

LTA – Written evidence (NPS0142)

Introduction

The LTA is the national governing body (NGB) for tennis in Britain, and as a not-for-profit organisation, our role is to govern and grow tennis in Britain, from grassroots participation through to the professional game.

Millions of people take part in tennis in Britain every year, including as players, coaches, volunteers and officials. Tennis delivers physical and mental health benefits and helps establish important life skills, regardless of age, gender, ability or background, as well as helping to tackle societal issues like loneliness and obesity. When our top British players experience success at major events on home soil and around the world, the country comes together as fans and the next generation are inspired to pick up a racket.

The LTA's vision is to open up tennis and these benefits to more people and places across the country by making it more relevant, accessible, welcoming and enjoyable to anyone, from players of all abilities and backgrounds to its many millions of fans. The LTA's role is as national governing body for tennis across Great Britain, but in Wales and Scotland the LTA works in collaboration with Tennis Wales and Tennis Scotland.

Executive Summary

- Sport matters. Across the country, millions of people participate, spectate and volunteer every year. Sports like tennis bring people together, deliver significant physical and mental health and wellbeing benefits, help create a sense of belonging, and transform lives.
- COVID-19 has presented the greatest challenge to sport and the way it operates in modern times. However, the pandemic has also clearly illustrated the central role and place of sport in society in the UK, and the value that it delivers to communities across the country. Government therefore needs to place sport at the heart of the nation's recovery, and ensure as much sporting activity can resume as soon as possible.
- In the short-term, there is a need to safeguard the sports sector from immediate threat. Many larger tennis clubs and indoor tennis centres that are at the heart of their communities may never re-open without additional targeted support. Ongoing uncertainty around when spectators may be able to return to stadia and at what level, presents challenges for the LTA's own revenue and therefore its ability to support tennis in Britain, with 90% of revenue generated by the LTA's grass court events and The Championships, Wimbledon, within a very short period in the heart of the British summer.
- For the sector to survive and be in a position to support this recovery, support over the next six months is needed from Government, in particular for tennis venues and clubs which are such vital assets for the communities they serve, to ensure these are able to re-open. This should

include targeted grant support where venues have missed out on Government schemes to date, as well as consideration of regulatory support including further VAT deferral and an extension to the business rates holiday, as well as extensions to the Coronavirus Job Support Scheme and Self Employed Income Support Scheme.

- As the nation emerges from the pandemic, there is also an opportunity to look at fresh approaches, including from Government. Sport England's *Unite the Movement* strategy sets out a welcome long-term commitment for the sector, which needs to be replicated by Government by introduction of a dedicated cross-departmental taskforce on sport, physical activity and wellbeing, driven by the centre of Government, and to realise one of the central aims of *Sporting Future*.
- Building on this, there are a number of specific key areas that need to be addressed by Government, working collaboratively with the sector:
 - **Investment in sporting infrastructure.** Long term investment into sporting facilities is required by Government, delivering and building on the manifesto commitment of £550million through the Football Foundation, to benefit all sports.
 - **A priority focus on children and young people.** Including introducing a statutory requirement for schools to deliver a set number of hours of sport and physical activity each week as well as delivering long-term funding commitments for inside and outside the school day.
 - **Targeted support to those who have been most impacted by the pandemic.** By investing in the long-term vision that Sport England has set out in its *Unite the Movement* strategy, to help support participation among women and girls, ethnically diverse communities, and disabled people.
 - **A renewed focus on the importance of parks.** Supporting local authorities to ensure that parks and green spaces are spaces that can provide opportunities for everyone to be active through sport and physical activity.

1. How can local delivery, including funding structures, of sport and recreation be improved to ensure that people of all ages and abilities are able to lead an active lifestyle? For example, how successfully do local authorities and other bodies such as Active Partnerships, Leisure Trusts, local sports clubs and charities work together, and how might coordination be improved?

- 1.1. Tennis in Britain is highly reliant on local structures for delivery. The LTA has around 4,000 registered venues in England, including clubs of all sizes, community indoor tennis centres, commercial venues, park tennis venues, schools and educational facilities, which are all vital for delivering opportunities to participate in the sport. Around 6,000 LTA accredited tennis coaches also play a key role in developing and growing the sport, as do around 30,000 volunteers involved with tennis in Britain.
- 1.2. The LTA works closely with local authorities, leisure trusts and other local delivery partners that provide community tennis facilities and develop

opportunities to play the sport. This includes supporting a network of 54 Community Indoor Tennis Centres, which are predominantly owned by local authorities and operated by leisure trusts and are vital in providing affordable, community-accessible opportunities to participate in the sport year-round. In addition to clubs and other venues, there are also around 2,500 park sites with tennis courts, predominantly in England, which local authorities are responsible for. These are particularly important sites for growing tennis, as the LTA's insight on participation shows that these venues are where many people have their first experience of the sport, and so ensuring that participants have a good experience is vital. The LTA also works with a range of other community organisations and charities to help take opportunities to play tennis to new people and places.

