

*An independent investigation commissioned by
Sport England and UK Sport following allegations
of mistreatment within the sport of gymnastics*

The Whyte Review

June 2022

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EXECUTIVE SUMMARY

1. Sport should be a positive and safe experience, regardless of age and ability. It should not involve conduct or practices that cause emotional or sexual harm. It should not cause physical harm beyond unavoidable hazards. Keeping participants safe requires everyone engaging in sport to maintain appropriate standards of behaviour. Where there are concerns that standards of behaviour have been breached, individuals should feel able to make disclosures to this effect. It is important that clubs and National Governing Bodies ("NGB") deal with alleged breaches properly in order to provide the sports community with the necessary confidence that concerns are taken seriously and managed fairly.
2. These uncontroversial observations apply to British Gymnastics ('BG'), the NGB for the sport of gymnastics and they apply to its clubs. This is particularly important given the age profile of participants in the sport. During the past 12 years, the majority (usually over 75%) of BG's members were children under the age of 12. Children are therefore central to BG's existence. The younger a participant, the more potentially vulnerable they are and the less able to identify inappropriate behaviour or to make disclosures about it. It follows that sufficient steps should be taken by those around them, and those overseeing the sport, to ensure that their wellbeing and welfare is at the centre of the sport.
3. The background to this Review lies in the disclosures made to the press in the summer of 2020, by several current and former British gymnasts about alleged abuse within their sport. These disclosures followed the airing on Netflix of an American documentary called 'Athlete A' about sexual abuse within the sport of gymnastics in the U.S.A and the failure of the sport to address such abuse. Similar patterns of disclosures followed in other countries too. The allegations made by British gymnasts included descriptions of emotional and physical abuse by coaches. One of the common themes running through these disclosures was a sense that BG had not only failed to prevent or limit such behaviours but had condoned some of them in the pursuit of national and international competitive success.
4. I was appointed by UK Sport and Sport England to conduct an independent review into the concerns that had been raised. I was asked to determine whether between 2008 and 2020 (the "period of Review"):
 - i. gymnasts' wellbeing and welfare is (and has been) at the centre of the culture of BG, its registered clubs and member coaches and if not, why not;
 - ii. safeguarding concerns and complaints have been dealt with appropriately in the sport of gymnastics and if not, why not;
 - iii. gymnasts, or their parents, carers or guardians, have felt unable to raise complaints with appropriate authorities and if so, why.
5. Having completed my Review, I have concluded that gymnast wellbeing and welfare has not been at the centre of BG's culture for much of the period of Review and it has not, until very recently, featured as

prominently as it ought to have done within the World Class Programme and within the development pathways used for talented gymnasts. I am unable to draw reliable conclusions about whether gymnast wellbeing and welfare has been the central guiding principle of every club. I can say that it has not consistently been the central guiding principle of a significant number of English clubs where elite gymnasts trained and it has not been at the centre of the way in which a non-trivial number of coaches, including some personal and national coaches, have coached even though some of them may have felt that they had gymnasts' best interests at heart.

6. I have also concluded that the management of safeguarding¹ concerns and complaints by BG and its clubs has not been consistently appropriate or rigorous, although it improved in a number of ways after 2016. Many gymnasts, especially elite gymnasts, have felt unable to raise complaints with appropriate authorities including BG. Some parents, carers or guardians have felt the same. This reticence, whilst a common feature of competitive sport, has been particularly pronounced in gymnastics.
7. My Terms of Reference have caused me to investigate safeguarding, education, complaints handling and policy implementation within BG. These are critical functions that rarely attract recognition if done well, but will attract criticism and loss of confidence in an organisation if done badly. Despite their significance, they do not deliver tangible commercial return. To its current reputational and financial cost, BG has failed to focus adequately on these areas, even though I believe it could have afforded to do so. BG has focused its energies on increasing participation and membership. BG has historically created the policies and structures necessary to comply with conditions of public funding but without thinking hard enough about *how* they should work in the particular sport of gymnastics and *whether* they were working. The financial stewardship of the former CEO and of the Board was impressive during the period of Review, the cultural stewardship was not.
8. I am extremely grateful to everyone who has contributed to this Review and to those who have co-operated with my requests for information. My report is long. This is inevitable given the breadth of the Terms of Reference and the need to explore them in the context of three full Olympic cycles. I wanted to ensure that my analysis and findings were based on the collective experiences of as many people as possible. The volume of submissions received from individuals and organisations following the Call for Evidence was significant and the relevant content deserves to be represented in this report. Finally, I have been critical of BG and others and it is important that everyone who is interested, understands why. The difficulties now confronting BG are borne of inadequate practice and procedure. They also reflect a culture which was less than inclusive and open and which was the product of the way in which people behaved and were allowed to behave.

