Non-protected

Equality impact assessment

Facilities Investment – September 2024





**Name of policy:** Facilities Investment

# Introduction

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| **Lead officers** | Dave Ewart; Darren McKay |
| **Others involved in the assessment** | Atta Yaqub, Barry Cook, Cara Viola, Gary Rodden, Mark Cowan, Pam Dewar, Duncan Bennington |
| **Date(s) of assessment** | August 2023, September 2024 |

# Description of policy

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| **Purpose and outcomes** | To develop and prioritise actions that will make our facilities investment more inclusive / accessible and better meet the needs of our communities and under-represented groups in sport. We will focus on: *How we invest* and *What we invest in*. |
| **How it links to sport**scotland **corporate strategy and business plans** | **Sport for Life:** Places is a key enabler in the sporting system. Alongside People and Profile, Places play an important role in maintaining and improving the environments where sport happens. They make a positive contribution towards our corporate strategy, Sport for Life, and the Active Scotland Outcome Framework.**Business plan:** We invest in capital infrastructure projects at a local, regional, and national level across all three environments – schools and education, club and community, high performance. We continue to prioritise strategic and community-based projects that achieve greater inclusion and are socially, economically, and environmentally sustainable in the long term.We want to support both the recovery of sport as well as respond to the local needs of clubs, community sport hubs and community organisations, particularly in areas of multiple deprivation and rural disadvantage and where gaps in provision and opportunities exist.We provide facilities investment through the following streams:* **Sports Facilities Fund (SFF):** We offer a universal strand of capital investment, which is open to all club and community-based projects. Our commitment to inclusion and reducing inequality drives our investment in projects
* **Cycling Facilities Fund (CFF):** Launched in October 2020 with £8m of funding to drive a legacy from the 2023 UCI Cycling World Championships being held in Scotland. Scottish Government and sportscotland have each committed up to £4m of capital funding to this. The Fund is investing strategically in community cycling projects and in a network of cycling hubs across Scotland that provide more people with the opportunity to participate in cycling as well as support the training and competition requirements of several cycling disciplines.
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| **How we intend to implement the policy** | Our Sport Facilities Fund (SFF) supports capital projects that help to create or improve places where people take part in sport and physical activity. We want to support projects that provide more opportunities for people to get involved in and participate in sport and physical activity.We offer investment based on applications from club and community-based projects. Information on how to apply is hosted on the **sport**scotland website. Our budget is circa £2 million per annum and there is likely to be greater demand and competition for funding than is available for us to allocate. [Sport Facilities Fund - sportscotland the national agency for sport in Scotland](https://sportscotland.org.uk/funding/sport-facilities-fund) (sportscotland.org.uk).Prioritisation will be given to projects that deliver the greatest impact on our Equality, Diversity and Inclusion (EDI) objectives. See  [Sport for Life and our approach to Equality, Diversity and Inclusion](https://sportscotland.org.uk/about-us/equality-diversity-and-inclusion) (sportscotland.org.uk). A summary of the process is noted below:* Bi-annual MySport online applications set for 1st April and 1st September​ each year.
* We can invest up to 50% of eligible project costs up to a maximum £200,000. This increases to £250,000 for community-led projects within or serving the most deprived areas (Deciles 1 and 2 on the [Scottish Index of Multiple Deprivation](https://simd.scot/)).
* Process includes an initial Gateway Assessment followed by a full assessment and consideration at a Standardisation meeting. Assessment areas include Sports Impact, Planning, Financial, Legal, Design and Operations​. The Sports Impact section focused on Equality and Inclusion, People Development and Collaboration and Impact​.
* Decisions made at Panel meeting are reported to **sport**scotland’s senior management team (SMT) for approval. This takes on average 2-3 months
* One approved, we issue an Offer of Award with terms and conditions for acceptance by applicant​.
* Once terms and conditions complied with, the project is authorised to start with the award provided in instalments until the project is complete.