- 1.3. Local authorities are particularly vital to the provision of tennis facilities, including in parks, as one of the biggest investors in culture, sport and leisure, spending around £1billion a year¹. Throughout the COVID-19 pandemic, the vital role of parks as spaces that can provide opportunities for everyone to be active through sport and physical activity has been clear, and this is supported by research on the value to the NHS and wider community value of access to parks, leisure and sports facilities².
- 1.4. The LTA is acutely aware of the significant financial challenges that local authorities are facing in the context of COVID-19, and that whilst they do invest heavily in sporting facilities, given is not a statutory requirement, spending in this area is at risk. As a result, the LTA has developed a collaborative approach around parks tennis courts, looking to support local authorities through a package of initiatives based on the LTA's experience and understanding of tennis, working through the LTA's dedicated regional teams, who engage directly with councils.
- 1.5. One area in which the LTA has found that coordination has worked well is in bringing together local authorities in various forums to learn from each other and share best practice with respect to delivery of public tennis facilities. Whilst it's clear that there is no single model around provision of tennis courts and delivery of programmes, and local factors influence effective delivery models, sharing understanding and experience across local authorities has helped, in a number of cases, to develop more effective local provision.

LTA Parks Accessibility Strategy

In 2020 the LTA launched a major drive to grow participation in tennis in parks in local communities throughout the country, supporting local authorities with a comprehensive cost-free offer to improve the health and wellbeing of their communities through tennis, and ensure park tennis venues are sustainable for the future.

¹ <https://www.local.gov.uk/lga-councils-one-top-investors-culture-sport-and-leisure>

² <https://www.kingsfund.org.uk/projects/improving-publics-health/access-green-and-open-spaces-and-role-leisure-services>

Park tennis courts are vital in helping open up the sport and its benefits to anyone who wants to play, with around 1.5million people playing on park courts every year. The LTA's package of initiatives is intended to support local authorities to provide flexible, free and low-cost opportunities for anyone to pick up a racket and get active through tennis on park courts:

1. **LTA Rally** – a new digital platform to help people search and find tennis activities in their area and make it easier to book a court. LTA Rally collects booking and coaching information via partner venues and displays it for participants in one easy-to-view page, searchable by location, helping to remove what the LTA's insight has shown to be a major barrier to increased participation in the sport in parks.
2. **Gate Access Systems** – the LTA will fully fund digital gate access systems for park tennis courts in around 1,000 target park sites which have been identified based on their potential to have a significant impact on improving accessibility to tennis for the local community. Gate access technology works hand in hand with gate access systems and helps venues track usage, and an easier participant journey to booking and getting on court.
3. **Products and Programmes** – the LTA acquired Local Tennis Leagues in 2020, which offers friendly, competitive tennis for thousands of adults, and plans to scale the delivery of the leagues to many more park sites across the country. The LTA's partnership with Tennis for Free also helps to provide weekly opportunities for people to take part in the sport for free in local communities, with a particular focus on families from lower socio-economic groups. A range of other programmes are also on offer for park tennis sites, including LTA Big Tennis Weekends, intended to help venues attract the local community to come and try the sport at fun and welcoming open days.
4. **Park Operating Models** – different park tennis venues or clusters of parks require different operating models to be successful, and so the LTA has developed a flexible set of best practice models based on experiences of a range of successful and sustainable park sites across Britain. Whether a local authority owns and operates a park venue or cluster of venues themselves, through a leisure trust or not-for-profit partner, or courts are operated by local community groups, an applicable operating model has been developed.
5. **Quick Access Loans** – high quality tennis facilities in parks have been shown to have a positive impact on participation levels, and so the LTA's interest-free Quick Access Loan scheme is intended to help support local authorities or operators in further developing park tennis facilities, with loans of up to £250k available. The priority of the scheme is on improvements such as floodlights and low-cost covered structures that help facilitate year-round play, with consideration also given to court upgrades, new tennis courts and accessible facilities that cater for disabled players.

- 1.6. Whilst collaboration at the local level around delivery and provision of facilities is important, funding structures are also vital. The Institute for Fiscal Studies has identified a funding gap for local authorities of up to £5billion by 2023/23, even with council tax increases of 2 percent each year and grants increasing with inflation³. Faced with such difficult financial challenges and other statutory duties, there is a very real risk to the future of many public sport facilities. Whilst spending by local

³ <https://www.ifs.org.uk/publications/15041>

authorities on sport and leisure is around £1billion, this is reduced from around £1.5billion in 2009-10⁴.

