

**Ireland Active**

**Response to  
*National Sports Policy Framework  
Public Consultation Paper***

*Submitted to the  
Department of Transport, Tourism and Sport*

***16<sup>th</sup> January 2017***

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# Introduction

## Ireland Active

Ireland Active is a not for profit representative body for the leisure and fitness sector in Ireland with over 200 members. The organisation was originally established as the Institute of Leisure and Amenity Management (ILAM) in 1998 and was rebranded as Ireland Active in 2013. Our membership is comprised of public and private sector leisure facilities, gyms, education providers, outdoor recreation providers and swimming pools in every community in Ireland.

Our standards programme includes the White Flag National Quality Standards and the Register of Exercise Professionals for the industry in Ireland. We advocate on behalf of our members and provide training, events and awards programmes for the leisure and fitness sector in Ireland as well as running a Garda Vetting service for the sector.

The Board of Directors is democratically elected from our membership each year at our AGM and is currently comprised of 12 directors who lead the strategy for the organisation. Gender balance and term limits are provided for in our Constitution and our team in the office is led by our CEO with voluntary committees supporting the operation of the organisation.

Ireland Active does not receive annual funding by any state agency despite delivering on several objectives and supporting many government initiatives. Our income is derived from membership income, events and programmes. We were happy to receive support for the European Week of Sport from both the Department of Health and Sport Ireland in 2016 and look forward to developing that relationship further in 2017.

- **Ireland Active delivers on government policy in the areas of sport, health, education, physical activity and water safety through our network of leisure and fitness facilities in every community in Ireland**
- **Personal exercise is the most popular sport in Ireland with approximately 500,000 adults (13.7%) participating in gyms each week<sup>1</sup> making it the most popular form of sports club**
- **Swimming is the third highest participation sport amongst adults in Ireland (8%) and in the top five for children**
- **Approximately 700 gyms/leisure facilities exist across Ireland, 450 of which have swimming pools and many of which have multi-sport provision**
- **Health club attendance has become the biggest adult “sport” in the Western World. Bigger than football, tennis and golf COMBINED.<sup>2</sup>**

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<sup>1</sup> Irish Sports Monitor, 2015

<sup>2</sup> Philip Mills, 2009

## Executive Summary

### Leisure and Fitness sector

The leisure and fitness industry in Ireland comprises of approximately 700 leisure and fitness facilities across the country (450 of which include swimming pools<sup>3</sup>) employing over 9,500 people<sup>4</sup> and generating €230m in membership receipts alone.

The sector employs everyone from duty managers to swimming teachers, coaches, lifeguards, personal trainers, fitness instructors and all those that support the operation of leisure and fitness facilities. We have addressed our vision for swimming in our joint submission with Swim Ireland and so we will concentrate on other areas which impact our sector in this submission.

The physical infrastructure for physical activity, sport and fitness in Ireland is delivered through both public and private gym and leisure facilities. One third of swimming pools are local authority with two thirds being operated by the private sector. Of the 450 pools approximately 200 are operated by hotels many of which have gyms and are now open to the general public as well as paying hotel guests. Many facilities have a mix of swimming pools, gyms, indoor halls and playing pitches providing a variety of opportunities for people to access physical activity.

- **We believe that a strategic approach to engaging with the public and private sector is required to Get Ireland Active**

### Cross sectoral working

Sport and physical activity crosses many public policy areas, including Health, Education, Transport, Tourism and Sport. The government has established a number of cabinet committees (Health, Housing, Justice Reform etc.) which are chaired by the Taoiseach, with an official from his Department acting as Secretary and chairing a Senior Officials Group which reports into the cabinet committee.

