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ENGLAND BOXING

INDEPENDENT REVIEW

24 NOVEMBER 2021

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SECTION 1 – INTRODUCTION

1. We have been instructed by England Boxing (“**EB**” or “the **Organisation**”) to conduct a fact-finding investigation and advise the Organisation (“the **Review**”).
2. The Review, the findings of which are distilled in this report, was commissioned by the Board of EB (“the **Board**”) not only to inform decision-making but also in order that recommendations can be made for the benefit of the continued evolution and improvement of the Organisation.

A. DECISION TO CONDUCT THE REVIEW

3. Over the past five years, EB has received a disproportionate number of complaints originating from, and relating to, the East Midlands Region (“the **EMR**”).¹ In 2019, the last complete year before the disruption caused by the Covid-19 pandemic, 25% of the total complaints received by the National Compliance Officer (“**NCO**”) originated from, or related to, the EMR.
4. Sport England has received more complaints about EB than any other National Governing Body (“**NGB**”) in recent years; all of the complaints received by Sport England originate from, or relate to, the EMR.
5. The number and regularity of these complaints has not only become a concern for the Board, but have also become damaging for the reputation of the organisation and the sport. The complaints, very few of which relate to what happens in the ring or at boxing clubs, have, understandably, placed unnecessary strain on officials at EB and distracted the Organisation and its members and employees from other important tasks, initiatives and improvements that might otherwise have been implemented for the benefit of the sport at both regional and national level.
6. It is for those reasons, that the Board decided to instruct independent barristers and investigators to conduct this Review.

¹ We have referred to both EMR and EMABA throughout this report, both terms refer to the regional boxing association that has historically, and currently, run competitions and liaised with local clubs in the East Midland Regions. The Regional Council of the EMR has variously been referred to as the Boxing Committee and the East Midlands Sub-Committee. In this regard, we have elected to use the term Regional Council as per paragraph 11 of the 1999 Memorandum and Articles for Regional Associations.

B. TERMS OF REFERENCE

7. The Terms of Reference (“**ToR**”) for our Review can be found at **Annexe 1**.² It should be noted that non-substantive amendments have been made to the document, on our advice, since it was circulated to certain members earlier in the year. In summary we have been asked to:
 - a. Investigate the incorporation of the East Midlands Amateur Boxing Association (“the **EMABA**”) which appeared to be the catalyst for and focus of the majority of complaints;
 - b. Make recommendations which may include, but are not limited to, further investigation and/or disciplinary action;
 - c. Consider whether EB has addressed complaints relating to the incorporation of the EMABA in a fair and appropriate manner;
 - d. Make recommendations as to whether any historic allegations relating to the incorporation of the EMABA should be re-opened; and
 - e. Review the EB disciplinary and complaints procedures.

C. INDEPENDENCE AND OBJECTIVITY

8. We would not ordinarily consider it necessary to make a statement as to the independent and objective nature of our work. However, given that the independence of this Review has been questioned during the course of our investigation, with one individual stating that there has been, *"lots of chat about whether this is an independent report or if EB have just bought in people who will say what they want"*, we pause, for clarity, to provide further assurances in this regard.
9. As explained to all individuals that we interviewed, whilst this Review was commissioned and paid for by EB, we were only prepared to undertake it on the basis that we could be truly

² There are several active disciplinary proceedings which have been drawn to our attention during the course of the Review which are still under investigation at the time of drafting. Those matters are not within our ToR and it would not be appropriate for us to investigate those matters, given that they are currently under investigation by EB. In addition, some individuals have asked us to revisit old investigations and/or old complaints not relating to the incorporation of EMABA. This is either because those individuals have not been made aware of the outcome of the initial complaint or are attempting to have them revisited. Again, these matters are not within the scope of the ToR and accordingly, we have not sought to investigate those matters.

independent in our methods, findings, and conclusions. We make clear that EB has at no point sought to influence or interfere with any of those matters. To the contrary, we consider that the Board has been cooperative, open and transparent in its dealings with us and has both sought, received and accepted our advice. For the avoidance of doubt, this is *our* report and it contains *our* objective findings and recommendations.

10. In this connection, one individual with whom we spoke suggested that, “*to draw a line under this, a recommendation from you to the England Boxing Board to publish these findings would go a long way in re-establishing trust which has been undermined over the four or more years*”. We have considered this suggestion and made the relevant recommendation.

D. SUMMARY OF AIMS AND APPROACH

11. The central principles of good governance in sport are derived from different sources. Those include corporate and sporting codes, rules and regulations and jurisprudence, in part developed through challenges to existing governance structures. The principal touchstone for our work is the UK Sport Code for Sports Governance.³
12. A summary of our recommendations can be found at **Annexe 2**.
13. In making our findings and recommendations, we take into account the resources available to EB and the particular challenges faced by the organisation, both historically and today. We have sought to be practical and pragmatic as far as possible.
14. As part of our approach to such reviews, we take soundings through our network of trusted contacts across different sports, on an anonymous and confidential basis, in order to compare experience and benchmark best practice. We have also spoken directly with Sport England on a confidential basis to better understand their position, objectives and expectations.
15. The Covid-19 pandemic has impacted significantly on all areas of society, with boxing clubs being forced to close or function at a reduced level for most of 2020/21. The Review was conducted in accordance with relevant government guidance and whilst we take into account, and are sensitive to, the impact of the Covid-19 pandemic, we do not consider that our ability to conduct an effective investigation has been hampered in any material respect as a result of these circumstances.

³ <https://www.uk sport.gov.uk/resources/governance-code>

16. We provide fuller details of the steps taken as part of the investigation at **Annexe 3**. These steps, and the information obtained as a result, collectively form the basis for our conclusions.⁴
17. In summary however, it should be noted that we have actively sought to identify and engage with all relevant parties as part of our process and ensure that everyone has had the opportunity to provide their views. Formal and follow-up communications have been sent encouraging engagement and requesting that evidence be provided for our consideration. A number of face-to-face and virtual interviews have been conducted, including in the EMR region.
18. We made it clear at the outset of the Review that, in order to encourage individuals to speak freely and openly, the names of individuals would not be ascribed to comments in our report. We have not, shared the identities of individuals when reporting to or communicating with the Board during the course of the Review.
19. We have been conscious to draft this report in a clear and accessible manner, avoiding an overly legalistic approach. This report could quite easily have been twice as long, through a detailed explanation of how certain findings and recommendations were reached, but it was felt that this was unlikely to be of practical assistance to EB and its members. We would be happy to provide further detail in relation to specific issues, findings or recommendations as required.
20. Whilst we have been invited to make recommendations as to disciplinary action, EB has been clear in its instructions to us, and we have been clear in our advice to EB, that whilst it is important to bring clarity to what has happened in the past, the primary focus and motivation is not on seeking to punish individuals for mistakes that may have been made, but rather to ensure that: (i) outstanding issues are resolved; (ii) mistakes are not repeated; and importantly (iii) the Organisation can move forward for the benefit of the sport and all associated with it.
21. We recognise that some individuals may not agree with some of the findings and recommendations within this report, but we hope that everyone will see it, at the very least, as a step in the right direction.
22. We would like to express our gratitude, once again, to all of those individuals who have given their time to provide information and speak with us.

