

## **Sport England strategy consultation – response by the Sport and Recreation Alliance**

### **QUESTION 1: TACKLING INACTIVITY**

**Within the new Government strategy there is a clear statement that ‘We (Government) will distribute funding to focus on those people who tend not to take part in sport as much, including women and girls, disabled people, those in lower socio-economic groups and older people’.**

**With this recommendation in mind, please provide your views on the following:**

#### **Which particular audiences should Sport England focus on?**

The Government’s sport strategy focuses on engaging under-represented groups – the inactive, women and girls, disabled people, those in lower socio-economic groups and older people – in physical activity. This provides a clear direction for Sport England’s own strategy and an expectation of where investment should be targeted. In addition, Sport England will also need to consider how it will support 5-14 year olds to participate now its remit has been expanded.

Having said this, it is important to recognise that Sport England’s remit is population-wide and many people who already participate in sport and recreation – and who therefore may not be the target for future funding – are those who do or could support new starters into sport and physical activity through volunteering. If those numbers fell away because of lack of investment, it would have a detrimental effect on the ability of the sector to engage new people in ‘harder to reach’ groups. It is important not to lose sight of the needs of those already maintaining positive behaviour to ensure that they do not slip back.

#### **What is the best way to engage with these audiences?**

There is considerable insight and evidence from specialist organisations as to the ways in which barriers to engaging under-represented audiences might be tackled. Particular attention should be paid to work conducted by leading sector specialists such as Women in Sport, the English Federation of Disability Sport (EFDS) and Sporting Equals, all of whom have a detailed understanding and knowledge of how best to tackle barriers for specific groups. NGBs also have a wealth of invaluable, bespoke insight which should be harnessed under the new strategy.

Sustained effort and activity by the sport and recreation sector, and by partners in both the private sector and in Government, will be required to increase participation, particularly among under-represented groups. This will include, but not be restricted to, a combination of:

- Product adaptations
- Improved consumer insight
- Better use of technology
- New and richer partnership working, including cross-sector partnerships
- A quality, accessible and safe experience for all participants

There are examples of this happening already which should be built on. For example the “Back to” programmes, often aimed at women to encourage them to return to sports they played in their

younger days, or the work the Tennis Foundation has done on creating a variety of ways people with a disability can play tennis. More examples are given in the next part to this question.

Sport England has a particular role in gathering sector best practice, directly investing in new interventions (including pilots) and in ring-fencing elements of funding for innovation. Sport England should also see a key role for it to act as a convener, bringing cross-sector partners together.

In defining its areas of focus, Sport England should set out its key role in facilitating and funding programmes and interventions. The actual delivery and reaching of target audiences should be done by specialist organisations.

Sport England should also consider how its funding will support the engagement of under-represented groups as this may involve additional cost for deliverers. There should be a premium attached to successful working with harder to reach groups. Sport England may also wish to consider how it facilitates the development of new funding models, such as Social Impact Bonds, and how it will support the sector to engage with such investment streams, including through helping organisations to become investment-ready.

Increasing and retaining participants requires deliverers to provide adequate facilities and opportunities. To engage a wide range of participants, a wide range of accessible, quality opportunities must be available. This must not be limited to traditional sports but also maximize the potential of outdoor recreation, as well as movement and dance activities and mind sports such as Bridge and Chess. Specific thought should be given as to how to provide both targeted and inclusive provision, noting that different people will be attracted to different offers. For example, a hockey club could run a disability youth section alongside its mainstream youth session. This provides a targeted offer but also an inclusive one for those who want it.

Increasing participation also requires demand-side interventions. The Government and Sport England must lead the way and provide a clear sense of how behavioural insight will be applied – building on the expertise of the Behavioural Insights Team (BIT). Alongside this, Sport England should share good practice and provide tools that allow deliverers to demonstrate that they are reaching identified target audiences and are also able to show positive outcomes against those set by the Government.

Sport England needs to tailor communications and campaigns to target audiences. It should take learning from the successful 'This Girl Can' campaign and help organisations in the sector apply this to other under-represented groups.

A focus on how to engage under-represented groups should also be included across the range of strategies that Sport England will be producing such as the volunteer and coaching strategies.

Technology is key to driving participation. Sport England should consider how best it can use technology to tackle inactivity, especially amongst target groups, and encourage sport and recreational organisations in receipt of public funds to do the same within their individual plans. It should recognise again that its principle role should be as a facilitator for others, for example, by setting expectations around the standardisation and sharing of data rather than seeing itself as the deliverer of new technology solutions. Sport England will want to look at the approach Transport for London took on making transport data across the city freely accessible which led to the development, by others, of new apps to allow customers easy access to the data.

Learning on tackling inactivity and inequality can be drawn from other nations. For example, sportsotland and the Equality and Human Rights Commission (EHRC) have recently published a report into equality in Scottish sport – [Equality and Sport Research](#). The report looks at who currently participates in sport and the barriers to participation. It also suggests potential solutions.

Finally, Sport England and others must accept the depth of underlying socio-economic reasons for underactivity amongst certain groups. To solve this will be long-term and challenging, and will require sustained investment, support and new partnerships across a breadth of sectors and organisations. Simply re-packaging existing offers, or changing providers will not be enough in isolation.

**Do you have experience of working with these audience groups? If yes please provide examples**

The Alliance has around 320 members, covering the whole spectrum of sport, recreation and physical activity. Many of our members sit outside 'traditional sport'. Therefore, we welcome the move to recognise and celebrate the huge diversity and richness of our membership within the Government's sport strategy and hope that Sport England will reflect this in its own strategies and work.

