







# AGS Consortium Data Analysis of 116 Partner Support Questionnaires

Report to Sport England and UK Sport from Sport Industry Research Centre (Sheffield Hallam University)

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#### 1. Introduction

All Tier 3 Partners of Sport England and UK Sport are required to produce a Diversity and Inclusion Action Plan (DIAP) as part of their obligations under A Code for Sports Governance<sup>1</sup>, namely Requirements 2.1 and 2.2. As part of the process, Partners are being assisted by the AGS consortium as they develop their DIAPs. Partners were offered the opportunity to complete an online Partner Support Questionnaire (PSQ) to provide the AGS consultants with a standardised overview of each organisation's baseline position. A 'Go Early' group of six organisations, including Sport England and UK Sport, completed a pilot PSQ which was subsequently completed by 116 Tier 3 Partners. The purpose of this paper is to present a summary of the data from the 116 Partner Support Questionnaires that were submitted to the AGS consortium. Where relevant, reference is made to other DIAP-related issues and key learning points are presented.

## 2. The nature of the sample

The 116 completed PSQs were divided into three groups: Active Partnerships (n=38); National Governing Bodies of sport operating at England, Great Britian or United Kingdom level (n=52); and Other Partners (n=26). The Other Partners include equality partners (e.g. Sporting Equals); representative bodies (e.g. the Chartered Institute for the Management of Sport and Physical Activity (CIMSPA)); and delivery bodies (e.g. StreetGames). The six 'Go Early' organisations are excluded from the analysis as the changes made to the PSQ after the pilot mean that the data are not directly comparable to the main study of 116 Partners.

# 3. The scale of the System Partners

In Tables 1 to 3 data are presented on the scale of the Partners, broken down into the three different categories and the proportion of them that meet size-based criteria.

Table 1: Number of board members by Partner type

How many board members are there in your			
organisation?	4-9	10+	Total
Active Partnership (n=38)	42%	58%	100%
National Governing Body (n=52)	33%	67%	100%
Other System Partner (n=26)	31%	69%	100%
Overall (n=116)	35%	65%	100%

<sup>&</sup>lt;sup>1</sup> A Code for Sports Governance (sportengland-production-files.s3.eu-west-2.amazonaws.com)

Some 35% of the 116 Partners have between four and nine board members. The significance of more than a third having fewer than 10 board members is that Sport England has set a precedent in its own 2021–2024 DIAP by not reporting the characteristics of its Senior Leadership Team because of the possibility of individuals being identifiable by their responses. The decision not to report on samples of fewer than 10 is based on an interpretation of the Information Commissioner's Office guidance.

Within the sample, Active Partnerships (42%) are the Partner type most likely to have fewer than 10 board members. Under Requirement 2.2 of The Code, Partners are required to publish their DIAPs on their website and to update them annually as per the guidance:

Annual reporting could include details of the following as a minimum:

#### • diversity breakdown of leaders, staff, volunteers and participants.

It is therefore likely that if Partners follow Sport England's lead, a significant minority (35%) may not report publicly on the diversity of their board.

The issue of small sample sizes is magnified when analysing the number of people described as members of the Senior Leadership Team (SLT) within Partners as shown in Table 2.

Table 2: Number of Senior Leadership Team by Partner type

	1			
How many members of the Senior				
Leadership Team are there in your	1-4	5-9	10+	Total
organisation?				
Active Partnership (n=38)	63%	37%	0%	100%
National Governing Body (n=52)	29%	62%	10%	100%
Other System Partner (n=26)	42%	46%	12%	100%
Overall (n=116)	43%	50%	7%	100%

The proportion of Partners with at least 10 people in their SLT is 7% (8 organisations), which implies that the vast majority of Partners may not report the diversity of this group publicly. A pragmatic solution for Sport England and UK Sport is to report the diversity of the sector's Senior Leadership by including SLT within the leadership diversity survey of board members. Using this approach overcomes the problem of small samples at individual organisation level as the total number of SLT reported in the PSQs is 619 (see Appendix 1).

An example of an organisation reporting the characteristics of its SLT despite having fewer than 10 members, is the extract from the Lawn Tennis Association's Inclusion Strategy shown in Figure 1, which demonstrates that the Executive Team has five members and yet the organisation is comfortable in reporting the diversity of this group.