⁴ Unless stated otherwise, the findings made and the conclusions reached are on the basis of ‘the balance of probabilities’, also understood as a “more likely than not” test (i.e. that there is a greater than 50% chance of a fact being true).

SECTION 2 – EXECUTIVE SUMMARY

23. EB is the NGB for the sport of Boxing in England, overseeing more than 900 affiliated clubs and more than 17,000 members across the country; its origins date back to 1880. The majority of the country's most successful and celebrated boxers have progressed through the amateur ranks before boxing at the Olympic Games and/or becoming professionals.
24. The Organisation carries out a number of functions including: (i) overseeing the safety and welfare of members (including Safeguarding); (ii) compliance; (iii) coaching; (iv) the promotion of boxing to potential new members; (v) enforcing rules and regulations; and (vi) providing a talent pathway for boxers who excel.
25. EB also organises and administers a number of national and regional competitions for Elite, Youth, Junior, Schools and Development Boxers, as well as an annual Three Nations tournament and a female-only Box Cup. Working alongside EB are a series of regional boxing associations⁵ that run competitions and liaise with local clubs.⁶
26. Whilst the EMR was described to us as "*being in political turmoil since 2013*" and the significant volume of complaints from within the region appear to be of a "*political of nature rather than relating to boxing issues*", all of the individuals with whom we have spoken have said that they are willing to move forward; that they are all willing to put their own battles behind them for the sake of improving boxing in the EMR and, to quote the region's own mission statement, to put boxers first.
27. One of the individuals with whom we spoke explained that the best way to move things forward with the EMR was, "*to have a clean slate*"; we respectfully agree. Until the infighting, complaints, counter-complaints and mistrust are addressed then we do not consider that this region will move forward. It is a shame that currently, much of the energy of some of boxing's fantastic volunteers is not properly focused where it should be, namely the promotion and support of the sport for the benefit of boxers and their clubs.
28. There have undoubtedly been breaches of rules and procedures in the past.

⁵ Tyne, Tees and Wear, North West Counties, Merseyside and Cheshire, Yorkshire, Midlands, East Midlands, Western Counties, Eastern Counties, Home Counties, London and Southern Counties.

⁶ There are also organisations that represent the interests of the British Police, the Royal Navy and Marines, the British Army and the RAF.

29. The decision to incorporate the EMABA was taken by the Secretary and Treasurer. We do not consider that the decision was taken for personal gain but rather, due to a concern about the liability of individual members. Having said this, the decision appears to have been taken in breach of the EMR Articles of Association (the “**EMR AoA**”),⁷ without the formal consultation and approval of the members. Equally, EB was not consulted prior to the decision to incorporate and amend the EMR AoA; nor was it informed in the immediate months following the same.⁸
30. Meetings have been conducted irregularly and there has been unacceptable and unexplained delay between EMR Council Meetings and Annual General Meetings (“**AGMs**”). Whilst we appreciate the difficulties posed by the Covid-19 pandemic, other regions facing the same difficulties have managed successfully to conduct regular Council meetings and AGMs. It is difficult imagine the circumstances which would support a decision to postpone an AGM following the resignation of an officer of the region, let alone the cancellation of such an important meeting as we understand occurred in the EMR in 2018. We consider that the infrequency and irregularity of meetings has resulted in a lack of engagement and communication which in turn has been a material factor in the lack of trust that exists between the membership and the elected officers within the EMR.
31. In addition to the lack of meetings, it is apparent that the manner in which minutes of meetings are taken, ratified and distributed in the EMR is poor. Once again, this has added to the sense of confusion and mistrust within the region.
32. There are real concerns as to the decision-making in relation to appointments to the EMR Council, in breach of the EMR AoA and democratic principles.
33. There appears to be, at best, a lack of understanding of the applicable rules and duties and, at worst, a disregard for them. It is clear that the manner in which the EMR has been managed and administered leaves a great deal to be desired.
34. We understand that some may feel that individuals who were involved in and responsible for these failings should be disciplined. However, having carefully considered this issue, taking into account all the circumstances, and whilst we consider that there exist grounds for disciplinary action, we do not consider, on balance, that it would be in the best interests of the

⁷ See Annexe 4

⁸ The precise timing of EBs knowledge of the change in the status of EMR to an incorporated body is unknown.

EMR, EB or the sport, to commence disciplinary action against any relevant individual at this stage.

35. In seeking to adopt a pragmatic and practical approach, a major factor in our decision-making is the fact that the impact of our recommendations, if implemented, will go some significant way to resolving past issues and significantly reduce the risk of such issues being repeated in the future. We set out our reasoning in further detail below.
36. The first step in creating a “*clean slate*” will be to hold an open and transparent AGM for the EMR as soon as reasonably possible. This AGM should not be run by directors of the EMABA or any member or officer of the EMR. The AGM should be run by an independent third party in order that the process is administered, and seen to be administered, in a fair and open manner. This AGM will provide the members of the EMR with an opportunity to vote upon its structure, its Council members and the Articles of Association that govern the operation of the region. Whilst it is a matter for the EMR membership, we recommend that the EMR adopts, as a starting point, and in order to ensure good governance and consistency, the Model Articles of Association (“**Model AoA**”) which have been drafted by an experienced and independent lawyer (**Annexe 6**).⁹
37. Once new officers and a new Regional Council is in place, meetings must be regular and properly minuted, with financial information published on a quarterly basis.
38. Whilst the difficulties within the EMR were the trigger for this Review, EB, in line with its commitment to continuous improvement, instructed us to examine the role played by EB in managing the issues and also to consider the current complaints and disciplinary process to ensure that it is fit for the future. It is a positive step that EB has both commissioned this Review but also that it has sought to do so in a balanced way, not seeking to avoid any proper scrutiny of the Organisation and its leadership.
39. It has become apparent to us that the difficulties in the EMR region have taken up a disproportionate amount of time, energy and resource within EB. We consider that they have impacted negatively on EB’s ability to push through positive and progressive initiatives and changes that might otherwise have been implemented for the benefit of the sport at both regional and national level. We also note the personal impact on individuals within EB who have regularly made reference to feeling “*drained*”, “*stressed*” and “*overworked*”. We

⁹ Should the members of the EMR decide they do not wish to become/remains as an incorporated body, the Model AoA could easily be amended to reflect that decision.

appreciate that a number of areas for improvement identified for EB below may have already been addressed had it not been for the strain placed on EB and its officers as a result of the difficulties in the EMR.