Some examples of how our members reach under-represented groups are:

- England Boxing initiatives to take boxing into mosques – e.g. [in Sheffield](#)
- Lawn Tennis Association's '[Tennis Tuesdays](#)' – run in partnership with Nike and targets female participants
- Amateur Swimming Association's [dementia-friendly sessions](#)
- Badminton England's [Inclusive Clubs](#) – an exclusive network of affiliated clubs who are committed to providing court time experiences to disabled players in their local area
- Royal Yachting Association's [Sailability programme](#) – which offers disabled people the opportunity to try sailing and gain certificates of achievement
- Wheelchair Dance Sport Association (UK) [supports disabled people to participate in dancing](#) and provides training for instructors
- The Ramblers, in partnership with Macmillan Cancer Support, helps the inactive get active through its [Walking for Health](#) programme

In addition, mind sports like Bridge, Chess and Go offer an important means for older people in particular to be active, socialise and interact with all the attendant benefits for their mental and physical health and wellbeing. Similarly, movement and dance providers have for many years been providing tailored 'dance for health' classes for those with chronic conditions including Parkinson's, dementia and MS. In many cases these classes provide an essential means for these groups to be active within an environment suited to their specific needs.

Alongside specific sport and recreation organisations, bodies such as Girlguiding UK, Scouts and the Duke of Edinburgh's Award, engage with a huge number of young people and offer an opportunity to get more of them active. Girlguiding UK has 400,000 young members and adventure is a significant part of their offer.

There is also the opportunity for Government and Sport England to support active travel schemes, specifically in relation to getting children to and from school. These are great to encourage inactive people to take their first steps by walking to school. For example, [Sustrans' Superheroes](#) is an individual award scheme recognising pupils' skills and achievements in walking, scooting and cycling. Aimed at 7- to 11-year-olds, pupils gain points for activities they complete to become either a Sustrans Hero or Superhero.

## QUESTION 2: INVESTMENT APPROACH

**Sporting Future states that “All new Government funding for sport and physical activity will go to organisations which can best demonstrate that they will deliver some or all of the five outcomes in this strategy.”**

**This means that Sport England will need to decide what evidence of ability to deliver it should require from the organisations it funds, bearing in mind the Key Performance Indicators and strategic outcomes in the new Government strategy. What evidence do you think Sport England should expect from:**

### **Organisations that have regularly received long term Sport England investment (2-4 years)?**

Sport England should adopt a tiered approach to the evidence it requires. Organisations with a demonstrable track record in delivery who have been in receipt of funding for longer, and who are larger and with a more sophisticated structure, should in principle be required to provide the most detailed information. As a principle, funding should be attached to organisations who have the capacity, willingness and ability to deliver priority outcomes. The number of KPIs must be manageable – an excessive number of *key performance indicators* can result in a loss of focus – and in terms of funding they must be linked explicitly to an organisation’s ability to influence them. Prioritisation is therefore important.

If Sport England is to significantly change its evidence and reporting requirements, then it is essential that adequate time is built into the system to allow organisations to move to the new system. Clarity at the earliest possible stage about what will be required is important, as is support and advice to assist organisations in what they need to do.

As an overarching point, Sport England should also use this consultation as an opportunity to ensure that its own processes and requirements are proportionate and efficient. Data collection requirements should be clear and streamlined, with data gathered once and in one format and then shared, rather than requiring multiple data collection exercises. This principle should also extend beyond Sport England and include other partner organisations including local government, central government departments and cross-sector delivery partners amongst others given the strong emphasis on cross-government working in the Government’s sport strategy.

We would strongly encourage Sport England to consider a ‘balanced scorecard’ approach to measurement. This would apply particularly strongly to organisations already in receipt of funding, but the principle should also apply to other organisations who are applying for some form of core (rather than project-specific or small grant) funds. The broader criteria for the scorecard should include, but not necessarily be restricted to:

- Retention rates (to reflect retention in sport & physical activity generally, rather than solely by individual sport)
- Volunteer numbers
- Qualified coaches and other staff
- Club numbers
- Work with under-represented groups
- Collaborative working
- Provision of services, including coaching, in schools and in other partner environments
- Good governance and financial probity

The announcement of Active Lives is a very positive development that offers the potential for a far more rounded and accurate measure of participation as one key component of the future evidence base.

A 'one size fits all' approach in an increasingly diverse sector has serious limitations. There should be additional flexibility in target setting for all funded organisations – also to take into account the focus in the Government's strategy on additional work with under-represented groups.

The focus on mental health and wellbeing within the Government's strategy was very positive and welcome. Sport England should work closely with organisations with expertise in the mental health sector specifically to develop robust and meaningful evaluation tools. This is a complex area to measure and Sport England's role should be in building and convening a partnership to tackle the issue and to build an appropriate set of measurement tools.

Sport and recreation organisations deliver enormous wider benefit to society and to the economy. It is a significant forward step that the Government's strategy recognises this clearly. Sport England should articulate how it intends to measure and weight the evidence of this impact, the requirements on funded organisations (and those with potential to be funded) and how it will work with organisations with knowledge of and expertise in impact measurement.

To develop this point further, the role of social impact in the strategy should be made clear. There are two distinct ways in which sport and recreation contribute to broader social outcomes – either as a positive benefit of an existing offer with resultant health, educational, community and wellbeing benefits or through more specific, bespoke programmes. These latter programmes might, for example, be primarily concerned with delivering specified outcomes and use a sport or recreational activity as a delivery tool. Both of these types of activity are vital, and should be funded, but they are distinct and should be funded differently.

It is often challenging to gather the appropriate evidence for commissioners. The Alliance has regularly seen this within the health sector, though this challenge does apply more widely. Sport England assistance and participation in projects – including those run by the Alliance's Public Health Working Group – to develop the tools and knowledge to gather appropriate and high quality evidence would be very welcome. This would help reinforce the focus on enabling partnerships to collectively build the evidence base on what works.

Sport England has a key role in developing useable impact measures and in building capacity for partners to be able to gather and articulate evidence. This is a challenging area and it is not realistic or helpful to plan to simply outsource the responsibility to providers.

In developing the future funding strategy, Sport England should also consider how to make best use of limited resources – including building on existing investment, developing more multi-sport facilities, better use of the national network of sport and recreation clubs, joint projects with local authorities and other key providers and innovative partnerships with the private sector.

In this regard Sport England's new strategy will need to take account of the impact of wider funding changes on the provision of sport and recreational facilities, particularly at local level. Changes to the way in which local government is funded – principally through a shift towards locally-raised revenue (Council Tax and business rates) – are likely to create significant challenges for many local authorities both in terms of investing in non-statutory services such as sport and leisure provision and in supporting local clubs, for example, through discretionary rate relief. Overall there is a risk that provision will become increasingly varied geographically over time.

