Non-protected

Equality impact assessment

**sport**scotland investment principles 2015-2019



# Name of policy: sportscotland investment principles 2015-2019

## Introduction

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| Lead officer | Penelope Peacock |
| Others involved in the assessment | John Lunn, Jacqueline Lynn, Shirley Campbell, Chris Robison |
| Date(s) of assessment | First draft – December 2015 |

## Description of policy

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| Background | The **sport**scotland investment principles 2015-2019 set out the investment principles and outcomes for local authority and governing body investment.  The investment principles are being reviewed to align with 2015-2019 Corporate Plan and this equality impact assessment will be done in conjunction with this review. The essence of the principles will not change.  The previous equality impact assessment relevant to this policy was completed in August 2014 on the sportscotland investment principles 2011-2015. This document can found here: <http://ssc-sharepoint/eo/eq/Impact%20Assessments/Equality%20impact%20assessment%20-%20Investment%20Principles%20-%20Final%20August%202014.docx> |
| Purpose and outcomes | The investment principles guide **sport**scotlands investment decisions and the process for managing these. The document clearly outline the outcomes we want our partners to achieve and the investment process we use.  The investment principles are:   * System Approach – focusing on partners who are committed and connected to the development of a world class sporting system for sport at all levels in Scotland. * Impact – supporting and working with partners that deliver significant impact against the changes we seek and can clearly show how our investment will contribute to these. * Sustainability – supporting activities that have a long term approach resulting in sustained access, opportunities and outcomes. * High Standards – in line with guidelines, policies and good practice; specifically around governance, ethics, equality, safeguarding, planning, budgeting, monitoring and evaluation. * Additionality – in line with National Lottery guidelines, we will only invest to support additional impact over and above what would otherwise be achieved, adding to and not replacing other funding sources.   The principles apply to all of our investment and underpin our approach to the development of outcomes for governing bodies and local authorities.  Governing bodies achievements are measured against performance and development outcomes alongside ensuring that they run an effective organisation.  Local authorities’ achievements are measured against three key outcomes which aim to increase opportunities, the number of people delivering those opportunities and the quality of those opportunities.  The review of the investment principles will not likely see a change to either the principles or the outcomes, but rather to the strategic context within which they are currently framed. |
| How it links to sportscotland corporate and business plans | **sport**scotland **2015-19 Corporate Plan**  **sport**scotland’s corporate plan sets out how we will work together with a wide range of organisations to build a world class sporting system for everyone in Scotland. We see good governance, sustainability and equality as being critical to all public sector investment. Importantly, it recognises that it is essential to take an integrated approach to all that we do with partners to develop the sport system in Scotland.  We have identified three priorities for improvement:   * Equalities and inclusion * People development * Collaboration and impact   It is our view that the system is not static and the elements of the system influence and connect with each other. This means focusing on those environments where support and improvement can have an impact, specifically schools and education, clubs and communities and performance sport.  Further strengthening of the enablers will provide the impetus for additional improvement.   * People * Places * Profile   **The 2015-19 Business Plan**  **Local Authorities**  School and education   * Active Schools * Physical Education   School sport investment and support   * Competition   Clubs and Communities   * Community sports hubs   People   * Young people as leaders   **Governing Bodies**  Partnership   * SGB governance and strategic support   Clubs and Communities   * SGB development   People   * Coach and Volunteer Development Infrastructure   Performance   * Performance Sport Programme |
| How we intend to implement the policy | We invest in local authorities governing bodies and other partners to deliver against agreed targets aligned to the outcomes in the investment principles. The investment principles ensure that our partners are delivering robust plans that are strategically linked to our corporate plan.  Partnership managers work with local authorities and other partners to develop and deliver strategic and integrated plans and manage direct investment into programmes (such as Active Schools, Community Sports Hubs etc.).  The investment principles are implemented through the investment and review process for local authorities, governing bodies and other partners. The investment principles make it clear that investment is not an entitlement and progress against agreed outcomes is reviewed.  Investment levels are agreed in advance to ensure that effective planning can take place. Review panels, held annually, consider the detailed investment for each SGB, LA or partner and make recommendations on those to SMT.  All investment is subject to approval by the senior management team. Investment that carries a high level of risk is referred to the **sport**scotland Board for approval.  Governing bodies are reviewed every 12months and in detail every four years, with the option for an interim review every two years. The cycle of review aligns to the performance cycle for those Olympic, Paralympic and Commonwealth sports and the strategic planning cycle for other sports. The review cycle is outlined in the SGB Investment Framework (<http://ssc-sharepoint/pp/Documents/SGB%20Investment%20Framework%20final%20May%2015.docx>).  Local authority investment is reviewed bi-annually. Six month expenditure trackers are completed with partners and submitted to demonstrate actual spend of **sport**scotland financial investment against what has been allocated. This is broken down into specific programme funded areas. Any unspent allocated investment is then reconciled so that allocation of monies is aligned with the Investment Agreement and the agreed targets and outcomes within this. |