Figure 1: Diversity at the Lawn Tennis Association<sup>2</sup>

	GENDER	ETHNICITY	DISABILITY*
<b>BOARD</b> 12 people	(Amber)	No current member from a diverse ethnic background (Red)	No current data
<b>COUNCIL</b> 61 people	38% female (Amber)	10% from a diverse ethnic background (Amber)	No current data
<b>EXECUTIVE TEAM</b> 5 people	40% female (Amber)	20% from a diverse ethnic background (Green)	No current data

Across the 116 Partners there is a workforce of nearly 6,800 and the vast majority (90%) of Partners have 10 or more members of staff as shown in Table 3.

Table 3: Number of paid staff by Partner type

How many paid staff does your organisation						
employ?	0-9	10-20	21-40	41-99	100+	Total
Active Partnership (n=38)	13%	39%	39%	5%	3%	100%
National Governing Body (n=52)		33%	17%	25%	19%	100%
Other System Partner (n=26)		31%	15%	27%	12%	100%
Overall (n=116)	10%	34%	24%	19%	12%	100%

The key message from Table 3 is that it would be reasonable to expect nearly all Partners to be able to report the diversity of their workforce. A more detailed analysis of Boards, Senior Leadership Team and the wider workforce of the 116 Partners is shown in Appendix 1.

#### 3.1 Learning points

- There is considerable variation in the scale of Partners, which reinforces the point about DIAPs needing to be bespoke and proportionate (as well as ambitious).
- The majority (65%) of Boards have 10 or more members, but a significant minority (35%) do not. It is within Boards that we see the least amount of variation in scale.
- Senior Leadership Teams (SLT) are relatively small with only 7% of the 116
   Partners having 10 or more on their SLT. This finding may compromise the

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<sup>&</sup>lt;sup>2</sup> LTA Inclusion Strategy 2021-23 (page 23)

likelihood of Partners reporting on the diversity of their SLT because of the potential General Data Protection Regulations (GDPR) around individuals being identifiable by their characteristics. Including SLT on the survey of Board diversity may provide an overview of this group's diversity at sector level. However, it is important to manage expectations at this point around the requirements of A Code for Sports Governance and GDPR considerations.

 The greatest variation in scale can be seen in the general workforce data with the scale of organisations ranging from zero paid employees to 900.
 Of the 116 Partners, 14 (12%) have 100 employees or more and they account for 57% of the entire workforce reported on the PSQs.

Having assessed the scale of the Partners, we proceed to report on the specific questions posed on the Partner Support Questionnaire.

## 4. Collecting good quality demographic data

A starting point in the DIAP process is organisations collecting good quality demographic data on their Board, Senior Leadership Team and wider workforce ('as well as where possible cascading this ambition in line with Requirement 4.1'). Table 4 provides an overview of Partners that state they collect good quality demographic data, broken down by the three categories of Partner.

Table 4: Proportion of Partners collecting good quality demographic data

Do you collect good quality demographic data to assess the make-up of your:	Board	SLT	Workforce
Active Partnership (n=38)	79%	55%	71%
National Governing Body (n=52)	83%	77%	73%
Other System Partner (n=26)	65%	85%	81%
Overall (n=116)	78%	72%	74%

The headline from Table 4 is that a considerable majority of Partners report that they collect good quality demographic data on their Board (78%), SLT (72%), and wider workforce (74%). Across a sample of 116 organisations it also means that up to 33 do not collect such data. The stand out findings are that Active Partnerships were the least likely to collect data on their SLT (55% v 72%); and Other Partners were the least likely to collect data on their Board (65% v 78%).

In the case of Active Partnerships the median number of SLT members was 4 (see Appendix 1), which legislates against this data being reported separately. In practice the SLT data for Active Partnerships is reported within the wider workforce

data. For Other Partners there is no obvious reason why they would not collect good quality demographic data on their Board. Of the 26 organisations in this category, the median score for board members is 11, which is broadly the same as the other Partners.

What Table 4 provides is a useful baseline against which to monitor future progress. Under the requirements of The Code, the figures reported in Table 4 should increase over time. Theoretically it is possible that every cell could be 100%, however small sub samples (e.g. fewer than 10 SLT members) could result in scores of 100% not being achieved.