- 1.7. An immediate concern for the LTA is the future of 54 community indoor tennis centres across England, Scotland and Wales, as well as a further 29 indoor tennis centres that are operated on a very similar basis by leisure operators. Some of these venues exist as standalone tennis centres, others are part of multi-sport sites, but all have faced an incredibly challenging financial operating context over the past year as a result of restrictions on indoor tennis, ongoing costs during closure and being ineligible for much of the Government's financial support. These venues are strategically important to growing tennis across the country, providing affordable, year-round opportunities for people of all ages to play the sport as well as many being integral to the delivery of the LTA's wider performance pathway, and coach development work. Whilst some centres will be able to access support via the Government's National Leisure Recovery Fund, this money will be thinly spread given it was announced prior to the third national lockdown, and additional support from Government is needed to help safeguard these vital community assets.

2. How can children and young people be encouraged to participate in sport and recreation both at school and outside school, and lead an active lifestyle? If possible, share examples of success stories and good practice, and challenges faced.

- 2.1. Participation levels in sport and physical activity among children were already concerning prior to the pandemic, but young people have been particularly impacted by the COVID-19 pandemic, with only 45% of children meeting the Chief Medical Officer's recommendation of an hour a day of sport and physical activity⁵. As the nation rebuilds and emerges from restrictions, it is vital that access to participation in sport for children is prioritised.
- 2.2. The first experience of sport for many is at school, and so it is vital that children have the opportunity to take part in sporting activity that is fun, in a positive environment and fosters a sense of confidence. To achieve this, Government needs to ensure that physical literacy is placed on a par with numeracy, at the heart of the curriculum and school day, as well as extracurricular opportunities.
- 2.3. To deliver this, there are a number of core issues that Government needs to address:
 - **An updated School Sport and Activity Action Plan.** The commitment made in the first cross-departmental plan in 2019 was welcome, but given the impact of the pandemic, Government urgently needs to set out how it will work with the sector to address significant inactivity among young people. This should include expanding upon:

⁴ <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/report-of-triennial-review-of-uk-sport-and-sport-england.pdf?MkCDIRsomq33ejs1oDIIdmsmpvxGeOVMo>

⁵ <https://www.sportengland.org/news/childrens-activity-levels-down-many-embrace-new-opportunities>

- **Improved teacher training**, in PE and school sport to ensure better quality provision across both primary and secondary schools.
- **Better reporting** to parents/carers of physical literacy and physical activity levels, and greater inspection of standards by Ofsted.
- **Guaranteed long-term funding for PE, school sport and physical activity.** In recent years, funding for PE, school sport and physical activity has tended to be confirmed year-on-year, and at relatively short notice, which presents difficulties for the sector in planning. Sport England's new 10-year strategy provides some certainty for the sector in the long-term, and Government needs to provide long-term commitment to the following funding mechanisms:
 - **PE and School Sport Premium**, including consideration of whether funding could be increased via an extension to the Soft Drinks Industry Levy.
 - **School Games funding**, including Schools Games Organisers who are vital to the delivery of competition in sports like tennis in England.
- **A National Curriculum requirement for a minimum number of hours of sport and physical activity.** This could include both curricular PE and extra-curricular sport. At present, the minimum requirement only exists as guidance from the Department for Education.

2.4. Sporting bodies also have an important role to play, by developing programmes and providing resources for schools and teachers that help them to deliver, both during and outside the school day, and are effective at engaging children.

LTA Youth

LTA Youth is a new and exciting junior programme, that aims to help more children and play tennis, whatever their ability and whatever their background, and helps them deliver skills for life.

LTA Youth has been designed for 4-18 year olds to bring together and improve the existing junior tennis journey, creating clear and compelling routes into the sport, through schools, parks, club, communities and competitions. The aim of the programme is to help more kids play and stay in tennis, and one of the key principles underpinning LTA Youth is fun and engagement.

The LTA's primary and secondary schools programmes will be fully embedded within LTA Youth. The programme will develop character skills and physical literacy that will benefit children and young people beyond the court, helping them develop resilience and respect. Crucially, there is an emphasis on key movement and motor skills, rather than a specific focus on tennis.

As part of the rollout of the programme, the LTA will be providing dedicated teacher training sessions and lesson plans, to provide teachers with the resources to deliver the programme in a fun and engaging way.

The LTA has Approved Provider Status from the Professional Development Board for Physical Education, as a provider of professional development and resources, for LTA Youth. LTA Youth was also recognised by the Department for Education in 2020, as the only national governing body to be listed on the Government's official list of online education resources for home learning.

- 2.5. A focus on fun and enjoyment remains vital for children and young people outside of school too. In this sense, the LTA hopes that LTA Youth can help to provide better join-up between opportunities within and outside of school, with school-club links a core pillar of the programme, and primary and secondary schools that attend the LTA's new teacher training course receiving a £250 club link voucher. Opening up school facilities for community use outside the school day is also an important way in which children and young people can be encouraged to take part in more sporting activity, particularly to combat the reduction in activity levels observed as a result of COVID-19. The Government's focus and funding commitment to this is welcome.
- 2.6. More broadly, Government funding and resource should continue to be targeted at addressing ongoing inequalities in children's participation. For instance, Sport England data shows that children and young people from the least affluent families are much less active than those from the most active families, whilst children and young people from white backgrounds are more likely to be active than all other ethnic groups, with decreases in activity levels over the last twelve months driven by children and young people of Mixed and Black ethnicities⁶.
- 2.7. Utilising existing local delivery structures is one important way to encourage participation among these groups and address this inequality. Whilst sporting bodies like the LTA can provide resource, training and information that is tennis-specific, local organisations with roots in the community are often likely to have a better understanding of effectively engaging young people in their area.