Sport England will therefore need to take account of the likely impact of these funding changes and ensure that any investment in facilities is targeted carefully at areas with the highest need and/or

where access to quality facilities is particularly difficult for local communities. In addition Sport England will need to work in partnership with sports bodies, local authorities and newly-created Combined Authorities to set investment priorities in response to local needs.

Further detail on the proposed future allocations, uses and requirements attached to Exchequer and Lottery funds will be important and Sport England should consider a specific ring-fenced Lottery fund to target projects designed to tackle physical inactivity. Sport England should, in addition, develop clear partnerships with other Lottery distributors to promote collaborative working and to develop projects that tackle physical inactivity whilst cutting across sector boundaries with the arts and heritage. This may include physical co-location of projects and the development of joint work to, for example, use heritage sites as attractive destinations and to use the power of the arts and creative sector to build an attractive offer for currently inactive people.

The Government's sport strategy is clear on the need for the sector to diversify its income and to generate new commercial and other partnerships and revenue streams. For existing and potential funding partners, Sport England should prioritise the provision of high quality advice and partner with expert organisations to deliver practical tools and training to support the sector through this process. Sport England's funding strategy should also take account of the leverage potential of both existing and new providers. Where providers are able to evidence the potential for match funding, leveraging of commercial, IP and other assets and the use of volunteers, then these should be given appropriate weighting within the system. Sport England's interest in early discussion about the potential for social investment in sport is welcome and the Sport and Recreation Alliance is keen to take forward this work with other interested stakeholders.

Funding is a vital tool in setting priorities, changing the sector's offer and in driving up standards. As such, the funding strategy should not be viewed in isolation but tied closely to other elements of the strategy, including governance.

### **Organisations that are applying for investment from Sport England for the first time?**

All of the overarching comments around the principles and general direction of Sport England's strategy outlined above would also apply in this section. Where new organisations are applying for investment, then it is reasonable to expect that they can articulate clearly the impact of their activity and how it is distinctive or complementary to existing provision.

New applications will, of course, have to demonstrate the robustness of their financial and governance processes in order to give confidence in their ability to invest funds. It would also be helpful if new organisations demonstrate their understanding of the current landscape, how they will form partnerships with existing and other new delivery bodies and how their offer is distinct, in particular how it adds value compared to what is already being provided.

There are a large number of bodies that are recognised but not funded by Sport England which, collectively, encompass a wide and varied range of sports. Feedback from these organisations indicates that they would welcome a more adaptable approach from Sport England that recognises the specific challenges they face. In this respect, Sport England could usefully consider engaging in a more structured dialogue with a representative group of such organisations rather than through bilateral discussions with multiple individual bodies.

Sport England should build requirements to satisfy funding criteria into its recognition process as far as possible to ensure that organisations that are recognised are fit to receive funds and to minimise duplication.

Sport England may also wish to consider making funds available against specific KPIs to deliver a range of projects.

Finally, Sport England will need to assess how to make appropriate support and advice available to these organisations to assist them through the process

### **Small organisations or projects seeking small grant opportunities?**

The guiding principle for small grants should be light touch evidential and reporting requirements. Burdensome application processes present a very significant and potentially insurmountable barrier for small organisations which are in most cases volunteer run and/or led. Organisations of all sizes are also likely to make the decision to forego grant opportunities if the application process is too burdensome.

In order to solicit high quality grant applications Sport England will need to proactively promote and seek out partnership opportunities rather than wait for community organisations to make the approach. This will particularly apply to organisations who have not worked with Sport England before and who may be working on a cross-sector basis, for example on joint arts-physical activity projects.

Sport England should assess if its current funding criteria will remain fit for purpose, and if requirements around governance, financial data and track record are appropriate and proportionate for micro grants.

Sport England should work with the other Lottery distributors to both learn from their experience of funding organisations for the first time and also to try and standardise requirements as much as possible such that where organisations seek funding from more than one distributor they are not asked unnecessarily for different or duplicate information.

### **QUESTION 3: 5-14 YEAR OLDS NOW WITHIN SPORT ENGLAND'S REMIT**

**Sport England's remit has been extended with a responsibility for sport and physical activity now being for children aged 5 years and upwards outside of school. The Department for Education will remain responsible for the delivery of physical activity and sport during curriculum time.**

**With the extended remit, but no additional funding, what should the priorities be for Sport England working with children aged 5-14?**

The cross-departmental nature of the Government's sport strategy provides a helpful framework for Sport England to work with the Department for Education (DfE) to best engage children aged 5-14 in activity and keep them participating through key transition points in their lives. Although we recognise that, on paper, remits for DfE and Sport England are different (curricular and extra-curricular respectively), they share the same aim of getting children active. For the 5-14 age group, schools are the most obvious place to achieve this. A joined-up approach between Sport England and DfE – and other key stakeholders such as Youth Sport Trust and Association for Physical Education – is critical to avoid duplication. To keep the Sport England investment entirely separate from the DfE responsibility for PE in the curriculum will seriously limit the impact of Sport England's ambitions to deliver on its new 5+ remit. Sport England should look to DCMS to support them in doing this.

The Government's strategy also commits to joined-up working to develop the most appropriate way to measure children's engagement in sport and physical activity through an extension of the Active Lives method. It would be helpful if any measurement system clearly links to the outcomes and KPIs set out in the Government's sport strategy.

The new measurement system and Sport England framework should encourage an environment where children aged 5+ are exposed to a wide variety of sports and activities with the focus on becoming physically literate rather than being pigeonholed too quickly into specific sports. It is important to recognise that, while some sports and activities are suitable for engagement from a very young age, all benefit from children who have developed an interest, enjoyment and skill in being active.

Further up the age range we believe there is scope to look outside traditional sports as a way of tackling the observed 'drop-off' in participation amongst teenagers. In particular, the provision of a strong dance offer within secondary schools – both through the curriculum itself but also extra-curricular clubs – can be an effective way of keeping young people (especially girls) active where they might otherwise choose not to take up a traditional sport.