#### 4.1 Learning points

- An important caveat to this analysis is that Partners are at different stages
  of development in their DIAP journey, which is in part dictated by
  organisational scale and resources. Furthermore, the data featured in this
  paper was collected between February 2023 and October 2023, meaning
  that it is possible for significant change to have occurred over the nine
  month period.
- There is an important distinction between collecting data and reporting that data publicly. There is nothing to prevent organisations from holding data on their Board, SLT and workforce, but there may be reasons why such data is not reported publicly. For example, Sport England has not reported the diversity of its SLT because:

"Our executive team comprises of eight members. As numbers are less than 10, Sport England is unable to report diversity breakdown due to General Data Protection Regulations." (Information Commissioner's Code of Practice).

[Source: Sport England DIAP 2021-2024 p30]

 The majority (72% to 78%) of Partners state that they do collect good quality demographic data on their Board, SLT and workforce. This is a positive finding in terms of the requirements of The Code and its implications for DIAPs. The minority of those that do not collect such data may need support to enable them to meet their obligations.

#### 5. The accuracy and currency of data

It is one thing to collect good quality demographic data, but quite another for that data to be accurate and up to date. For those Partners that met the basic criteria

of collecting good quality demographic data, a follow up question asked if they considered their data to be accurate.

Table 5: Do you consider your data to be accurate and up to date?

	Board		SLT		Workforce	
Partner type	Yes	n=	Yes	n=	Yes	n=
Active Partnership	87%	30	86%	21	70%	27
National Governing						
Body	88%	43	88%	40	84%	38
Other Partner	82%	17	82%	22	76%	21
Overall	87%	90	86%	83	78%	86

Data relating to Boards (87%) and SLT (86%) had relatively high levels of agreement that their data were accurate. For the workforce the overall score was lower at 78%, and this was driven largely by a low score amongst Active Partnerships. One possible explanation for this finding is that some Active Partnerships are 'hosted' and may well be that the host (typically a Local Authority) will hold the data on the workforce. It is also quite likely that the data were collected as part of the recruitment process and are not subject to the same level of updating as might be found in Partners that are responsible for their own Human Resource and payroll functions.

Some Partners who stated that their data were not accurate and up to date, qualified their responses by saying that they were in the process of updating their data to inform their DIAPs. It would therefore be reasonable to expect these scores to increase if the data questions on the Partner Support questionnaire were to be repeated.

Virtually all the data for Board (98%), SLT (96%) and workforce (95%) were provided by individuals themselves. This is a strong positive finding as it means that the practice of people reporting on behalf of others is almost non-existent. The gold standard of work of this type is that people must be allowed to describe themselves and not be subject to others making assumptions about them. Furthermore as people's characteristics can change over time, it is also important that people are provided with the opportunity to update their data in response to change and indeed to confirm their data even if there has been no change.

Typically, demographic data collection was conducted internally (Board 91%; SLT 96%, and workforce 90%) rather than using external providers. Where external providers were used it tended to be in combination with internal measures with 3% of Board and SLT data collected externally only and 7% of workforce data collected

externally only. For those who collect workforce data externally, a common explanation was Partners making use of outsourced Human Resource and payroll services.

A specific obligation under Requirement 2.2 of The Code is that Diversity and Inclusion Action Plans should:

c. be published on the organisation's website, with an annual update.

It is therefore important to know the extent to which data about Board, SLT and workforce are updated regularly. In round numbers, around 50% of Partners update their data at least annually and for 25% data is collected on recruitment and not updated. For the remaining 25% respondents stated that updates were either less than annually or they did not know when updates were made. The precise proportions for each Partner type and leadership or workforce category can be seen in Appendix 2. The basic message however is that around half of the Partners will need to change their current practice of data collection to one which is consistent with the 'at least annually' category.