⁶ <https://www.sportengland.org/news/childrens-activity-levels-down-many-embrace-new-opportunities>

LTA SERVES

LTA SERVES takes tennis and its benefits right into the heart of disadvantaged communities, seeing it played by young people aged 8-18 in venues across the country as diverse as youth clubs, community centres, church halls, mosques and temples.

The programme is part-funded by Sport England, and the LTA works with a number of national partners, to identify small, locally-led community groups that have roots in their community and know the needs of local young people. These groups are then provided with the tools they need to deliver fun, informal tennis activity, and support them with training and investment to create a workforce of tennis activators recruited from the local community.

The strength of this approach is the knowledge of the local community and how best to engage young people among activators. For example, at one LTA SERVES site in Manchester, Khizra Mosque - run by partners Sporting Equals - sessions are consciously timed to begin immediately after children have been to mosque studies.

LTA SERVES also has an import social change element, with sessions seeking to encourage participants to talk about their lives, aspirations and the challenges they face, as well as offering support. The programme also has a community cohesion strand, covering health and self-confidence.

Since its launch, over 30,000 young people have been engaged in the SERVES programme, with half of participants from ethnically diverse groups and more than three-quarters from the 30% most deprived communities in the country.

3. How can adults of all ages and backgrounds, particularly those from under-represented groups, including women and girls, ethnic minorities, disabled people, older people, and those from less affluent backgrounds, be encouraged to lead more active lifestyles? If possible, share examples of success stories and good practice, and challenges faced.

- 3.1. The Government should continue to fund direct interventions targeted at under-represented groups, and the focus within Sport England's ten-year *Unite the Movement* strategy on addressing stubborn inequalities in participation is very welcome. Participation and activity levels among these groups has been most impacted by the pandemic, and it is vital that the sector works together to address this through specific, targeted, interventions.
- 3.2. A particular focus for the LTA is on engaging and providing opportunities for disabled people to participate in tennis. Data shows that disabled people continue to be less active than non-disabled people, with only 17% of disabled people doing at least 30 minutes of sport and physical activity five times or more in a week⁷. Based on a recent LTA survey of disabled

⁷ http://www.activityalliance.org.uk/assets/000/003/695/Impact_of_COVID-

participants, the biggest current challenges around participation are concerns around safety related to COVID-19, and so the LTA has worked hard to produce specific guidance for delivery of disability activity. More broadly, delivering effective opportunities for disabled people to participate means listening to their concerns and seeking to address these through support, guidance and advice for venues, clubs, and coaches that are at the forefront of delivering tennis activity.

LTA Open Court Disability Programme

The LTA's open court programme enables people with a disability or long-term health condition to pick up a racket and play tennis. Having launched following the London 2012 Paralympics, it has grown to become one of the largest disability specific programmes across any sport, and helped a record number of disabled people pick up a racket and get active through tennis. Around 15,000 disabled people played tennis on a monthly basis across the 400 venues involved prior to the coronavirus pandemic. Almost 60% of monthly participants are players with a learning disability, with the remainder including wheelchair tennis players, visually impaired players, deaf players. A network of local, regional and national disability tennis competitions are also support and delivered by the LTA through the Open Court programme.

Through the programme, the LTA is also expanding to target those with other long term health conditions such as dementia, and mental health. The LTA is also looking to expand other formats of the sport, such as walking tennis, particularly to look at supporting those with long term conditions, and older people, to be active.

As part of the programme, which is supported by Sport England, the LTA supplies venues with adaptive equipment, training and resources to increase opportunities for disabled people to get involved in tennis, as well as dedicated support and advice from the LTA team.

Supporting disability-specific participation activity is just one strand of the LTA's work to make the health and social benefits of the sport open to disabled people. It sits alongside activity to make tennis more inclusive, supporting venues and coaches to open their doors and make tennis welcoming to disabled people whether they want to play, volunteer or coach.

- 3.3. Positive and relatable coaches and leaders are also vital in inspiring and engaging under-represented groups. Developing the female workforce is an important way in which the LTA is working to provide more engaging opportunities for women and girls to get involved in tennis. This is both through the She Rallies programme, but also in revising the content and structure of the LTA's coach qualifications and training to allow greater flexibility around learning, which the LTA believes will disproportionately aid female coaches, and improved content on coaching female players.

She Rallies

She Rallies, part-funded by Sport England and launched by the LTA with Judy Murray in 2017, aims to develop the female tennis workforce, providing support and inspiring and empowering women to create more opportunities for women and girls in tennis.