After school clubs are a key way of encouraging children to be active. These have expanded to include a range of activities covering sport and recreation activities as well as movement and dance. There is an opportunity for further partnerships between schools and national governing bodies of sport to deliver these activities. In addition, clear pathways from schools to clubs are crucial for children and young people to continue participating in their chosen activities.

There is potential for Government and the sport sector to work together and build on initiatives like Satellite Clubs and local partnership working through County Sport Partnerships (CSPs) to reduce the likelihood of drop-out. We would welcome continued support for CSPs and similar structures which provide a valuable infrastructure for local delivery.

Sports clubs and community groups offer a wealth of opportunities for children and young people to take part in and develop a love for sport. However, more could be done to provide opportunities that

match local need. Our ["Five-step plan for a more active population"](#) published ahead of the Election recommended that:

- Every local authority to produce a robust and comprehensive strategy for physical activity opportunities in response to local need
- Local areas to create, protect and utilise accessible places where people can be active
- Government should support local communities to maximise the opportunities around asset transfer

We welcome the commitment in the Government's sport strategy for Sport England to pilot local physical activity strategies. Many of our members have already developed local relationships with health partners to deliver projects which meet the five key outcomes of the Government's sport strategy. However, more needs to be done and we would welcome more support from Sport England how to achieve this.

The Alliance believes that every local authority's strategy should include a requirement to conduct a robust and comprehensive audit of all local assets and facilities and to take all reasonable steps to promote and provide information to the local population about opportunities to participate in sport and physical activity.

This provides another avenue for joined-up working as many schools already open up their facilities to the community. Nevertheless, there is more that could be done. As stated in the Government's strategy, Sport England should continue to build on resources such as "Use Our School" and work with DfE to ensure that schools are aware of such guidance. DfE should continue to push all education establishments, including academies, to provide access and perhaps consider an incentive/reward scheme for schools (state and independent) that meet agreed KPIs on community use.

Many of our members provide opportunities for children to get active outdoors so we welcomed the inclusion of outdoor recreation in the Government's sport strategy. In particular, we support the plan for Sport England to consider all spaces, not just built facilities, for future investment. We would welcome further guidance from Sport England on how this will work in practice.

Sport England should also use the joined-up nature of the Government's sport strategy to engage other departments working with 5-14 year olds, for example the Ministry of Justice and the Home Office which lead on youth justice and gangs. We have been exploring links with the Ministry of Justice and would be keen to collaborate further on this.

The increasing prevalence of academies and free schools potentially add further complexity and cost to the accessing of school facilities and Sport England should work closely with both academy chains as well as with local authorities, the Education Funding Agency and the DfE to provide support and guidance to encourage schools to make their facilities available. This principle of accessibility also applies to independent schools. Sport England could helpfully work with the Independent Schools Council (ISC) and others to promote further access for community groups to schools assets, facilities, teachers and coaches. There has been some positive work in this area, including recently by the ISC and Charity Commission, which should be built upon.

Finally, we believe there is an important role for OFSTED in supporting Sport England's new strategy through monitoring the inclusion and delivery of swimming lessons in primary schools.

## QUESTION 4: GOVERNANCE STANDARDS FOR SPORT SECTOR

The Government strategy states:

**“UK Sport and Sport England will, along with the other Home Nations’ Sports Councils, agree a new UK Sports Code of Governance by September 2016, the equivalent of the Financial Reporting Council’s UK Corporate Governance Code”.**

**“This new UK Sports Governance will be mandatory for all sports bodies seeking public funding in the next funding period. Organisations that do not meet the code will not be eligible for public funding”.**

**Agreeing the Governance Code and requiring grant recipients to comply with it will therefore be an important part of Sport England’s work in future. From your own organisation’s perspective:**

**What are the minimum governance standards that you would expect any sports body to achieve?**

The Alliance is committed to the development of progressive, robust and functional standards of good governance for the sector. These should build on the standards and best practice developed in the commercial sector and contribute to the development of NGBs and other sporting bodies as high performing organisations.

In 2011 the Alliance led a sector wide initiative to help sport organisations improve governance standards. A consultation was launched with the support of UK Sport, Sport England, the British Olympic Association, the British Paralympic Association and Birkbeck, University of London to understand the needs of the sector. The Alliance also consulted with the whole of our membership through divisional meetings and the result was the launch of the Voluntary Code of Good Governance for the sport and recreation sector – created by the sector, for the sector.

In 2014, the Alliance commissioned Birkbeck to carry out an independent assessment of the impact of the Voluntary Code since its launch in 2011. A total of 62 respondents from 51 separate organisations participated in the survey and **81%** of the respondents indicated that they signed up in order to improve governance in general, to adopt best practice, to demonstrate commitment to good governance and/or to use the Code as a framework for positive change within the organisation. The findings were significant with **95%** respondents stating the Code had been effective or very effective in assisting good governance. Moreover, **3 out of 4** respondents said implementing the Code had had a positive effect on their whole organisation. Whether in receipt of public funds or not, organisations that sign up and take action have shown the Code can make a difference to their organisations.

Since the launch, the landscape of the sector has changed and the Code was revised and refreshed in 2014. The Voluntary Code of Good Governance sets the foundation for our work in this area, outlining seven principles we believe underpin the development of a gold standard governance framework for the sector. We have used the principles to structure our response; outlining what we believe to be the minimum acceptable standards in each area and detailing action that should be taken to achieve these. To date, over 100 organisations have signed up to the Code.

Similar to the FRC’s UK Corporate Governance Code, we believe that governance standards must be strong but flexible and adaptable if they are to cater for the huge diversity of organisations represented in the sport and recreation sector. For this reason, we think that the new UK Sports Governance Code should follow the “Comply or Explain” model, should there be any deviation from the minimum expected governance standards.