The three key departments in delivering a more active nation are the Departments of Health, Education and Sport. The National Physical Activity Plan and the school curriculum are of critical importance to delivering on government sports policy and it is our view that:

- **The government should establish a cabinet committee on Health, Education and Sport**

### National Physical Activity Plan

One of the goals of the Healthy Ireland Framework<sup>5</sup> is to reduce health inequalities and one of the primary ways of doing this is through physical activity. The National Physical Activity Plan (launched in January 2016) has been developed on a cross departmental basis led by the Department of Transport Tourism and Sport and the Department of Health under the HI Framework. Some of the National Physical Activity Plan Actions which Ireland Active are key to delivering are:

- **Action 5- Develop a publicly accessible national sports/recreation facilities and amenities directory**
- **Action 9- Extend the Active School Flag programme to 500 further schools**
- **Action 11- Fully implement the Physical Education curriculum for all primary and post-primary pupils to meet Department of Education and Skills guidelines**

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<sup>3</sup> EHAI, 2016

<sup>4</sup> Deloitte/Europe Active, 2016

<sup>5</sup> [Healthy Ireland Framework, 2013](#)

- **Action 25- Develop and implement a pilot programme for the National Exercise Referral Framework**
- **Action 41- Continue to support the Community Sport and Physical Activity Hubs in disadvantaged areas**
- **Action 43- Rollout a new Active Communities Walking Programme in all LSP areas and support over 500 new active community walking groups around the country under the Get Ireland Walking initiative**
- **Action 45- Develop a physical activity for health culture in Ireland through the development of new Get Ireland Running, Get Ireland Cycling, Get Ireland Swimming initiatives**
- **Action 47- Continue to support the work of the National Governing Bodies of sport in implementing programmes to promote physical activity**

### **Government investment**

Investment in sport is vital to the continued operation, management, administration, delivery and development of sport and physical activity in Ireland. Since 2008 current spending on Irish sport by government, as distributed through the Irish Sports Council (now Sport Ireland) dropped by 26% (€15m) and thankfully investment in 2016 and 2017 has levelled off with some small gains foreseen through the Dormant Accounts funding.

- **Long term funding needs to be committed from government to implement the National Physical Activity Plan**
- **Government gets a return of €149 for every €100 invested in sport, showing significant return on current and capital investment programmes<sup>6</sup>**

### **Participation**

The cost of physical inactivity is estimated to be €1.6billion<sup>7</sup> and the cost of overweight and obesity €1.13billion<sup>8</sup>, and so it is imperative that we invest in preventative health measures such as sport and physical activity to reduce the cost of the health budget. The involvement of the voluntary, public and private sector is an important part of solution in delivering participation programmes.

- **Participation programmes aimed at getting people active need to be extended beyond the traditional means of funding to new and innovative initiatives delivered by the voluntary, public and private sector**

### **Facilities**

The Local Authority Swimming Pool Programme (LASPP) which delivers capital investment has decreased dramatically from €27.8m in 2007 to just €4.2m planned for 2017. Although the funding initially provided for new pools the money is now primarily for upgrade of existing pools. The scheme is in urgent need of review having been closed to new entries since 2000 and having last been reviewed in 2006. The operation of local authority facilities in Ireland are primarily delivered through 3 different models-

1. Direct local authority management and operation
2. Establishment of a private limited company (not for profit) within local authority ownership- any profits being re-invested in sport, leisure and recreation services (e.g. K-Leisure, Swan Leisure, DLR Leisure)
3. Outsourcing to a Private operating company (e.g. Aura, Coral Leisure, Kingfisher)

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<sup>6</sup> Federation of Irish Sport, 2016

<sup>7</sup> NHF, 2010

<sup>8</sup> Safefood, 2013

There are pros and cons for each model in terms of control, staffing, recruitment, cost efficiencies, expertise and knowledge sharing. In the UK, there has been a growth of the establishment of leisure trusts (similar to model 2 above) for the operation of public facilities with around one third of all facilities being operated this way. In Ireland, we have a very disparate leisure sector without a single dominant player in the market (which is not necessarily negative). It is worth examining whether different models could offer efficiencies and we suggest that:

- **A review of the LASPP needs to be undertaken**
- **As part of the review new models of operation need to be examined**

We believe that a new National Facilities Strategy is required to ensure capital investment is strategically provided for. €134m was allocated for sports capital programmes between 2011-2015 and a new SCP is provided for in 2017. Given the significant amounts of funding that need to be provided to build, maintain and operate local and regional sports facilities it is important that government examines the public and private sector to ensure that it understands where current and future demand is required. It is often the case that the private sector delivers public provision in certain areas (through pay as you go gym/swim or pitch rental) and the duplication of services simply distorts local markets and creates over supply.