40. It should be noted in this connection that the Organisation appears to be functioning well in all other regions.
41. The EB complaints and disciplinary process is highly centralised. It currently requires all disciplinary matters to be reported to NCO. This means that all complaints, even those of a very minor nature, will find themselves on the desk of a single individual. This is not sustainable.
42. Whilst we understand that there are plans on the part of EB to establish and train suitable candidates, the post of Area Disciplinary Officer is not presently well developed. Cases are only allocated to the regions by the EB Disciplinary Committee when a trusted and suitably qualified individual can be identified. In practice, this generally means that only low-level complaints are delegated and on an ad-hoc basis.
43. EB should consider restructuring its complaints and disciplinary process applying the principles that all discipline matters should be dealt with fairly and pragmatically at the lowest appropriate level and resolved at the earliest possible opportunity.
44. Arrangements should be made for the development and training of Area Discipline Panels, reporting to EB. These panels should be chaired by an individual who has experience of running such quasi-judicial processes such as a lawyer, police officer or HR specialist. It is understood that EB already has plans in place to use a group of volunteer lawyers in such roles and this is to be encouraged. Our experience has found that the involvement of boxing administrators, officials and ex-boxers on disciplinary panels ensures a sophisticated, practical and balanced approach to complaints and disciplinary matters.
45. As part of the updating and restructuring of the complaints and disciplinary process, there is a need for an enhanced range of lower level and progressive sanctions which may include some form of reparation or other informal resolution which would be particularly relevant at club and regional level in a more devolved system. We also recommend that EB puts in place measures to prevent future abuse of the complaints process, including introducing policies to address vexatious/frivolous complaints.

46. There exists an opportunity to review the role of the NCO, who, in addition to acting as discipline manager, is currently the EB lead on Safeguarding and Anti-doping. Consideration should be given to separating the disciplinary and safeguarding roles. Consideration should be given to creating a Discipline Manager role reporting into the NCO.
47. Whilst we have not been instructed formally to review all of EB's policies and procedures, we have read a number of these documents as part of our Review. We provide a number of summary observations and recommendations for the benefit of EB.
48. Again, whilst outside the formal scope of our Review, we are bound to comment on the fact that we have, unfortunately, observed issues relating to racism within the EMR which is, of course, unacceptable. We recognise in this connection that EB is committed to safeguarding and promoting diversity and inclusiveness and that progress will continue to be made through education, direct engagement and a robust approach to disciplinary action. We note the significant strides which have already been made by EB in this regard. We provide further detail and recommendations below.
49. It should be noted that since September 2018, we have identified over 20 EMR officials that have left the sport or moved region, ranging from AIBA grade referees to timekeepers, from Grade A Supervisors to Computer Operators. During the period of our investigation, the CEO of EB also resigned from his role. If people are not willing to move forward and to put boxers first, there is a significant risk that talented boxers, coaches, judges and officials will continue to leave the sport.
50. We have every confidence that as the difficulties relating to Covid-19 subside, there is a real opportunity for EB and the EMR to move forward. Taken together we are confident that our recommendations, if implemented, will not only help the EMR to become more open and transparent, which in turn will help to re-build trust, but also assist EB to continue to align with best practice in the sporting, public and private sectors.

SECTION 3 – THE EAST MIDLANDS REGION

51. We address below, the areas for consideration set out in the ToR. However, before doing so, we provide some general observations and findings in relation to related and incidental issues which have arisen and been identified during the course of our Review.

A. GENERAL AND INTRODUCTORY FINDINGS/OBSERVATIONS AND RECOMMENDATIONS

‘Political Turmoil’

52. The EMR was described to us as “*being in political turmoil since 2013*”. We consider that this is, unfortunately, a fair summation.
53. That said, views have varied from one extreme to another. At one end of the spectrum an interviewee suggested that the whole region had, “*lost confidence in their elected officials*” while another interviewee explained that there was, “*nothing wrong with the elected officials and they should be allowed to get on with it.*”
54. What was clear to the Review team during the interview process was that there were two distinct ‘sides’ involved in this long-standing dispute. On one ‘side’ were the current directors and EMR Council members and their supporters. The other ‘side’ contained individuals from a range of clubs across the region, with roles ranging from owners to coaches, from supervisors to referees.
55. We have also observed that individuals have moved from one ‘side’ of the dispute to the other, changing their stance entirely on certain issues. One interviewee explained to us that “*people slinging mud now and calling it a dictatorship have just joined the band wagon. They were originally part of it.*” We consider that, in the context of highly politicised environment where personal grudges clearly exist, individuals have acted in an opportunistic manner, losing sight of what might be in the best interests of the sport, its membership and community.
56. Despite our clear warnings that individuals should not discuss their evidence with others, it became apparent that members of each group were communicating with each other in the lead up to and following their interviews with us. The matter came to a head during one interview where an individual was called on his mobile phone by an individual who we had spoken to

the evening before. We took this into consideration when assessing the evidence that we obtained.

Use and Misuse of the Disciplinary Process

57. It also became apparent to us during the investigation that both ‘sides’ of the dispute have sought to use the disciplinary system as a weapon against their ‘opponents’. By way of example, following the email from the CEO on 10 August 2021 and our first face-to-face interview on 28 September 2021, we received 12 separate email complaints from one individual. The interim National Compliance Officer officer (“NCO”) received 15 complaints in their first week in office; many of these complaints had already previously been raised, considered and addressed.
58. Individuals admitted in interview that they had sent emails and complaints with the intention of causing maximum mischief. One individual explained that he/she was aware that his/her actions were causing annoyance to the CEO and explained that it was a tactic that he/she had decided consciously to deploy.
59. As stated above, the abuse and misuse of the complaints process has been a drain on EB resources and has had a personal impact on a number of EB officers. Progress which would otherwise have been possible has not been made as a result of the actions of a small group of individuals. Unfortunately, the actions of that small group of individuals have had an impact on the organisation as a whole and the sport has undoubtedly suffered as a result.
60. Whilst it should be noted that we have seen examples of the complaints process being used effectively and respectfully, we recommend that EB considers publishing a policy setting out its approach to vexatious/frivolous complaints as part of a transparent approach to complaint handling.