Our recommendations for **minimum** acceptable standards of governance in sport and recreation organisations are as follows:

### Principle 1: Integrity

1. The Board should establish formal and rigorous arrangements to protect the integrity of their sport and demonstrate that these policies and procedures are being sustained and adhered to; including:
  - 1.1 The Board should implement policies to govern protection of integrity in their organisation and the wider landscape of their activity. It should be able to evidence ongoing compliance with and enforcement of these policies.
  - 1.2 Every organisation should have a board member or senior executive designated with responsibility for ensuring integrity. Their remit should cover both business and sporting integrity; including, but not limited to: bribery, corruption, gambling, doping, and safeguarding of children and vulnerable adults.
2. The Board should maintain high ethical standards and actively promote the moral, physical and mental wellbeing of participants.
3. The Board should satisfy itself that the views of athletes/participants are considered on a regular basis to foster organisational development.
4. The Board should be able to show evidence of risk monitoring and risk mitigation procedures for their organisation.

### Principle 2: Defining and evaluating the role of the board

1. All board members should have clear and distinct roles and responsibilities.
2. The Board should have a formal and transparent procedure for the appointment of new directors.
3. The Board should run an effective induction process for new directors.
  - 3.1 New board members should be provided with information containing the organisation's governing documents, director's legal duties, the organisation's code of conduct and the board member's role description and terms of engagement.
  - 3.2 Board members should have access to necessary resources which enable them to clearly understanding of the structure and operation of the organisation.
4. The Board should be collectively responsible for the recruitment, management and support of the CEO.
5. Board members should adhere to the decisions agreed at board meetings (even those they may have disagreed with).
6. The Board should undertake ongoing monitoring and annual evaluation of its own performance and the performance of its committees.
  - 6.1 Each board member (including the CEO) should carry out annual self-assessment.
7. The Board is responsible for setting and achieving the strategic aims of the organisation.
  - 7.1 The Board should maintain appropriate risk management policies and internal control systems to support the strategic goals.
  - 7.2 All board members should ensure they understand the strategic and operational distinction and, where possible, delegate operational responsibility to the executive staff or committees or volunteers.
8. The Board is responsible for the welfare of the organisation's staff, including volunteers.

### Principle 3: Setting vision, mission and purpose

1. The Board should delegate appropriate authority to sub-committees for specific areas of responsibility as required (i.e. nominations, audit, finance etc.)
  - 1.1 Board sub-committees should be provided with appropriate terms of reference to guide and govern their activity.
2. Board members should maintain appropriate relationships with stakeholders and external partners to support the vision, mission and purpose of the organisation.
  - 2.1 The Board should use the AGM (and other occasions where appropriate) to communicate with members and other stakeholders.
3. The Board should monitor progress against achievement of the organisation's mission, vision and values.
  - 3.1 The Board should undertake an annual review of the organisation and its activities against the organisation's strategic aims.
4. The Board must satisfy itself that it has necessary resources within the organisation including its staff and volunteers to support the delivery of the strategic plan.

### Principle 4: Objectivity: Balanced, inclusive and skilled boards

1. All board members should have written job descriptions and there should be a clear distinction of roles and responsibilities between the Chair and the CEO.
2. The Chair should regularly review the professional development, training and education needs of the Board.
3. The Chair should make reasonable effort to maintain communication with and amongst board members between board meetings.
4. The Board, where possible, should appoint and delegate necessary authority to a nominations committee.
5. The Board should have an appropriate balance of appointed and elected members.
  - 5.1 At least 25% of board members, including the Chair, should be independent. ('independence' as defined by the Sports Councils).
6. The Board should aim to maintain a level of diversity that is representative of the community they serve, wider society, the members and participants.
  - 6.1 The Board should make efforts to improve diversity on all fronts including, but not limited to, age, race and gender.
7. The Board must be of a size that is appropriate to their organisation's circumstances, but should number no less than eight and no more than twelve members to ensure effective decision making.
8. Board members must be elected or appointed on fixed terms, and there must be a limit to the number of terms an individual can serve. All elected directors must submit for re-election at the end of each fixed term.
9. The Board should make provision for succession planning, in the knowledge that limited, fixed terms for board members will generate increased turnover of board members.
  - 9.1 This planning should include a regular skills audit to ensure that necessary skills continue to be represented, and that skills gaps can be filled.
10. The Board must have a conflict of interest policy and maintain a register of interests for board members and senior executives.

## Principle 5: Standards, systems and controls

1. The Board must ensure controls are in place to protect the moral, physical and mental wellbeing of participants.
  - 1.1 The Board should ensure the policies include, but are not limited to: bribery, corruption, gambling, doping, bullying and discrimination and monitoring and reduction of common injuries and associated risks (including concussion).
2. The Board should establish formal and appropriate arrangements to ensure compliance with legal and regulatory requirements.
  - 3.1 The Board must ensure adequate financial controls are in place and where appropriate this should be supported by an audit sub-committee chaired by an independent board member.
3. The Board should set procedures for identifying, assessing and regularly monitoring organisational risks.
  - 3.1 Action should be taken to mitigate identified risks
  - 3.2 A risk register should be maintained and regularly reviewed by the board.
4. The Board (and Audit Committee) should maintain appropriate relationships with external auditors.

## Principle 6: Accountability and transparency

1. The Board is responsible for ensuring that the activities and decision making processes of the organisation are transparent.
2. The Board must publish annual reports detailing progress against strategic goals, vision, mission and purpose.
  - 1.1 The Board should ensure the publication of audited annual accounts.
  - 1.2 The organisation's "Register of Interests" should be made publically available.
3. The Board should ensure that details of the organisation's activities are being communicated to members and stakeholders, with particular focus on communicating major or contentious decisions in a clear and punctual fashion.
4. The Board is responsible for ensuring that they remain accountable to all members and stakeholders.
5. The Board should ensure that AGMs and other general meetings take place on a regular basis and are structured so as to allow members to use it as a platform to discuss the Board's activities for the year.
6. The Board must ensure there are systems in place to efficiently manage member queries.

## Principle 7: Understanding and engaging with the sporting landscape

1. The Board is responsible for establishing beneficial strategic relationships with other organisations, including Sports Councils and other national and international bodies.
2. The Board should ensure their organisation cultivates beneficial and supportive relationships with volunteers and have mechanisms in place to manage volunteers effectively.
3. Board members have collective responsibility to make reasonable efforts to promote their organisation domestically and internationally.
4. The Board must make all reasonable efforts to gather the views and opinions of their membership to ensure the organisation's strategy reflects the needs of the sport or recreation activity at all levels, from grassroots to elite.
5. The Board should ensure the organisation collaborates with other similar organisations, both nationally and internationally, where this will benefit members and participants.