## Who policy is likely to impact on and how

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| Who will the policy benefit (i.e. who is the customer?) If applicable, you should consider how **sport**scotland’s investment is spent in the context of this policy. | The initial impact of the policy is on our partners, namely governing bodies, local authorities and other partners. The work our partners do will benefit the sporting community across Scotland.  Governing bodies work directly with their members. Members may not always be representative of the wider population that may participate in a sport and in some instances members are clubs rather than individuals.  The main focus of our investment into governing bodies is in coaching, staffing, development and performance.  Local authorities work to deliver sport in their local communities. The main focus of our investment into local authorities is in school sport and club sport. |
| Is it designed to impact on one/some/all people who share a protected characteristic? How? | The policy is not designed to have an intended impact on any particular group of people who share a protected characteristic. |
| How will customers be involved in the development and roll out of the policy? If no involvement mechanism, how will customer needs be identified and addressed? | * Internal consultation. * The Partnership Managers are involved in the development of the principles through guided discussion at team meetings. This is refined by managers and the draft policy is approved by the Senior Management Team and then the sportscotland board. Once approved, the customers (the SGBs and Local Authorities / Trusts) are informed by the **sport**scotland partnership managers. * External consultation. * The SGBs were invited to a series of consultation sessions when the initial policy was being developed. (Three focus group sessions in summer of 2014 that included 13 sports). This included a cross section of SGBs and the early outline draft was modified to take into account their feedback. The revision to the Investment Principles for the current 2015-2019 Corporate Plan was minor and did not warrant further external consultation and was therefor an internal review process. The SGBs, Local Authorities / Trusts and other partners were updated of these changes through the **sport**scotland partnership managers. Development and roll out * The new investment principles were passed to SGBs, Local Authorities / Trusts and other partners by partnership managers and also placed on the **sport**scotland website. SGBs, Local Authorities / Trusts and other partners also receive a copy of the investment principles ahead of reviews at the end of each cycle. |

## Think about the impact the policy/practice will have on eliminating discrimination, promoting equality of opportunity and fostering good relations between different groups. Also consider whether there is potential for discrimination.

