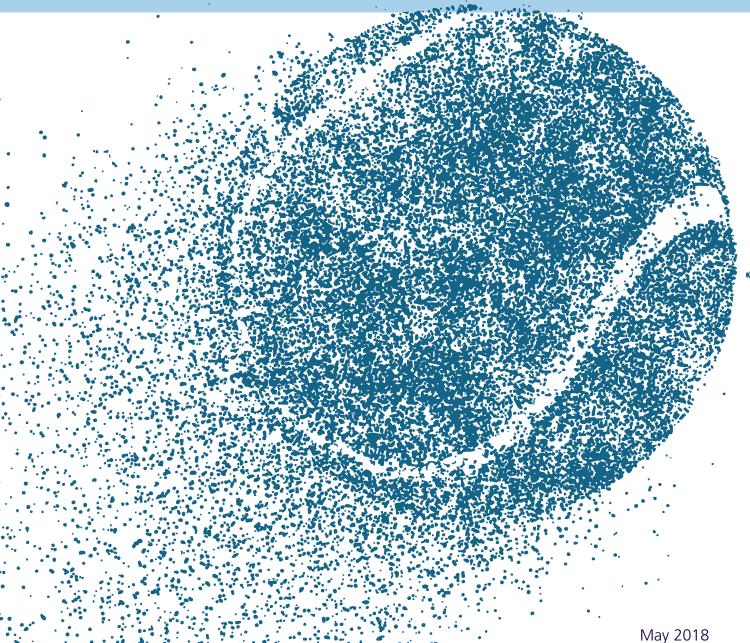


Assessing and improving attitudes and behaviour



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If you have any feedback on the content of these resources, or additional questions that you'd like to discuss, please contact the ICSA information centre: **020 7612 7035** | **informationcentre@icsa.org.uk**

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Introduction

Sport plays an important role in society and in the economy. Clubs, organisations and the staff and volunteers who run them make the benefits of sport available to millions.

However, a series of high-profile failures, often attributed to shortcomings in governance, have been experienced by international sports federations, domestic national governing bodies (NGBs) and individual clubs in recent years. These have had a negative impact not only on the organisations themselves, but on their disciplines more widely and on sport in general. In some instances the actions have extended to criminal wrongdoing. The outcomes have ranged from serious reputational damage, threats to sporting integrity, third party investigations and legal proceedings to, in the worst cases, very real and grave suffering on a human level.

At the time of writing, the publicly-funded sports sector in the UK is embedding the mandatory Code for Sports Governance and equivalent measures in the separate jurisdictions. Whilst steps to improve governance processes are to be welcomed, there is a growing recognition that rules-based compliance cannot on its own deliver healthy behaviour within organisations. Indeed, the efficacy of rules and processes depends in large part on the integrity of those subject to them: their usefulness is negated if there is a mindset of bypassing them. Across all sectors there is an awareness that behaviour is determined to a significant degree by the culture of the entity concerned.

Despite this, there remains a sense that the relationship between governance and organisational culture is still not fully recognised and that too much emphasis is placed on the mechanics of governance – its policies and procedures – with too little on dynamics, attitudes and behaviour which are interwoven with them.

Interplay of governance and culture

The Independent Governance Committee to the Executive Committee of FIFA, a federation which has experienced its own cultural challenges, noted that:

'There should [...] be little doubt that the reason for inappropriate conduct can usually be determined. It is almost always a combination of personal greed, a breakdown in systems and controls and a lack of ethical and moral culture within an organisation'.¹

In large part this assertion holds, particularly if the definition of 'personal greed' is extended beyond pecuniary interests to include a range of malefactions.

Processes and organisational culture play mutually reinforcing roles. Moreover, a positive culture not only serves to protect reputation, but also to generate value for the organisation, amplify its assets, and to assist in the achievement of its strategic goals in a sustainable manner. This is reflected, for example, in Principle 4 of the Code for Sports Governance and the rationale behind it.

An inclusive culture can also act as a bulwark against damaging behaviour.

A Code for Sports Governance – Principle 4: Standards and Conduct

'Organisations shall uphold high standards of integrity, and engage in regular and effective evaluation to drive continuous improvement.'

Rationale: 'Having the right values embedded in the culture of the organisation helps protect public investment and also enhances the reputation of the organisation, earning stakeholder trust. Constantly seeking to improve makes an organisation swift to respond to new challenges and opportunities.'

¹ FIFA Governance Reform Project – Final Report by the Independent Governance Committee to the Executive Committee of FIFA, April 2014, p. 6.

The roundtable

ICSA: The Governance Institute has previously carried out projects on identifying markers of negative and positive culture within organisations in the corporate and charity sectors. These suggested a range of indicators, some quantitative and directly measurable, others more qualitative and requiring further analysis, which could be used to assess the state of organisational culture within a range of bodies.