#### 5.1 Learning points

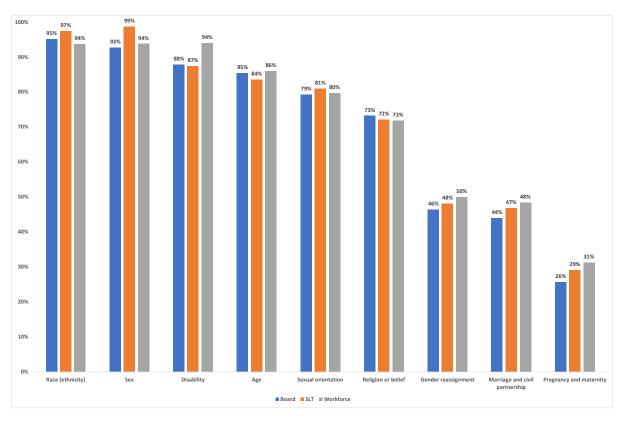
- Those Partners that collect demographic data on their Board, SLT and workforce state that it is accurate and up to date. For those where it was not the case, the most common explanations were that the process was under review or being conducted at the time of completing the PSQ.
- Active Partnerships are something of an anomaly for their workforce data and this might be explained by those who are 'hosted' having less control over their data than other Partners.
- The practice of allowing people to describe themselves is almost universally embedded, with very little evidence of some people reporting on behalf of others.
- The Code requires Partners to review their DIAP annually and publish an update on their website, which has implications for reporting the frequency and accuracy of Board and staff data.

## 6. Protected Characteristics under The Equality Act 2010

A starting point for measuring diversity within System Partners is the nine Protected Characteristics detailed in the Equality Act 2010. On the PSQ, organisations that stated that they collected good quality demographic data ((n=64 to 89 out of 116)) were also asked whether they collected data on some of all the nine Protected

Characteristics. Figure 2 shows the proportion of eligible Partners who measured Protected Characteristics and the data are split by Board, SLT and workforce.

Figure 2: The proportion of eligible System Partners measuring the 9 Protected Characteristics



The nine Protected Characteristics can be divided into three groups. First, those with at least one score for the three groups being 90% or more and thereby near universal, namely race (ethnicity), sex, and disability. Second, those with scores of more than 70 but less than 90, namely: age; sexual orientation, and religion or belief. Third, those with scores of 50% or below, namely: gender reassignment; marriage and civil partnership; and pregnancy and maternity.

Sex and gender reassignment data are captured in two ways: first, the Census and other Office for National Statistics make a distinction between 'sex assigned at birth' whether a person's 'gender identity is different to the sex they were assigned at birth'; and second, a one step process used in the Active Lives Survey, which asks if people describe themselves as 'male, female or in another way'.

The majority (87% to 92%) of Partners who collect data on Protected Characteristics collect such data on four or more measures. This finding is in line with Sport England which stated in its 2021–2024 DIAP that it reports on four: race (referred to ethnic group); disability (referred to disabled / long term conditions); sex (referred to

gender); and sexual orientation (referred to LGBT+<sup>3</sup>) Similarly, UK Sport focuses on the same four Protected Characteristics in stating that its Board, Senior Executive Leadership and workforce will by 2031 be: 50% female, 20% disabled, 14% diverse ethnic background, and 3% LGBTQ+.

It is useful to consider the incidence of certain Protected Characteristics in the population as they have implications for reporting data and GDPR concerns. The box below shows the proportions of the population for the four Protected Characteristics that Sport England and UK Sport measure, plus gender reassignment.

Women c. 51% (Census)
Disability / LTC c. 19% (Census)

Ethnically diverse c. 17% (Census / England only) 15% (ALS)

LGB+ c. 5.5% (Active Lives Survey)

Gender reassignment c. 0.5% (Active Lives Survey)

If we then apply these proportions to the median number of people on the Board, SLT and workforce for the 116 System Partners in the data sample as shown in Table 6, some important issues are raised.

Table 6: Measuring diversity in a typical Partner

Characteristic	Incidence	Board (n=11)	SLT (n=5)	Workforce (n=23)
		(11-11)	(11-3)	(11-23)
Women	51%	6	3	12
Disability / LTC	19%	2	1	4
Ethnically diverse	17%	2	1	4
LGB	5.5%	1	0	1
Gender reassignment	0.5%	0	0	0

The main points of note in Table 6 are that when percentages that relate to a minority of the population are applied to relatively small numbers of people in a group, what is returned is low numbers of people who have a particular characteristic. The implications of this finding pose two key questions. First, how

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<sup>&</sup>lt;sup>3</sup> The T standing for 'Trans' in LGBTQ+ is not a form of sexual orientation.

likely is it that individuals can be identified by their responses, particularly if data are published on websites, and which may well breach GDPR protocols. Second, given that small groups of people are statistically unlikely to be representative of the wider population, why are certain characteristics being measured?