## **How might Sport England help organisations to achieve any required standards?**

To achieve a sustainable culture of adherence to high governance standards, action should be taken to embed the principles of good governance across the workforce, not just at board level.

We strongly believe that minimum governance standards should be included as pre-requisites in the Sports Councils' NGB recognition processes and for any agency funded to deliver governance outcomes. This would set the tone of what is expected from NGBs and assist new NGBs to focus on developing as high performing organisations from the outset.

Building good governance into the syllabus of workforce and future leadership development programmes would embed the concepts of good governance across the workforce. By educating more people on the basics of good governance, why it is important and how it contributes to high-performing organisations, the likelihood of buy-in and adherence across the sector is greatly increased.

Linking to workforce development, increasing the diversity of the workforce at all levels (not just at board level) can contribute to better, transparent, accountable and objective governance, and should certainly be encouraged. The focus so far has been primarily on targets for female representation at board level (with targets of 25% by 2017 set by Sport England), but it would be beneficial to see this focus extended to cover BME and disability representation also.

In terms of hands-on assistance in the more immediate future, the Alliance provides a range of governance training opportunities – independently and with partners – that are open to all sport and recreation bodies.

Sport England should identify the needs of NGBs and signpost them to relevant courses which can help them take advantage of the existing support and resources available.

Alternatively a more tailored approach could use external partners, including the Alliance, to develop a programme of governance development for all (or subsets of) recognised NGBs. The Alliance is currently working with Sport Wales to deliver the 'Governance and Leadership Framework' to 28 NGBs and we are in a position to extend this support to NGBs in England.

The role Sport England itself plays is extremely important. In support of a sector-wide, collaborative push for better governance the Sports Councils should help to promote best practice case studies, connect NGBs that can learn from each other and celebrate publicly governance developments in the sector.

Sport England must develop a comprehensive and robust plan to ensure that new standards are applicable to the full diversity of providers and that potential challenges and conflicts with other governance requirements for both charitable and corporate organisations are understood and accommodated.

Finally, we believe Sport England must give organisations an adequate amount of time to understand the governance changes they need to make and sufficient time – probably around 12-18 months – to allow such changes to bed-in fully.

## **Are you aware of any other sources of support or expertise to help organisations improve their governance?**

The Alliance is well connected within the sector and has a consortium of consultants who are able to work with NGBs to improve governance. Recently, the Alliance has partnered with both the Non-Executive Directors Association (NEDA) to provide specialist training for non-executive directors

focussing on corporate governance and directors' legal duties and the Institute of Chartered Secretaries and Administrators (ICSA) to launch the Advanced Certificate for Sport Governance and Administration for the sport sector.

Regarding integrity, the Alliance chairs the Sports Betting Group (SBG) which brings together experts from the leading sports governing bodies and player associations to share knowledge and good practice on sports betting corruption. The SBG is therefore well placed to support other governing bodies and sports bodies with practical guidance and advice in relation to betting integrity and its links with broader governance requirements.

## **QUESTION 5: CAMPAIGNING AND COMMUNICATIONS**

**The Government has recognised that the success of the new sport strategy will be significantly aided by the creation of both campaigns, such as This Girl Can, and overarching messages that the sector can use to help change behaviours in targeted audiences.**

**Sport England and PHE has been tasked with leading “message development and marketing activity to create a compelling environment that encourages everybody, especially people in under-represented groups, to meet the Chief Medical Officer’s (CMO) guidelines.”**

**What approach do you think would be most effective in terms of creating a campaign to encourage people to meet the CMO’s physical activity guidelines?**

The Alliance is concerned that the Chief Medical Officer’s (CMO) Guidelines on physical activity are not as well understood as they should be; if people are to take the need to be more active seriously, they must be clear and confident about what they should be doing. This should start with clinical professionals, with clearer and more detailed training on the role of physical activity in good health. There is a pressing need for NHS professionals to not only understand but to actively use the CMO guidelines.

We welcome the publication of the infographic launched by the CMOs across the nations and believe this will work well with professionals, however a more public-focused campaign would be helpful. This may not explicitly refer to the CMO guidelines but focus on the core messages: how long people should be active for, why they should be active and what they can do. Given that its remit has broadened, Sport England should promote a wide-range of activities including outdoor recreation as we know there is huge latent demand in this area.

The key in this campaign is a simple, clear and encouraging message. Success should be defined as a public that is more aware of the need to become more active and not focus exclusively on the specific CMO guidelines.

Sport England and Public Health England (PHE) could run a broader public health campaign building on the learning from This Girl Can. This should use language that presents activity as fun and enjoyable, as well as being good for health. This would help challenge a common perception that exercise is a punishment for being inactive or unhealthy. A focus on wellbeing rather than specifically on obesity or other physical health conditions may also be helpful to motivate people to get active. The focus should also be on enabling, encouraging people through fun messaging around the enormous benefits of becoming more active.

Given the broad scope of the Government’s sport strategy and its focus on under-represented groups, Sport England could consider a campaign focused on one such group, again building on the success of This Girl Can. Mental health is another area that could be targeted as it is an outcome of the Government’s sport strategy and sport and recreation can make a significant contribution to improving people’s mental health and wellbeing. Sport England could work with PHE to consider how physical activity is promoted as part of the Government’s obesity strategy to ensure that its value is not lost amidst a focus on diet. Alternatively, Sport England could focus specifically on an under-presented group, for example disabled people.

Any campaign must be matched by opportunities for those being targeted to be engaged and the method by which they can do this must be clearly communicated and understood.

## QUESTION 6: VOLUNTEERING

A key element of the Government's new strategy is to require Sport England to invest in and subsequently deliver upon the following key performance indicators:

- Increase in the numbers of people of volunteering in sport at least twice a year
- The demographics of volunteers in sport to become more representative of society as a whole.

**What are the key interventions you think would increase both the number and diversity of new volunteers?**

The Alliance welcomed the increased focus on volunteering in the Government's sports strategy, specifically the announcement that Sport England will be publishing a new volunteering strategy later this year. We would encourage Sport England to use this strategy to consider how best the sports sector can recruit, retain and reward volunteers, as set out in *Sporting Future*.