There seems to be an appetite for a similar undertaking for the sports sector.

With this in mind, ICSA brought together individuals with experience in a variety of capacities – board members, NGB staff, governance professionals and consultants, and members of sector umbrella bodies – across a range of disciplines and levels, to discuss and identify different sources of threats to a positive culture. The discussion also sought to ask which of these threats – if any – are unique to the sports sector, and to suggest what to look for when seeking to instil a positive set of behaviours in an organisation.

Recognising that sports bodies share many of the experiences of organisations across sectors, but are also subject to factors and pressures which are particular to the sporting environment, the discussion was framed in two parts. The first focused on factors which might be found in organisations of all types. The second was directed around issues which seem more particular to the sports sector.

Defining culture

Though it has grown in relevance and popularity, organisational culture remains to some an ill-defined concept and consequently can be viewed with some scepticism. Particularly for those who prefer their evidence to be quantifiable, laid out on a spreadsheet – or balance sheet – talk of 'culture' can feel nebulous and difficult to apply. This is short-sighted.

'Culture is the operating system through which people create meaning, purpose and belonging. That's why it's an organisation's most valuable asset'.

The Ethics Centre, Culture Alignment, 2017²

At its simplest, organisational culture is taken to mean 'the way we do things around here' – an agreed set of customs and norms that inform, and are evident in, the behaviour of those who work in and for an organisation. The New Local Government Network recently defined culture as:

'the norms and values that determine the behaviour of those who work within an organisation. These norms result from complex processes of emulation and reinforcement, sometimes unconscious, by each employee of their colleagues' behaviour. The norms are often but not always reflected in the explicit formal processes of an organisation but can often also act in contradiction to those formal processes'.³

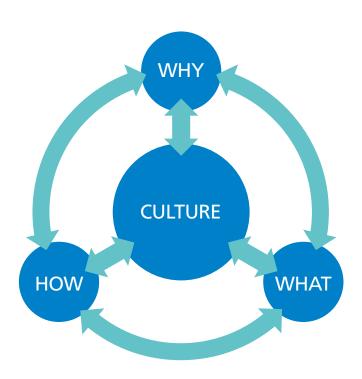
Fully understanding the concept and its importance to organisations requires one to go beyond the 'how' of 'the way we do things' and to embrace the 'what' and the 'why' behind their activities; these are all forces that drive behaviour. In fact, the 'why' ought perhaps to be the starting point. So much of what an organisation does and how it does it stems from that initial determination. The 'why' can colour all that follows. As such, 'culture' should be taken to encompass:

- what an organisation does its overall purpose and the individual activities it undertakes in pursuit of that;
- why it does the things it does what it hopes all of its activities will achieve, individually and collectively; and
- how it goes about doing those things and the processes it has in place in terms of monitoring and control.

² The Ethics Centre, Culture Alignment, 2017, p. 54.

³ A. Lent and J. Studdert, Culture Shock: Creating a changemaking culture in Local Government, February 2018, p. 10.

Figure 1: The three factors of culture



These three factors all feed into and draw from the abiding culture of an organisation. They should be in accordance with one another. The review of the culture at the Australian Olympic Committee in 2017 found that the organisation's culture was 'not aligned with the ideals it aspires to hold', adding that:

'[it] is not just a question of what the AOC must 'do' to meet future challenges. It is also a question of what the AOC must 'be'. What type of organisation must it become? What model of culture will best serve it? How must it be led? What character must leaders develop in themselves. And finally, how will they lead?'⁴

Culture provides the context for and underpins all that an organisation does.

⁴ The Ethics Centre, Culture Alignment, p. 6.

What is sport for?

Behind the debates surrounding many of the high-profile stories which have engulfed the sector lies a simple question, but one which plays a significant role in determining culture: what is sport for? This is the over-arching 'why' for the sector. To many, who play or volunteer, the answer to the question is obvious. It is to have fun, play the sport they love, interact with others and build a sense of team or community. But recently questions have been asked of the sector's primary purpose.

The funding model for elite sport in the UK, for example, has attracted criticism. Notably, the 'no compromise' policy, explicitly targeting podium potential when considering elite funding allocations, has been equated with a 'win at all costs' mentality. The independent review panel investigating the climate and culture in the World Class Programme at British Cycling noted that the central pursuit of medals and derived National Lottery funding led to a de-prioritisation of tackling cultural and behavioural issues in the organisation. Focusing on medal success, it was concluded, had created a deeply-ingrained medal-oriented culture and had a 'blinding effect' with regard to other cultural issues.⁵

Similar allegations in other bodies have prompted serious questions about which values and objectives are being prioritised and cultures created in pursuit of success. Additionally, a focus on Olympic and Paralympic disciplines represents only a portion of elite opportunities, with the result that many athletes fall outside the funding scope.

⁵ Report of the Independent Review Panel into the Climate and Culture of the World Class Programme in British Cycling, April 2017, paragraphs 1.1, 5.33–5.34.