- **A National Facilities Strategy is required to ensure capital funding under the Sports Capital Programme (SCP) is invested strategically**
- **The Sports Capital programme should be allocated on an annual basis; provision of funding should take local provision into account and be referenced against the National Sports/Recreation Facilities and Amenities directory under the NPAP**

### **Tax Measures**

In 2011, the government introduced a reduced VAT rate of 9% for the leisure sector (down from 13.5%). This applies to gym membership, swimming pool admission and renting of sports halls and pitches. The tax measure has helped retain and grow jobs in the sector and increase participation in physical activity in our member facilities. Personal exercise has increased from 11% to 13.8% of the adult population since the introduction of the measure<sup>9</sup>.

We believe it is critical for government to maintain and further reduce the VAT rate to encourage job growth and participation in sport. In addition, a vat exemption exists for children's swimming lessons that adhere to the school curriculum. It is our view that this exemption should apply to all physical activity programmes for children and adults in an effort to deliver on the National Physical Activity objective to increase participation by 1% per year. Furthermore, the VAT exemption should in fact be changed to a 0% VAT rate which would allow public and private operators offset vatable capital expenditure.

- **The 9% VAT rate for the leisure sector should be retained and reduced**
- **The VAT exemption on swimming lessons for children should be extended to other programmes of physical activity for children and adults**
- **The VAT exemption should be changed to 0% VAT**

### **Standards**

Standards in leisure facilities can vary dramatically, and it is of serious concern to Ireland Active that no legislation exists in relation to safety and hygiene standards in swimming pools, facilities and gyms in Ireland. Ireland Active manage the White Flag National Quality Standards

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<sup>9</sup> Irish Sports Monitor, 2011 & 2015

for public and private facilities which is a voluntary scheme which aims to raise standards in the sector. The scheme is endorsed by the Irish Hotels Federation, Fáilte Ireland and Sport Ireland. The industry has suffered increased insurance premiums in recent years and most private operators now have to get insured in the UK. This is in part due to inadequate risk management measures being implemented by some operators in the sector, impacting upon others. We believe that:

- **The White Flag National Quality Standard should be a mandatory minimum requirement for industry operators, in particular publicly funded facilities**

### **Conclusion**

To maximise the potential of physical activity and facility infrastructure in Ireland we need a coherent and strategic approach to Irish sport which includes-

- **Long term investment to enable the implementation of the National Physical Activity Plan (NPAP)**
- **Review of the PE curriculum in primary and secondary school to ensure that the Dept of Education guidelines are implemented as per the NPAP**
- **Establish a high level cabinet sub committee on Health, Education and Sport**
- **Review of the Local Authority Swimming Pool Programme**
- **Annual Sports Capital Programme investment**
- **New National Facilities Strategy required**
- **Engagement with the public and private commercial sector as a major facilitator of Irish sport**
- **Maintain and extend tax measures to support physical activity**
- **Implementation of the White Flag National Quality Standards for facilities**

In the **Appendix**, we will go into further detail on areas covered in the consultation document.

## Appendix- answering each section of the NSP framework document

### Contribution of Sport

Sport contributes to the physical and mental health of our population and well as contributing to the economy, children and communities. The leisure and fitness sector is a significant employer as well as providing the infrastructure for sport to happen in Ireland.

- Personal exercise is the most popular sport in Ireland
- Investment in facilities delivers employment in construction as well as a lasting infrastructure for the community for years to come
- 9,500 people are employed in the leisure and fitness sector, with 40,000 being employed in sport in total

### Participation

Ireland Active members deliver participation programmes and opportunities to every community in Ireland each day. Multi-sport camps, swimming lessons, pitch hire and fitness classes are just some of the activities that happen in their facilities.