#### 6.1 Learning points

- Most Partners that collect good quality demographic data on their Board, SLT and workforce measure some or all the nine Protected Characteristics.
- The commonly used measures are sex, ethnicity, disability/ long term health condition, age, sexual orientation and religion / belief.
- Sport England and UK Sport are relatively large organisations and have set an example of focusing on four measures: sex, ethnicity, disability / LTC, and sexual orientation.
- For many Partners collecting and publishing diversity data may have GDPR implications and statistical limitations concerning their ability to be representative of a wider population.

# 7. Measure of socioeconomic, lived and regional experiences

The Code asks organisations to extend the nature of their diversity discussions and ambitions beyond the Protected Characteristics as indicated in the quote below.

Discussions around the organisation's ambitions should include and go beyond the nine protected characteristics in the Equality Act 2010, including how to recruit, retain and develop people with different lived, regional and socio-economic experiences.

The PSQ included a question on whether the data collected by Partners covered measures of socioeconomic status. The results in Table 7 show that it is a minority (21%-29%) of organisations that measure socioeconomic status. Within the sample, Active Partnerships have above average scores for Board (37%) and SLT (33%); whilst National Governing Bodies (24%) have a marginally above average score for workforce.

Table 7: Does this data cover measures of socioeconomic status?

	Board		SLT		Workforce	
Partner type	Yes	n=	Yes	n=	Yes	n=
Active Partnership	37%	30	33%	21	22%	27

National Governing Body	12%	43	30%	40	24%	38
Other System Partner	18%	17	23%	22	19%	21
Overall	21%	90	29%	83	22%	86

The scores in Table 7 compare unfavourably with the scores for Protected Characteristics (see Figure 2) and indicate an area in which considerable development work is required across all Partners to enable them to meet broader diversity ambitions. We have found examples of good practice across the Partners, notably the England and Wales Cricket Board (ECB) which report on the proportion of its staff who: attended independent schools (20%); have caring responsibilities (11%); or are neurodiverse (1%). These are but a few of the possible measures that could be used and an indicative range of what could be used is provided in the box below.

Socioeconomic group (NS-SEC) – a function of job role and work type

Index of Multiple Deprivation – derived from postcodes

Caring responsibilities

Educational attainment

School type

Income

Location

Neurodiverse

Social Mobility Commission - 4 standard questions about background

We are not suggesting that Partners should use all measures of socioeconomic status but given that The Code encourages broader thinking and only a minority of organisations collect them, our list of suggestions should be seen as a menu. Partners can select from it and other measures, those indicators that they deem to be important to them and their objectives.

#### 7.1 Learning points

- A minority of Partners measure indicators on socioeconomic status.
- There is considerable development work to be done to embed this type of practice.
- Organisations should be focused about which measures they choose to implement.

# 8. External benchmarking

The Code requires that:

Each organisation shall publish clear ambitions to ensure its leadership represents and reflects the diversity of the local and/or national community (as appropriate).

To measure the extent to which an organisation reflects the diversity of the community it serves, it follows that measurement methods should be consistent between two sets of data. It is for this reason that we have recommended that data collection should be consistent with the Census, other Office for National Statistics surveys; or high quality national surveys such as the Active Lives Survey. Using this type of data enables Partners to make like for like comparisons between themselves and a wider population.

As an example, using Sport England's diversity data from its 2021–2024 DIAP, it has been possible to benchmark the characteristics of is staff of 290 against the population. For the measure of sex (referred to as gender) shown in Figure 3, it is clear to see that Sport England's workforce is over representative of women.