Against this, one may compare the anxiety felt in Norway following the country's success at the Winter Olympics in Pyeongchang. Their domination, it was felt, threatened the very sport they love. Further, for the Norwegian chef de mission, the medal tally was a consideration secondary to the enjoyment had in the process.

Initiatives such as 'Sporting Giants' might also seem to contradict the message that sport should be for all. Launched in 2007, the programme targeted young athletes with a minimum height requirement of 6'3" for men and 5'11" for women. Ten of the scheme's participants represented Team GB at the London Games in 2012 and an Olympic champion was produced. Talent identification of course forms part of coaching and selection procedures. The message sent to those who did not fit the profile, however, could be seen as questionable, with the risk of undermining other efforts to promote sport to the wider population.

Governance commentators often talk of the tone set from the top. What is the message when the primary and explicit strategic aim is success so narrowly defined?

It is perhaps fair to expect a different approach to sport from organisations which operate at the elite level and those whose focus is on promoting and facilitating participation at the grassroots. However, particularly where public money is being expended, society has a role to play in establishing the purpose of sport and what it is prepared to accept in terms of behaviour in its leading organisations. Moreover, disconnects between the top of the pyramid and the bottom can be problematic.

Culture – a board or management responsibility?

Opinion was divided among the roundtable participants as to whether primary responsibility for establishing and monitoring culture lay with the board or with the executive.

It was suggested that 'the way we do things' definition of culture makes it an executive function. On the other hand, the strategic element of setting an ethos which underpins all that an organisation does would indicate that responsibility must lie with the board.

Governance codes are generally clear that the onus is on the board to set the tone from the top and to determine and monitor the culture and values of an organisation. At present a proposed change to the UK Corporate Governance Code states that 'the board should establish the company's purpose, strategy and values, and satisfy itself that these and its culture are aligned'. Principle 2 of the King IV Report on Corporate Governance requires that 'the governing body [i.e. the board] should govern the ethics of the organisation in a way that supports the establishment of an ethical culture'.

Whilst it is the duty of the board to retain oversight of an organisation's activities and performance, its members are, by virtue of their role in sufficiently large bodies, detached from day-to-day operations. Meeting intermittently, they can be at the mercy of the information provided to them when establishing a picture of how the organisation functions. Management, on the other hand, is much closer to the people and activities which characterise an organisation and in a stronger position to intervene. It was also suggested that culture as an issue lacks a firm, discrete deadline with which to focus minds, prompting boards to concentrate discussion on seemingly more pressing matters. Though sports are increasingly placing cultural issues on their risk register, the specifics remain poorly understood. The recent profile given to cultural issues may have raised

Achieving board 'buy-in' to adopt a positive culture:

- Properly evidence the impact it could have – make the benefits clear
- Link culture to sustainability for the organisation and the sport
- Identify the risks associated with a poor culture and adverse behaviour
- Set out the importance of openness and transparency – it is increasingly difficult to keep negative stories under wraps
- Offer training and development from board level to volunteers
- Provide an opportunity for board members to experience the organisation at all levels
- Make discussions about the organisation's culture a regular agenda item

⁶ Financial Reporting Council, Proposed Revisions to the UK Corporate Governance Code, Appendix A – Revised UK Corporate Governance Code, Section 1 – Leadership and purpose, Principle A.

the topic higher up the agenda for some organisations, but it is still under-discussed at board level. Crises or perceived crises focus thinking, but boards should not wait for one before discussing what culture they have, or thought they had. Or what culture they want.

One major cause of negative behaviour identified was a poorly stated or poorly communicated set of values adopted by the organisation. Responsibility for this lies with the board. Yet recent research suggests that fewer than 60% of board members of sports bodies in the UK believe that their organisation has a defined set of values.⁷

Boards must take the lead in setting and establishing the culture of an organisation and the ethical parameters within which it acts, and retain oversight of the implementation. They should also gain experience of the organisation to see for themselves what it feels like, what processes are in place, what works and what does not. An equivalent of the 'From ward to board' initiative in the NHS, giving board members exposure to an organisation's operations at all levels, would not only improve the board's familiarity with the organisation and benefit decision making, but would also help them to gauge the cultural health of the body they lead.⁸

But success in embedding the culture and values cannot be achieved without the central involvement of management for it is they who have the greater contact with personnel throughout the organisation and are charged with the implementation of its plans and policies. A disconnect between the board and the executive can undermine, dilute or confuse the stated culture. The two need to work together to embed and monitor agreed values and standards.

⁷ Moore Stephens & Birkbeck, University of London, *The state of sports governance – are you leading or lagging?* 2018, p. 9. The study suggested that only two-fifths of respondents have received training in 'culture and behaviours'.

⁸ For further information, see From ward to board – identifying good practice in the business of caring, The King's Fund, 2009.