We recognise our investment (circa £2m per annum) is small and there is likely to be greater demand and competition for funding than is available for us to allocate, but we have significant influence. We need to ensure our investment drives inclusion and diversity. ​Looking forward, we are currently undertaking an in-depth review of the sports facilities estate in Scotland. This project will provide updated evidence to inform our decision making. |

# Impact of policy

## Who policy is likely to impact on and how

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| **Who will the policy benefit (i.e. who is the customer?)**  | The primary aim of this policy is to provide a universal facilities capital investment opportunity to club and community-based projects. The initial impact of the policy will therefore be on investment applicants however the ultimate beneficiaries will be those people who use the facilities to take part in sport. Applicants are asked to demonstrate how they have engaged their community or plan to engage their community. This includes consultation on current and /or proposed programme of use. They are also asked what affiliations or memberships they have with Scottish governing bodies of sport (SGBs), local authorities or other organisations and groups.  |
| **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 specific group of people who share a protected characteristic. However, projects that can clearly demonstrate an inclusive approach that targets participants in/from SIMD areas or areas of rural disadvantage, or those with additional needs, or those from ethnically diverse communities, or other protected characteristics, as identified in The Equalities Act 2010, will be prioritised. |
| **How will customers be involved in the development and roll out of the policy?**  | See in Guidelines under Our Impact section: <https://sportscotland.org.uk/funding/sport-facilities-fund/sport-facilities-fund-guidelines> (sportscotland.org.uk) We facilitated a cross-organisational project group, with representation from across **sport**scotland, to carry out the assessment. This followed the stages below.Six stage process Stage 1 - Scope group responsibilities, principles of equality impact assessments and inclusive design. Stage 2 - Review application process and investment profile. Review national, local and sportscotland evidence. Stage 3 - Determine what we know, outline key issues and how we can respond. Stage 4 - Scope actions in reponse as well as gap analysis and prioritisation. Stage 5 - Review actions through criteria matrix scoring and consultation Stage 6 - Finalise assessment |
| **Which partners will be involved in the development and roll out of the policy? How?** | We consult SGBs and local authority partners on applications we receive during assessment process via the assigned project manager and/or partnership manager. In terms of promotion of the SFF, we occasionally present to SGB and local authority partners and also attend Funding Fairs with other funders and agencies. However, due to the limited budget, we do not actively seek these opportunities and consider carefully those which we do. |

# What we know

We reviewed evidence and research. This is summarised in Appendix one. Key points are noted below:

## Places enabler

Facilities are key enablers, in both formal and informal sport settings. Facilities are proven to provide more choice and opportunity for participation, including for under-represented groups.

Cost increases and cost of living pressures are key barriers to participation. Investment should prioritise lower-cost participation where possible.

Facilities can increase accessibility and usage by under-represented groups if they are more visible in support of inclusion and through staff training e.g., [Equality Network Rainbow Mark](https://www.equality-network.org/our-work/scottish-lgbti-rainbow-mark/).

## Facilities participation

Evidence from local authority sport and leisure facilitiesshows that participation:

1. Decreases with age
2. Is slightly higher for men/boys than women/girls.
3. Is significantly lower for disabled people, people from diverse ethnic communities and people from areas with higher deprivation.
4. Increasing risk to local authority sport and leisure facilities, depleted reserves and reduced service provision and / or reduced concessions.

## Application process

Improvements should be made to ensure this is simple, clear and easy to access for all. There can be unintended barriers such as need to register, online only services, lack of understanding or trust with public bodies. Action on lived-experienced can improve outcomes.

Tools and processes should be reviewed with support of those groups or communities we want to support.  It is important to have diversity throughout decision-making process.

## Our investment impact

Our facilities investment primarily supported projects which impact women/girls, disability, age, SIMD and rurality. This may be linked to how we positioned groups for our previous equality outcomes.

Example: we see ~10% of applications from lowest 20% SIMD, however this increases to 16% of awards made from lowest 20% SIMD. Guidance is informing how we make decisions but recognise it may not always be people from these communities’ using facilities.

## Monitoring and evaluation

We have limited evidence to show impact on participation from our funding, to inform choices or enable objective decision making.

Stronger evidence base on the connection between investment in facilities and engagement with under-represented groups is important goal, but difficult to realise. ​

Different approaches for undertaking primary research may be required. Some EDI information captured in local models.

# What are the issues?

Through evidence review, we identified five key thematic issues:

## Monitoring and evaluation

Full equalities data is not routinely collected by projects receiving facilities investment. Previous research and data requests for equalities returns are often incomplete and when data is returned, it is not representative.

In 2024, we requested monitoring data and qualitative feedback from 88 projects receiving £12.21m Sports Facilities Fund (SFF) investment. This showed accurate data regarding visits for adult and youths for all projects. For male and female, returns were provided by 54 facilities. 59,769 weekly visits were recorded by SFF facilities.

While anecdotal evidence suggests that SFF is widening access and opportunities for specific targeted groups, most facilities could not demonstrate accurate data collections for the EDI characteristics **sport**scotland seeks to examine. It is therefore difficult to assess impact of facilities investment on under-represented groups or to determine accurately which facilities serve which communities, leading to gaps or over provision.