She Rallies is expanding to work alongside LTA SERVES, our sport for development programme which takes tennis and its benefits to the heart of disadvantaged communities, to upskill female activators and provide content to enable delivery of female-only sessions. The LTA has also built and recently formalised an innovative relationship with Girlguiding using She Rallies to train young female leaders to engage more girls in tennis. The partnership marks the first time Girlguiding has linked with a sporting governing body in this way, and will enable us to take tennis to new audiences, through provision of training and resources for leaders.

As part of the She Rallies programme, the LTA is also providing support to make the formal coaching pathway more accessible to women, including through She Rallies Ambassadors but also a new Introduction to Level 1 course, to bridge the gap between activator training and a Level 1 coaching qualification.

- 3.4. A fundamental and immediate challenge in encouraging those from under-represented groups to participate in sport is ensuring the future of those facilities and community organisations that ultimately deliver and provide opportunities. Almost all of these have been impacted by the COVID-19 pandemic, but particularly larger tennis clubs and venues with indoor court provision, which have seen the most significant ongoing fixed costs during enforced closure, and in many cases have not been eligible to access much Government support other than the Coronavirus Job Retention Scheme, given their rateable value, or that they are not business ratepayers at all. Indoor tennis venues are particularly important for delivery of disability-specific activity which in many cases cannot be delivered effectively outdoors, for instance visually impaired tennis sessions. Protecting these venues is, therefore, essential to continued efforts to improve activity levels among under-represented groups.

4. Sporting Future: A New Strategy for an Active Nation, the Government's 2015 sports strategy, outlines five outcome priorities: physical health, mental health, individual development, social and community development and economic development. Are these the right priorities and how successful has the government been in measuring and delivering these outcomes to date?

- 4.1. The priorities set out in the Government's sports strategy reflect the breadth of value and impact that sport delivers to communities across the nation. Whilst these outcomes are important, the economic, social, health and wellbeing benefits of sport are well documented, including prior to the strategy⁸⁹. The fundamental vision of the LTA is to open up tennis and

⁸⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/416279/A_review_of_the_Social_Impacts_of_Culture_and_Sport.pdf

therefore deliver its benefits to many more people across Great Britain, as participants, volunteers, coaches and fans, including those who have previously experienced barriers to involvement in the sport, perceived or real.

- 4.2. Sporting Future set out that “if this new strategy is to work effectively, all parts of government must work more closely together towards clear, shared outcomes”. This is, perhaps the central challenge that remains to be overcome. Whilst there has been some welcome collaboration from Government departments in recent years, for instance around the School Sport and Activity Action Plan or Childhood Obesity Strategy, improved collaboration across Government is still needed to help build on this progress and support growth in sport and physical activity across society. DCMS plays an important role, but cannot effectively drive change on its own.
- 4.3. Related to this, whilst two detailed annual reports on Sporting Future were produced in 2017 and 2018, and showed good initial progress including around sports governance, the Government has not reported on progress in such a meaningful way since. Sport England and UK Sport have both co-ordinated some good work on measuring outcomes, and Sport England have made good progress in sharing insight within their own surveys as well as advising on how to address these within sporting bodies’ own surveys. However, there remains no consistent methodology for sporting bodies to evidence social impact.
- 4.4. Sport England’s *Unite the Movement* strategy has a welcome focus on tackling inequalities, delivering against the outcome priorities of Sporting Future. This aligns well with the LTA’s own vision to open tennis up, making it a sport that can be played by anyone.

5. Is government capturing an accurate picture of how people participate in sport and recreation activities in its data collection? How could this be improved?

- 5.1. The main data collection from Government on participation in sport and recreation is through Sport England’s Active Lives and Active Lives Children surveys. These provide useful data on participation in specific sports that allows some element of comparison and complements detailed data that the LTA also collects on participation in tennis across Great Britain. These surveys also have a focus on outcomes, such as mental wellbeing and individual development, though the published data tables do not break these outcomes down by sport.
- 5.2. The LTA collects data on participation reflecting, weekly, twice monthly, monthly and yearly participation in tennis for adults and children, to help build a comprehensive overview of trends and changes in participation in tennis, inform priorities and measure success against programmes. Sport England focus on a twice monthly participation measure for adults and

⁹ https://www.sportengland.org/how-we-can-help/measuring-impact?section=social_and_economic_value_of_community_sport

weekly measure for children, which whilst useful does not necessarily on its own capture the entire picture around participation, i.e. those on the periphery of an activity. Providing more regular updates (i.e. quarterly) than twice yearly for Active Lives and once yearly for Active Lives Children would also help the sector to better understand changes throughout the year rather. Sport England has provided some very helpful regular general data on activity levels throughout COVID-19, which has been helpful.