Understanding of and Respect for Disciplinary Procedures and Processes

61. It appears that, since 2015, the EMR has failed to have proper regard to its own and/or EB’s disciplinary processes.

62. By way of illustrative example, on 1 December 2014, by way of a Notice of Resolution, the EMR suspended Mr David Randle (a Divisional Secretary, and Secretary of the Merlin Club) from all boxing activities for two years from 5 April 2013.¹⁰ Mr Randle appealed the decision.
63. Ms Kate Gallafent QC, was appointed by Sports Resolution as the independent chair of the disciplinary appeal panel and found that the conduct of the EMR during the appeal procedure, *“raised very serious questions as to [EMR’s] understanding of its obligations and responsibilities under England boxing’s disciplinary and appeals procedures.”*
64. This view was supported by Ms Blondel Thompson in her judgement following a disciplinary panel convened on 14 October 2017 to determine charges relating to the way in which the EMR had handled various issues relating to the role and conduct of one of its members.¹¹
65. At the hearing, the EMR admitted that it: (i) failed to follow procedure in removing an individual from his/her role on the EMR Council; (ii) failed to comply with various Subject Access Requests (“SARs”) from the same individual; and (iii) was unreasonable in refusing the same individual’s membership application.
66. The EMR was fined £1,000, suspended for 12 months on the condition that the EMR worked with EB to agree and then comply with an action plan covering: (i) disciplinary matters/procedures; (ii) SARs/data protection; and (iii) social media. We have not been provided with any evidence to suggest that the action plan was complied with.
67. We also discovered that at an EMR Council meeting on 22 November 2020, it was agreed that a disciplinary panel should be set up for *“dealing with all grievances and complaints before escalating [them] to England Boxing.”* As things stand, and whilst it may not have been the intention of the EMR Council, any such attempt to deal with a complaint before EB receives it would constitute a breach of Paragraph 6 of the EB Disciplinary Procedures.
68. We agree with Mr Thompson that a review of the way in which the EMR deals with complaints and disciplinary matters, which may include advice and training for those officers responsible for the regional disciplinary process, would be appropriate. We recommend, as recommended in 2017, that an action plan should be agreed between the EMR and EB, and complied with.

¹⁰ The date of his original interim suspension date.

¹¹ https://www.englandboxing.org/wp-content/uploads/2019/05/19_10_17-EB-VS-EM-REGIONAL-COUNCIL.pdf

Equality, Diversity and Inclusion

69. Perhaps the most concerning matter which has arisen during the course of our Review relates to complaints relating to racist social media posts. We have not been instructed to conduct an investigation into these matters but we consider it important that we explicitly address this topic in light of the concerning information that we have received.
70. Boxing is one of the most diverse sports in our country. The impact of racism at Yorkshire County Cricket Club has had a devastating financial, reputational and cultural impact on the organisation, the sport and people associated with it at every level. Individuals in other sports have been given immediate custodial sentences for online racial abuse.^{12 13} These sentences have been a welcome reminder that racism has no place in sport or in our society.
71. From what we have seen as part of our Review, we consider that EB is committed to safeguarding and promoting diversity and inclusiveness. The establishment of the new Diversity, Equality and Inclusion Sub-committee (“**DEIC**”), to assist with the implementation of the recommendations from the Diversity, Equality and Race Review, is to be welcomed as part of that commitment.
72. In line with the recommendations of Ms Thompson in 2017, we recommend that EB produces a nationwide document to assist all regions in their handling of comments and abuse on social media platforms in particular. We are aware of the good work which has been conducted to date on producing such documentation, but we recommend that it is implemented as soon as possible.
73. Consideration should also be given to direct engagement by the DEIC with the EMR to educate, inform, and make clear the robust stance that will be adopted by EB should racist or other abuse occur in the future.

Democratic Process

74. A number of individuals with whom we have spoken have raised concerns about the current elected committee members of the EMABA, alleging incompetence and unfairness.

¹² <https://www.cps.gov.uk/london-north/news/football-fan-jailed-10-weeks-after-euro-2020-rant-facebook>

¹³ <https://www.independent.co.uk/sport/football/west-brom-facebook-rupert-jones-manchester-city-wolves-b1929862.html>

75. We asked a number of the complainants whether they would be willing to stand for one of the elected posts; most responded, categorically, that they would not.
76. Whilst it is for the members to decide who is elected to run a region as part of a proper democratic process, it is also important that members recognise that regions do not run by themselves and function only through the commitment of volunteers.
77. In circumstances where members do not wish themselves to stand for election, there is a duty on them, for the benefit of the sport, to engage constructively with those individuals who have chosen to stand and have been properly elected.

B. INCORPORATION OF THE EMABA

Summary Timeline of Events

78. We have sought, in considering the complex history of this longstanding issue, to produce a timeline of events relating to the issue of incorporation. Where possible, we have sought to rely on documentary sources, however, where that has not been possible, we have relied on the accounts and recollection of individuals with whom we have spoken.
79. Until 17 November 2016, the EMR was an association affiliated to EB. It, like all of the other regions, was governed by the 1999 Memorandum and Articles for Regional Associations (“**1999 AoA**”). The EMR’s members were the affiliated clubs whose headquarters were situated within the defined region. We provide a copy of the EME AoA at **Annexe 4**.
80. Paragraph 19 of the EMR AoA states that:

“any alteration addition excision or amendment to the memorandum, articles rules or regulations of the association shall only be made at the annual general meeting of the general committee and then only if not less than 2/3 of those voting in favour...Notice of any proposed changes must be given in writing to the Honorary Secretary of the Association by the Honorary Secretary of the proposing Regional Club not less than 21 days prior to the annual general meeting and notice thereof shall be sent to each affiliated Regional Club not less than 14 days prior to the meeting.”
81. In short, this means that changes to the EMR AoA could not, and should not, be made without an AGM where members are able formally to have their say.