In the UK, Sport England have a MOU <sup>10</sup>with our UK counterparts (UKActive) to develop certain sports (e.g. tennis, swimming, cricket etc.,) and we believe that a similar initiative should be explored in Ireland.

*'Eleven of the top twenty sports in the UK occur within a health club or leisure centre. So as the body with greatest levels of access to the operators of these facilities, we are working in partnership with National Governing Bodies to achieve our mutual goal of increasing participation levels.'*

We believe the sports policy should recognise the contribution that public and private operators make to the provision of physical activity and sport in Ireland and should form part of the solution to getting Ireland active through:

- Implementation of the National Physical Activity Plan
- Publicly available National sports/recreation and amenities directory- Ireland Active to assist in its collation
- Innovative participation programmes delivered in local facilities
- Co-ordination of all stakeholders in delivering the School Curriculum (schools, facilities, clubs and NGBs)
- Learnings from Sporting Schools in Australia<sup>11</sup>- a central hub connecting sport at a national and local level

### High Performance

Ireland Active sees the synergy in the progression of athletes as users of 'grassroots' and community facilities to world class training facilities (on the National Sports Campus) where preparation for national and international competitions can be facilitated. We see our facility operators as part of the support structure for athletes before they make the progression to the elite stage. We are already working with Sport Ireland to raise awareness in these gyms of safe supplements for athletes and the public.

Our education sector members (e.g. UCD, DCU, WIT, Athlone IT) are also providing scholarships and pathways for athletes to progress in sport as well as life.

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<sup>10</sup> <http://www.ukactive.com/partnerships/working-with-ukactive/national-governing-bodies>

<sup>11</sup> <https://sportingschools.gov.au/>



- We believe there is a role for Ireland Active and its members to strategically facilitate and develop high performance sport

### Local and Regional Facilities

Our members operate facilities across every community in Ireland and as outlined in the executive summary we believe that a strategic approach to managing the existing stock and future development is needed through a:

- New National Facilities Strategy
- Review of the LASPP
- Review of models of operation of facilities
- Sports Capital Programme investment on an annual basis

### National Sports Campus

We believe that the development at the campus are something for Ireland to be proud of as it stands shoulder to shoulder with the best in the world. The National Aquatic Centre is the fourth most visited fee paying attraction in the country with almost 1million people visiting in 2016.

Momentum must be sustained however and the completion of the masterplan for the campus should be achieved within the lifetime of the National Sports Policy. It is our view that private and philanthropic investment should be investigated as part of the strategy, For example naming rights for the National indoor arena would offer some financial stability for the facility whilst tapping into the marketing power that a brand could bring. Ireland needs to bid for an international event strategically and with the support of state agencies (such as Fáilte Ireland) to make any such event viable.

The National Sports Campus now acts as a hub for many sports and representative bodies, including Ireland Active, and we believe it is essential to create a viable and sustainable central point which will develop all sports in an equal manner. The support structures and learning from more established NGB's will assist in developing weaker or less established NGB's.

The existing facilities at the National Sports Campus (NSC) aims to adhere to best practice standards in terms of provision of facilities and the operation of same. Ireland Active is working with the NSC as part of the White Flag award scheme and we believe this will assist the National Sports Campus in benchmarking the operation of facilities on campus. It could also serve as a standard bearer for best practice in the operation of sporting facilities. This could reap benefits by providing a support structure/education tool for newly built facilities.

### Governance

We believe that adoption of The Governance Code<sup>12</sup> should become a requirement for sporting bodies and that a sport specific governance education programme should be funded for roll out across the sports sector.

Boards of sporting bodies should have balanced competency based boards with the requisite skills to meet the needs of the organisation. The Better Board Stronger Sport<sup>13</sup> toolkit provides guidance for sporting bodies in developing governance good practices.

