

Non-protected

# Equality impact assessment

## Safeguarding Action Plan Tool

Sport for life

**sportscotland**  
the national agency for sport

**Name of project, programme or service: Online Safeguarding Action Plan Tool**  
**EQIA lead(s): Susan Menzies, Chris Robison**

### Section 1 – Description of project, programme or service

#### **Background**

The Standards for Child Wellbeing and Protection in Sport (Standards) were launched in December 2017. Since then, all Scottish governing bodies of sport (SGBs) receiving investment from **sportscotland** are working toward full compliance. During this period, the Standards were piloted and developed with clubs to ensure their relevance in a community context and ensure accessibility.

The Standards are a series of requirements which are recommended to have in place within any sports club or organisation. They aim to support the wellbeing and protection of children and promote a positive safeguarding culture.

As part of the pilot, clubs undertook an excel spreadsheet based, self-assessment against the Standards criteria. This then generated an action plan to help identify gaps in provision and areas where improvement could be made to safeguarding children in their care. Clubs were then signposted to SGB specific resources and Children 1<sup>st</sup> generic resources to support the implementation of change. The self-assessment and action plan were also

available in Word format and/or paper-based for those unfamiliar with the use of spreadsheets or with no/limited access to a computer.

The pilot identified the need to reduce the administration and complexity of the Standards assessment and action planning process into an online safeguarding tool. This approach would help:

- Streamline and reduce the complexities experienced on the spreadsheets and Word document.
- Greatly improve functionality and user experience thus encouraging completion of the tool.
- Allow SGBs and Children 1<sup>st</sup> to analyse the data to target the development of further support resources.

### **Target audience**

The online tool will have an extensive reach to many different audiences with the responsibility for the wellbeing and protection of children within their care.

#### Primary Audience:

- Community sport club management committees (those responsible for club activities) regardless if they are affiliated to an SGB.
- Club safeguarding officers (or equivalent).

#### Secondary Audience:

- SGB safeguarding lead officers to identify where support in safeguarding children is needed.
- Local authority, Leisure trust, Active Schools and Further/Higher education (HE/FE) professional officers to understand what safeguarding standards should be in place within community sports clubs.
- **sportscotland** to have an indicative understanding/knowledge of the safeguarding practice within community sport to focus investment and report to government on progress.
- Children 1<sup>st</sup> to deliver support services.

## **Section 2 – General impacts of the project, programme or service**

The ultimate impact of the project is to safeguard the wellbeing and protection of children in sports environments. We have identified two main areas where this project will impact on people:

### **Content of the Self-assessment and Action Plan**

- Provide awareness of what a good safeguarding environment is for clubs and the requirements.
- Informs clubs on how to respond to and manage a safeguarding concern.
- Help clubs identify where they are doing well and where they need to improve.
- Direct links to SGB and Children 1<sup>st</sup> resources, templates and advice.
- Educate on safeguarding requirements and why, linking with SGB affiliation and safeguarding requirements.
- The tool directs users to education courses.
- Encourages continuous improvement.
- Strengthens partnership working with SGBs to collectively promote good practice and safer environments for children.

### **Accessibility of Online Tool**

- The tool will be hosted on the **sportscotland** website with direct links to Children 1st and SGB websites.
- Children 1<sup>st</sup> will monitor and provide support the tool.
- The tool will be accessible on all mobile devices and can be utilized in a real-time situation e.g. clubs will be able to work collaboratively on the action plan via virtual meetings. This will reduce the need to download, circulated and print attachments. We know that digital accessibility and exclusion is a key area of inequality for some groups. Therefore, the option to download and produce hardcopy reports and action plans will remain.

## **Section 3 – Evidence**

### **Digital exclusion**

Many different terms are used interchangeably – digital inclusion, digital participation, digital capability, digital literacy. Essentially these terms are about people being able to use digital technologies, particularly the internet, in ways that enhance their lives and contribute to helping them overcome other disadvantages which they might face ([The Wales Co-operative Centre with Carnegie UK Trust, 2018](#)).

Broadly defined, digital exclusion is where a section of the population have continuing unequal access and capacity to use Information and Communications Technologies (ICT) that are essential to fully participate in society ([Schejter, 2015](#) ; [Warren, 2007](#)).

