

The Welsh Sport Association's vision is for a 'vibrant, active nation', and our mission is to empower our members to be stronger and more successful, contributing towards a society fit for the future. We believe that ensuring there are accessible opportunities for the people of Wales to be active through sport and physical recreation is key to delivering a generational shift in attitudes towards health and wellbeing.

We represent 80 deliverers and facilitators of a broad range of sports and activities in Wales including governing bodies, charitable trusts, private providers and local authorities, and are therefore grateful for the opportunity to respond to this consultation. The following is an amalgamation of responses received from our membership.

### **Consultation Questions**

#### **Healthy Weight: Healthy Wales**

We are seeking views on what will work to prevent and reduce obesity in Wales and help people achieve and maintain a healthy weight.

If you would like to comment on specific proposals under this theme, please use the summary of proposals document.

- 1. Are you responding as an individual or on behalf of an organisation? If you're responding on behalf of an organisation, please provide the organisation's name.**

Individual

Organisation

Name of organisation: Welsh Sport Association

We have identified some proposals for how we think we can help people to achieve and maintain a healthy weight but we want to know if these are the right proposals, if you know of different approaches which have proven to be effective and how we can best deliver the plan

- 2. Do you agree that a whole system approach could enable change to take place? If not, why? What are the opportunities, risks and barriers to effective leadership?**

In theory a whole systems approach could be a positive way forward, and the Wellbeing of Future Generations Act provides the mechanism to get statutory bodies to collaborate, however, our experience is that the culture still requires a significant shift in behaviours

to enable the true collaborative working necessary for a whole systems approach. Entrenched silos are still commonplace within organisations and there continues to be poor practice in terms of communications and information sharing. We are yet to see the bold leadership necessary to make the WbFG Act work, let alone taking a fairly radical approach to whole systems thinking.

Interventions must be based on evidence and insight, and implementation times must be reduced and be flexible to adapt to changing needs.

There is a strong appetite among the sport sector to collaborate more, but often it feels like we speak another language to health. The recent Healthy and Active Fund application process highlighted the disparity between health and physical activity organisations, as it appeared skewed towards public health reporting methods – with which the majority of sporting organisations are unfamiliar. We believe that the funding criteria should have included a requirement that not only were the projects led by third/public sector organisation, but that at least one partner had to be one which came from a physical activity background. This would have encouraged far greater cross sector partnerships; ensured the involvement of relevant expertise; and helped sports to understand the requirements of public health – particularly given that a substantial amount of the money used for HAF would have originally come from a budget for sport which has already seen a reduction in investment of 43% in real terms since 2011 according to Sport Wales' Finance Department.

**3. Are you aware of any good practice locally? How can we build upon and maximise existing practice and resources to support population change across Wales?**

There are some fantastic inclusive programmes currently underway within sport across Wales which help introduce people to physical activity and help combat social isolation and loneliness. Walking sports have really taken off – for example, [the walking netball team in RCT](#) and walking rugby in Torfaen. Run Wales also have a number of successful projects across Wales encouraging social running, given the strong body of evidence on the positive impact of running on mental health, as can be seen by the continuing success of events such as [Parkrun](#) and [Go Tri](#). There has been a phenomenal upsurge in cycling in recent years and Welsh Cycling's free [Breeze and Ride programme](#) has done much to encourage more women and girls into social cycling. Wales Golf also has some excellent case studies, including [one where they have worked with the Stroke Association to get survivors back playing golf](#).

Our members would like to see far greater collaboration between sport, GPs and frontline NHS staff in terms of social prescribing, as much of this work fits in seamlessly with the NERS programme.

We also hope that the innovative Dewis Cymru platform will be more widely promoted as a vehicle for signposting activity within local communities.

Healthy environments start at home, but in the absence of being able to guarantee this, making physical activity an integral, and more importantly fun, part of the school day is vital. The [Vision for Sport](#) places a strong emphasis on “enjoyment” as this increases the probability of sustained participation in physical activity.

We need to do far more in schools to ensure that children understand the benefits of positive lifestyle choices from an early age. Physical literacy is imperative in providing the tools to overcome these barriers to activity, and schools are the ideal place to ensure that children develop the skills to be able to be active for life. We also need to involve parents and make volunteering as easy as possible.

More research and insight are needed to properly understand the barriers to activity at grassroots levels. Organisations such as StreetGames Wales have had considerable success in working closely with young women via their award winning [Us Girls programme](#), largely due to its iterative and participant-led approach. We must do more to learn from this model of intervention if we are to reach those who are traditionally difficult to engage.