Organisational 'nuts and bolts'

Sports bodies are, first and foremost, organisations just like any other. They deliver a very particular product or service, but they also deal with people, enter into transactions and manage finances. As a result, many of the factors which affect their culture are common to organisations of all types, albeit sometimes with a sporting twist.

Governance architecture and administrative discipline

Culture and governance are interlinked, and can be mutually reinforcing. The framework that an organisation has in place can give important clues as to the culture which predominates.

Board composition

Ensuring that the leadership is equipped for the task it undertakes sends an important message. Sports organisations are often accused of lacking professionalism and relying on passion, enthusiasm and even time served rather than expertise, experience and qualifications for the job. Fitting roles to skills at all levels, from the board down, illustrates that responsibilities are taken seriously. This should be informed by a regular skills evaluation of the board as a whole and its individual members. There is a place for the retired sports person, but it is not necessarily in leading the organisation. In membership bodies with appointed board members, elections may not always return candidates with the most appropriate skills and sometimes speak of cliques or pockets of influence.

Demonstrating that the leadership reflects the diversity – in the widest sense – of the community it seeks to serve also gives a powerful indication of what the organisation stands for and values.

• (Im)balances of power and dominant personalities

Dominant personalities can be a double-edged sword. On the one hand they can drive change or the pursuit of excellence. On the other hand they can intimidate, subdue and, if left unchecked, assume an air of impunity. On the board this can manifest itself through the inhibition of challenge or a monopoly on decision making. Throughout the organisation it can lead to the forced adoption of poor practices and behaviour.

Where these individuals or groups of individuals are located may vary according to the organisation. Potential examples identified included: one whose reputation as a participant has seemingly entitled them to authority within an organisation, irrespective of their fitness for the role; player power proving disruptive in the dressing room; traditional or lucrative disciplines within a multi-format sport; or simply an over-mighty chair or chief executive.

It was noted that in some clubs and sports bodies, existing processes and patterns of behaviour can be undermined by the influence exerted by an owner or major investor or where considerable assets such as expensive facilities are in private ownership. This was highlighted as particularly difficult – even impossible – to counter.

One test of the extent to which a culture is sufficiently embedded is whether it can withstand the arrival or departure of a strong personality. Both can provide powerful impetus for change, but an organisation's values and ways of operating should not be dependent on one individual.

Attendees at the roundtable suggested that a positive culture can be aided by seeing both boards and organisations as social systems and reducing the tendency for hierarchical management and silo-building.

It is particularly destructive when those in positions of power use their privilege or trusted role, or their status as gatekeeper of dreams and aspirations to take advantage of those subject to their influence. This has been highlighted starkly in allegations of bullying, discrimination and, most harrowing of all, sexual abuse in sports bodies in the UK and internationally. The ability to make or break a person's life or career is a powerful one and needs to be watched carefully. Those with such influence must be properly accountable.

Staff and board turnover rates

A high rate of churn of board members or staff, indicating problems with retention, might be evidence of an unhappy working environment, or one where staff feel disengaged or lacking advancement opportunities. Conversely, with regard to boards, an unchanging membership can become stale, lacking in fresh perspectives and closed to new ideas and initiatives. In addition, long-serving board members with no limit to their tenure may be more focused on preserving their position than on the needs of the organisation.

• Financial discipline

The majority of sports bodies do not of course operate under the same circumstances as Premier League football clubs, where the financial stakes can encourage a culture of short-termism and unsustainable business models. Yet even in English professional football's second tier, wage bills have exceeded clubs' revenue in three of the last four years studied, suggesting a culture of over-reaching (often in an attempt to attain Premier League status).⁹

However, organisations of all sizes can offer clues as to the prevalent culture in their attitude to punctual, transparent reporting, investment practices and reserves policy. Frequent interaction with regulators can indicate the presence of a problem. So too can dependence on a single source of income, including owners, funders and investors. Not only can this render an organisation unsustainable in the long term (should that income be withdrawn), but it can also expose them to undue influence and potential deviation from behaviour which would otherwise prevail.

Stability aids the proactive establishment of a consistent and coherent culture; an organisation of any type which spends considerable energies constantly fighting fires has little opportunity to embed the values and behaviour it seeks.

⁹ Deloitte Sports Business Group, Ahead of the Curve – Annual Review of Football Finance, July 2017, p. 3.

• Stakeholder relations

The existence of a culture of accountability is a key component of positive behaviour within an organisation. Openness and transparency are central to this. Honest and effective communication with stakeholders can help to transmit and embed an organisation's message and also facilitate the opportunity for feedback from those with an interest in the sport. In the event of a culture going awry, communication with stakeholders can help hold the organisation to account and also enable it to keep relevant parties informed as to what has been done to redress the situation, a key factor in retaining confidence. Owning up to mistakes, whilst often difficult to do, can be a powerful tool for improvement.

