

All-Party Parliamentary Group on Sport, Modern Slavery and Human Rights – Written evidence (NPS0076)

Introduction

In June 2020, the Centre for Sport and Human Rights, on behalf of the All-Party Parliamentary Group on Sport, Modern Slavery and Human Rights (APPG SMSHR)¹, submitted [evidence](#) to the DCMS call on the impact of Covid-19 on the sport sector that focused on ensuring that government spending during the recovery goes to those who have experienced the most severe impacts from the crisis, that issues beyond just the financial impact are taken into consideration, and that public funding on sport is better aligned with sporting values such as non-discrimination and fair play.

This submission is also motivated by those objectives. While this call for evidence is not focused on recovery from the pandemic, the current context must be taken into consideration, as now is the opportune time to focus on how to create a more inclusive sport and recreation sector for all in the UK. This group is of the view that a National Plan on Sport and Recreation should be created, provided such a plan is used to ensure equal treatment within a safe sporting environment and equal access to sporting opportunities.

This submission therefore focuses on the higher-level, more systemic questions that were posed in the call for evidence. It pulls in findings from the submission made to DCMS last summer, as well as evidence gathered by this APPG thus far, much of which was published in an [interim report](#) in Summer 2019.

6. How can racism, homophobia, transphobia, misogyny and ableism in sport be tackled?

Sport has often been heralded as an avenue to overcoming differences in society, however, racism, homophobia, transphobia and misogyny unfortunately remain commonplace in UK sport – anecdotally, many athletes and fans from minority ethnic backgrounds have experienced racism in the context of sport. Further, a [2017 UK government study](#) into homophobia in sport found that 25% of people thought that homophobia was present in football, and a 2015 study from 'Out on the Fields' found that an overwhelming 73% of respondents felt that youth sport in particular was not a welcoming place for LGBT people. While there are many different examples of discrimination in sport and they manifest differently, they can broadly be linked back to the same root causes described below.

Lack of diversity in sports governance

¹ Please note, Lord Colin Moynihan is a member of this APPG, but as a member of the House of Lords Select Committee, he has recused himself from this submission.

Diversity in all forms is lacking across UK sport bodies. The Telegraph for example [revealed](#) a shocking lack of ethnic diversity on Boards across national sports governing bodies, which shows the following numbers of Black Board members in a number of major federations:

- The Football Association – 0/10
- Rugby Football Union – 0/14
- Swim England – 0/12
- UK Athletics – 1/9
- British Cycling – 0/12
- Sport England – 2/11
- UK Sport – 0/10

This issue does not improve when looking at gender diversity for example. In the FA's 2017-2018 Handbook, it was reported that only 3 / 23 committees have more than two women – the Women's Committee, Sanctions Committee and Football Development. While a lack of female representation on Boards is an issue in more sectors than sport alone, most sectors do not rely on public finances to support themselves. The UK Sports Governance Code tried to address this by setting a 30% target for gender, however, this does not go far enough, and in fact creates a sort of "hierarchy of oppression" by saying gender is more important, or is the only issue that needs to be considered, when looking at "diversity and inclusion".

Unequal spending of public finances

Prize money is often cited as one of the gross inequalities between men's and women's sport, but inequalities run deeper and include unequal spending of UK taxpayer money. For example, many of the large stadiums and other sporting venues are built, at least in part, using taxpayer funds. Governments should be spending this money for the benefit of society as a whole, and yet this is not always the case. Take Wembley stadium as one example. Wembley receives approximately £120 million in government funding, yet in 2018, they hosted 16 men's events for every one women's event. Information such as this is available for a stadium like Wembley, but is not available for local community centres or parks and is worth consideration.

Lack of sporting opportunities and resources

[Research from Women in Sport](#), in partnership with the Youth Sport Trust, found that only 56% of girls enjoyed taking part in school sport compared with 71% of boys, and only 45% of girls saw the relevance of physical education to their lives, against 60% of boys, despite evidence demonstrating that participation in sport improves career opportunities. This evidence is also supported by a 2017 [EY report](#) found that 94% of female executives in Fortune 500 companies played sport, making a very strong correlation between a woman's participation in sport and future career success.

Nevertheless, female non-participation in sport has been exacerbated by the Covid-19 pandemic and concern is that it will have a long-term impact on women's opportunities to be active. According to [Sport England data](#)

collected on a weekly basis across April and May 2020, women's activity levels were on a downward trend – at their worst, the gap between men and women was 10%, with only 28% of women meeting weekly activity guidelines.

Furthermore, when looking at more elite level sport, inequalities also exist in what access to resources women's sports and teams have. For example, evidence gathered by this APPG found that women often play on pitches that are not as well maintained as the fields the men play on. This can increase the chance of injury. If and when injury occurs, issues have also been cited with regard to healthcare provisions and health insurance. Female players are required to go through public healthcare services and return on a weekly basis to continue to be signed off work.