We recognise the ask for this can in fact be barrier or burden to community groups who lack data collection expertise, resource or capacity. There may be religious reasons why some communities may not apply for facilities investment given it is funded through the National Lottery. It is also difficult to capture usage for ‘open use’ facilities or spaces such as biking trails or pump tracks. To obtain more accurate data, a systematic review is required of SFF and its monitoring and evaluation plan. This can better inform our modelling and support objective decision-making.

## Application content and process

We refreshed our SFF Guidance in January 2023 to reflect current Sport for Life language. The requirement for organisations or community groups to register through our online application system MySport can be a barrier. There is a conflict between simplifying the process for small volunteer club/community organisations and scrutiny required for larger organisations and investment of public funds.

## Support

We have limited capacity within the facilities team, as a result we mainly provide reactive, not proactive support. Staff and external partners lack knowledge and confidence on EDI and community-need data and research which may impact how we make decisions.

## Funding mechanisms

Smaller, community organisations may have limited awareness of us or may not understand our role or context. Funding mechanisms generally do not reach the communities most in need. Organisations that adopt “colour blind” approaches favour those who can best navigate the application process i.e., more ‘professionalised or better resourced’. Under-represented groups and communities are known to be poorly represented in grant-making structures and less likely to be aware of support structures that can help in accessing grants and funds. ​

## Our investment

Difficult to analyse reasons for rejection. Limited post-decision support. No process to direct to other funding streams / support sources e.g., third sector. £2m budget is already over-subscribed. Increased award level but not total investment.We risk creating unmanageable expectation. Better understanding of pipeline (LA/SGB) could help. Some communities won’t apply for or accept lottery funding for ethical or religious reasons.

# Consultation

## Who will be consulted externally on this EQIA?

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| We will engage with our equality, diversity and inclusion (EDI) partners such as ENABLE, Scottish Disability Sport, Sporting Equals, Scottish Sporting Futures. We engaged internal and external partners from the club and community sector to determine how we improve the support that local and national partners provide to club & community organisations. This identified a key theme of: Access to facilities that are affordable, inclusive and sustainable, underpinning the ability to deliver sport and physical activity.   |

## Who will be consulted internally on this EQIA?

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| We engaged a cross-organisational working group to develop this EQIA with representation from finance and investment, EDI manager, research, Scottish governing bodies of sport team and schools and community team. We engaged the wider facilities team which covers planning, design and investment as well as **sport**scotland’s inclusion group.  |

# Action plan

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| **Action** | **Responsibility** | **Timeline** |
| We will refresh our monitoring and evaluation of facilities investment to determine the key EDI information to gather to capture impact of our funding. This will include devising accessible methods of gathering quantitative and qualitative EDI data and impact on outcomes. | Facilities teamResearch | July 2025 |
| We will look to strengthen our decision-making processes by engaging our EDI partners (such as Scottish Disability Sport, Sporting Equals, ENABLE and Scottish Sporting Futures) to help us:* adapt and improve the tools and processes we use to assess facility investment applications.
* improve the facilities’ team knowledge and understanding of the needs of under-represented groups.
 | Facilities team | October 2025 |
| We will formalise the process to advise ineligible and / or rejected applicants on other available funding streams or support, where applicable, and provide clear reasons for rejection. | Facilities team | April 2025 |
| We will continue to update the SFF guidance and assessment in line with Sport for Life ensuring our eligibility criteria is more user friendly, accessible and flexible. Initial improvements include responding to applicant feedback, ensuring application / guidance is hosted on a webpage for greater accessibility and ease of translation, and incorporating additional EDI prioritization to investment panels to manage over-subscription. | Facilities team | September 2024 and ongoing |

## Future actions

As part of the assessment, we have identified the following future actions:

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| **Action** |
| Following the completion of the national estate review and the refresh of our monitoring and evaluation approach, we will explore how we use local data modelling as part of the investment process to identify which facilities projects serve communities and better inform our decision-making. |
| We will work with our EDI and third sector partners to:* Improve our reach into groups / communities historically under-represented through our funding and encourage a more diverse range of applicants.
* Explore more proactive, specific support for groups historically under-represented from investment.
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| We will profile inclusive facilities and share examples of investment into non-traditional sports facilities. Examples include case studies, funding fairs, roadshows, conferences and targeted presentations. This will be informed by our work with our EDI partners. |

# Sign off

We will capture the improvement actions in our corporate performance management system. Actions will be assigned to specific members of staff and dates for completion agree. The strategic planning team will provide support.