It was suggested that improving the level of public reporting and transparency – voluntarily rather than as a requirement – and enhancing stakeholder voices in the boardroom could aid the development of a stronger culture.

There may also be a benefit in bodies reporting specifically on organisational culture on a regular basis. Most FTSE 100 companies now do this to one degree or another. The natural place, for those who produce annual reports, is in the governance, leadership and people, or risk sections of the document. It could even form a section in its own right. Regular and focused reporting will allow an organisation to monitor their efforts, communicate these to stakeholders and link cultural issues to strategic objectives and performance.

Policies

One aspect of assessing any organisation's culture is to ask whether it has in place appropriate policies. These include:

- An agreed code of conduct which is communicated to all who work within the organisation (including volunteers) and is enforced robustly. This should be linked clearly to the agreed ethics statement.
- An appropriate policy for the handling of conflicts of interest, underpinned by a register of interests and a record of gifts and hospitality offered, accepted and refused.
- A 'speak-up' or reporting procedure in which users can have confidence. This confidence stems from reassuring those who speak up that their concern will be acted upon, that their identity will be protected, and that they will not suffer any adverse consequences of raising an issue.
- A suitable procedure for handling complaints, both internal and external.
- A data protection policy which ensures the safe and confidential handling of athlete data, as well as that of others who interact with the organisation.
- Safeguarding. Understanding of safeguarding risks has grown in recent years. Safeguarding is a legal requirement, but the approach taken reveals a significant amount about an organisation's culture and priorities. Safeguarding matters need to be embedded throughout the organisation from the top down; they are not solely the concern of those individuals accountable for implementing safeguarding procedures.

The response in other sectors has suggested that openness on this issue is necessary. The absence of reported incidences may not automatically equate to no such incidences taking place, whereas a transparent response can give confidence that the issue is being addressed.

Pressures from commercial deals and partners

Some industries have long fallen out of favour with sport, and organisations should be clear, where possible, as to the commercial partners that they feel are acceptable. In the squeeze for funding, the options might not be as wide as some would hope. Nor is it always clear that a commercial partner from an industry seemingly at odds with sport is necessarily bad. A sponsorship deal with a fast food provider, for example, may encourage participation or even provide facilities and equipment. Boards should discuss what they are and are not prepared to do commercially, ensure that this is aligned with their stated ethical position, subject to agreed non-negotiables, and that they have rationalised their decision – and communicated it to stakeholders.

Commercial partnerships also have the power to improve both governance and behaviour. Sponsors often have more sophisticated corporate integrity structures than has traditionally been commonplace in sports organisations and should expect them to be matched by those in which they invest. Eager to protect their own brands and reputation, they can be quick to withdraw support if behaviour in a partner fails to match up to their expectations. The language of sponsors who ended their deals with individual players and Cricket Australia following the recent ball-tampering episode spoke clearly of ethical and reputational concerns.

Diversity

A key area both of pressure on culture and of opportunity for change is the issue of diversity. Participants felt strongly that barriers to participation need to be removed in terms of both the boardroom and the field of play. Within the leadership, diversity in its widest sense – experiences, ways of thinking, socio-economic backgrounds, in addition to the protected characteristics of the Equality Act 2010 – can improve decision making and add legitimacy to the body as it seeks to engage with the communities it serves. Drawing on a wider range of lived experience brings fresh perspectives and can offer real potential for growth in underrepresented markets and sections of society.

This came with warnings, however, that tokenism in board and leadership appointments is often counter-productive and that failing to accommodate and respect conflicting opinions was also damaging.

An organisation which is appropriately diverse at all levels is better placed to promote inclusivity and thus dilute or eradicate what might otherwise be blinkered misconceptions and attitudes. Demonstrating inclusivity can in turn help to attract more diverse participants, staff and supporters, reinforcing the cultural change desired.

Discussions around equality of pay (in common with other sectors) and prize money, or a more equitable distribution of broadcast airtime give an indication that there is still some way to go before gender parity is achieved in the sector. Remedying some of these will require the involvement of other stakeholders, such as sponsors, broadcasters and even the consumer base.

Many sports struggle to reflect the diversity of society in their leadership, staff and participants. A number are still perceived as 'white' or 'elitist'. The efforts which sports make to engage with the whole community can give an indication of what sort of organisation they are and want to be.

The provisions which sports make in terms of access for participation, competition and spectating for those with specific needs can also reveal how close to the forefront of their thinking such considerations are. So too can the stances which organisations take with regard to discrimination of all types.

Use of key performance indicators

Whether used to achieve sporting goals or business targets, poorly-designed key performance indicators (KPIs) can have a deleterious effect on behaviour. Incentivising the wrong type of behaviour is a real danger. Organisations need to be wary of unintended consequences which may promote unethical actions (or actions which run counter to the stated ethics), create an intimidating or uncomfortable environment for working or training, offer temptations to cross boundaries with regard to sporting integrity, or result in criminal acts.

