusion Action Plan which, among other things, shall:

- a. identify actions needed to achieve, support and then maintain the ambitions laid out in 2.1, including how these will be reviewed;
- b. demonstrate a strong and public commitment to promoting, embedding and advancing diversity and inclusion on the board, senior leadership team and beyond;
- c. be published on the organisation’s website, with an annual update; and
- d. be agreed with UK Sport and/or Sport England.

**Requirement 2.3**

The board shall maintain and regularly review the Diversity and Inclusion Action Plan (DIAP), on at least an annual basis.

**Commentary**

All organisations are required to create a Diversity and Inclusion Action Plan (DIAP). The DIAP is a tool to help boards set out, publish and regularly review their ambitions and actions for achieving greater diversity and embedding inclusion in the board, senior leadership team and wider organisation and membership.

Regular gathering of diversity data of board and workforce composition will be key to ensure progress is tracked and measured, and relevant priorities and actions are appropriately identified.

For transparency and to ensure accountability in delivery, it is essential that the DIAP is publicly accessible via the organisation’s website.

To maintain its relevance and to track progress against the organisation’s ambitions and actions regarding diversity, the DIAP should be reviewed annually at a minimum. Annual reporting could include details of the following as a minimum:

- A diversity breakdown of leaders, staff, volunteers and participants
- Policies and procedures related to equality, diversity and inclusion
- What recruitment practices have been adopted to improve diversity and ensure an inclusive approach
- Individuals or roles within the organisation with a specific remit for providing strategic leadership on equality, diversity, and inclusion.
- Any activities or programmes undertaken (e.g. shadowing and mentoring schemes) to encourage future leaders from particular communities.







When the revised Code was published, Sport England and UK Sport wanted to use the opportunity to shift the dial on Equality, Diversity and Inclusion (EDI) across the sport and physical activity sector. As part of this, we commissioned AGS, a consortium of specialist organisations, to provide a consultancy service to support nearly 130 Tier 3 organisations with drafting new, or reviewing existing, DIAPs, ensuring these DIAPs were robust, ambitious, bespoke and proportionate. These organisations included National Governing Bodies of Sport, Active Partnerships and other Sport England/UK Sport funded partners (e.g. charities and not-for-profit companies with sport and physical activity as their main remit).

We want to acknowledge the substantive work partners have undertaken to date in this area following publication of the revised Code and the roll out of support from AGS. The feedback and analysis gathered as part of this has helped provide an understanding of the current EDI position at both organisational and sector levels, as well as informing what might be required going forward. DIAPs vary considerably in content from partner to partner and can be viewed on partners' respective websites. Sport England and UK Sport have also developed their DIAPs, which can be accessed here:

[Equality | UK Sport](#)

[Our new diversity and inclusion action plan | Sport England](#)

The guidance below is drawn from a project report provided by AGS at the end of their consultancy service. It has been reshaped to help any organisation looking to develop a DIAP or improve their existing DIAP. Sport England and UK Sport are fully committed to creating a fully representative and inclusive sport and physical activity sector at the heart of our missions. We hope you find this information useful and look forward to continuing to work with you to bring meaningful, systemic change in this area.

## Who is this guidance for?

This booklet primarily aims to provide support and ideas for organisations seeking to meet Requirements 2.1 to 2.3 in the Code.

However, it is also relevant to any organisation seeking to develop or improve a DIAP (or equivalent) to clarify the organisation's ambitions and commitments to achieving greater board and senior leadership diversity, as well as achieving this more broadly within the organisation.

## How to use this guidance

The booklet does not aim to be fully comprehensive or prescriptive.

Organisations and their boards are encouraged to use it as a starting point for discussing ideas and deciding how to develop a DIAP that best suits their needs and ambitions. The guidance expands on the different elements of the DIAP-related Requirements in the Code and provides suggestions for how organisations may approach this. The guidance is not standalone, and organisations needing to meet the Code Requirements should consider how work in this area fits with their overall plans to become compliant with the Code or to continuously strengthen their governance.





# Developing an Effective DIAP: Insights and Tips

The following guidance draws on the approach adopted by AGS in supporting the organisations participating in the project to develop and review their DIAPs. The insights and tips are informed by real-time learning which resulted in improvements and refinements to the approach along the way.