¹ In this report I have adopted the definition of safeguarding as set out in the statutory guidance 'Working Together to Safeguard Children' which states '*Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes.*'

9. The report identifies various areas in which BG and some of its clubs and coaches fell short. Some of this may make difficult reading for those involved in gymnastics not least for any gymnasts and former gymnasts who have experienced the behaviours recounted in my report. Whilst my report is based upon the information I received from many such individuals who bravely came forward with their experiences, I am conscious there will be others who, for their own reasons, did not. I hope that the findings in this report will allow the gymnast community to feel that the failures of the past have been publicly recognised and enable the sport to move forward and make positive changes.
10. I am also conscious that the descriptions of past failings in my report may demoralise some individuals in the short term, especially coaches, even though I am confident that the sport of gymnastics is already undergoing change for the good. Where possible I have indicated the chronological context of failings I have identified. Any criticisms that I have made are confined to the period of Review, namely August 2008 to August 2020. They do not extend beyond.
11. I have identified for UK Sport and Sport England [recommendations](#) which I believe are necessary to improve the processes adopted by BG and its clubs and which should help to re-calibrate the culture in the sport of gymnastics. I have tried to avoid making recommendations which are dependent upon the agreement and involvement of other agencies or organisations or are otherwise so 'sports-wide' that it would be unworkable to require just one sport to implement them. I have concentrated on what I believe BG, as the NGB, can do to improve the culture of the sport. Baroness Tanni Grey-Thompson recommended the creation of a Sports Ombudsman in 2017. Five years on, this remains an aspiration rather than a reality. One wonders how many sporting scandals it will take before the government of the day appreciates it needs to take more action to protect children who participate in sport, a sector where coaches do not have a central regulator and where most complaints lack independent resolution. An Ombudsman is an obvious step in the right direction. I have carefully considered whether I should recommend that the current senior age restriction for the women's sport in the UK should be increased from 16 to match the men's minimum age of 18. I believe that this would have a number of advantages and that it would reduce the disproportionate training pressures on young girls. I raised this with FIG and whilst I was unpersuaded by its approach to this issue, I have concluded that it is not realistic to bind BG in this way when other countries will continue to operate under the current age restrictions. FIG and other international gymnastics bodies need to confront this issue in a collaborative and forthright manner. Until they do, female gymnasts will always be exposed to earlier and greater risks than male gymnasts.
12. I have stipulated that the BG Board publish at six, twelve and twenty four month intervals details of the progress BG has made to comply with my recommendations, with the expectation that most if not all of the them will have been implemented within 24 months. I consider these recommendations to be achievable. The current pace of reform within BG and across sport generally is rapid and it very likely that some of the improvements that I hope will emerge from my recommendations are already in the process of being actioned.