The Alliance also commends the Government's decision to explicitly account for and measure volunteer numbers and delivery by volunteers, under a new, broader measurement of sector performance. The relevant Government strategy KPI which will measure these outcomes under the *Active Lives* survey explicitly targets the increase in the number of people volunteering in sport at least twice in the last year which is important for capturing the overall health of volunteering and volunteer retention across the nation.

However, Sport England might also want to consider tracking initial engagement of volunteers/those who volunteer only once a year. The distinction between these two figures would provide an estimate of the 'drop-out' rate for volunteers, which in itself would be valuable evidence. The current specificity of the measure could also potentially exclude those individuals who actively chose to volunteer only once a year at standalone major sporting events e.g. Olympic/Paralympic/Commonwealth Games or World Championships.

Ultimately, Sport England and sports organisations need to ensure that the offer to volunteers is appropriate and allows for volunteers to engage flexibly and on their own terms. In order to build on the dedicated army of volunteers who make sport happen, there are a number of positive steps that could be taken:

### Recruit

- Barriers to entry:
  - Any new volunteering strategy should seek insight from volunteers and potential recruits directly, to find out what motivations and barriers promote and inhibit volunteers to participate.
  - In terms of increasing the diversity of volunteers, we would encourage Sport England to engage with a wide range of organisations who already work with under-represented groups – disability, BAME, LGBT – to gain an understanding of existing barriers to entry for volunteering for these individuals.
  - Efforts should be made to ensure community role models reflect the diverse profile of potential volunteers.
  - Volunteering, by its very nature, can pose an opportunity cost to participants. Financial constraints must be taken into account when considering the viability of the offer made to volunteers.
  - Work life/balance - employers should be encouraged to have a volunteering policy to make it easier for employees to volunteer. This could be through better provision of

information, linking employers to clubs or other local organisations, or by offering employees designated time-off to volunteer.

- Attracting new volunteers
  - o Attracting new people, including those from outside sport, would add greatly to the sector's skill base. This should include specific, targeted work to attract people with commercial, legal, financial and other skills at all levels – from local clubs to national boardrooms.
- Awareness and provision of opportunities:
  - o Clear and simple information needs to be provided through a variety of channels – including social media – covering essential details regarding where, when, how and why.
  - o Government and the sector need to actively advertise projects that are already up and running and use these to inspire more people to volunteer, using joined-up awareness and educational campaigns. Any future strategy should build on existing platforms, and try to avoid duplication where possible.
  - o This consultation should also consider the barriers to entry for young people – the benefits of volunteering (listed below under 'reward') should be promoted through school channels from an early age.
  - o Sport England should consider using outcome targets in funding and grants as levers to nudge national governing bodies and sports organisations to focus on creating opportunities – in particular for under-represented groups (including young people) – to volunteer.
- Elite ambassadors:
  - o While we recognise that our Olympian and Paralympian athletes already do a lot to promote their respective sports, we also believe there is scope for funded athletes to work more closely with organisations to promote the value of volunteering in sport. The involvement of high-profile athletes in these initiatives would increase the profile and reach of volunteering, particularly amongst young people.

## Retain

- Making volunteering easier - ensuring the regulatory burden is reduced:
  - o Sport England should continue to build on its existing resources, including Club Matters, to provide easy to understand guidance for volunteers, and volunteer coordinators.
  - o Consider more carefully the impact on volunteers of regulatory and legislative change – the Community Amateur Sports Club (CASC) scheme is one of the most prominent examples of where sports club volunteers are currently expected to cope with growing and changing technical demands. Policy makers in Government should consider the impact on volunteers' ability to meet these demands and the consequential effect on grassroots clubs.
  - o Bring as much consistency and streamlining as possible to requirements on local organisations – this applies particularly to health and safety requirements, where volunteers are often asked to comply with multiple different regulators and/or requirements. In each area, there should be a clearly established prime regulator who could then work with NGBs and others in the sector.
  - o Communication is vital for keeping volunteers updated with relevant information and keeping them involved, particularly if volunteering is infrequent or irregular.
  - o It is important to create a sense of community for volunteers so that people feel part of a wider movement/project.

- Supporting the mental wellbeing of volunteers:
  - o The [Mental Health Charter for Sport and Recreation](#) highlights different areas the sport sector can focus on to support positive mental health, including supporting volunteers.
- Flexibility:
  - o Sports clubs should consider the time pressures and levels of commitment required for volunteering. Flexible volunteering schemes should be available where possible – these would allow participants to give their time as and when they are able to and ensure a higher level of commitment in the long term.
- Training:
  - o Volunteers need to be supported and fully equipped with the relevant knowledge and skills to fulfill their roles. Personal development and continual learning opportunities would aid volunteer retention. Government and the sector should work together to review and implement training programmes for new and current volunteers.
  - o Volunteers should be supported around safeguarding where relevant and have a clear understanding of the expectations placed on their role – referral pathways should be made clear. This should include ‘on the ground’, practical training to complement existing resources.
  - o Given all of the above, clubs should be aware of placing too large a burden on volunteers, which is off-putting for some.

## Reward

- Personal benefits (both direct and indirect):
  - o Employability skills, education, leadership, team work etc – promotion and awareness of these benefits also plays an important part in recruitment and retention.
  - o Social value of volunteering.
  - o Positive influence for mental wellbeing.
- Recognition:
  - o National Volunteer Day/Week in the UK (and other such activities) could be supported by Government promotion and a media campaign, similar to This Girl Can.
- Volunteering should be enjoyable, not a chore!
  - o This is an important point – volunteering should be enjoyable for those involved. In addition, volunteer roles, whilst often in a position of responsibility, should not be considered a direct replacement for paid employees.

## Grassroots vs Major Events

There is a distinction between volunteering for grassroots sports and recreation and volunteering for standalone major spectator events.

The Games Maker model, which was used successfully during the London 2012 Olympic and Paralympic Games, has already been applied to other major sporting events with the creation of “Hockey Makers” for the Euro Hockey Championships and “The Pack” for the Rugby World Cup. The continual learning from each of these major events should be passed on to future event organisers.