## The Five Elements of a Good DIAP

Based on the Code Requirements and their own research and experience, AGS identified five elements fundamental to developing a good DIAP.

- 1. **Leadership and Strategy** sets direction and tone
- 2. **Governance** ensures accountability and structure
- 3. **Representation** ensures diverse voices inform decisions
- 4. **Stakeholder Participation** builds ownership and inclusivity
- 5. **Data** provides the evidence to prioritise, act, and measure progress

It is believed that these elements can collectively help build a sustainable, impactful and authentic EDI framework. The following information offers some key considerations for each element.



## Element 1: Leadership and Strategy

Strong leadership and clear alignment to the organisation’s strategic goals are essential starting blocks to the creation of an effective DIAP.

### Key Considerations:

- **Strategic Alignment:** Ensure your DIAP is grounded in, and contributes to, the organisation’s business and EDI strategies. This will help to clarify the DIAP’s purpose and embed EDI into the fabric of your organisation and its core mission.
- **Plan Authentically** Tailor the DIAP to your organisation’s size, context and ambitions. Keep it realistic but forward-thinking.
- **Visible Commitment from Leaders:** Include statements from senior leaders (e.g. Chair, CEO) outlining the organisation’s commitment to EDI. This helps set the tone, acknowledge any current challenges, and signals the intent to drive meaningful change. Ensure leaders role model the language and behaviours that promote an inclusive workplace culture, and set the tone from the top.
- **Vision and Ambition:** Identify key equality and diversity challenges, prioritise them and link each to actionable solutions.
- **Clarity of Objectives:** Define specific, measurable objectives and actions with timelines and assign clear responsibility—preferably to roles rather than individuals in order to maintain accountability through any personnel changes.
- **Integration with Other Plans:** The DIAP should align with other organisational plans, such as the People Plan and business plan. Best practice includes ensuring that at least one business objective relates to EDI.



## Element 2: Governance

Robust governance helps ensure EDI is championed, tracked and improved over time.

### Key Considerations:

- **Clear Structures:**  
Clarify which roles and group(s) (existing or new - e.g. EDI committees or advisory boards) will oversee the DIAP process and report to the Senior Leadership Team (SLT) or the board.
- **Accountability and Transparency:**  
Identify who in the organisation is accountable for development and delivery of the DIAP and define what is reported to leadership. Set measurable goals, review those at least annually and publish updates for transparency, using internal (e.g. intranet, newsletters) and external (e.g. website, annual reports) channels to communicate progress. Clear reporting mechanisms support performance tracking and informed decision-making.
- **Format:**  
Ensure the DIAP is accessible and easily understood by all colleagues and stakeholders —specify the period it covers (e.g. one year, multiple years), set priorities (e.g. short/medium/long-term), and link actions to owners (as noted earlier, roles are preferable to names to enable continuity in ownership).
- **Measuring Progress:**  
Include clear measures and objectives (e.g. for representation) that enable progress to be tracked.
- **Embedding in Governance Documents:**  
Wherever appropriate, include and embed DIAP-related considerations and processes in broader policies and strategies to help ensure the ‘golden thread’ of EDI spans the whole organisation.



## Element 3: Representation

A rich diversity of people and viewpoints across all levels of an organisation helps to build greater accountability for embedding EDI, ensures the organisation’s leadership is representative of its workforce and stakeholders, and drives better informed and more inclusive decision making.

### Key Considerations:

- **Workforce Diversity:**  
Think about actions to help improve the diversity of leadership, the workforce and decision-making groups (such as boards, committees, panels etc.) within the organisation.
- **Talent Development:**  
Create pathways for under-represented groups (e.g. positive action measures such as mentoring) to grow and progress within the organisation.
- **Board and Leadership Responsibility:**  
Clearly define how board and leadership will be held accountable for representation goals.
- **Data-Driven Focus:**  
Use workforce and community demographic data to set realistic and meaningful targets for improving representation. Gather qualitative data (e.g. from exit interviews and staff engagement surveys) to identify any cultural issues which may negatively impact recruitment and/or retention of individuals from under-represented groups.





#### Element 4: Stakeholder Participation

Diversity and inclusion thrive through active engagement with internal and external stakeholders.