While gender reporting is becoming more common, data is still strongly lacking on other metrics, making it difficult to report on different forms of discrimination. Nevertheless, they are often interrelated and those facing discrimination based on gender, might also face barriers based on their ethnicity, social class, age, sexual orientation, ability or other factors. This leads to a lack of accountability and understanding of the diversity picture as a whole, and misses the case for intersectionality.

7. What can be done to improve and implement effective duty of care and safeguarding standards for sport and recreation activities at all levels?

The protection of athletes from abuse and exploitation is one of the single most systemic risks facing all sport bodies. This is recognised in the [2017 Duty of Care in Sport Independent Report to Government](#) by Baroness Tanni Grey-Thompson DBE which identified a number of recommendations. While some areas have been addressed, such as funding for safeguarding to organisations which include NSPCC Child Protection Sports Unit, NWG, and the Anne Croft Trust, more remains to be done, including the allocation of resources to these agencies, and support to the British Athletes Commission to provide 24-hour assistance.

Additional recommendations that need further improvement include:

- Reviewing and addressing the gaps that still exist in the 'position of trust' legislation, including the requirement that it extends to sport coaches and others in an athletes' entourage. Realising the NSPCC #closethe loophole campaign goals could support this objective.
- Addressing funding and reporting requirements related to safeguarding for all national governing bodies.
- Establishing an independent reporting and hearing system beyond the voluntary opportunity for cases to be heard through the Sport Resolutions Safeguarding panel. The lessons learned from the pilot on an accessible investigation system for England need to be applied in practice.
- Appointing a Sports Ombudsman. This position would hold national governing bodies to account for the Duty of Care they provide to all athletes, coaching staff and support staff. As noted in the 2017

Duty of Care report, this would address many of the issues covered within the review, including those that have not yet been addressed.

The recommendations made in that report look at how to strengthen duty of care within the UK, but to address this question globally, the UK government should consider implementing the [Kazan Action Plan](#), adopted by Ministers and Senior Officials Responsible for Physical Education and Sport in 2017. The Plan recognises the contribution that sport can make to the achievement of the SDGs. Of particular relevance to safeguarding is SDG target 16.2 which calls for an end of all forms of abuse, exploitation and violence against children. Achievement of this SDG target by 2030 requires the protection and safeguarding of all children engaged in sport. With the support of UNESCO and the Commonwealth Secretariat, an Open-Ended Working Group has been developing common indicators for measuring the contribution of sport in each country to prioritised SDG targets, including 16.2. The indicators measure how well a country, including the UK, is contributing to target 16.2, including the extent to which every national sports body has adopted policies and procedures to safeguard children, has a nominated child protection officer, and has ensured that all athletes, coaches, and sport officials have participated in training on the safeguarding and protection of children and youth.

8. What are the opportunities and challenges facing elite sports in the UK and what can be done to make national sports governing bodies more accountable?

Elite sport in the UK faces many challenges. Most of these have been exposed, and indeed exacerbated by, the Covid-19 pandemic. The opportunities and challenges as the UK looks to rebuild the sector following the pandemic include:

- Challenge: Ensuring those sports that have struggled do not get left behind
- Opportunity: Enhancing exposure to and participation in new sports

Challenge: Ensuring those sports that have struggled do not get left behind

Impact on women's sport

The summer of 2019 was a particular high point for women's sport in the UK, with England playing host to the Vitality Netball World Cup and making it to the semi-final of the FIFA Women's World Cup. Yet Covid-19 has threatened to erase this progress with several examples of women's sport struggling, such as:

- Cricket: The Hundred competition should have had [an equal number of women's and men's franchises take part for the first time](#) with equal prize money – all broadcast on BBC and Sky, but this has been postponed.
- Football: The FA decided to cut the 2020 women's season and provided no financial support. This is in sharp contrast to Germany,

where the richest men's clubs [donated \\$2 million USD to ensure the women's league could continue](#).

- Rugby: The Rugby Football Union (RFU) made a [decision](#) early on to end the women's season, whereas the Premiership opted to postpone the men's season until 15 August 2020.
- Cycling: [The Cyclists' Alliance \(TCA\)](#) – a group representing professional athletes on the UCI Women's World Tour – criticised the governing body for prioritising the men's race calendar over the women's, with [new tour dates](#) announced for the Tour de France, while major British women's races such as the Tour de Yorkshire and the Women's Tour were cancelled.

Impact on under-funded sports

With the postponement of the 2020 Olympic and Paralympic Games, and even the 2021 alternative date in jeopardy, both an athletes' and a federations funding opportunities are delayed. According to [UK Sport](#), the best-funded Olympic disciplines are rowing, cycling and athletics, receiving £30 million, £29 million and £26 million respectively. When comparing these figures to sports like archery or karate which receive just £630,000 each, it is easy to understand the financial burden many federations have faced. Furthermore, overall funding for Olympic sports equates to roughly £266 million compared to funding for Paralympic sports, which receive just £75 million. It is important that priority for financial recovery be given to those sports and athletes who come from less well-funded areas of the sector.