82. It appears that the members of the EMR did not have their say when the decision was taken to incorporate the EMABA.
83. During the EMR Council meeting on 22 October 2016, the Joint-Registrar and Secretary (“**the Secretary**”), suggested that the EMR should register as a limited company to protect its members. It was discussed by those present and the Treasurer was tasked to “*look into it*”.
84. It appears that the EMR Council was concerned that, following a complaint in July 2016, there was a risk that the members and/or the officers of EMR could be held personally liable in the event that the complainant decided to bring proceedings against the EMR.¹⁴
85. At the next EMR Council meeting, on Sunday 22 November 2016, it was reported that the region had become a limited company. The minutes of that meeting show that a discussion took place and those present were informed that the Treasurer, who was not present at the meeting, may be able to shed more light on the issue at the next meeting.
86. It appears that between the October and November EMR Council meetings in 2016, the Treasurer contacted a company named UK.plc, that specialised in the formation and incorporation of new companies. We have seen documentation that shows that UK.plc formed the EMABA and registered that company at Companies House. UK.plc also provided the EMABA with new AoA (“**the New AoA**”), which can now be seen on Companies House. It does not appear that the New AoA were seen by, or voted upon, by the members of the EMR.
87. Whilst there is some dispute and uncertainty as to who, if anyone, gave the Treasurer the final approval to incorporate the EMABA, it is clear that it was not the member clubs. Filings at Companies House show that the Treasurer was the original subscriber and the Secretary was the first director and secretary. The registered office of the EMABA was the home address of the Secretary.

¹⁴ The liability of members of unincorporated associations is a difficult issue and the law is not straight forward. The lack of certainty may in fact be a good reason why an association may not want to operate as an unincorporated association. As an example, if an unincorporated association put on an event where, through carelessness on the part of the organisers, the ring collapsed injuring a boxer, the court may take the view that the executive committee was liable for breach of their contract with both the boxer, it might even be said that all the members of the unincorporated association were liable for breach of contract. All members of the club would probably be liable to the boxer in tort / nuisance.

88. The Treasurer and Secretary accepted that they were aware, at the time, that it was for the membership to decide upon any changes to the EMR AoA and that the membership was not consulted as it should have been.
89. Following the 22 November 2016 meeting, the next EMR Council meeting took place on 6 May 2017 (some six months after the previous meeting and the incorporation of the EMABA). The Treasurer was present at the May 2017 meeting, but the minutes of this meeting do not record any discussion in relation to the incorporation of the EMABA.
90. The next meeting took place on 17 September 2017. Again, there is no mention within the minutes of any discussion relating to the incorporation of the EMABA.
91. On 20 September 2018, a new director was appointed as a director of the EMABA. On 4 October 2018, the appointment of the Secretary was terminated. The director who was appointed in 2018 was terminated on 26 April 2021 with a number of new directors appointed on 28 April 2021.¹⁵ The legitimacy and validity of these appointments is, of course, questionable in light of the prior failings.
92. It is not clear exactly when EB was made aware that EMABA had been incorporated. However, in October 2019, a meeting between EB and members of the EMR took place regarding further changes to the New AoA. Following this meeting, EB committed to providing EMR with draft Articles of Association to reflect EMR obligations within EB's own Articles of Association, together with good practice and compliance with company law. These Model AoA (see **Annexe 6**) were drafted by an experienced and independent lawyer.
93. When the full extent of the potential issues regarding the incorporation of the EMABA became apparent to EB, it took the active step of instructing us to conduct an independent review with a view to fully investigating and addressing any issues.

Recommendations regarding the Incorporation of EMABA

94. It appears that the former Secretary and Treasurer were both proactive and instrumental in the incorporation of the EMABA. Whilst neither individual accepted in interview that it was their

¹⁵ We were told that additional directors were appointed due to concerns raised around the EMABA having one sole director. There is no legal impediment to having only one director in this case. But generally, it is recommended that companies that have a "quasi-public" function have more than one director to spread responsibility and ensure that no single individual is vested with total control.

idea nor their final decision, and both sought to place the blame on the other individual, we do not consider that either individual acted for personal gain. We do consider however that steps may have been taken due to ignorance or lack of understanding of the applicable rules. It is concerning that neither of them consulted with EB either prior to taking steps or subsequently, a point which, in fairness to them, they both acknowledged. The incorporation of the EMR has been fundamental in the discontent in the region and had this issue been addressed at an earlier stage, time, effort, and money could have been prioritised elsewhere.

95. The other members of the EMR Council who were present at the November 2016 (when it was announced EMABA was a limited company) and May 2017 meetings, appear to have failed properly to question why such action was taken without informing or consulting with the members. Equally, the other EMR Council members also appear to have failed to report the matter to EB. Some of those individuals who sat on the EMR Council in 2016, remain officers of the EMABA.
96. The principal advantage of unincorporated associations is that they are cheap to set up and relatively informal to maintain. Those features frequently endear themselves to members' clubs, sports clubs, charities and other not-for-profit organisations.
97. For entities of any size conducting more than a relatively modest volume of business, the disadvantages of unincorporated status outnumber the advantages. Most of these disadvantages stem from the fact that associations have no legal personality separate from their members from time to time.
98. Rather than setting out a detailed legal analysis of the validity, or otherwise, of the incorporation of the EMABA and the adoption of the New AoA, we consider that the most effective and pragmatic way of addressing these breaches and failings is to hold an AGM as soon as reasonably possible in order that relevant matters can be properly raised, discussed and voted upon with a view to regularisation.
99. We consider, in the circumstances, that the AGM should not be run by directors of the EMABA or any member or officer of the EMR. The AGM should be run by an independent third party in order that the process is administered, and seen to be administered, in a fair and open manner. This AGM will provide the members of the EMR with an opportunity to vote upon its structure, its Council members and the Articles of Association that govern the operation of the region.

100. We make the following further suggestions:
- a. The AGM should be run in accordance with the EMR AoA (see **Annexe 4**).
 - b. The question of whether the region should become/remain a limited company should be the first agenda item as those individuals wishing to stand for office should be aware of the nature of their role should they be elected.
 - c. The question of becoming an incorporated company, along with the points for and against such a decision, should be explained to all clubs and members prior to the meeting.
 - d. The EMR should vote on the adoption of the Model AoA (see **Annexe 6**) and any amendments that might need to be made to the same.
 - e. Virtual meetings and/or roadshows may be appropriate prior to the AGM.
 - f. Clubs should have the ability to vote by proxy.
 - g. Those individuals nominated for office should confirm prior to the AGM, whether they are willing to accept such a role should they be elected.
 - h. The EMR Council should be elected in accordance with Article 11 of EMR AoA.
101. To ensure that such conduct is not repeated, we recommend that EB inserts a clause in the Rule Book to ensure that EB is properly notified prior to any steps being taken to change the status of any regional association. All regions should be specifically notified of this additional reporting responsibility.