##### Key Considerations:

- **Engagement Strategy:** Develop and document a structured approach to engaging employees, members and community stakeholders. This could include, for example, surveys, focus groups and open forums.
- **Inclusion and Learning:** Ensure all voices are heard — listen, learn and adapt. Stakeholder insights can help refine policies and challenge outdated norms.

- **Employee Education:** Raise awareness through engagement on the DIAP’s purpose, principles and each individual’s role in delivering it.
- **Cultural Change:** Improve workplace culture by removing barriers, encouraging open and safe dialogue, not tolerating bad behaviour, building trust through transparency, and creating fair and inclusive policies and practices.

The Code emphasises the importance of stakeholder engagement, with Requirement 3.3 focused specifically on developing and delivering a general strategy in this area. This includes further commentary that may be helpful to consider alongside the points above.



#### Element 5: Data

Data collection and analysis underpin all meaningful EDI action. Given the important role it plays in developing a robust DIAP, the key considerations below are followed by some more detailed thoughts and guidance.

##### Key Considerations:

- **Baselines and Targets:** Establish a clear baseline using internal/external data and use this to set targets and measures that indicate what success will look like for each action. You might refer to these as KPIs and/or SMART targets.
- **High-Quality Data:** Ensure data is accurate, up-to-date and includes protected and socio-economic characteristics while respecting GDPR<sup>1</sup> considerations.
- **Benchmarking:** Compare internal data to local or national population demographics to identify gaps and opportunities for improvement.
- **Transparency:** Publish anonymised demographic data (respecting GDPR considerations), performance indicators, and progress updates to build trust and accountability.
- **Data Utilisation:** Use data to inform recruitment, retention, and promotion strategies – identify disparities, address barriers, and monitor improvement.



<sup>1</sup> GDPR (General Data Protection Regulation) is a set of rules designed to protect the personal data of individuals within the European Union (EU) and the UK. It gives people more control over their personal information and how it is used by organisations. Further information about the UK’s data protection legislation can be found here: [www.gov.uk/data-protection](https://www.gov.uk/data-protection)



# Further thoughts and guidance

The following provides some additional points to think about regarding the collection, measurement and reporting of data. This is merely a guide – it is important for organisations to consider what measures are relevant, proportionate and pragmatic for them depending on factors such as their size and resource.



## Collecting good-quality demographic data

A key starting point in the DIAP process is the collection of high-quality demographic data for the organisation’s board and SLT. Where possible, extending data collection to the wider workforce further strengthens the organisation’s understanding of its overall diversity. It is recommended that this data be collected on at least an annual basis to ensure the organisation maintains an accurate and up to date understanding of its current diversity.

There is an important distinction however between collecting data and reporting that data publicly. There is nothing to prevent organisations from holding data on their board, SLT and workforce, but there may be reasons why such data is not reported publicly – for example, if a leadership team is small and reporting diversity information could easily identify individuals.

## Accuracy and currency of data

Collecting high-quality demographic data is important but ensuring that data is both accurate and up to date is equally crucial.

The gold standard for work of this nature is that people should be able to describe themselves, free from assumptions made by others.

Additionally, as personal characteristics can change over time, it is important individuals are able to update their data in response to any changes or confirm if no changes have occurred.



## Measuring Data on Protected Characteristics under the Equality Act 2010

The Equality Act 2010 identifies nine protected characteristics, which can be a useful basis for understanding, tracking and benchmarking diversity. These are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The most commonly measured and/or reported tend to be race (ethnicity), sex and disability, followed by age, sexual orientation, religion or belief, then gender reassignment, marriage and civil partnership and pregnancy and maternity.

Sex and gender reassignment data is collected in different ways. For example, the Census<sup>1</sup> and other surveys by the Office for National Statistics ask about: a person’s sex assigned at birth and whether their gender identity is different from that sex. The Active Lives survey (which measures the activity levels of people across England)<sup>2</sup> takes a simpler approach, asking if someone identifies as ‘male’, ‘female’, or ‘in another way’.

Aligning data collection with recognised national, local or sector specific surveys such as the [Census](#) or [Active Lives](#) enables organisations to make meaningful comparisons with the local or wider population.