Remuneration

As with KPIs, poorly conceived pay packages – particularly where bonus-related or contingent on achieving targets – risk incentivising negative behaviour. Recent media coverage of pay issues in the wider economy have highlighted the importance of transparency relating to remuneration and organisations may wish to reflect on what their pay structures, including when analysed by gender and ethnicity, say about their values and employee coverage.

Sporting context

Some challenges to organisational culture are clearly more specific to sport, whether focused on competition or not. Some of the factors below may be present in one form or another in different sectors. However, they will be taken here in their manifestations in a sporting context.

How athletes and staff are treated

The treatment of participants, employees, volunteers, customers, beneficiaries and a range of other stakeholders is a concern for organisations of all types. But the issue has been brought into sharp relief for the sports sector in recent times. In the cases of alleged bullying and discrimination across a number of NGBs, a critical question is what sports bodies and we as the public are prepared to accept in pursuit of success. If 'winning at all costs' becomes the predominant mentality, this would have a dangerous effect on the cultures of performance sport and on the wider view the public has of sport.

Duty of care has become a major issue in sport and sports governance, as evidenced by Baroness Tanni Grey-Thompson's report in April 2017, which posed tough questions as to whether the current balance between winning and welfare was appropriate. Organisations have a range of responsibilities towards their athletes, staff and volunteers. How they respond to the challenges in that report will offer important clues as to the priority given to the most important asset of any organisation: its people. It will be interesting, too, to witness the sector-wide response to the issues which have lately cast a dark cloud over sport.

For some of the nation's funded sports the issue of whether athletes are classed as employees and afforded associated rights is an unresolved question. This might suggest for some a culture that is not people-focused. At the other end of the spectrum, the roundtable participants also noted difficulties organisations face with volunteers and holding them to the same standards as contracted employees. Whilst the goodwill of volunteers is key to their service, they should be subject to the same standards of behaviour and code of conduct, uphold the organisation's values and be requested to leave if they do not. Volunteers must also undergo the same checks as other members of the organisation regarding their fitness and aptitude for the role.

Monetisation of sport

The influx of considerable sums of money into some (though relatively few) sports and disciplines has transformed both their sporting and business environment. For these sports – in particular at those levels which such changes affect – the Corinthian spirit has been replaced by the professional athlete and their coaching and support network. Some sports bodies are now sizeable businesses which has inevitably changed the way they are run and the abiding culture within them. Participants in the roundtable discussed the effect which this has had on a range of issues, including a risk that athletes are treated as commodities rather than as people or as members of the organisation.

Integrity

Participants in the roundtable observed that all organisations tend, unsurprisingly, to claim integrity as a value. However, threats to sporting integrity blight competition across different disciplines and take a variety of forms: doping (chemical, mechanical and financial); match-fixing and spot-fixing; management corruption; simulation; equipment-tampering; competition design, and so on.

It is perhaps possible to divide integrity issues into two distinct groups: those that concern actions which are engineered solely within the organisation, and those which involve external stimulus.

The first group covers issues such as doping, equipment-tampering and other methods of gaining an on-field advantage. The impetus for these comes from within the organisation, either sanctioned and enacted at various levels of the structure or undertaken by a small group of individuals and undetected or overlooked by those with management responsibility.

Several of the factors noted above are key to organisations combating these issues: a clear and well-communicated statement of ethics and values; a strictly-enforced code of conduct to which all athletes, coaches, volunteers and staff members sign up; and an effective whistleblowing process for concerns to be raised.

The second group covers problems such as match-fixing, which involve wrongdoing by those within the organisation, but as part of an operation which extends beyond its sphere of control. In general, the same points for addressing the problem apply. In addition, at a recent conference on match-fixing it was noted that organisations can reduce the risk of athletes succumbing to temptation by ensuring that they are not financially compromised (i.e. by low wages or repeatedly delayed payment) and so softer targets for criminals. It was suggested that organisations have a role to play in educating athletes and employees, with particular attention to 'the three Rs':¹⁰

- Recognise when an approach is being made
- Resist the approach
- Report to the organisation and the appropriate authorities

NGBs and individual organisations must continue to work with regulatory bodies and law enforcement to adopt a robust approach to these issues and also ensure that their disciplinary procedures and sanctions remain fit-for-purpose.

In general terms, integrity threats can be tackled by improved governance, both in terms of having appropriate systems in place for identifying these threats and also in demonstrating high standards of probity: it is acknowledged that corruption and unethical behaviour at the top of organisations increases the risk of integrity failures elsewhere. Only if a sports organisation practices ethical behaviour itself can it have the credibility to expect and enforce that in its participants.

^{10 &#}x27;Tackling Match-Fixing', Rex Sport Academy & Inside World Football, London, 9–10 March 2018.