| **All protected characteristics – outcome area** | **What do we know about equalities in the context of this policy?[[1]](#footnote-1)** | **What is the potential impact (positive, neutral and negative) on people who share the characteristic?** | **What could we do to reduce any negative impacts, maximise positive impacts and ensure quality information?**  **What further evidence should we collect?** |
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| **Scottish Governing Bodies: Performance outcomes** | | | |
| Scots winning medals at the Olympic/Paralympic Games both winter and summer (Rio 2016, Pyeong Chang 2018, Tokyo 2020)  Scots gaining selection to Team GB for the Olympic/Paralympic Games both winter and summer (Rio 2016, Pyeong Chang 2018, Tokyo 2020)  Scots winning medals at the Commonwealth Games (Gold Coast 2018)  Scots gaining selection to GB world class (Podium, podium potential) funded programmes in Olympic/Paralympic sports\*  Scottish team sports competing with increasing distinction on the world stage. | Equalities evidence for performance sport tells us that:   * There are fewer female coaches in elite sport * Professional sportswomen report that they receive lower pay, support, and media representation than their male counterparts. (Active Scotland Outcomes: Indicator Equality Analysis ) | The impact of the performance outcomes as set out in the Investment Principles should have a neutral impact on people who share a protected characteristic.  Athlete selection is based on performance. Investment is directed at performance programmes and athletes linked to medal potential.  Influence is more likely to filter through the pathway and development programmes of an SGB (see below: development outcomes).  In addition to this, influence needs to be assessed against the membership and participation programmes which widen the talent pool and increase opportunities to be involved in sport for people who share protected characteristics. | Please see actions under the pathway and development sections of this EQIA.  Para Initiative to ensure we continue to develop and support para-sport athletes across Paralympic and Commonwealth Games sports.  Be proactive about the athletes we profile as ‘success stories’ to ensure we cover protected characteristics and profile is viewed as balanced |
| \* For golf and tennis feeding athletes on to the appropriate high performance pathway applies  \***\***To be considered for support under the area of ‘Scottish team sports competing with increasing distinction on the world stage’ SGBs must demonstrate that the team can qualify and perform in major world competitions at a level of significance to raise the profile and stature of Scottish sport whilst being underpinned by a robust development pathway structure and a strong membership base. This is further decided by sports being able to evidence a top 6 outcome at the 2018 Gold Coast Commonwealth Games or a world ranking in the top 20% on the international federation ranking list. | | | |
| **Development outcomes** | | | |
| SGBs retaining and where applicable increasing membership through a systematic approach to development.  SGBs that demonstrate the impact of their sporting pathway by providing inclusive opportunities for athletes to learn and compete at their respective age and stage. | We know that people who share protected characteristics are less likely to participate in sport. This difference varies across the protected characteristics and can be prominent for those people who have one or more characteristic (e.g. Muslim women).  Headline equality evidence tells from the Active Scotland equality indicator analysis[[2]](#footnote-2) tells us that:   * Women participate in sport less then men. WO men who identify as black minority ethnic or as Muslim are the least likely to be involved in any sporting activity. * People with disabilities have poorer experiences in school PE and are significantly less likely to participate in sport as adults. * There is limited data on ethnicity and religion. The overlap between the Pakistani and Bangladeshi population and the Muslim population makes drawing conclusions from the data difficult. * Pakistani and south Asian populations are the least likely to participate in sport. * People who identify as Muslim are the least likely to participate in sport, particularly Muslim women. Not all people who identify as Muslim are from a Pakistani or south Asian background. The Muslim community itself is diverse. * There is a significant drop in participation levels at ages 13-15. This drop is particularly significant for girls. This gap has been narrowing in recent years but is still an area of concern. * When measured over time, this drop in activity levels does not change for activities that are taking place outside of the school setting. * Older people participate less with participation beginning to fall in the mid to late thirties and continuing to a rapid drop in over 75s * There is limited quantitative data on participation in sport for the LGBT community. What data that does exist indicates that people who identify as bisexual, lesbian or gay are equally as likely to participate in sport as people who identify as heterosexual. However, people who identify as ‘other’ or ‘prefer not to say’ are significantly less likely to participate in sport. * Qualitative data indicates that sporting experiences are different for lesbian women then for gay men. * In addition to this people who identify as LGBT are more likely to be disengaged in their school