C. MEETINGS, RECORD-KEEPING AND ADMINISTRATION

Frequency of Meetings

102. It became apparent during our Review that the EMR holds fewer regional meetings than other regions. It is unclear as to how many EMR Council meetings have taken place since 2016 but it is considerably fewer than most other regions, which tend to meet every 4-6 weeks.
103. We consider that the infrequency and irregularity of meetings has resulted in a lack of engagement and communication which in turn has been a material factor in the lack of trust that exists between the membership and the elected officers.
104. More than six months elapsed between the November 2016 meeting and the May 2017 meeting, an important period in the history of the EMR. The fact that no EMR Council

meeting was held for almost a year between September 2017 and September 2018 is concerning.

105. More concerning still is the lack of AGMs. We understand that the 2018 AGM did not take place due to the resignation of the Secretary, and there has not been an AGM since April 2019. Whilst we appreciate the difficulties posed by the Covid-19 pandemic, other regions facing the same difficulties have managed successfully to conduct AGMs. It is difficult imagine the circumstances which would support a decision to postpone an AGM following the resignation of an officer of the region, let alone the cancellation of such an important meeting.
106. AGMs are crucial for the proper functioning of an association or company and it goes without saying that we recommend that an AGM must take place as soon as reasonably possible and must take place annually thereafter.
107. We recommend that the EMR Council meetings take place at least once every six weeks and preferably on a monthly basis. As one region explained to us, with the use of technology and everyone now being comfortable using online meeting platforms such as Microsoft TEAMS or Zoom, there is no excuse not to get together, even if only for a short meeting.
108. We have had no explanation as to why EMR Council meetings were not held more regularly and why AGMs did not take place. The responsibility for ensuring that meetings take place properly lies with those elected to represent the region and in particular the Secretary and Chair.

Minutes of Meetings

109. In addition to the lack of meetings, it is apparent that the manner in which minutes of meetings are taken, ratified and distributed is poor. Once again, this has added to the sense of confusion and mistrust within the region.
110. The minute keeping of the EMR Council is equally poor. By way of example, the minutes of the May 2019 EMR Council meeting and the September 2019 EMR Council meeting were not sent to the members until September 2020, some 16 months after the May 2019 meeting and some 12 months after September 2019 meeting. The membership cannot be aware of what is going on within their region unless accurate minutes are provided in a timely fashion.

111. We also learnt that the directors of the EMABA meet on an ad-hoc basis separately from the EMR Council. We have requested the minutes of these meetings but we have not been provided with them at the time of writing. It is unclear whether minutes were taken or exist.
112. By contrast, we heard of best practice from other regions, where a dedicated minute taker forwards the minutes of meetings to the chair of the meeting for approval on the day after the meeting and subsequently forwards the minutes promptly to all clubs following said approval. Should any club or individual wish to raise concerns or comments relating to the minutes, they are able to do so at the next meeting. In addition, we learnt that financial balance sheets are discussed at each Regional Council meeting and sent to clubs along with the minutes. All of this, we were told, improved trust in the regions.
113. The EMR must follow the example set by other regions and basic principles of good governance:
 - a. Detailed and accurate minutes must be kept of all meetings;
 - b. Minutes must be accurate and make clear who was responsible for taking and producing the minutes;
 - c. The minutes must record the date on which they were ratified and if any concerns were raised or amendments made
 - d. The date of the next meeting should be noted on the minutes; and
 - e. Balance sheets should be published on a quarterly basis at minimum.

Accuracy of Information

114. During the interview process, we were provided with a list of questions which was sent to the EMABA directors. The Directors responded to these questions on 9 September 2020 (see **Annexe 5**).
115. The responses contain errors and are capable of giving a misleading impression. For example, the responses suggested that directors (who are also the elected officers of the region) were to remain in place for 4 years and that members of the EMR Council would be selected rather than elected. Further, in the lead up to the aborted 2021 AGM, a message sent from the directors of EMABA to all member clubs of the EMR, mistakenly described EMABA as a “public limited company”.

116. Whilst we do not consider that there was an intention to mislead, and that the responses were provided in good faith with a view to assisting to clarify matters, the responses resulted in confusion and further mistrust.
117. It goes without saying that, whilst innocent mistakes are made, care should be taken in providing accurate information and when substantive mistakes are identified, the members of the region should be informed.

Appointments and Democratic Process

118. Confusion has arisen due to the inconsistent manner in which reference has been made to the EMR Council. Some refer to it as the 'Boxing Committee', others as the 'Regional Council' while the minutes describe it as the 'East Midland Sub-committee'. The website of the EMABA states that the organisation is overseen by the 'East Midlands Executive Council'.
119. Whilst there is no prescribed title/description to be used, we recommend, for clarity and good order that that the organisation agrees on the name to be used consistently to describe the EMR sub-committee, looking to the descriptions/titles used by other Regions for guidance. There would be logic in using the term Council as per the EMR AoA.
120. The EMR AoA makes clear that a council shall have between 12 and 16 members, elected by the members of the EMR at an AGM.¹⁶
121. During the course of our Review, the Chair explained that in reality, people either applied to the Chair or were asked by the Chair to join the EMR Council. The Chair would, largely unilaterally, decide whether or not that individual should join the EMR Council.
122. We were told that one individual was refused membership on account of the fact that he had previously been an aggressive and abusive critic of the EMABA directors. We were also told that an application was declined due to a member of the same club already being a member of the EMR Council. We have not seen any document or policy which justifies this decision.
123. There are real concerns as to the decision-making in relation to appointments to the EMR Council, in breach of the EMR AoA and democratic principles.

¹⁶ Paragraph 11 of EMR AoA

124. We recommend that terms of reference of the EMR Council, including the process for election onto the Council, should be drafted, in a manner consistent with the original EMR AoA as a matter of urgency and presented to the membership for formal approval.