**4. Do you agree that the proposals set out in HE1- HE5 would make our food and drink environment healthier?**

5 Completely agree | 4 Agree | 3 Neither agree/ disagree | 2 Disagree | 1 Completely disagree

If you agree, how do you think these could be implemented and what support will be required? If not, why?

LEC 1.2 – We know that preventative health interventions are vital if we are to make any improvements in the health and wellbeing of the nation. We are therefore concerned that there is no formal role for Sport Wales on Public Service Boards, making it easy for physical activity to slip off the agenda against a backdrop of crisis healthcare – this would need to be considered if there is to be a whole systems approach.

In terms of LEC 1.4 – Where does responsibility for physical activity sit within this? The previous Minister said that Physical Activity was to be jointly accountable between Sport Wales and Public Health (<http://sport.wales/news--events/news--events/our-news/latest-news/response-to-ministerial-statement-on-sport.aspx>). Given the contribution that physical activity makes to reducing obesity, we are disappointed that the role of Sport Wales in this area has not been referenced in this document and feel that the focus on nutrition is overshadowing the concurrent need to address inactivity.

LEC 2 – Any reviews of impact need to ensure that we are comparing apples with apples, and any measurement systems need to be consistent and comparable across different sectors. Again, we understand that many sport-led applications to the Healthy and Active Fund were unsuccessful – this is deemed largely due to their inexperience with health reporting systems in comparison to those of Sport Wales.

HE2. We would strongly caution against limitation of advertising at sporting events without a full understanding of the consequential potential collateral impact on funding. For example, fast foods advertising in sport provides many £millions of fundamental funding which enables grassroots sport to exist. This investment has a significant impact on the availability of opportunities for people to be active and participate in sport. Before taking any action, we need to fully understand the theory of change process behind negative lifestyle choices, e.g. the impact of the sugar tax on sugar level consumption; and the impact of advertising versus availability and access, on influencing a person's food purchasing behaviours.

We also believe that more could be done to engage with sport role models to promote healthy diets and activity behaviours due to their popularity and social reach. We should also look to other digital influencers, taking an approach similar to that of Sport Wales' Our Squad and "This Girl Can", and harness the power of social media platforms and vloggers to engage with young people using role models that they look up to and trust.

Ensuring that people can understand the impact of their food choices on their health is key, for example how much activity would be necessary to negate calories consumed for healthy weight maintenance (e.g. a standard mars bar would require two hours of brisk walking to burn off).

We must also support children and families to understand how to cook simple and nutritious meals and help them to recognise ideal portion sizes. We also need to reinforce positive messages, particularly through social media. Young people are increasingly aware of their food intake and its provenance – which is one of the reasons behind the recent upsurge in vegan diets. We need better insight as to how this movement came about and how we can learn from it to cascade messages more widely.

We also need to guard against substituting sugar with artificial sweeteners. The sugar tax has missed a trick in that while manufacturers are reducing natural sugars, they are increasing the use of sweeteners - ensuring that "sweet tooth's" persist and sugar cravings remain, and still posing potential health risks given the growing body of evidence that they are carcinogens.

We strongly believe that ANY interventions need to be weighed against each other to determine the most effective solutions and mitigate any unintended negative impact.

**5. Do you agree that the proposals set out in HE6-HE7 would provide an environment with more opportunities to be active?**

**5 Completely agree**

**4 Agree**

**3 Neither agree/ disagree**

**2 Disagree**

**1 Completely disagree**

**If you agree, how do you think these could be implemented and what support will be required? If not, why?**

We firmly agree that Health Impact Assessments need to be commonplace and would wholeheartedly support move to make interventions more evidence and insight based.

While there is certainly a place for Active Travel, it is not the "panacea for obesity" it is made out to be by officials and politicians. Alongside this we must ensure that there are sufficient places for both children and adults to play. This is enshrined within the Rights of the Child and should be a fundamental pillar of any infrastructure and housing development.

Our suggestion is that Welsh Government considers pooling the funding from Section 106 agreements so that there is a much more strategic approach to investment in local communities. Transparency in terms of how these funds are distributed is very patchy across Wales, and we have anecdotal evidence of considerable investment being directed at the whim of Council officials rather than after a thorough review of local demand and need. This has resulted in unwanted and rapidly obsolete playgrounds installed in areas where other facilities would have been far preferable. We would like to see greater consultation with local communities in terms of what facilities they would like to see in their areas, and the inclusion of active spaces (as opposed to an out of the box uniform playground facilities) as a condition of planning for new developments.