### Coaching

REPs Ireland is the Register for Exercise Professionals and provides internationally recognised standards for the fitness instructors and personal trainers in Ireland. Established in 2009 the

<sup>12</sup> <http://www.governancecode.ie/>

<sup>13</sup> [http://www.sportireland.ie/Governing\\_Bodies/NGB\\_Support\\_Kit/Better-Boards-Stronger-Sport-Toolkit/](http://www.sportireland.ie/Governing_Bodies/NGB_Support_Kit/Better-Boards-Stronger-Sport-Toolkit/)

register has approximately 500 members with 15 approved training providers (e.g. WIT, Tralee IT, NTC, NCEF). A voluntary council is made up of representatives from the sector, which includes the HSE and Sport Ireland, providing a governance structure for the organisation. We believe that:

- Government funded/Local Authority facilities should be required to employ REPs Ireland qualified fitness staff to ensure the confidence and safety of the public
- REPs Ireland should receive government funding to allow it to grow and become self-financing

### **Volunteer engagement**

Many of our members provide bases and facilities for voluntary clubs and volunteers whether it be for basketball, squash, football, swimming or tennis, for example. It is our view that our member facilities can be developed further to act as community hubs for volunteer engagement and education, as many currently do. Local facilities provide a focal point for community activity and together with local clubs and LSPs we believe that they should be harnessed to encourage volunteer engagement.

### **Safety in sport**

#### *Safeguarding children*

Ireland Active is working to develop a leisure specific child welfare training in consultation with Tusla to develop a framework. We currently operate a Garda Vetting facility for members and process approximately 2,000 vets per year helping to keep the sector safe for the public.

#### *Safety Standards*

Ireland Active has operated the White Flag National Quality Standards Awards for the past 15 years. The awards cover Safety, Hygiene, Customer Service and Human Resources for both wet and dry facilities (public and private including hotels). The facilities are audited independently and an independent judging panel issue awards based on operational excellence. Rising insurance costs mean it is now imperative that risk mitigation measures and standards are in place.

- **The National Sports Policy should provide the White Flag National Quality Standard as the quality assurance framework for sporting facilities**
- **The White Flag scheme should be funded to ensure it is allowed to grow within the sector and become self-financing**

#### *Water Safety*

Ireland Active have developed the Swimming Pool Guidelines (2011) along with Swim Ireland and Irish Water Safety which provide a framework for operating pools in a safe way. Guidance is given on lifeguards for example to ensure that children and adults are swimming in a safe environment.

### **Integrity of sport and international influence**

Ireland Active is working with the Sport Ireland anti-doping unit to educate the sector on safe supplement usage through the White Flag scheme. We will continue to work to raise standards and awareness in the sector to protect the integrity of sport.

### **Sport in a cross-sectoral context**

As already outlined in the executive summary, sport crosses many government departments and agencies including the:

- Department of Education- sport as part of the school curriculum
- Dept of Housing, Planning, Community and Local Government- Local Authority Facilities
- DTTAS- Sports Capital programme, LASPP, funding to Sport Ireland, sports policy

- Sport Ireland- delivery of sports policy and funding to sport in the areas of; participation, ethics, coaching, high performance and the National Sports Campus
- Dept of Health & DTTAS- National Physical Activity Plan
- HSE- Physical Activity coordinators, exercise referral

*'The best outcomes are achieved when partnerships are developed with those outside the sector: with those in education, health, with Iwi, and the private sector. This increases the likelihood that the facilities will be used to their full potential, maximising the return on investment.'* - **New Zealand Sporting Facilities Framework**<sup>14</sup>

One of the guiding principles of the Healthy Ireland Framework is Partnerships and Cross Sectoral Work and in order for us to deliver on government health (and sport) objectives we believe that a partnership approach is required.