13. In reaching my conclusions and making recommendations, I recognise that the sport of gymnastics has provided positive, healthy and rewarding experiences for the vast majority of its participants and that most gymnastics coaches are diligent, caring and responsible. I also realise that BG has succeeded in increasing active participation in the sport and in assisting national gymnasts to compete successfully at international level. These are important achievements. I believe that the crisis of 2020 and this Review has enabled BG to reflect and in the course of my dealings with BG, it has made mature concessions about culture, welfare, education and complaints handling. BG has invested significant thought and work into modifying the culture of the sport during the last two years. Whilst BG is to be commended for this, there is much more work to be done.
14. The unacceptable culture described in this report (and in other similar reviews in other countries) will not be fully eradicated until the national and international leadership within the sport publicly recognise its existence and take (and are seen to be taking) active and transparent steps to eradicate it.
15. My report focuses on welfare, safeguarding, complaints handling, standards and governance. This Executive Summary sets out the key areas of concern about these issues that I encountered during the Review and the principle recommendations for change.

4(a)(i): Gymnast Wellbeing and Welfare – Was it at the Centre of the Culture of the Sport?

Forms of Abuse

16. I received over 400 submissions in response to my Call for Evidence in August 2020. Whilst I have not been tasked with resolving individual complaints, the volume of information I received from many different sources allowed me to identify themes in the behaviours reported to me and the experiences of gymnasts. Over 40% of submissions received by the Review described [physically abusive](#) behaviour towards gymnasts, primarily during training. This behaviour included physical chastisement, inappropriate training on injury, the enforcement of excessive training hours and training loads leading to physical pain and exhaustion beyond acceptable limits, overstretching to the point of distress as a form of flexibility management and withholding food, water and access to the toilet during training sessions. There was a strong correlation between statements about the withholding of food, water and access to the toilet and those individuals who reported long term negative consequences because of their gymnastics experiences. Physical punishments were also reported to have been imposed in response to perceived transgressions. I was told about gymnasts being physically manhandled, usually in circumstances when coaches were frustrated by what they deemed to be a lack of effort or achievement. These behaviours were often reported to have happened in front of other gymnasts and coaches.
17. Over 50% of submissions reported an element of [emotional abuse](#), again primarily during training. This included reports from gymnasts, parents, coaches and other adults of inappropriate verbal

communications such as shouting, swearing, name calling and use of belittling language. It included gaslighting, excessively controlling behaviour and suppressing athletes' opinions and emotions. I was also told about more emotional forms of punishment when a child was frightened of a skill, or injured or deemed to be under-performing, such as the young gymnast being isolated, ejected from training or ignored. Gymnasts reported feeling humiliated in front of others and as if they had no ability to express their feelings or make choices about their gymnastics and, at times, their life outside of gymnastics.

18. The vast majority of reports about physically and emotionally abusive behaviour related to female gymnasts. The behaviour seems to have been more prevalent at the elite end of the sport. Whilst the coaches said to be responsible for these types of conduct probably thought that they were improving the gymnasts' prospects of success, such conduct was not putting gymnast welfare first and was in breach of BG's policy and training. If it was in breach of policy, then it was also in breach BG's Standards of Conduct that were supposed to govern coaches, clubs and all members.
19. It appears to me that the scale of emotionally abusive behaviour in clubs was far larger than BG had appreciated. BG should have been aware that issues such as bullying, harassment and excessive control can be quite challenging to recognise and to confront. BG now accepts that it failed to give the same consideration to emotional and physical abuse as it has to sexual abuse.
20. Allegations of [sexual abuse](#) were referred to less frequently in submissions to the Review but featured in some 30 submissions. Whilst serious issues were engaged such as grooming, sexual assault and sexualised communications, none of these behaviours appeared to be systemic in the sport in the way that the issues of physical and emotional abuse that I have referred to above were. I had the impression that there was a much better understanding within the sport of the seriousness of sexual abuse allegations than there was about the features and effects of physical and emotional abuse.