With regards outdoor sports facilities, we understand that Cardiff is currently the only local authority looking at developing a playing pitch strategy, while the Vale of Glamorgan has done some preliminary work on this. Given the increasing push from local authorities to asset transfer facilities, the availability of green spaces for activity will become more and more important. We understand that Sport Wales has commissioned 4Gobal to review the pitch provision across Wales, this is entirely reliant on Local Authorities giving up-to-date information.

During this facility audit process there has been very little engagement with Higher Education (HE), who are significant providers in this space. It seems that HE falls between the gaps of “high performance facility providers” and “community provision”, but in many cases span both in practice. It is unclear at this time if Sport Wales has a strategy for facility development, despite several recent reports (e.g. high-performance facility report) indicating that there should be a strategic overview. Our higher education members tell us that they typically have a “civic mission” embedded within their own performance indicators and strategies and that there needs to be more trust by Sport Wales and other partners that HE can also deliver community sport. Key national stakeholders involved in delivering physical activity must take a strategic overview of delivery opportunities, and the mapping capability of Dewis Cymru should prove very useful in determining gaps and identifying possible sporting delivery agencies – of which HE is an enthusiastic potential partner.

We understand that funding is scarce and that we must look for new and innovative ways to deliver activity. The recent response on Government Response: Taking Forward Wales' Sustainable Management of Natural Resources Consultation – Access Proposals, is a positive move towards having more access to the countryside so that people can take advantage of the benefits that Wales' natural resources have to offer from an activity perspective. We must collaborate more effectively to shared insight and better understand the potential delivery landscape, so that investment can be used most cost-effectively.

An overarching strategic group to consider Section 106 funding could have a significant impact in ensuring that investment is fit for purpose and meets the sustainable development aims of the WbFG Act. We have seen some success in a similar approach via the 3G Collaboration Group Football, Hockey, Rugby and Sport Wales, providing expert advice and guidance to Welsh Government and Schools on investment in all-weather pitches across Wales.

However, we are aware that there is still evidence of silo working within local authorities where education and leisure officers are not communicating requirements, and this has

led to inappropriate facilities being developed (e.g. AstroTurf instead of 3G pitches). Our members tell us that the funding via the 3G collaboration group has been paltry compared to the real cost of facilities – e.g. £50k towards a £500k build. Given the reporting requirements and expectation required, chasing the funding becomes pointless leading to commercial investment decision, versus strategic facility development.

A more collaborative strategic and evidence-led approach should be extended to other planning applications, and we warmly welcome moves in HE7.4 to support Sport Wales in providing more proactive advice to encourage best practice, provided it is delivered by experts in the field. We are also pleased to see funding starting to be released into facility provision/capital investment however, given that this is against a backdrop of increasing pressure on local authorities who have no statutory obligation to deliver leisure services, there needs to be a continued commitment beyond the two years to ensure that those facilities, which have received chronic underinvestment in recent years, are fit for purpose.

The Welsh Sports Association (WSA) already provides advice for physical activity related business and clubs. We provide business support services for our members who include the national governing bodies of sport (NGB), leisure trusts, local authorities, charities such as the Urdd, recreational bodies and private providers. This support includes, HR, Legal, VAT, Tax and Commercial helplines. We have also developed a low cost bilingual online DBS checking service and work closely with Social Business Wales to identify other sources of support for the sector. Our website also contains resources such as templates and guidance. All sports clubs are eligible to receive our services for free if their NGB is a WSA member.

We will shortly be launching a sport and physical activity specific fundraising tool in conjunction with the WCVA, in order to help sports organisations identify potential grants from charitable trusts and foundations. We would welcome any opportunity to discuss the work of the WSA with officials, and for any support in identifying potential sources of financial support for the sport and active recreation sector in Wales.

**6. Do you agree with the proposals for the following settings (*please identify which setting(s) you wish to comment upon?*)?**

- Early Years (HS1)
- Schools (HS2)
- Higher/ Further Education (HS3)
- Workplace (HS4)
- NHS (HS5)
- Public Sector (HS6)

**5 Completely agree**

**4 Agree**

**3 Neither agree/disagree**

**2 Disagree**

**1 Completely disagree**

**If you agree, how do you think these could be implemented and what support will be required? If not, why?**

HS2.

We warmly welcome the recommendations of the [National Assembly for Wales' Health, Social Care and Sport Committees Inquiry into Physical Activity of Young People](#) and continue to call for Physical Education to be assessed as a core subject within the school curriculum.

However, for this to work in practice, teachers must be properly supported and where necessary, outside expertise should be brought in to ensure that PE is delivered at a high standard. There a significant number of not-for-profit organisations who would welcome the opportunity to deliver within the school setting – whether within or outside of school hours. This must be explored further given that the curriculum is already overcrowded. As such, we believe that the concept of an extended school day – which does not necessarily need to be organised by teachers - needs to be more fully considered.