## Governance

For many sport and recreation organisations and charities, the roles of board members are voluntary. It is important that organisations are encouraged to have diverse boards and have

sufficient black, Asian and minority ethnic (BAME) representation, as well as young people. Diversity is not only about female representation but also about encouraging boards to ensure that they truly represent their local community as well as the vast pool of talent which is unrecognised and underutilised.

### **Who are the key partners (within or outside the sporting sector) Sport England could work with to deliver these targets?**

It is important that Sport England, in working towards its targets, taps into existing networks and expertise, rather than trying to create new organisations and structures. Sport England should engage with the Cabinet Office who hold the policy lead in Government for volunteering and more broadly should engage with:

- National Governing Bodies: a number of NGBs already coordinate their own volunteering schemes. These schemes should be given appropriate support from Sport England and resources/expertise where necessary. Sport England should also encourage and incentivise other NGBs to create programmes where they don't already exist.
- Girl Guiding/Scouts: both organisations offer opportunities for adults to volunteer, but also for children and young people to progress from participant to volunteer coordinator.
- Step up to Serve: charity established to coordinate the #iwill campaign. Enables organisations to pledge to take positive action to provide opportunities for young people and raises awareness about the benefits of youth social action.
- Volunteer Kinetic: web-based solution to allow volunteers to find opportunities and events with extensive filtering on activity, duties and location.
- Join In: charity promoting local sports club volunteering opportunities through campaigns and its community network.
- Sports Leaders: charity which offers awards and qualifications to equip young people with employability skills for life improving motivation, self-esteem, communication, team work and confidence. All courses contain leadership volunteering to allow young people to practice and build their skills.
- National Council of Voluntary Organisations (NCVO): membership organisation representing diverse community of over 11,000 voluntary organisations – a third of the voluntary sector workforce in England. Connects, represents and supports members. Provides links for individuals to connect to their local Volunteer Centre.
- National Council for Voluntary Youth Services (NCVYS): national independent body that represents voluntary and community youth organisations in England, through regional and local networks that work with and for young people.
- Sports Volunteering Network: online source which enables users to connect with their local County Sports Partnership (itself a useful direct source for information about local opportunities), either to register as a volunteer or to advertise volunteering opportunities.
- Do It: online source which enables users to find and post available volunteering opportunities.

## **QUESTION 7: FURTHER QUESTIONS**

**As explained in the opening paragraphs of this consultation, the questions above are focussed on limited number of issues.**

**If there are other issues or areas you wish to comment upon, please do so below:**

Overall, we believe there must be a clear recognition in Sport England's new strategy that breadth and depth of the sport and recreation sector extends beyond those sports in receipt of funding through the Whole Sport Plans and elite sport funding from UK Sport and the National Lottery. This point was made clear in the Government's sports strategy and we believe the whole of the Sport and Recreation Alliance's membership – which includes many sports and activities not currently funded through these mechanisms – will have a role to play in delivering many of the strategic outcomes the strategy has identified as priorities for Government.

Against this background we believe it is important for Sport England to set out clearly in its new strategy precisely what its strategic role will be and the supporting rationale for this. Doing so will help to define where and how Sport England can most effectively carry out its core functions as funder and facilitator, creating the framework to support organisations from across the sector to deliver the outcomes in the broader Government strategy.

In addition to defining Sport England's broader strategic role, we are concerned that the questionnaire does not cover Sport England's proposed approach to a number of important policy announcements contained within the Government's Sports Strategy. In particular we would like to understand in more detail how Sport England will:

- Develop common data standards to enable funded organisations to fulfil the requirements set out in the sports strategy to provide data on, amongst other things, the location and availability of facilities, coaches and clubs;
- Measure and support a wider range of physical activity outside traditional organised sport including cycling, dancing and walking;
- Maximise the benefit of the new Coaching Plan for England to ensure that coaching is more accessible and includes expanding and diversifying the type of coaching on offer;
- Create a new scheme to support English cities and regions to bid for major sporting events;
- Create a framework within which sports organisations are able to grow commercial income – principally from sponsorship and media rights – sustainably and in so doing reduce reliance on income from public funding;
- Develop a workforce strategy that will support greater professionalisation and the development of future sector leaders at national and local level.

Many of our members and wider stakeholders have valuable experience and expertise in each of these areas and we are therefore keen to assist Sport England in developing its strategy further.

Other areas that we would like to see addressed include:

### **Concussion**

There needs to be proportionate risk management in and around sport and recreation to ensure that people are not put off participating themselves or letting their children take part. One way to do this is to work together to educate people, in particular parents, about the benefits of being active and how to play safely. The Forum for Concussion in Sport and Physical Education brings together the sport and recreation sector, specialists and Government. This Forum developed concussion guidance for the education sector which provides practical guidance on specific safety issues. We

welcome Sport England's involvement in the Concussion Forum and recommend that it promotes the same messages in its activities outside of the school setting.

## **Safeguarding**

We were disappointed that safeguarding children and adults at risk did not feature strongly in the Government's sport strategy but are pleased it will feature in the remit of the Duty of Care review led by Baroness Tanni Grey-Thompson. We recognise that Sport England is a valued member of the Sport Safeguarding Partnership and hope that it will continue to support improvements within the sector. More work needs to be done to ensure that the sector understands what safeguarding means, both in terms of children and adults, and what it needs to practically do to protect participants. It would be helpful if safeguarding featured in subsequent strategies, such as volunteering and coaching.

## **Mental health**

Sport England is a welcome signatory to the Mental Health Charter for Sport and Recreation and we were pleased to see mental health as a key outcome in the Government's sport strategy. What is not yet clear is how organisations are expected to measure and demonstrate success against this outcome. Any guidance and support on the practicalities of doing this would be helpful.

## **Conclusion**

Overall we recognise there is a significant amount of work for Sport England to do in order to turn the feedback from this consultation into a final strategy. In this context, the Sport and Recreation Alliance would welcome the opportunity to be engaged in further discussions and if useful to help facilitate further conversations with our members as the strategy is developed, including testing specific proposals in more detail on an informal or confidential basis.