- 5.3. Sport England's approach to engagement with sporting bodies like the LTA has become far more collaborative in recent years, moving away from a static focus on participation targets, with more of a focus on working together to understand challenges. This is explicit in the new *Uniting the Movement* strategy recently launched and is very welcome. Specifically with reference to data collection, the LTA increasingly works collaboratively with Sport England to understand both Sport England and LTA data and use this to help understand challenges and barriers to participation. Further collaboration could focus on better information-sharing in terms of full questionnaires, and more regular updating of online reporting tools, to help share best practices across the sector.
- 5.4. The Government's Taking Part Survey, conducted by DCMS, has historically been another source of data on participation in sport but the Government has moved away from a focus on sport within this survey, in recognition of the work undertaken by Sport England, which the LTA believes is appropriate.

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

- 6.1. Discrimination such as racism, homophobia, transphobia, misogyny and ableism can come in many forms, and can be indirect and systemic as well as direct.
- 6.2. The LTA is clear that any instance of racism or discriminatory behaviour within sport cannot be tolerated and there has to be a zero tolerance approach to this. In line with this, the LTA committed last year to review what is done to ensure appropriate training, guidance and processes are in place for this. When such discrimination does occur it can have a long lasting impact on those involved, and so it is also important to ensure that current and future generations of all those involved in tennis are properly supported.
- 6.3. The Government's focus on online harms is welcome, as the levels of vicious and offensive abuse that those involved in sport can receive from users of social media is appalling. Legislation from the Government to make social media companies more accountable for what happens on their platforms would be welcome, and help to tackle discrimination which some British tennis players have experienced.

- 6.4. As much as can be done to ensure overt instances of racism and other forms of discrimination are not tolerated within sport or more broadly, ultimately within society, things are not equal. Discrimination is structurally ingrained in our society, and so the effect of it is still very much evident and pervasive within our sport.
- 6.5. In turn, that means there is not equality of opportunity, and so it is pleasing to see the focus on tackling inequalities at the heart of the new Sport England strategy, *Uniting the Movement*. That also aligns closely with the vision the LTA has for tennis in Britain – for it to be open to anyone. There is absolutely no reason that tennis cannot be a sport that can be played by all, no matter their age, gender, race, background or ability, and the LTA has an extensive programme of activity underway and planned for the coming years to help make this happen, including programmes such as LTA Youth, SERVES and Open Court.
- 6.6. To further underpin this vision and programme of work, the LTA is developing a new inclusion and diversity strategy for tennis in Britain to drive the real change that is needed and ensure the organisation continues to build on the progress already made. To assist in the development of that strategy, the LTA has improved the way in which the organisation listens and learn from the lived experience and viewpoints of those most impacted by all forms of discrimination. This is an ongoing process but the LTA believes if such change is going to happen, then, as the national governing body for our sport, the organisation has a clear responsibility to lead from the front – the publication of the new strategy is the platform to do that.
- 6.7. Alongside this, the LTA is also taking steps to make sure that the organisation’s governance is more representative of society and reflects a more diverse range of experiences and backgrounds. This has included recent recruitment of seven new board nominated councillors to the LTA Council, as well as a new independent non-executive director to the LTA Board.

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

- 7.1. Nothing is more important to the LTA than the safety and wellbeing of those involved in tennis, particularly children and adults at risk. The LTA has been committed to leading the way for safeguarding in sport, delivering significant change in the way safeguarding standards are implemented in tennis through the 2018-2020 Safeguarding Strategy. In 2019 and 2020, the LTA has been rated as “excellent” across all categories by the NSPCC’s Child Protection in Sport Unit (CPSU), in recognition of the organisation’s clear strategic vision and commitment to delivering the best safeguarding systems and processes.

LTA Safeguarding Strategy 2018-2020

The *LTA's 2018-2020 Safeguarding Strategy* focused on four key pillars, setting out a vision for the LTA to be at the forefront of safeguarding by delivering best-in-class procedures, systems and processes.

1. Places to Play – ensuring tennis venues are safe spaces to play, implementing and mandating a set of minimum safeguarding standards across registered venues.
2. People – ensuring coaching is safe by implementing the highest standards for the LTA's Accreditation scheme, and mandating this across registered venues, as well as making it easier for players and parents to identify a safe coach.
3. Awareness – improving safeguarding awareness and knowledge across tennis to prevent safeguarding issues, but also ensure concerns can be effectively identified and reacted to.
4. Case Management – introducing best-in-class case management processes to robustly manage incidents and discipline those who seek to bring harm to those involved with tennis.

The LTA will shortly launch a new Safeguarding Strategy 2021-2023, building on progress over recent years. This will continue to focus on the areas set out above, as well as ensuring consistent safeguarding standards are implemented at all levels of competition, a renewed focus on training and development to support a skilled and confident workforce, and ensuring maintenance of robust governance, policies and procedures.