**7. Do you agree that proposals HP1 – HP2 will support behavioural change and increase conversations about healthy weight through front line services?**

**5 Completely agree**

**4 Agree**

**3 Neither agree/disagree**

**2 Disagree**

**1 Completely disagree**

**If you agree, how do you think these could be implemented and what support will be required? If not, why?**

The necessary behaviour changes to improve lifestyle choices impact far more widely than Public Health. This approach must be high profile and cross portfolio, with visible strategic leadership and accountability if it has any chance of success. As it stands, we do

not believe that these proposals are sufficient to encourage and support significant behaviour change.

Frontline staff are the backbone of our NHS and if they are expected to deliver behaviour change support for the public, they must themselves be encouraged and supported from the perspective of their own health, wellbeing and weight if they stand any chance of being taken seriously.

We would wholeheartedly support any moves to extend social prescribing, and increased investment in the promotion of websites such as Dewis Cymru to aid practitioners in signposting to activities of interest within their local area such as this [bowls project in Tonteg Community Centre, Rhondda Cynon Taff](#)

**8. Do you agree that proposals HP3 – HP4 will enable children and families to support a healthy weight?**

**5 Completely agree**

**4 Agree**

**3 Neither agree/disagree**

**2 Disagree**

**1 Completely disagree**

**If you agree, how do you think these could be implemented and what support will be required? If not, why?**

Research shows that sport is incredibly powerful in providing real benefits to those involved - from helping people to be more active; developing strong social groups and friendships and developing skills which improve employability. Therefore, we are very disappointed that there is no reference to physical activity physical literacy within HP3. Obesity will not be overcome by improvements to nutrition alone, physical activity must go hand in hand with this.

We also know that taking part regularly in sport and physical activity can significantly improve the life chances of those with Adverse Childhood Experiences (ACEs), by providing some of the tools which increase resilience and help them to overcome challenges. But for sport to maximise its potential in contributing to social good, we need to better understand the role that it can play in identifying and supporting those who could benefit the most and help to create an active nation.

We are currently in discussions with the ACEs Hub to explore how we can support the sector to improve their understanding of the role they can play in terms of ACEs but would welcome any additional support.

**9. Do you agree that proposal HP5 will develop a clinical pathway to ensure those who are overweight or obese can access the right kind of support?**

**5 Completely agree**

**4 Agree**

**3 Neither agree/disagree**

**2 Disagree**

**1 Completely disagree**

**If you agree, how do you think these could be implemented and what support will be required? If not, why?**

Any insight developed from the review of delivery and implementation barriers should be shared with other stakeholders to help support and inform their own work and not just kept within health - for example key stakeholders such as Sport Wales should be made aware of any potential opportunities around physical activity.

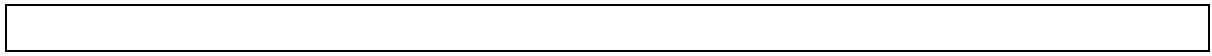
Affordable alternatives must be promoted, and the reduced use of artificial sweeteners should be encouraged.

**10. This question relates to the impact the proposals might have on certain groups.**

**Do you think the proposals in this consultation document might have an effect on the following?**

- o Those living in rural areas
- o Welsh language
- o Equality
  - Age
  - People with disabilities
  - Sex
  - Transgender
  - Marriage or civil partnerships
  - Pregnancy and maternity
  - Race
  - Religion
  - Sexual orientation

**o Children and young people**



**11. Do you have any other comments about these proposals?**

We note with interest the recent publication of Driving Prosperity for All through Investing for Health and Well-being by Public Health Wales. Given the increasing levels of obesity and chronic illness, we warmly welcome any steps to improve early interventions, but we were very disappointed that the role of sport and physical activity did not feature more prominently in helping people to make better lifestyle choices. While measures such as the Active Travel Act will prove useful in helping children and young people to be more active, this cannot replace the positive impact of regular participation in sport and physical activity.

We believe that sport has a crucial part to play in ensuring that Wales is a vibrant, active nation and that much more can be done to work together with health to help solve some of our society's biggest problems. The Welsh Sport Association is already working with the ACE Support Hub to improve awareness amongst the sector and explore how sport can help strengthen the protective factors which make those who have experienced ACES more resilient.

As the representative body for sports organisations in Wales, we would be grateful for an early opportunity to meet with officials from Public Health to discuss the collaborative role that our members in the sport and active recreation sector can play in achieving our collective wellbeing goals.