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| **Assessment signed off by:** | Senior management team  |
| **Sign off date:** | November 2024  |

# Appendix 1: Evidence review summary



* [Equality, diversity and inclusion: Toolbox - sportscotland the national agency for sport in Scotland](https://sportscotland.org.uk/equality-diversity-and-inclusion/equality-diversity-and-inclusion-toolbox)
* [Scottish Household Survey](https://www.gov.scot/publications/scottish-household-survey-2020-telephone-survey-key-findings/)​
	+ Local Authority Sport and Leisure Facility Use ​
	+ Sex, Age, Disability, Ethnicity (4/9 PC’s)​
* [Scottish Health Survey - gov.scot (www.gov.scot)](https://www.gov.scot/collections/scottish-health-survey/)
	+ Physical Activity Levels by Age and Sex. (2/9 PC’s)
* [SHS Data Explorer: 2014-2019 comparable](https://scotland.shinyapps.io/sg-scottish-household-survey-data-explorer/) ​
* [LGBF Data 2022](https://www.improvementservice.org.uk/benchmarking/explore-the-data)​
* [Sported Insights - Sep 2022](https://sported.org.uk/our-work/)​ - Findings based on 543 responses from Sported’s Member Survey (June, 2022). Provides insight into type of premise and challenges each type of facility is facing due to the Cost-of-Living increase.
* [UK Active - Report 2022:](https://www.ukactive.com/news/forty-per-cent-of-council-areas-at-risk-of-leisure-centre-and-swimming-pool-closures-and-restrictions-before-april-without-immediate-support/) ​ The 2022 report provides insight into the challenges councils/local authorities face with Covid-19 and Cost of Living increase.
* [CLUK Scotland November 2022 Landscape Headlines](https://sportscotland.sharepoint.com/%3Ab%3A/s/PLAN_PlanRep/EZvzVRXkB3hFpARZ50aH-2oB1WS71Pvd5fLq_aHPGMKqAQ?e=bDgi61)​ Current Landscape for Leisure and Culture Charities in Scotland
* [Tackling Racism and Racial Inequality in Sport review](https://www.uksport.gov.uk/news/2021/06/23/tackling-racism-and-racial-inequality-in-sport-review#:~:text=The%20review,%20led%20by%20the%20five%20Sports%20Councils,)
* [Evaluation of sportscotland's work in facilities investment and support - sportscotland the national agency for sport in Scotland](https://sportscotland.org.uk/about-us/our-publications/archive/evaluation-of-sportscotlands-work-in-facilities-investment-and-support)

**Caveats**: There are large data gaps within national data – lack of protected characteristics data and protected characteristics data in relation to facilities. ​ Due to Covid-19, data collection methodologies have changed, rendering data from 2020-2022 non comparable.​bData from 2014-2019 is comparable but cannot provide insight to post Covid-19 landscape.

## Key trends

**Age** - A decreasing use of local authority sport and Leisure facilities by age category. ​​Similar trend in participation in sports is highest in 16-24 age group and declines steeply after age 45 - concern with an ageing population.​ Key barriers for older people include: lack of local access; cost; and/or; access to transport to facilities.​

​Intersectionality i.e. older people are more likely to have a disability and/or a limiting long-term illness that limits participation in similar ways a disability could.​ Sport-specific participation trends means that facility decisions are likely to impact more or less on certain ages (i.e. bowls for example has higher participation amongst older people.)

**Sex:** Men and boys use LA sport and leisure facilities by 2% points more than women and girls.

**Disability**: Disabled people use local authority sport and leisure facilities significantly (8% points) less than non-disabled people. AND higher never used.​ Around one third adults are disabled, 10% children – 2019 Health Survey​.

Disabled adults are much less likely to be active. Disabled children are slightly less likely to be active.​ Disabled adults are much less likely to take part in sport and in our programmes - Household survey 2019 / ASOF survey​.

Previous data shows disabled people report lower levels of satisfaction (47% very/fairly satisfied) with local authority sport and leisure facilities than those with non-disabled people (62%) when they use them.​

UK research found only one in four sports clubs thinks they have suitable sports facilities for disabled people

**Race / ethnicity:** White other / diverse minority groups are less likely to use local authority sport and leisure facilities than White Scottish (3-4%).​ Much higher figure have never used facilities for minority ethnic groups.​ Please note there is very limited data or information on participation or facility issues​. We can't draw strong conclusions as the numbers are small. Participation in our programmes appears broadly similar to representation in the Scottish population.