Weighing Gymnasts

21. One particular form of abusive behaviour that I heard about from over 25% of those who contacted me, was excessive weight management.
22. In gymnastics, female competitors tend to wear leotards, the design of which is still subject to surprisingly prescriptive rules. Other limited forms of attire are now permitted, depending upon the competition, although leotards still tend to prevail. Male competitors wear less revealing clothing. This is a cultural issue which requires frank organisational discussion at national and international level. There is also cultural pressure within the sport for gymnasts, particularly female, to maintain a pre-pubescent body shape. This has lessened in recent years, but still remains a feature of the sport for many.
23. The anecdotal evidence I received suggested that [excessive weighing](#) of, again particularly female, elite gymnasts was, for much of the period of Review, a common occurrence, especially in Women's Artistic Gymnastics ("WAG"), Acrobatic Gymnastics and Rhythmic Gymnastics. Some personal and national

coaches weighed gymnasts as a matter of course, sometimes daily, even though this would not, of itself, provide a useful index of body composition, which is what matters most according to sports science professionals. Weight-taking was, at times, accompanied by an uneducated attitude to diet and a humiliating choice of language.

24. The tyranny of the scales was coach-led and quite unnecessary. Yet gymnasts and parents believed or were led to believe that it was necessary. This was sometimes justified on 'health and safety' grounds which were not always fully informed. In reality it seems it was just as often designed to meet presumed aesthetic values within the sport and to generate the body shapes thought to be favoured by judges. In numerous cases, gymnasts took what can only be described as unhealthy steps, such as purging or dehydrating themselves, to keep their weight down in order to satisfy the weight demands of their coach. Others resorted to disconcerting strategies to hide food, in extraordinary places, especially when away from home. I was told that some coaches went to damaging lengths to control what gymnasts ate and weighed, to the extent of searching luggage and rooms for food. As a result, some gymnasts suffered from (and still suffer from) eating disorders and associated mental health issues.
25. Throughout the period of Review, BG was aware that repeated weighing of gymnasts was not a reliable indication of body composition and constituted poor practice. It was also aware that careless and disrespectful comments about weight could cause harm and offence. It knew that gymnasts, especially female gymnasts, were at risk of developing eating disorders through a combination of excessive weighing and dietary restriction. BG said as much, though briefly, in some of its generic policies that were in force throughout the period of Review. Coaches were supposed to comply with such policies as a condition of membership and as part of the applicable Standards of Conduct. In addition, the coaches of gymnasts in the World Class Programme had access to (but did not always use or respect) suitable expertise about nutrition and weight management from the English Institute of Sport.
26. BG failed to provide sufficient guidance to gymnasts, coaches, clubs or parents, about the circumstances in which it might be acceptable to weigh gymnasts and it did not address this topic adequately in coach education materials. Until 2020, its guidance about the frequency of weighing lacked sufficient detail, was inconsistent and capable of being interpreted in a way that permitted weighing more than once a day. To compound matters, the observations that BG did make about weight management were, confusingly, split across more than one policy. If BG had wanted to send a message out to clubs, coaches, parents and gymnasts that daily or even weekly weighing of gymnasts, especially pre-pubescent gymnasts, was unnecessary and potentially harmful, there was nothing to stop it from doing so in clear and ordinary language. It did not do so. In 2020 BG published much more technical and informative guidance about the responsible approach to weight management and measurement which is unambiguous and which is to be welcomed.
27. I have therefore concluded that despite knowing of the risks associated with excessive weight control, BG failed to ensure that clubs and coaches, including national coaches, were acting responsibly in this

regard. It was, I believe, a widely known and accepted feature of the sport which will not be fully eradicated until education for coaches and gymnasts about it improves (as it is) and until senior figures within the sport demonstrate informed and transparent leadership on the issue.

What was the Culture in the Sport?

28. It is evident to me that gymnast welfare and wellbeing has not been the central feature of the culture of gymnastics for much of the period of Review. Instead, there were a number of cultural themes that came across from the information I received from the gymnastics community and which seemed to dominate the culture at the expense of athlete welfare.