D. RECOMMENDATIONS REGARDING DISCIPLINARY ACTION

125. We understand that some may feel that individuals who were involved in these breaches and failings should be disciplined.
126. It is clear that the manner in which the EMR has been managed and administered leaves a great deal to be desired.
127. However, having carefully considered this issue, and taking into account all the circumstances, whilst we consider that there exist grounds for disciplinary action, we do not consider, on balance, that it would be in the best interests of EMR, EB or the sport, to commence disciplinary action against any relevant individual at this stage.
128. This is a recommendation based on the unique facts and circumstances. Nothing in our recommendation should be taken to suggest that similar such breaches will not or should not result in disciplinary action in the future.
129. In considering and reaching our recommendation, we have taken into account a number of factors, including:
- a. The longstanding political turmoil which has been damaging to the EMR, EB and the sport;
 - b. EB's desire to be forward looking as an organisation;
 - c. The historic nature of much of the activity in question;
 - d. The level of understanding of relevant individuals at the time in question;
 - e. The intentions of the individuals at the time in question;
 - f. The fact that the individuals in question are volunteers;
 - g. The nature and quality of resources, training and support provided and available to those individuals at the time in question;
 - h. The need for EMR Council members and the apparent lack of candidates to fill those posts; and
 - i. The time, resource and energy that has already been spent on these matters and diverted away from other more progressive and positive measures and initiatives.

130. Seeking to adopt a pragmatic and practical approach, a major factor in our decision-making is the fact that the impact of our recommendations, if implemented, will go some significant way to resolving past issues and significantly reduce the risk of such issues being repeated in the future.
131. However, it should be noted that in the event that further issues arise in the future in relation to individuals who have failed to discharge their duties properly in the past, we consider that the EB would be justified in relying on said past conduct, including relevant information and findings from the present Review, taken in their proper context, as part of any training, monitoring or disciplinary action. We do not seek to bind EB in this regard as a result of the above recommendations.
132. For the same reasons, and subject to the implementation of our recommendations, we do not consider that it would be a good use of EB's resources to conduct further investigations into any other matters at this stage, albeit that, again, we do not seek to bind EB in this regard and in the event that further information comes to light relating to the matters considered as part of this Review.
133. Equally, we do not recommend that historic allegations relating to the incorporation of EMABA be re-opened. Of the allegations which we have been made aware and considered, we consider, other than where we state otherwise in this report, that they have been investigated adequately.
134. In the meantime, we recommend that those members who were elected by the clubs to sit on these EMR Council during the relevant period (2016-2021), should be contacted and provided with copy of this report and reminded that they: (i) have duties as Directors of a company and members of the EMR Council; (ii) are required to ensure that the Articles of Association are followed; and (iii) have a responsibility to protect the interests of the membership and the sport.

SECTION 4 – ENGLAND BOXING COMPLAINTS AND DISCIPLINARY SYSTEM

A. GENERAL AND INTRODUCTORY OBSERVATIONS AND FINDINGS

135. Whilst the issues within the EMR were the trigger for this Review, it is not only to be positively recognised that EB has actively decided to commission an independent review but also that it has sought to do so in a balanced way, not seeking to avoid scrutiny of the Organisation at a national level.
136. EB, in line with its commitment to continuous improvement, instructed us to examine the role played by EB in managing the issues relating to the EMR and also to consider its complaints and disciplinary process to ensure that it is fit for the future.
137. It has become apparent to us that the difficulties in the EMR have taken up a disproportionate amount of time and energy within EB. They have not only impacted negatively on EB's ability to push through positive and progressive changes at national level but have also had a detrimental impact on individuals at EB who have regularly made reference to feeling "*drained*", "*stressed*" and "*overworked*" as a result.
138. We consider that a number of areas for improvement below may have already been addressed had it not been for the strain placed on EB and its officers as a result of the difficulties in the EMR.
139. It should be noted in this connection that the Organisation appears to be functioning well in all other regions based on the information obtained as part of our Review.

B. STRUCTURE OF THE COMPLAINTS AND DISCIPLINARY SYSTEM

140. The current disciplinary process is highly centralised. There is presently a requirement that all disciplinary matters are reported to EB. Those matters are then considered by the EB officer charged with such matters.¹⁷ The title of the EB officer charged with overseeing disciplinary matters is the NCO. In practice, this means that all complaints, even those of a very minor nature, find themselves on the desk of a single individual.

¹⁷ Unless the complaint involves or relates to that officer.

141. Many of those spoken to had sympathy with the huge workload of the NCO and were aware that this workload had a negative impact on the efficiency of the process.
142. Section 17 of the EB Disciplinary Procedure refers to Regions (17.4) and Clubs (17.3) being allocated discipline cases by the EB Disciplinary Committee when, (i) there is a case to answer, but (ii) the matter is most suitable for their own resolution according to their own internal procedure. It appeared from our interviews with coaches, regional committee members and administrators that such procedures are not formally established in the majority of regions and clubs.
143. The ABA Informal Grievance Procedure (dated May 2010) sets out in summary a sound rationale for the early resolution of minor complaints and disputes without the need for a formal disciplinary process.
144. The coaches we spoke to referred to “*sorting out*” their own minor discipline issues in a pragmatic way but it was clear that this was done without reference to any standard policies, procedures or advice in relation to appropriate sanction. This naturally leads to the position that the prevailing standards of behaviour and discipline regime in any given club will be based on the culture and approach of the coach and their fellow administrators.
145. Whilst we understand that there are plans on the part of EB to establish and train suitable candidates, the post of Area Disciplinary Officer is not presently well developed. Cases are only allocated to the regions by the EB Disciplinary Committee when a trusted and suitably qualified individual can be identified. In practice, this generally means that only low-level complaints are delegated and on an ad-hoc basis.
146. The absence of a structured and developed process for dealing with complaints at local level has led to a situation where volunteers in clubs and regions do not have the competence, confidence, or motivation to manage those complaints effectively. This has, in turn, placed a significant burden on the NCO who is dealing with a heavy caseload of matters, many of which could properly be addressed at local level.
147. Many individuals who had direct experience of the complaints and disciplinary process commented that it lacked transparency and was subject to delay, with timescales often running into months and sometimes whilst suspensions were in force. It was felt that these issues contributed to a sense that the process lacked impartiality.

148. Most felt that more work could be done regionally if the process was clearly understood and supported by EB. All felt that more written guidance and simple documentation would be helpful. However, it should be noted that some individuals felt that moving more responsibility to volunteers, especially at club level, would be unwelcome as their interest often lies in boxing and not administration.