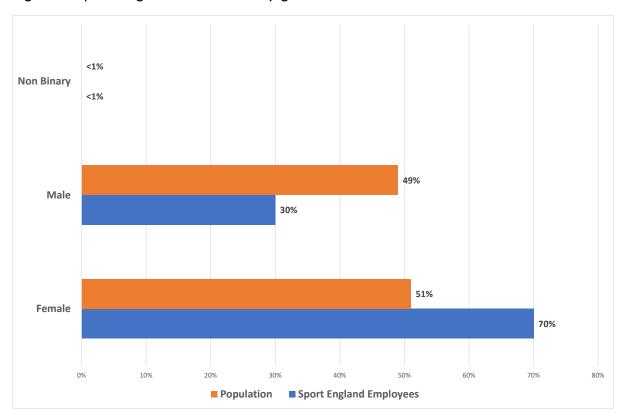


Figure 3: Sport England workforce by gender

There are two further points of note about Figure 3. First, the sport industry is under representative of women who form 43% of the sport workforce and in this context Sport England's data is a positive finding. Second, women are under represented in the workforce generally and thus any organisation that has mostly women employees is noteworthy.

To establish the extent to which Partners were able to conduct external benchmarking in line with The Code, The PSQ asked whether the data they collected was consistent with the Census or other surveys used by the Office for National Statistics. The results are shown in Table 8.

Table 8: Is this data consistent with the Census or other ONS surveys?

	Board		SLT		Workforce	
Partner type	Yes	n=	Yes	n=	Yes	n=
Active Partnership	33%	30	24%	21	33%	27
National Governing Body	40%	43	45%	40	50%	38
Other System Partner	41%	17	50%	22	52%	21
Overall	37%	90	41%	83	45%	86

At least 50% of all respondents answered the question 'Don't Know' with around 5% answering 'No'. Consequently those who are consistent with national data sets are a significant minority (37%-45%). Noticeably below average scores were noted amongst Active Partnerships. Again, as per the socioeconomic status measures there is development work to be done.

#### 8.1 Learning points

- The Code Requirement means organisations need to be able to understand their representativeness against the wider community an organisation serves.
- It is not common practice for Partners to use their data in this way and therefore sector wide development work is required to enable them to meet their obligations.

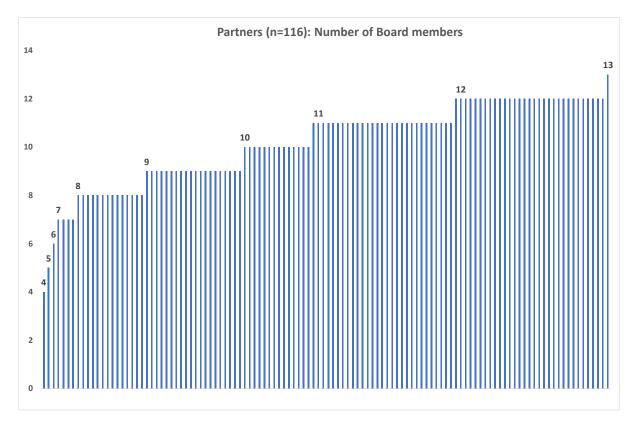
## 9. Concluding points

- The Partner Support Questionnaires have proven to be a useful source of data from which to obtain a snapshot of the approach taken to diversity data in the sector. We now have a baseline against which we would expect to see progress as Partners align themselves with Requirements 2.1 and 2.2 of The Code.
- There are large differences in the scale of the Partners, which reinforces the importance of DIAPs being bespoke and proportionate. There is no 'one size fits all' and it is therefore reasonable to expect DIAPs to be bespoke.

- Sector-wide development is required in the following areas
  - Collecting good quality demographic data that is accurate and up to date;
  - GDPR considerations as they impact on the possibility of individuals being identified by their characteristics and the publication of DIAPs on websites;
  - Protected Characteristics, particularly how the nature of applying data that relates to a minority of people to small group sizes can create issues and lack meaning;
  - Socioeconomic characteristics, in terms of what they are, how they can be measured, what they tell us, and whether they are or are not important; and
  - How to collect and compare data that enables external benchmarking against wider communities.
- Whilst there is merit in providing some organisations with bespoke resources, there is also merit in developing tool kits to enable organisations to help themselves. There is also merit in organisations that are similar in scale or remit to collaborate and share learning and good practice.