Consequences of funding struggles

The harsh reality of the pandemic is even those areas of sport that are traditionally very well funded, such as Premier League football clubs, have struggled financially – Tottenham Hotspur for example [secured a £175 million loan](#) from the Bank of England to ease the impact of coronavirus. These financial woes will make clubs more likely to look elsewhere for funding, including through foreign ownership.

Last summer saw the saga of the Saudi Arabian Public Investment Fund trying to takeover Newcastle United FC – a move which drew sharp criticism from human rights groups. With funding tighter following the impacts from the pandemic, and with Saudi Arabia lifting its embargo against Qatar, the UK government should be prepared for more attempts to buy-up clubs and teams within the English Premier League, and must ask itself whether it is willing to support 'sportwashing' the poor human rights records of many of these governments through sport.

Opportunity: Enhancing exposure to and participation in new sports

While funding following the pandemic presents a huge challenge, there is also an opportunity, provided the government ensures a fair and equal recovery. The 2019 FIFA Women's World Cup for example drew huge viewership numbers – a [record breaking 11.7 million people](#) in the UK tuned in to watch the semi-final game between England and the United States. This resulted in a boom in grassroots participation – [according to the FA](#), more than 2.63 million women aged 16 and over were playing

football in the UK, up by 850,000 since the World Cup. This demonstrates the enormous positive impact and opportunity of showing and supporting under-represented sports for grassroots.

The Olympic and Paralympic Games are another important opportunity to showcase sports that traditionally attract smaller viewership numbers. While the Government of Japan is insisting the Games will go ahead regardless of the pandemic, there remains doubt and significant challenges, and so the UK government should be considering what it can do to protect its athletes and keep them safe should they attend the Games, and be thinking of contingency plans in the event that the Games are postponed again or cancelled altogether.

10. Should there be a national plan for sport and recreation?

There should be a national plan for sport and recreation, provided that that plan is used to ensure equal access to sporting opportunities and that it sets minimum standards for things like good governance and safeguarding measures across all sports and sport federations within the UK.

As recommendations from this report, this group feels that any National Plan for Sport and Recreation must:

On tackling discrimination

- Continue to push for gender equality, but recognise that this is not the only form of diversity, and consider how to avoid reinforcing this thinking if and when implementing quotas and targets
- Be used to set minimum standards for diversity on Boards of national sports bodies, prioritising those entities that receive government funding
- Be used to start tracking who is using what when it comes to public spaces and logging this information in a central database. MPs should also consider whether it is possible to look at this information in their local constituencies. They should ask questions such as:
 - Who is using the school fields? Is it equal? If not, why not?
 - How often do the girls' and boys' teams play? In other words, do the boys play in a regular league while the girls simply play in a one-off tournament?
 - Who uses parks and community centres? Are there facilities there for everyone to use? Are the facilities accessible?
 - Where are parks and community centres located? Are they in wealthier areas? Do all have equal access to them?
 - Who uses stadiums? Both in terms of the teams playing in the stadiums and the fans attending?
- Set minimum standards for ensuring equal access to sporting opportunities, and incentivise this with funding
- Establish data reporting mechanisms to begin to capture and measure sporting opportunities using metrics beyond gender, including race, sexual orientation and level of ability to start with

On effective duty of care and safeguarding

- Begin the process of complying with the International Safeguards by implementing Common Indicator 16.2, namely requiring:
 - All UK sport bodies to have formal policies to protect children and youth
 - All UK sport bodies to have a designated safeguarding and protection focal point who is accountable to, and empowered by, the organisation to coordinate a safeguarding and protection response
- Require all athletes, coaches and sport officials to take training on safeguarding and protecting children and youth in relation to their role

On challenges and opportunities in elite sport

- Give equal priority to both men's and women's sport
- Factor in support for under-funded sports as well as sports for persons with disabilities to ensure equal access to sporting opportunities
- Set minimum ownership standards, including funding transparency and strong governance requirements, across all sports
- Outline how it can showcase under-represented sports, including women's sport and Paralympic sport

About the Centre for Sport and Human Rights: The Centre for Sport and Human Rights is a human rights organisation for the world of sport. It aims to support the prevention of human rights harms from occurring through sport, support access for effective remedy where harms have occurred, and promote a positive human rights legacy from sport and sporting events. For more information, please visit: www.sporhumanrights.org

About the APPG on Sport, Modern Slavery and Human Rights: This APPG is co-chaired by Baroness Young of Hornsey and Alex Norris MP and is joined by Lord Colin Moynihan* and Darren Jones MP, with the UN Global Compact Network UK and the Centre for Sport and Human Rights acting as secretariat. Its mission is to find solutions to pressing human rights problems affecting large scale sporting events around the world, focusing on the human rights impacts of mega-sporting events, the impacts of the UK Modern Slavery Act on professional sport companies and discrimination in sport. For more information, please visit: www.appgshr.org.uk

*Please note that as Lord Moynihan is a member of the House of Lords Select Committee, he has recused himself from this submission.

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