years. * Protected characteristics, such as those described above do not act in isolation. A person is a woman and a Muslim, or an older man, or a transgender woman who has a disability. The complexities of what is called ‘intersectionality’, or how these protected characteristics interact with each other to often create even further disadvantage is often overlooked. * For all those people who share a protected characteristic and do participate in sport, they are likely to participate just as much as the general population. * The complexities associated with socio economic disadvantage have a direct impact on levels of sport participation and often interact with those characteristics that are protected in legislation. Research shows that people who live in the most deprived areas of Scotland are much less likely to participate in sport than people in the least deprived area. This finding is true only for adults; there is very little difference for young children.   Within **sport**scotland:  Our investment into Scottish Disability Sport ensures that governing bodies have access to support to ensure that they are developing inclusive pathways both into sport and onto the competitive pathway.  The Equality Standard for Sport ensures that SGBs who achieve Preliminary Level review their membership and put an action plan in place to encourage a more diverse range of participants.  Current progress against the standard is good, with 42 SGBs having completed foundation level and of these 28 have completed preliminary level and 9 have gone on to complete intermediate level. These figures are increasing all the time with more and more SGBs engaging with the Standard.  Actions outlined in the previous EQIA where as follows:  Through work on the Equality Standard for Sport increasing numbers of SGBs are putting in place initiatives to ensure they are widening access to their sport. **sport**scotland could further support this work by:   * Continuing to share examples that have worked in practice * Continuing to encourage SGBs to move towards achieving higher levels of the Equality Standard for Sport.   Both of these actions have been completed and work in this area continues. | There is the potential for the development outcomes to have a positive impact where SGBs are working towards higher levels of the equality standard for sport. | **Action:** All members of the SGB partnership manager team to attend Equality training  SGBs are being asked to consider and describe their sporting pathway, including the competition structure. A tool is being developed to do this, that partnership managers can use with their sports to identify if the exiting competitions provide suitable opportunities and levels of competitions that is appropriate for all of their members and prospective members.  **Action:** ensure that the development of the Pathway tool includes elements for describing and developing the competition structure and also covers issues of inclusion. |
| *These headline outcomes will, where relevant, be underpinned by the following:* | | | |
| SGBs that increase the number and improve the quality of what clubs offer to better meet the needs of participants. | There is very little evidence on club participation and equalities.  We know that some SGBs have clubs aimed at specific groups of people where as others have clubs that try to be accessible to everyone. There are distinct challenges with mixed inclusive clubs as they rely heavily on the skills of the deliverer.  As mentioned above, there is evidence that sport participation for young people drops in the teenage years for the school setting, but participation outside of school doesn’t necessarily change. This finding has been replicated in qualitative studies looking into girls’ participation in sport and young LGBT people.  The Equality and Sport Research report provides summarised research carried out by the English Federation for Disability Sport found that clubs are the first point of contact for people with a disability. Club offer fully inclusive sessions or bespoke groups and sessions. It was clear that clubs who offer inclusive sessions where the larger clubs with higher levels of finance and greater numbers of disabled members and more trained staff. Clubs may not always realise what simple adaptations they can make to include more disabled people in their sport. A key factor to successful integration of disabled athletes was a partnership which could support and facilitate that work.  For people who identify as Lesbian, Gay or Bisexual, there is a preference that a club is explicit about being inclusive or LGB friendly.  This finding was echoed for all protected characteristics in the recent Equality and Sport Research report published by sportscotland. This report found that although clubs often state that they are open to all, this isn’t always explicit and often people’s needs are clearly understood.  Within **sport**scotland:  Through the investment process the number of new clubs is measured. The content with regards to quality and inclusion will be brought to the table by the partnership manager.  As part of the investment process, data is collected on the gender of coaches. This data is stored in a CRM system but currently not collated or used in the panel process. There is no data on other protected characteristics.  **sport**scotland has in place a number of programmes and initiatives to support governing bodies in their work with local clubs.   * Help for Clubs and the club first development tool * Community Sports Hubs * Direct club investment * Regional development posts (managers and officers).   Although there is no single initiative that focuses on inclusion. Each initiative has inclusion built into its delivery. | The potential impact is negative. The evidence we do have indicates that people who share a protected characteristic might not feel they are able to join their local sports club. | The EQIA for direct investment into clubs is not yet complete. This EQIA will help to inform work in this area.  There is a lack of data in this area and it is not clear what data we do have.  **Action**: review the available data currently collected by **sport**scotland and assess ability to increase this if gaps are found.  **Action**: review the collection and use of equalities data as part of the investment process. |