# Appendix 1

## Board members - distribution



## Board members – summary statistics

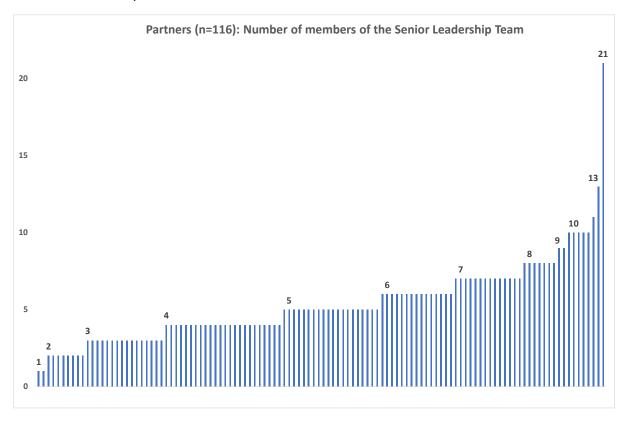
Board	APs	NGBs	OSPs	Overall
Count	38	52	26	116
Number	377	441	261	1079
Lowest	6	5	4	4
Highest	12	13	12	13
Median	10	11	11	11
Mean	9.9	10.4	10.0	10.2
Std Dev.	1.7	1.6	1.9	1.7

APs = Active Partnerships

NGBs = National governing Bodies

OSPs = Other Partners

#### Senior Leadership Teams - distribution



#### Senior Leadership Teams – summary statistics

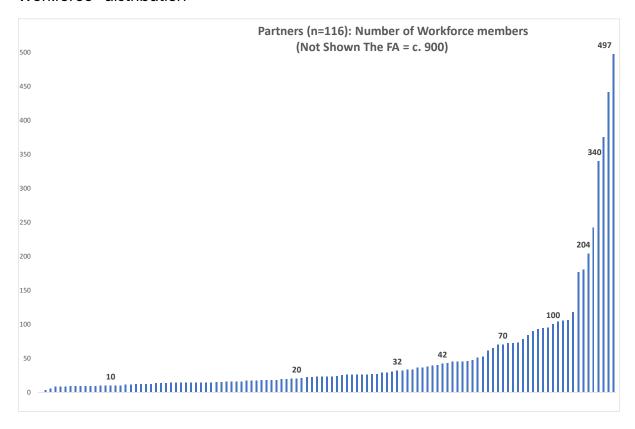
SLT	APs	NGBs	OSPs	Overall	
Count	38	52	26	116	
Number	160	326	133	619	
Lowest	2	1	1	1	
Highest	8	21	10	21	
Median	4	6	5	5	
Mean	4.2	6.3	5.1	5.3	
Std Dev.	1.5	3.1	2.4	2.7	

APs = Active Partnerships

NGBs = National governing Bodies

OSPs = Other Partners

#### Workforce - distribution



#### Workforce – summary statistics

Workforce	APs	NGBs	OSPs	Overall	
Count	38	52	26	116	
Number	872	4574	1339	6785	
Lowest	8	8	0	0	
Highest	104	900	441	900	
Median	19	31	25	23	
Mean	22.9	88.0	51.5	58.5	
Std Dev.	17.7	151.9	85.5	112.9	

APs = Active Partnerships

NGBs = National governing Bodies

OSPs = Other Partners

# Appendix 2

# Frequency of data collection

· '						
Board	At least	At	Less than	Don't Know	Total	
Board	annually	Recruitment	annually	/ Other		
Active Partnership (n=30)	53%	23%	17%	7%	100%	
National Governing Body (n=43)	53%	33%	9%	5%	100%	
Other Partner (n=17)	53%	18%	24%	6%	100%	
Overall (n=90)	53%	27%	14%	6%	100%	
SLT	At least	At	Less than	Don't Know	Total	
SLI	annually	Recruitment	annually	/ Other	Total	
Active Partnership (n=21)	38%	38%	10%	14%	100%	
National Governing Body (n=40)	53%	25%	3%	20%	100%	
Other Partner (n=22)	50%	23%	18%	9%	100%	
Overall (n=83)	48%	28%	8%	16%	100%	
Workforce	At least	At	Less than	Don't Know	Total	
Worklorce	annually	Recruitment	annually	/ Other		
Active Partnership (n=27)	56%	19%	15%	11%	100%	
National Governing Body (n=38)	50%	24%	5%	21%	100%	
Other Partner (n=21)	43%	24%	10%	24%	100%	
Overall (n=86)	50%	22%	9%	19%	100%	