Sporting cultural norms

Cultural norms are those beliefs, practices and behaviour which seem to form the fabric of sport in general or particular sports. Sport is, of course, competitive and participants and fans alike often make no apology for this: it is part of the appeal. But can this underlying competitiveness and survival-of-the-fittest mentality colour behaviour in an unacceptable way?

Literature on organisational culture identifies a masculine/feminine axis on which experiences can be placed. Is sport traditionally located too far to one side on such a continuum? A so-called 'macho' culture might be seen to lie behind risks such as a reluctance among athletes to admit injury or tendency to mask it, leading to long-term problems. It might also be said to contribute to attitudes to sexuality or mental health issues, with sport being deemed not a safe environment for individuals who differ from a perceived cultural norm, despite some recent progress in this regard.

Yet if 'macho' tendencies do contribute to unhealthy behaviour, sport is not alone in this. Such patterns can be identified in numerous other sectors, but manifest in different ways. In banking, finance and business where deal-making and risk-taking cultures hold sway brash behaviour has often been expected and tolerated.

Similarly, other sectors have experienced integrity issues. Where there is a competitive advantage to be gained there may always be a temptation to use underhand tactics. Sport encounters cheating in different forms, from doping to simulation or ball-tampering. Yet other sectors have witnessed industrial espionage, insider trading, rate-fixing, automotive emissions manipulation. The list goes on. When the pressure is on to achieve results a strong, ethical culture may prevent the wrong choices being made.

Participants in the roundtable discussion pointed out the difference between the culture of the sport and the culture of an organisation within that sport.

Each sport will have its own culture (and this may be significantly different from that of separate bodies within that sport). One thinks of 'the spirit of cricket', rugby's respect for officials, or the inclusivity of those sports designed from the outset to be mixed participation. But it is legitimate to ask whether some sports are more susceptible to certain types of cultural issues than others. Certain sports, for example, are more rigidly hierarchical, even patriarchal, than others. In such disciplines in-built rank and status can stifle challenge, bypass objective skills-based recruitment in governance and management, and can expose the organisation to the power imbalances noted earlier.

Embedding a culture

Establishing a coherent culture throughout the organisation can take time, planning and training at all levels in order to ensure that there is acceptance across all departments and teams. A striking feature of the Independent Review into the culture at British Cycling was the existence of relative staff-level cultures in British Cycling and the World Class Programme which 'could be described in polar-opposite terms' despite being physically located only 50m apart. This has been highlighted as a problem in other disciplines, where twin organisational outcomes can be identified, operating along a split between grassroots and elite participation. Ensuring that the message reaches the lifeblood of the grassroots is critical, particularly as the numbers involved at that level may increase the risk of incidences of poor behaviour.

One potential cause of friction in attitudes and behaviour was identified as being generational. In some instances present athletes and participants are coached or led by those who may be considerably older and whose formative years in sport were spent in a time where different standards prevailed as to what was acceptable in terms of interactions, training protocols and attitudes to injury. Often presented as 'old school', such individuals can (though it would be wrong to suggest that the issue is ubiquitous) present methods and behaviours which are at odds with the rest of the organisation. If successful in what they do, this can be tolerated and even justified by their results.

A vital step towards establishing an organisation-wide culture is to begin with a clearly articulated mission, vision and set of values. These should be simply stated to avoid misunderstanding, and preferably memorable. Importantly, these should be demonstrably 'lived' by the board and leaders. Words alone are hollow when the example is not followed and lack the impact of behaviour. The board should be prepared to review its own conduct through regular evaluation and also that of the organisation, listening to stakeholder feedback.

Where actions do run counter to the stated values and the policies in place, the response is key. Large scale transgressions rarely emerge from nowhere and can often be traced to leniency towards or indulgence of less serious (even relatively minor) adverse behaviour. This can be for a variety of reasons – a lack of awareness or investigation, the personality of the individual involved, the results which are yielded, tacit approval of those actions, or failures in the reporting process – but can lead to incrementally poor behaviour.

11 Independent Panel Review, paragraph 5.42.

Tips for embedding culture

- **Decide** The board should determine what culture they want to define their organisation and establish the values they wish it to espouse.
- **Embody and demonstrate** The organisation's leadership should act and be seen to act in accordance with these principles, individually and corporately, showing that they underpin all that the organisation does.
- **Communicate** A clearly stated mission and set of values should be articulated to all who interact with the organisation, including external stakeholders. Regular and focused reporting on organisational culture will allow sports bodies to monitor their efforts, engage stakeholders, and link cultural issues to strategic objectives and performance.
- **Enforce** Policies and processes should be in place to prevent poor behaviour and when it does occur it should be dealt with appropriately and robustly.
- **Recruit** When bringing people into the organisation, attention should be paid not only to the skills they possess, but whether they suit the culture being promoted.
- Train In addition to technical development, employees, volunteers and board members should receive training on the organisation's culture and on the 'soft' skills required to promote it.
- **Review** The board should monitor adherence to the agreed culture and its relationship to strategic objectives. Regular reviews can be undertaken both internally and externally.