- 7.2. Given the role of national governing bodies as custodians of their respective sports, it is appropriate that organisations like the LTA lead on the development and implementation of the highest safeguarding standards, working in collaboration with sector partners such as Sport England and CPSU, as well as the police, as appropriate.
- 7.3. However, there are a number of policy changes and issues that Government could address, to aid the implementation of effective safeguarding standards in sport, including providing legislative backing to sporting bodies. These should include:
 - **Changing criminal law to recognise sports coaches as being in a "position of trust"**. The LTA believes this legal change is required to deter predatory behaviour from coaches in cases where consensual behaviour can escalate to sexual contact offences, and to provide further support and legislative backing to the LTA's own codes of conduct and safeguarding procedures. In the majority of cases that the LTA sees where a young person at age 16 or 17 enters into a "consensual" relationship with a coach, the relationship is based on an imbalance of power and the coach manipulates the child. Without legal change a two-tier system exists whereby sporting bodies are to deal with "consensual" coach/player relationships, whilst the law deals with "consensual" teacher/pupil relationships.
 - **Remove the statutory presumption to release without bail and adjust timescales and authorisation levels for pre-charge bail.** The

Home Office recently published its response to a consultation on “Police Powers: Pre-charge Bail”, to which the LTA made a representation. Since the introduction of the Policing and Crime Act 2017, the general presumption against police bail has caused some significant challenges for the LTA in implementing safeguarding standards, as the LTA has often been relied upon by the police

- **Establishing a more consistent process for information sharing from the police to national governing bodies.** Sport is often forgotten in abuse cases where perpetrators can hold coaching roles, but the LTA finds inconsistency in information-sharing from police forces, with some who share well, some who ask for payment for information and some who won't share at all. National governing bodies play a key role in accrediting and licensing coaches, which needs to be fully recognised by the police.
- **Ensuring consistent safeguarding standards across sports venues.** The LTA has the largest venue audit programme in sport, with almost 1,000 tennis venues subject to audit since the provisions of the LTA's Safeguarding Strategy were implemented. However, Government and Sport England could play a more effective co-ordinating role to ensure consistency across sports.

7.4. An additional area in which the LTA is working with Sport England is to look at innovative approaches to delivery of safeguarding standards and awareness. *Safe to Play* is a cutting-edge safeguarding awareness campaign for parents, players and coaches, utilising augmented reality to deliver online information, video content and other materials on the signs of abuse, how to report a concern, and how to keep all young people and adults at risk safe.

7.5. Following on from Baroness Grey-Thompson's 2017 Duty of Care report, the LTA launched a collaborative process across the organisation to improve duty of care standards for elite tennis, developing a strategy focused around eight key areas: physical health and injury management; education and wellbeing; psychological and mental health management; travel safety; people policies; environment and culture; clinical governance; and induction and exits. Given that the Government's previous Duty of Care review was four years ago, it would be highly appropriate for Government to review progress among the sector, but more importantly to also honestly reflect on the extent to which it has implemented the recommendations made within the review. The priority recommendations of the 2017 review were welcome and there should be a focus on ensuring these are implemented in full, such as the creation of an ombudsman or duty of care quality commission, and benchmark standards for sporting bodies to be measured against.

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? For example, accountability for representing and protecting their membership, promoting their sport and maximising participation.

8.1. In 2018 the LTA established a new ten-year performance strategy, which for the first time would provide a clear pathway for every age and stage of

a player's development. In September 2019, two new two new National Academies opened at Stirling and Loughborough universities for the very best players aged 13-16, after they progress through 50 local (LPDCs) and 11 regional player development centres (RPDCs) across the country. This is a long-term strategy, but there are early signs of success, such as on the LTA's Pro-Scholarship Programme, which provides individually tailored support to enable players with the highest potential to reach the top 100 within 5 years, and has seen players progress at a faster rate than the equivalent international cohort based on age and ranking.

- 8.2. Elite sport in the UK is facing significant challenges, including as a result of COVID-19. In tennis, the LTA has transformed the National Tennis Centre in recent years as a training base for leading players, with new courts and facilities of the highest standard put in place to provide the level of facilities the need, and with many more top players all using the centre on a regular basis, particularly throughout the pandemic. However, the LTA's performance pathway is heavily reliant on many other tennis clubs and indoor tennis venues which act as RPDCs and LPDCs, a number of which are at threat of closure given the financial impact of the pandemic. If closures occur, this will present significant challenges for the development of talented young tennis players.
- 8.3. From a funding perspective, the LTA receives limited public investment compared to the majority of Olympic and Paralympic sports, with some funding from Sport England for talent development. Historically, UK Sport had funded a wheelchair tennis World Class Programme, but this funding was removed for the current Paralympic Cycle, though a small number of elite wheelchair tennis athletes receive solely lottery-funded Athlete Performance Award payments, which provide vital support. The LTA's summer grass court major events and the Championships account for around 90% of the LTA's revenue, which is invested back into developing the sport, including in the LTA performance strategy. Therefore if spectators are unable to return to stadia by summer 2021 in significant numbers, this has the potential to impact the LTA's ability to invest in developing future British champions.
- 8.4. Improving diversity within elite sport remains an issue that the LTA is committed to addressing. The challenging impact of COVID-19 on women's sport is well documented, but the LTA is committed to ensuring that elite women's tennis is not disproportionately impacted by the pandemic. This means a continued focus on women and girls throughout the performance pathway, but also on providing competitive opportunities on British soil and maximising the visibility of women's tennis by maintaining a full calendar of WTA grass court events in the build-up to The Championships. In a similar vein, the LTA is also working hard to protect and ensure opportunities for wheelchair tennis players to compete in the UK
- 8.5. In terms of accountability, as a recipient of public funding, the LTA is compliant with A Code for Sports Governance, which is positive and has strengthened transparency in the sector, and also been helpful in providing a set of minimum standards. Furthermore, the LTA welcomes