<sup>1</sup> See [www.ons.gov.uk/census](http://www.ons.gov.uk/census) for further information.  
<sup>2</sup> See [www.sportengland.org/research-and-data/data/active-lives](http://www.sportengland.org/research-and-data/data/active-lives) for further information.

## Measures of socio-economic, lived and regional experience

The commentary which accompanies the diversity Requirements in the Code encourages organisations, in their discussions, to ‘include and go beyond the nine protected characteristics in the Equality Act 2010, including how to recruit, retain and develop people with different lived, regional and socio-economic experiences.’

The [Social Mobility Commission](#) provides guidance and practical advice for employers to find, attract and develop employees from all socio-economic backgrounds.





## Legal use of data

It goes without saying that data must be collected legally, with organisations holding the necessary permissions to use any data gathered.

Measuring diversity requires collecting information on protected characteristics, which often includes special category data such as health status, which is governed by strict rules and protocols.

Central to the lawful use of this data is the GDPR (General Data Protection Regulations), reflected in the UK by the [Data Protection Act 2018](#). Both data collection and reporting need to adhere to GDPR standards.

## Cultural considerations

People can sometimes be hesitant or reluctant to share information about themselves which can inhibit an organisation's ability to understand their current diversity and/or develop a DIAP. This reluctance may be because of a lack of trust or because of a previous experience or for some other reason. Without genuine engagement from colleagues, organisations will find it difficult to assess their status, develop action plans, or track progress.

Building and maintaining a culture where everyone understands and supports the importance of data collection is not only crucial for a DIAP to succeed, it is essential to creating an inclusive workplace. Steps that can be taken to support this include being open and transparent about the purposes for data collection, ensuring data is used legally, encouraging detailed answers over vague responses, and establishing trust in the process.



## Other information sources

Organisations seeking to better understand or embed EDI in their organisation can consult further resources such as:

### Sports Councils' Moving to Inclusion Framework:

[movingtoinclusion.co.uk/](https://movingtoinclusion.co.uk/)

Moving to Inclusion is the hub for equality, diversity and inclusion in sport and physical activity. It is an initiative by all the UK Sports Councils to provide resources and support for sport and physical activity organisations, moving towards a more diverse, inclusive and socially responsible sector.

### Sports Councils review on 'Tackling Racism and Racial Inequality in Sport':

[www.sportengland.org/funding-and-campaigns/equality-and-diversity?section=race-in-sport-review-section](https://www.sportengland.org/funding-and-campaigns/equality-and-diversity?section=race-in-sport-review-section)

In 2020 the five Sports Councils responsible for investing in and growing sport across the UK came together to explore racial inequalities in sport and to look at how reflective the sporting system is of UK society. Led by the five chief executives of each organisation, this group established the Tackling Racism and Racial Inequality in Sport Review (TRARIIS). This was to help better understand if the Councils were doing enough to understand the context and tackle the issues involved. The review involved an extensive analysis, carried out by the Sport Industry Research Centre (SIRC) at Sheffield Hallam University, of all publicly available data on race and ethnicity in sport. It also involved an additional piece of work led by AKD Solutions, a Black-led learning and development consultancy, to carry out a lived experience research project ([Tell Your Story](#)) in which over 300 people across the UK, ranging from grassroots participants to elite athletes and coaches, shared insights into their experiences of racism in sport. The Sports Councils agreed five common themes for action around people, representation, investment, systems and insight.

UK Sport and Sport England continue to meet regularly with the TRARIIS Advisory Group.

### Sports Governance Academy:

[www.sportsgovernanceacademy.org.uk/](https://www.sportsgovernanceacademy.org.uk/)

The Sports Governance Academy (SGA) is the governance support hub for the sport and physical activity sector. Its goal is to improve the standard of governance in sport and physical activity organisations in the UK by supporting, developing and connecting the people who work with, and have an interest in governance in sport. Its services are designed to meet the diverse needs of an audience that includes governance professionals, those with governance responsibilities as part of their role, chief executives, board members and everyone who has an interest in improving the way their organisation operates.

The SGA is provided by The Chartered Governance Institute UK & Ireland in partnership with the Sports Councils with its training, events and resource base open to all with an interest in governance in the sports sector.



# Glossary

## Active Partnership (AP)

Active Partnerships are organisations taking a place-based approach to breaking down the barriers that prevent people from being active. The Active Partnership network contains more than 40 organisations – further information can be found here: [activepartnerships.org/](https://activepartnerships.org/).