Participants at the roundtable tended to be of the view that cultural change must come from within. Determining the ethical standards which are appropriate to the organisation will ensure the greatest likelihood that they are adhered to. Artificially imposing values from outside is unlikely to achieve the same buy-in or sustainability as those which have been developed and agreed by the organisation itself. Some have suggested that a bottom-up approach is required in order to achieve the greatest level of engagement and acceptance.

As culture relates primarily to people, they are key to its success. This begins at recruitment, with organisations identifying the type of person they want, advertising widely in such a way and with such language that attracts the best candidates. Upon joining, an appropriate induction programme should draw their attention to the organisation's values and the behaviour expected of them, including the code of conduct. Ongoing training should cover not only the development of skills, but also those aspects likely to foster an inclusive environment: for example, diversity awareness and unconscious bias.

Conclusion

Sport, by definition, can be a competitive environment. Pressure to achieve is placed on organisations and on individuals, from both a performance and business perspective and from everyday interactions. These face choices in terms of the actions they take and the behaviours they exhibit. Their decisions when faced with such choices will depend in no small part on the culture in which they operate. The potential fallout from poor choices – reputational, ethical, financial and legal, as well as the experiences of those who work with and for the organisation – makes the establishment of a strong culture an essential component of the governance framework.

This report, like the roundtable discussion from which it arose, has sought to consider some of the pressures which sports bodies face in terms of their organisational culture and to begin to give those in leadership roles an indication of where to look in their organisation for evidence of the prevailing culture. This can be both a quantitative and a qualitative, subjective endeavour and should be seen as an ongoing process, rather than a one-off exercise. Identifying and changing organisational culture is acknowledged to be challenging, but can also be valuable, contributing to long-term sustainability and, indeed, present success. This report should provide some of the tools necessary to start the process.

Culture checklist

The following is a list of questions to help board members and leadership teams understand the prevalent culture in their organisations and identify areas where it may be strong or need improvement. The individual responses do not necessarily imply a positive or negative culture, but may be useful in indicating areas that require greater focus.

- Is the organisation successful in achieving its stated objectives?
- Has the board set out the values which underpin all of the organisation's activities?
- Does the board and senior management team behave in accordance with the agreed values of the organisation?
- How frequently is organisational culture discussed as part of the formal board agenda? When did this last take place? What happened as a consequence?
- Does the composition of the board reflect the community which the organisation serves or wishes to reach?
- Are appointments to the board or management/leadership roles made against objective, skills-based criteria?
- Has the organisation undergone an externally-facilitated governance review in the last 48 months? In what ways have the recommendations and those of a board evaluation been implemented?
- Do staff/athlete/member/customer survey results mirror the agreed culture of the organisation?
- How does organisational culture measure up when benchmarked against peer group bodies?
- Is an agreed code of conduct in place to help build the desired culture?
- How are incidents of inappropriate behaviour or unwanted culture dealt with? Are minor breaches dealt with sufficiently robustly?
- Does the organisation have appropriate and robust policies relating to:
 - raising and handling concerns;
 - data protection;
 - safeguarding;
 - health and safety;
 - conflicts of interest;
 - disciplinary matters; and
 - integrity issues, such as cheating, drug use or gambling?

- Are staff/athletes/volunteers given a comprehensive induction covering all aspects of the organisation's activities, policies and expected behaviour?
- Are athletes and staff given adequate education and training around integrity issues?
- What attention is given to providing ongoing training and development in areas which will improve behaviour?
- How are complaints (internal and external) handled and does feedback reach the board? What has changed as a result?
- What interaction has the organisation had with regulators in the last 24 months?
- What mechanisms exist for two-way communication with stakeholders?
- Does the organisation report specifically on cultural and ethical issues?
- Does the organisation conduct its business with openness and transparency, supported by a publicly-available disclosure policy?
- Have key performance indicators led to any unintended consequences or inappropriate behaviour? What action was taken as a result?
- Has the board established non-negotiables in terms of the commercial or other third-party contracts it enters into in order to protect the culture and values of the organisation?
- Does the organisation learn from 'near miss' events and put in place remedial measures?

Places to look for evidence:

- Measures of organisational success against declared objectives
- Policy documents, risk register, board minutes
- Staff turnover, planned and unplanned
- Board turnover and succession planning
- Board attendance and activity
- Board evaluation reports and governance reviews
- Regulatory involvement
- Audit reports and letters, annual returns
- Staff survey and exit interviews
- Stakeholder surveys, particularly if benchmarked over time
- Impact assessments
- Results of whistleblowing and complaints processes
- The organisation's cultural reporting.

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