| SBGs that up-skill, develop and increase the number of coaches, officials and administrators through education, support and development opportunities. | Evidence demonstrates that people who share the protected characteristics are under represented in coaching. There is very limited evidence in this area, especially when attempting to gain an a breakdown in data based on the different roles volunteers undertake (e.g. officials, administrators)  Actions from the previous EQIA where all completed.   * The SQA are unable to share equalities data with us due to data protection requirements. * For all **sport**scotland level 1-4 UKCC grants data on age and gender is now collected. This data has been analysed and tells us that as the level of the course increases, the number of women attending decreases. The majority of attendees are around the 35-45 age bracket. | The potential impact is negative.  Through the investment process SGBs are required to provide data with regard to the numbers of coaches they have at levels 1 – 4 and whether those coaches are male or female.  This data is stored in a CRM system but currently not collated or used in the panel process. There is no data on other protected characteristics  The potential negative impact is that there is no current capacity to measure the number of coaches who share other protected characteristics, although some SGBs will have this data from their monitoring reports carried out as part of the Equality Standard for Sport.  **sport**scotland implements a number and variety of coaching programmes working directly with SGBs which all value inclusion. | The EQIA on coach development will help to inform discussions in this area.  **Action**: review the collection and use of equalities data as part of the investment process. |
| **Scottish Governing Bodies**  **Effective organisation** | | | |
| SGBs are required to ensure they have an up to date policy framework and action plans covering all areas of equality, anti doping and sports betting. Board management and functionality is measured through a robust audit process. Development recommendations from the audit and the SGB Governance Framework will be used to identify and agree specific targets. | The investment principles outline that the importance of a strong organisation with effective governance to deliver performance and development outcomes has been well evidenced.  As outlined in the SGB Governance Framework (<http://ssc-sharepoint/pp/sgbpi/GS/Governance/Governance%20Framework%20print%20final%20Feb%202015.pdf> ) good governance stems from an organisation that takes equality seriously, a diverse board and good policies are the starting point. | The potential impact is positive.  SGBs, from Foundation level of the Standard are required to have a robust and up to date equality policy in place which is owned by board. As SGBs work through the levels of the Standard, they continue to mainstream equality across their organization; this includes putting initiatives in place to aim for a diverse board.  All SGBs that **sport**scotland invest in also have access to the **sport**scotland suite of expert resources. This includes HR and legal guidance and advice which, where applicable, are linked to the Equality Standard.  As part of the investment process, data is collected on the gender of board members. This data is stored in a CRM system but currently not collated or used in the panel process. There is no data on other protected characteristics. | **Action:** Review the collection and use of equalities data part of the investment process. |
| **Local Authorities**  **More opportunities to participate**  **More people delivering opportunities**  **Improved quality of opportunities** | Local authorities are subject to the specific duties outlined in the Equality Act, 2010. Like **sport**scotland they have to adhere to a number of requirements, including the development of equalities outcomes and monitoring of these. | We do not have a clear picture overall with regards to how equality is captured in local authority strategic plans. It is assumed that local authorities meet their equalities duties.  In line with our EQIA principles, we would not impact assess individual investments. | **sport**scotland does not currently review local authorities’ equality responsibilities. This is beyond our remit. The previous EQIA action was to include a clause in the local authority investment terms and conditions that outline our expectation that LAs will impact assess our programmes locally in line with their public duty. This action has been completed.  Action: partnership mangers to attend equality training to ensure we are working with our partners with an understanding of the duties. |