The [Scottish Household Survey 2019](#) provides evidence on internet access and usage. The proportion of internet users had increased since the questions were first asked in 2007, from 65% to 88% of all adults in 2019. However:

- 10% of people in Scotland don't have internet access. 50% of people in Scotland don't have access to laptops or computers.
- Among older people the proportion of internet users was significantly lower than the Scottish average.
- Only half of those over 60 in the most deprived areas used the internet, while 83% of those over 60 in the least deprived areas did.
- Among younger people the difference between area deprivation was smaller, but it was still significant.
- 96% of those between 16 and 34 in the most deprived areas used the internet, while 100% of those in the least deprived areas did.
- Among disabled people the proportion of internet users was significantly lower than the Scottish average.

The online tool is fully compliant and accessible on all types of devices.

**Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations, (2018)**

- This legislation came into force in September 2018. The aim of the regulations is to ensure public sector websites and mobile apps are accessible to all users, especially those with disabilities.
- [In Scotland, about a third of adults are disabled](#). Many more have a temporary disability.
- [Accessibility means more than putting things online](#). It means making your content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things. To reach all your audience, you need to make effective use of [accessible communication formats](#).

Current guidance for public sector bodies recommends:

- o Keep it simple – if your initial document is designed using the following principles it will already be accessible to a greater number of people and may reduce demand for special accessible versions:
- o write in plain language
- o make it as concise as possible
- o design to be as legible as possible, for example using a minimum 14 point text size, limit use of contrasting colour on text.

User research is also establishing that information published in a PDF is harder to find, use and maintain when compared with [HTML](#) content. More importantly, unless created with sufficient care, PDFs can often be bad for accessibility and rarely comply with open standards. For this reason much of the [available guidance for public bodies](#) recommends that the default should be to create all content in HTML.

## Section 4 – Differential impacts and opportunities

<b>Age: older people / children &amp; young people</b>	<p>We are aware that there is a clear relationship between age and use of the internet. Older people are less likely to have access to the internet and are more likely to have lower skills and confidence accessing online services. However, the impact of COVID-19 has encouraged reluctant users to use the internet to communicate and collaborate. We are progressing ways to disseminate information, detailed in section 6 below.</p> <p>The content of the guidance also has the potential to help ensure opportunities better meet the needs of children and young people. Section 5 explains more about how we are using stakeholder engagement to understand this and act.</p>
<b>Disability</b>	<p>We are aware that disabled people are less likely to use the internet. This can make it difficult to access online support and services. In particular those who are experiencing digital exclusion due to visual and aural impairment will require solutions to improve access. We are progressing ways to disseminate information, detailed in section 6 below.</p> <p>The content of the tool could have a potential positive impact for disabled young people, who perhaps experience more difficulty in getting their voice heard within their club than non-disabled young people. It will help ensure club and community organisations know how to understand and meet their needs by giving them a voice in how the club operates.</p>
<b>Gender Reassignment</b>	<p>We are not aware of any published evidence which suggests that gender reassignment would be impacted differently by this project.</p>
<b>Marriage and civil partnerships</b>	<p>We are not aware of any published evidence which suggests that this project would impact people differently due to their marital status.</p>
<b>Pregnancy and Maternity</b>	<p>We are not aware of any published evidence which suggests that pregnant women or women on maternity leave would be impacted differently by this project.</p>

<b>Race</b>	We are aware that cultural issues and language can be additional barriers to people from minority ethnic backgrounds when it comes to seeking help and support and accessing services. We are progressing ways to disseminate information, detailed in section 6 below.
<b>Religion and Belief</b>	We are not aware of any published evidence which suggests that this project would impact people differently due to religion and belief.
<b>Sex: women and Men</b>	We are not aware of any published evidence which suggests that this project would impact people differently due to sex.
<b>Sexual Orientation</b>	We are not aware of any published evidence which suggests that this project would impact people differently due to their sexual orientation
<b>Socio-economic disadvantage: any people experiencing poverty</b>	We are aware that people experiencing poverty are more likely to be experiencing digital exclusion. They are less likely to use the internet; more likely to access the internet with a handheld device and more likely to have lower skills and confidence accessing online services. We are progressing ways to disseminate information, detailed in section 6 below.
<b>Care-experienced young people</b>	We are not aware of any published evidence which suggests that this project would directly impact people differently due to being a care experienced young person.  As stated above the content of the tool could have a potential positive impact for care-experienced young people. As it helps ensure club and community organisations better meet the needs of all children and young people.

## Section 5 – Stakeholder engagement

The establishment of the Standards has been led by Children 1<sup>st</sup> who have consulted extensively with SGBs including Scottish Disability Sport, local authorities and leading safeguarding organisations such as Police Scotland, Together – Scottish Alliance for Children’s Right and the **sportscotland** Young People’s Sports Panel and over 80 sports clubs.