## AGS

AGS was a consortium that came together specifically for the DIAP project. It consisted of three organisations that combined their expertise and skills to provide a comprehensive, holistic approach to supporting partners in developing their DIAPs. These organisations are:

- [AKD Solutions](#) specialises in organisational change management and engaged more directly with those responsible for DIAPs during this project.
- Sheffield Hallam University’s [Sport Industry Research Centre](#) is a leading authority in sports data and applied research. It advised on the nature and use of demographic and other data across the project.

- The Governance Forum is a niche consultancy which designed and executed the auditing processes and oversaw the independent review of DIAPs.

## Code

- References to the Code mean [A Code for Sports Governance](#), a revised version of which was issued in 2021. The Code sets out the levels of transparency, diversity and inclusion, accountability and integrity that are required from organisations which are in receipt of UK Government and National Lottery funding from Sport England and/or UK Sport. DIAPs are a Requirement at Tier 3 of the Code, which generally applies to organisations in receipt of substantive, strategic investment. Further information about the Code can be found here: [www.sportengland.org/news/revised-code-sports-governance-published](https://www.sportengland.org/news/revised-code-sports-governance-published).

## Diversity and Inclusion Action Plan (DIAP)

The action plans which set out the practical steps organisations will take to achieve greater diversity and create inclusive cultures, and that meet Requirements 2.1 -2.3 of the Code.

## Equality, Diversity and Inclusion (EDI)

This booklet refers to equality, diversity and inclusion (EDI) throughout to align with the terminology ‘Diversity and Inclusion Action Plan’ but recognises organisations may use different terms, including ‘equity and belonging’. For the purposes of this document, EDI includes the following definitions:

- **Equity** refers to fairness and justice in treatment, access, and opportunity by recognising that different people have different needs. It involves providing resources or opportunities that are tailored to individual circumstances to achieve fair outcomes, rather than treating everyone the same.

- **Equality** means treating everyone the same, without discrimination, and ensuring that everyone has the same rights, opportunities, and status. It focuses on providing equal treatment or opportunities, regardless of differences, such as race, gender, or socio-economic status.

- **Diversity** acknowledges and values the unique perspectives and experiences that people from various backgrounds bring, which extends beyond protected characteristics.

- **Inclusion** refers to creating environments where all people feel valued, respected, and able to contribute fully.

## KPI (Key Performance Indicator)

A quantifiable measure of performance over time for a specific objective.

## National Governing Body of Sport (NGB)

An organisation that governs and administers a specific sport at a national level.

## Partner

References to ‘partner’ in this booklet relate to organisations involved in the DIAP project who are Sport England and/or UK Sport funded partners. This includes National Governing Bodies of Sport and Active Partnerships (also defined in this glossary) as well as other organisations receiving long term, strategic funding. The other organisations range in nature from charities to companies, with sport and physical activity as their main remit.

## Partner Support Questionnaire (PSQ)

AGS began the DIAP project by asking partners to complete a questionnaire, known as the Partner Support Questionnaire. This aimed to provide a standardised overview of each organisation’s baseline position on diversity and inclusion.

## Senior Leadership Team (SLT)

References to Senior Leadership Team or SLT in this document mean the Executive or senior management team of an organisation, with responsibility for the operation of the business. This would usually include positions like the Chief Executive, Finance Director, Chief Operating Officer, Performance Director etc.

## SMART Targets

The SMART approach aims to ensure targets are well-defined and achievable by adopting the following framework:

**Specific:** ensure targets or goals are clearly defined

**Measurable:** make sure progress can be tracked

**Attainable:** be realistic in setting goals

**Relevant:** ensure goals align to overall business objectives

**Time-bound:** assign target dates to keep accountable





## Disclaimer and Credits

This guidance has been prepared and made available for general information purposes only. The content may be, or may become, inaccurate or incomplete and particular facts unique to an organisation may render the content inapplicable to that organisation's situation. This guidance is but one source of information available. Organisations may wish to consider multiple sources in order to develop practices and procedures which are relevant to them.

Organisations using this guidance remain wholly responsible for evaluating the completeness and effectiveness of their own practices and procedures.

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