Tackling Racism and Racial Inequality in Sport - There is emerging evidence that people from ethnically diverse groups experience sport and physical activity differently to White British people. Ethnically diverse populations are more likely to use public sport and leisure facilities; less likely to belong to clubs; and, seemingly more likely to take part in unaffiliated sport. We don’t know why this is the case or whether there is pent up latent demand that could be released if the correct conditions were created.

There is evidence that funding mechanisms do not reach the communities most in need. This was reported by participants representing grassroots organisations, elite athletes, and teams. ​

Black and Asian communities, groups and clubs are poorly represented in grant-making structures. The research found that these communities are also less likely to be aware of support structures that can help in accessing grants and funds. ​Organisations adopt “colour blind” approaches that favour organisations who can best navigate the application process.​

When considering investments to encourage people from ethnically diverse backgrounds to be more physically active, success depends on much more than the nature of an intervention. Other fundamental ingredients include: who delivers the intervention and how it is delivered.

**Socio-economic deprivation**: Across Scotland we know that there is a 12-point difference between use of local authority sport and leisure facilities from the least deprived (24) to the most deprived (12).​ In the two most deprived quintiles, 28% used sport and leisure facilities in the past year, compared to 39% from the top two quintiles.​ 11% point difference between the two lowest SIMD and two highest SIMD quintiles.

## Places wider evaluation

An independent, external evaluation of **sport**scotland’s facilities investment and support focused on the Sport Facilities Fund (SFF) and Legacy 2014 Active Places Fund (APF). This also included the wrap-around planning and design advice and support provided to applicants.​ It provides a look back, largely focusing on the five years leading up to 2017/18. Findings:

* Facilities are key enablers to achieving the benefits of sport and physical activity, around physical and mental health and well-being.​
* An integrated approach to facilities planning and investment can help ensure the most disadvantaged or under-represented benefit from scarce resources. ​
* This could be supported by more co-ordinated and effective partnership working across sport and non-sport sectors.

Available data not complete enough to meaningful assess the impact of facilities investment on under-represented groups. ​This was due to:

* monitoring data not routinely collected from projects​
* the data request form sent to projects resulted in incomplete equalities returns​
* the service user survey attracted a very high response rate from those living in non-deprived areas, males, people with no disability, and those of working age. ​

Findings did show that our investment in quality facilities and places, both in formal and informal settings, provides more choice and opportunity for participation, including for under-represented groups. ​ Around half of the funding recipients reported our investment had enabled specific activities that engage with inactive or under-represented groups in sport and physical activity. The main target groups included disabled people, followed by women and girls, children, and older people.​ This included a range of projects, such as those to improve accessibility, disability sports projects, female only sessions, improved changing facilities, and a greater focus on SIMD areas.

Tackling inequalities in sport and physical activity requires long-term strategic investment and partnership working, alongside creative and innovative approaches. ​Part of the solution lies in better reaching and engaging under-represented groups. ​

New approaches could include investing more in non-traditional sporting infrastructure (e.g. church halls, health centres), and engaging with a much broader range of partners in communities.​

There are challenges in collecting robust data to track changes in participation amongst specific groups. This reflects difficulties in tracking casual use, and some funding recipients struggled to provide even basic equalities data.​

Improving monitoring processes to develop a stronger evidence base on the link between investment in facilities and engagement with under-represented groups is an important goal, even if difficult to realise. Different approaches for undertaking primary research may be required.

## Identified data gaps

* Pregnancy and Maternity data ​
* Marriage and Civil Partnership​
* Sexual Orientation data​
* Gender Reassignment ​
* Looked after children / Care Experience

## Facilities investment and support summary

Source: [Facilities Investment Infographic (sportscotland.org.uk)](https://sportscotland.org.uk/media/snmjbm4f/facilitiesinvestmentinfographic-final.pdf)



## Good practice examples

### National Lottery Heritage Fund (NLHF)

NLHF engaged with funded groups/previously unsuccessful applicants/those interested in applying for funding, focusing on those identified as ‘under-served’. ​Provided insight on how NLHF is viewed, the expectations as a funder, what support would be helpful to for under-represented groups. ​Used to drive action – Kick The Dust programme, young people as decision makers. <https://www.heritagefund.org.uk/about/insight/research/understanding-how-we-can-be-more-inclusive-and-equitable-funder>

### IVAR UK

IVAR supports funders and make fund processes easier for those they fund. ​Outlines 6 principles and some case studies with suggestions of good practice. ​ [Joseph Rowntree Foundation - Embedding direct experience - Funding applications and assessments - IVAR](https://www.ivar.org.uk/publication/embedding-direct-experience-jrht/)