The Standards are based on all relevant legislation including the UN Convention on Children's Rights and Children and Young People (Scotland) Act 2014. The Standard take a rights-based approach to the protection of children putting them at the centre of the club and instilling the importance of engaging children in decisions that affect them.

#### Legislation Reviews

- United Nations Convention on the Rights of the Child (1989) UNCRC
- European Convention on Human Rights (1950)
- Children and Young People (Scotland) Act 2014
- Commissioner for Children and Young People (Scotland) Act 2003
- Rehabilitation of Offenders Act 1974
- Exclusions and Exceptions (Scotland) Amendment Order 2010
- Police Act 1997
- Protection of Vulnerable Groups (Scotland) Act 2007
- Disclosure (Scotland) Act 2020
- Criminal Procedure (Scotland) Act 1995
- Children (Equal Protection from Assault) (Scotland) Act 2019
- Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005
- Sexual Offences (Amendments) Act 2000 – Sexual Offences (Scotland) Act 2009
- Protection from Abuse (Scotland) Act 2001
- Children (Scotland) Act 1995
- Age of Legal Capacity (Scotland) Act 1991
- The Age of Criminal Responsibility (Scotland) Act 2019



- Data Protection Act 1998
- General Data Protection Regulation

#### Framework Reviews

- International Safeguards for Children in Sport, International Safeguarding Children in Sport Working Group led by UNICEF UK
- UK Equality Standard, The Sports Councils Equality Group
- Club Framework for Safeguarding Standards in Sport, Child Protection in Sport Unit (Northern Ireland)
- Standards for Safeguarding and Protecting Children in Sport and Safeguarding Framework Self-Assessment Tool, Child Protection in Sport Unit
- National Care Standards, Scottish Government
- How Good is Our School, Education Scotland
- How Good is our Culture and Sport, Scottish Government

#### The outcome of the consultation influenced the project to:

- Further refine the interactive online tool to reduce the technical difficulties using a spreadsheet.
- Embed the use of plain English.
- Include automated processes such as pre population, automated reports and updates.
- Include direct links to specific resource rather than to general webpages. For example, if a club or community organisation is required to put in place a code of conduct for coaches, officials, parents etc. then a link will be provided to each template.
- Ensure the tool is mobile device
- Produce an automated Action Plan for users to work on.
- Direct interaction and support from SGB safeguarding staff and Children 1<sup>st</sup>

#### Internal consultation:

- Fiona Lilley – Partnership Manager and Equality and Inclusion Group member
- Darren McKay - Planning and Quality Improvement Officer

- Paul Kidd – ICT Development Lead
- Ronnie MacQuaker – Website Manager

## Section 6 – Actions

Action	Timelines
<p><b>Accessibility and Digital exclusion:</b> We will work with stakeholders (existing and new) to develop our understanding of emerging inequalities and review the online tools accessibility to reduce discrimination and advance equality</p>	Ongoing with quarterly reviews and full review Summer 2022
<p><b>Accessibility and Digital exclusion:</b> We will ensure local authorities, leisure trusts and other national partners to disseminate the tool to the sporting communities.</p>	Autumn 2021
<p><b>Accessibility and Digital exclusion:</b> We will encourage local authorities and leisure trusts to directly support any users who are facing difficulties access or using the tool and resources.</p>	Summer 2021 and ongoing
<p><b>Accessibility and Digital exclusion:</b> We will encourage those with responsibility for safeguarding within local authorities and leisure trusts to receive training to support those who are digitally excluded.</p>	Autumn 2021 to Spring 2022
<p><b>Disability</b></p>	Spring 2021

We will engage with Scottish Disability Sport to review the tool before launch.	
<p><b>Disability</b></p> <p>We will explore investing time and resource into voiceover/narration and subtitling/BSL plus to support disabled people with a visual and/or auditory impairment where need is identified.</p>	When requests are received. Quarterly review of all feedback and support requests
<p><b>Socio-economic disadvantage</b></p> <p>We need to ensure that hard copy written guidance is accessible. This includes clear and plain English that is simple enough so that people can use it without needing to adapt it.</p>	When requests are received. Quarterly review of all feedback and support requests
<p><b>Race</b></p> <p>Consideration has been given to support people from minority ethnic backgrounds to access the tool. Where required we will invest time and resource make the learning available in different languages.</p>	When requests are received. Quarterly review of all feedback and support requests

## Section 7 – Sign off

<b>Assessment signed off by:</b>	Senior management team
<b>Sign off date</b>	January 2021