the Government's commitment to review the code, and believes that the code should be extended to include targets for better ethnically diverse representation at board level within sporting organisations. The LTA already has work in progress to drive down the existing provisions of the code to other bodies in the sport including county associations.

9. What successful policy interventions have other countries used to encourage people of all ages, backgrounds and abilities to participate in sport and recreation, and lead more active lifestyles?

- 9.1. In Denmark, the Folkeskole Act, initially passed in 1993 and subsequently updated in 2014, makes it compulsory for schools to offer an average of 45 minutes of physical activity per school day in primary and secondary education. This can either be integrated into learning structures or conducted during time specifically dedicated to exercise, with the Danish Government providing resources to assist schools¹⁰. A similar statutory requirement could be effective in the UK, if backed by proper resource for schools, and go a long way to addressing inactivity levels among children and young people.
- 9.2. In Flanders, Belgium, the Government have provided direct funding to schools to open their sporting infrastructure outside of school hours, including at the weekends and during holidays, as part of the Government's Master Plan for School Construction. The funding is intended to ensure existing and new sporting infrastructure is practically available for use¹¹, which may be informative for Government efforts in the UK to open school facilities, to overcome operational challenges that schools face.
- 9.3. For many nations around the world, provision of public sport and leisure facilities is a statutory requirement for Government. Introduction of such a requirement by Government in the UK, alongside local authorities responsibilities around public health, could provide the basis for a far more holistic approach to health and wellbeing like in New Zealand, with sport as a central pillar.
- 9.4. From a funding, rather than delivery perspective, the financial structures of many sports are going to be challenged as a result of the COVID-19 pandemic. This will particularly impact those sports, like tennis, which are reliant on revenue from spectators, commercial and broadcast partners to reinvest back into the long-term development of the sport. One potential solution for Government to explore, now the UK has left the European Union, is to legislate to reintroduce sports betting (copyright) rights into UK law. This has historical precedent, prior to the imposition of the EU Database Directive into UK law in 1996 and subsequent European Court of Justice ruling on William Hill vs British Horseracing Board in 2004. Whilst elite sport has continued behind closed doors, sporting bodies continue to be impacted by restrictions on spectators, whilst the betting industry's

¹⁰ <https://www.uvm.dk/folkeskolen/laering-og-laeringsmiljoe/bevaegelse>

¹¹ https://eacea.ec.europa.eu/national-policies/eurydice/content/national-reforms-school-education-3_en

profits continue to be driven by live sport. The introduction of a fair return would open an additional stream of funding for investment into grassroots sport.

**10. Should there be a national plan for sport and recreation?
Why/why not?**

- 10.1. The work that the LTA does to support, grow and promote tennis in Britain is ultimately impacted by policy across Government, of course including DCMS, but also DfE on PE and school sport; MHCLG on parks and local government; DHSC on social prescribing and public health; BEIS on support for tennis businesses, to name a few.
- 10.2. Given the impact of the COVID-19 crisis, it is an appropriate time for Government to reflect on the role and value of sport to the nation. Sport England's ten-year *Unite the Movement* strategy helps to provide a welcome long-term vision and commitment for the sector to unite around, building on Sporting Future. This now needs to be matched by a long-term commitment from Government to place sport at the heart of the nation's recovery from COVID-19 over the next decade, with a focus on developing the existing sports strategy to deliver that.
- 10.3. This is not just as the responsibility of DCMS in terms evolving the existing sports strategy, but would be most effectively delivered by establishing a cross-departmental taskforce for sport with leadership from the heart of Government to deliver on the ambition of a truly active nation and all the associated health, economic and social benefits.
- 10.4. In the short term, there is a very immediate threat to the sector and many of the organisations involved with it to survive through the coming year. In tennis, this includes the clubs, venues and coaches who are vital to delivering the sport. Without additional financial support, the LTA is very concerned that community indoor tennis facilities, particularly in more socially deprived areas of the country, may not re-open following relaxation of current lockdown restrictions. Likewise, without the return of spectators to sports stadia in significant numbers by summer 2021, many sports whose funding structures are reliant on major events, such as tennis, will continue to face significant financial challenges. Whilst welcome support has been provided by Government through the Winter Survival Fund, additional support may be needed to help the sector survive if restrictions on spectators persist throughout 2021.

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