*'Healthy Ireland describes supportive mechanisms to ensure effective co-operation between the health sector and other areas of Government and public services concerned with social protection, children, industry, food safety, education, transport, housing, agriculture and the environment. It invites the private and voluntary sector to participate through well-supported and mutually beneficial partnerships.'* **Healthy Ireland Framework**<sup>15</sup>

We believe that greater working together will help deliver on sport's potential. Ireland Active member facilities as providing the infrastructure and programmes to enable the delivery of public policy across a broad range of areas at a local and national level. We believe that high-level engagement by government is needed to deliver a cross sectoral approach and that government needs to:

- **Establish a cabinet sub-committee on Health, Education and Sport to help deliver on the potential of sport with a cross sectoral approach**

*Collaboration among community, regional and provincial/territorial partners supports the development of sustainable sport facilities, green spaces and equipment accessible to all citizens...Linkages and partnerships between and among sport organizations, municipalities / local governments and educational institutions align and leverage athlete, coach and officials' development and facility utilization.'* - **Canadian Sports Policy**<sup>16</sup>

### Outdoor recreation

Ireland Active members include outdoor recreation providers and we believe that the report that was developed by Sport Ireland in consultation with the sector needs to be acted upon. We believe that the White Flag standards programme could be expanded to encompass the outdoor recreation sector bringing much needed improvements in standards to the sector.

### Sports Tourism

The 'Event Ireland' unit with Fáilte Ireland needs to be further developed to ensure that our natural resources and facilities are optimised to bring large scale events to Ireland. The development of a working group to include all stakeholders in the sector should be established.

### Financing Irish Sport

As we have outlined in the executive summary, sport impacts upon many areas of government policy, the economy and society (sport, education, health, tourism etc.). Therefore, we believe

<sup>14</sup> Better Value From New Zealand Sporting Facilities, The New Zealand Sporting Facilities Framework, 2014

<sup>15</sup> <http://www.hse.ie/eng/services/publications/corporate/hieng.pdf>

<sup>16</sup> Canadian Sports Policy, 2012

that alternative income streams and supports for sport should be explored from other government departments, private and philanthropic sources.

The UK Sports Strategy looks at the tax system as a way of supporting sport and physical activity:

- *'The government will launch a consultation at Budget 2016 on how to expand support that can be given to grassroots sport through the corporation tax system.'*
- *'Alongside the Treasury's planned consultation on expanding the support that can be given to grassroots sport through the Corporation Tax system, government will undertake a cost/benefit analysis for some of the tax proposals suggested.'*

Our members are working with schools to deliver the education curriculum and on improving the health of the nation for example, and other sources of income such as the Healthy Ireland Framework, Dept. of Education and Skills and other government policy initiatives should be explored as part of an overall National Sports Policy. We believe it would be beneficial if the sports policy explored the tax system acting as a means for further investment in sport:

- Retain the 9% VAT rate for the leisure industry- gym/pool memberships, pitch hire
- Extend the VAT exemption for children's swimming lessons to adult lessons and all physical activity programmes, change to 0% VAT rate to cater for capital expenditure
- Philanthropic funding- a tax relief on current donations would help encourage support, targeted at specific programmes that deliver on government objectives- participation, health, education, HP sport
- A portion of the betting tax being allocated to sports other than the horseracing industry should be examined

### **Measuring the impact of sport**

Sport delivers on government policy in a way that few other sectors do- in the areas of health, education, economy, tourism, communities etc. Sport needs people, programmes and infrastructure to operate and therefore it requires the sustainable investment by government to allow it to deliver on its full potential.

Investment by local authorities in sport and leisure must be seen as a necessary requirement for the delivery of public services. The strategic investment of public money in facilities needs to be carried out to ensure the best return for the public purse. The subvention of some existing local facilities is inevitable given the location of certain facilities, the operation costs and the low population base.

Government needs to avoid the duplication of facilities in areas where sufficient public and private facilities already exist. The private sector is an essential part of the delivery of sport in Ireland and needs to be recognised as such.

The tax system needs to be viewed as an investment mechanism for sport, which will enable sport to become more affordable and to get more people active. As outlined above, philanthropic investment can be encouraged by tax reliefs on capital and current investment. In addition, the commercial sector need to be supported by the reduction in sales taxes (VAT), which will in turn encourage lower socio-economic groups to engage in programmes to be more active.

The Children's Sport and Physical Activity Study (2010) needs to be undertaken again and published on a bi-annual basis, similar to the Irish Sports Monitor, to ensure that participation levels are being monitored for children as well as adults, as per the NPAP- Action 50.