## Who will be consulted internally on this EQIA?

In planning internal consultation please consider anyone internally who may have an interest in this EQIA, additional knowledge in the policy area, or be impacted by the actions you have identified.

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| This EQIA will be shared with John Lunn, Chris Robison (SGB Team), Jacqueline Lynn, Shirley Campbell (LA Team) and Iain Kennedy (Coaching). In addition it will be reviewed by Phil Reid (High Performance Manager), based on feedback from the previous EQIA.  For the final stage this EQIA will be taken to the partnerships portfolio group. |

## Who will be consulted externally on this EQIA?

In planning external consultation please refer to the guidance on page five and speak to the strategic planning team for advice and support. It may be that there are several EQIAs that require external consultation at the same time and it is important this is coordinated.

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| No external consultation is planned for this EQIA. |

## What recommended steps should we take to improve the policy and monitor its equality impact?

In developing an action plan, project leads should balance how to maximise the positive impact of the policy or practice on all people who share the protected characteristics, with the requirement to maximise the core outcomes of the policy/practice (i.e. recommendations should be proportional and relevant.) The assessment should take steps to embed ways of monitoring the ongoing impact of the policy and practice.

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| Action | Responsibility | Timeline |
| Ensure that the pathway development tool for SGBs covers issues of inclusion | Michael Cavanagh | 31.03.17 |
| Review the available data currently collected by **sport**scotland, and assess the ability to increase this if gaps are found. | Patricia Horton | 31.08.16 |
| Review the collection and use of equalities data we collect as part of the investment process. To include, coach data, club data and board members. | John Lunn | 31.03.17 |
| Continue to have partnership managers attend equality training to ensure we are working with our partners with an understanding of the duties. | Jacqueline Lynn/John Lunn | Ongoing |

## Sign off

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| Assessment signed off by: | Senior Management Team |
| Sign off date: | 9 June 2016 |

**Appendix 1: 2015 Action Plan**

Action Plan from previous EQIA (2015)

<http://ssc-sharepoint/eo/eq/Impact%20Assessments/Equality%20impact%20assessment%20-%20Investment%20Principles%20-%20Final%20August%202014.docx>

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| Business plan | Action | Responsibility | Timeline | **Complete?** |
| SGB Generic Support  (SGS13.06.02) | Support SGBs equality work:   * Continue to develop the SGB equality training programme * Implement a method for sharing examples of inclusive work amongst SGBs * Continue to develop partnerships with equalities organisations * Develop resources to support SGB trans policy development * Investigate methods for reviewing the protected characteristics SGBs are working with | Fiona Fagan | 31/03/2015 | **One item outstanding -** *Investigate methods for reviewing the protected characteristics SGBs are working with* |
| SGB Generic Support  (SGS13.06.01) | Deliver the Equality Standard for Sport with SGBs:   * Raise with SCEG gap in Equality Standard with regard to the Standard’s ability to influence high performance sport and not just development activities | Fiona Fagan | 31/03/2015 | **Complete** |
| Coach education  (CE) | * Investigate with the SQA access to equalities data for UKCC Levels 2-4 * Revise internal equalities data collection for UKCC Level 1 subsidy * Analyse existing UKCC Level 1 data on sex and age to determine areas of under-representation | Iain Kennedy | TBC | **Penelope To Follow Up** |
| Learning and Development  (LD) | Ensure all partnership managers attend ‘Introducing Equalities’ training, which will provide them with the skills and knowledge required to support partners to address gaps in their own policies and practices:   * SGB PMs * Local authority PMs * High performance PMs | Stan Holden  John Lunn  Jacqueline Lynn  Phil Reid | 31/03/2015 | **Ongoing 83% complete @ 31.03.15**  Due to team changes, this action will be ongoing. |
| National and local partnerships and planning support  (NLP) | Include a clause in the local authority investment terms and conditions that outlines our expectation that LAs will impact assess our programmes locally in line with their public duty. | Shirley Campbell | TBC | **Complete** |
| National and local partnerships and planning support  (NLP) | Ensure revised investment principles include a strong statement on expectations of SGB and local authority partners around equality | John Lunn | TBC | **Complete** |
| SGB Generic Support | Use SGB Generic Support network meetings to embed equality into each programme area (i.e. audit, expert resource, safeguarding), and identify areas of overlap and collaboration | Jacqui Stone | 31/03/2015 | **Complete** |
| Planning and Improvement | Complete an evidence review on participation in sport. | Penelope Peacock | 31/07/2014 | **Complete** |

1. Best practice would involve gathering evidence through internal and external consultation. [↑](#footnote-ref-1)
2. [Active Scotland Outcomes: Indicator Equality Analysis](http://www.gov.scot/Publications/2015/11/9439/3). Scottish Government Social Research, 2015. [↑](#footnote-ref-2)