Recommendations relating to the Structure of the Complaints and Disciplinary System

149. EB should consider restructuring its complaints and disciplinary process applying the principles that all discipline matters should be dealt with fairly and pragmatically at the lowest appropriate level and resolved at the earliest possible opportunity. We are mindful of the reasons that led to the centralisation of the complaints process in 2016 but recommend moving, at this stage, to a position where complaints can be assessed and recorded locally but simultaneously viewed and quality assured centrally.
150. The precise nature of the process and procedures will require further careful thought and work, in consultation and collaboration with the regions, however, we set out a number of headline considerations and recommendations below.
151. Although club coaches and officials should have good knowledge of the new procedures and should be able to play a part in initially receiving and recording complaints where appropriate, we do not consider that they should be routinely involved in the administration of the complaints process.
152. Arrangements should be made for the development and training of Area Discipline Panels, reporting to EB. These panels should be chaired by an individual who has experience of running such quasi-judicial processes such as a lawyer, police officer or HR specialist. It is understood that EB already has plans in place to use a group of volunteer lawyers in such roles and this is to be encouraged. Our experience has found that the involvement of boxing administrators, officials and ex-boxers on disciplinary panels ensures a sophisticated and practical approach to complaints and disciplinary matters.
153. Section 32 of the EB Disciplinary Procedure sets out the sanctions available to a disciplinary panel. The lowest sanction is a reprimand followed immediately by the imposition of a fine or a ban. It seems to us that the potential use of fines against those involved in the sport of boxing who are often volunteers of modest income is problematic.

154. There is a need for an enhanced range of lower level and progressive sanctions which may include some form of reparation or other informal resolution which would be particularly relevant at club and regional level in a more devolved system. Whilst there are other progressive measures such as a training requirement, the lack of recognition of formal warning or final written warning as an outcome is an area which should be addressed.
155. A clear decision-making matrix should be developed to assist the boxing community to understand which matters can be dealt with locally and those that need referral to national level. A decision-making flowchart in respect of the complaints and disciplinary procedure should be updated and enhanced to assist as a basic decision-making tool. The guidance and documents should include reference to informal resolution as a legitimate and pragmatic means of delivering natural justice.
156. In addition, detailed guidance should be provided in relation to: (i) assessing the gravity of a complaint/issue; (ii) how to conduct an effective and proportionate investigation; (iii) what appropriate sanctions and other disposals are available; and (iv) the right of appeal available to individuals at national/EB level.
159. EB should consider the provision of appropriate training to support any approved changes. This might include the provision of a short 'in person' training course to appointed 'Area Compliance Officers' and Area Discipline Panels and the development of on-line resources and training for all regional and club officials. The training should not be limited to complaints and discipline only but also address relevant and connected subjects including whistleblowing and Safeguarding in addition.
157. For clarity, we do not recommend 'full devolution' but rather, a structure where the regions and EB work together as part of an efficient and progressive approach to complaints and discipline. Appeals from the Area Discipline Panels will be to EB and EB will remain the body with ultimate oversight and responsibility.

C. THE NATIONAL COMPLIANCE OFFICER

160. Whilst reviewing the EB policies and procedures, we became aware of the extent of the role of the NCO.
161. In addition to reporting to the CEO and the Compliance, HR and Legal Sub-committee, the role of the NCO currently includes acting as discipline manager and lead responsibility for Safeguarding (including conducting DBS risk assessments) and Anti-doping.

162. The Safeguarding role has expanded significantly in the past 9 years. The number of disciplinary cases has also dramatically increased during that time. It is therefore of no surprise that issues have arisen in relation to the ability of the NCO, through no fault of his own, to fulfil all of his duties as he would wish.
163. The current NCO himself considers that this is no longer a single-person role. We agree. The role is continually expanding (the UKAD assurance framework being a recent and relevant example) and we do not consider that a single-person role is sustainable or realistic any longer.
164. Consideration should be given to creating a Discipline Manager role reporting into the NCO.
165. In such a structure, the Discipline Manager would be responsible for liaising and working with the Area Discipline Panels. The NCO would retain responsibility for Safeguarding and Anti-Doping. Both the Discipline Manager and the NCO would liaise with Area Compliance Officers.
166. In the event that complaints are levelled against the Discipline Manager, the NCO could deal with such complaints in the first instance and the CEO and/or the compliance, HR and legal sub-committee, with any appeals.

D. RECORD KEEPING AND CASE MANAGEMENT

167. We found a lack of consistency of process and paperwork for the recording of complaints, and disciplinary matters at regional and club level. There does not appear to be a standardised reporting template nor any guidance regarding the completion a report.
168. To support a new complaints and disciplinary procedure, EB should consider creating a standardised web-based system/portal accessible at regional level.
169. EB should also consider purchasing or developing a national case management system for its compliance team which organises and securely stores investigation materials and allows appropriate access to management.

E. OTHER OBSERVATIONS

170. Whilst we have not been instructed formally to review all of EB's policies and procedures, we have read a number of these documents as part of our Review. We provide a number of summary observations and recommendations for the benefit of EB.
171. The suite of documents we have seen includes an 'Equity Policy' (dated November 2016). The policy addresses issues such as discrimination, harassment, and victimisation. This Equity Policy should be linked to, and supportive of, the updated complaints and disciplinary procedures. EB should monitor and review the complaints process in line with the commitments made in its Equity Policy.
172. The website has a link to a document entitled 'Whistle Blowing – a guide'. This document should be updated to increase its scope further than its present focus on child protection and Safeguarding.
173. Whilst not a critical issue, it appears that there is no corporate EB 'standard format'. EB should refresh its suite of documents to reflect current EB branding and ensure consistent application.

CONCLUSION

174. This Review and the issues considered as part of the same have not been straightforward. We recognise that emotions have, in the past, and sometimes for good reason, run high. We consider that the difficulties associated with the Covid-19 pandemic have not helped.
175. The passion for the sport is clear among everyone that we have spoken with. This is something to be recognised as valuable and we are confident that it can be harnessed for the good of the sport and everyone associated with it.
176. We have every confidence that as the difficulties relating to Covid-19 subside, there is a real opportunity for EB and the EMR to move forward. Taken together are confident that our recommendations, if implemented, will not only help the EMR to become more open and transparent, which in turn will help to re-build trust, but also assist EB to continue to align with best practice in the sporting, public and private sectors.

177. We repeat once again that we are grateful to all of those individuals who have given their time to provide information and speak with us and we remain, of course, to assist with any matters arising including clarification of our findings and recommendations and the implementation of the same.

24 November 2021

WAYNE BARNES

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