Coach-led Culture

29. It is unfortunate that the many examples of excellent and athlete-centred coaching that I'm sure are evident within the sport have been overshadowed by the negative coaching techniques of certain coaches, some of whom have coached for a very long time and have influenced the experiences of so many individuals within the sport. BG now accepts that some senior coaches have exhibited unacceptable and unduly harsh coaching practices and that this was allowed to go on for too long. It now acknowledges that there was a ['coach-led' culture](#) in its high-performance programmes which left gymnasts, especially in WAG, feeling undervalued as individuals and as though they would not be listened to. This culture expected gymnasts to follow directions from coaches rather than have a meaningful say in decisions about their training and development. The negative example set by some senior coaches became engrained and, in some cases, their behaviours and training techniques were passed onto more junior coaches.
30. It is clear that the potential for coaching techniques to cause physical and emotional harm to gymnasts was not recognised by BG or some coaches soon enough. Certain inappropriate coaching techniques and styles have been allowed to flourish within the sport at all levels for decades, especially in the women's disciplines and most notably WAG, Acrobatic Gymnastics and Rhythmic Gymnastics. Some of these techniques were viewed as normal because they were so prevalent and because too often, other coaches or club personnel stood by and said nothing. Such techniques took priority over considerations of welfare and were deployed by coaches in the misguided belief that they were necessary to achieve the podium success that young vulnerable gymnasts and their coaches aspired to. BG now acknowledges that unacceptable coaching practices were normalised and allowed to develop in some quarters in the pursuit of success. BG is now working to re-define the culture to be more athlete focussed.

The Culture of Fear

31. Connected with this, I am satisfied that a not insignificant number of gymnasts, including high-performance gymnasts, and others in the gymnastics community, have been fearful of speaking their

minds and of questioning the methods of some coaches in circumstances when they would have been justified in doing so. I have explored this in the section of my report entitled [Culture of Fear](#). This fear was apparent to me in my meetings with individuals despite the extensive steps taken by the Review team to protect confidence and privacy. Often, the gymnast's fear was borne of the power imbalance in the relationship between talented gymnast and successful coach and it had taken root early in the relationship. It was easily maintained because some coaches continued to treat adolescents and young adults, especially females, like children and failed to involve them (and their parents) sufficiently in decision making and in discussion. Used to treating gymnasts in this way and to keeping parents at arm's length, the coaches in question treated other adults similarly with the result that parents, other coaches and sport science professionals did not challenge them.

32. Some coaches exerted, and were allowed to exert, excessive control over the training regimes and lives of gymnasts. The gymnasts' natural desire to succeed at competitive events and to gratify such coaches co-existed with fear of the coach. So, at times, it became quite normal for a highly successful young gymnast to be frightened of the very person towards whom they simultaneously felt immense gratitude and affection. This is dysfunctional and as a dynamic almost impossible for a child or young person to understand and process. Striving for the approval of one's coach should involve a process of respect, not of fear. Fear of coaches has no place in gymnastics. This needs to be talked about in the sport and addressed honestly in educational materials.

Insularity

33. BG was, at times, an [insular organisation](#). This has manifested itself in various ways, including:
- a. A historical reluctance to embrace at operational level, the expertise or skills of professionals in senior management roles with experience outside of the sport of gymnastics;
 - b. An occasional historic disconnect between some senior coaches and available sports science support. Historically the coaching department has been physically separate from the sports science and medicine department. This and other factors have seen a lack of collaboration at times between the two;
 - c. A disconnect between BG and its members, including its clubs;
 - d. A disconnect between the various gymnastics disciplines and the men's and women's sport;
 - e. A disconnect between important departments such as education, ethics and welfare (now Integrity) and business support;
 - f. Inappropriately 'closed' training environments, especially in WAG;

- g. A perception of close personal relationships between members of the Executive Directorship for some of the period of Review.

An insular culture is rarely a healthy one, either for the organisation or the individuals associated with it. If BG was disconnected from its clubs, it was likely to be disconnected from the welfare of the gymnasts. The injection of different perspectives and experiences from outside the sport is vital and assists in developing a more positive and inclusive culture. In its open letter of 17 August 2021, BG accepted that it had failed to be close enough to the gymnastics community. In its written communications with me, BG observed that aspects of the culture within the sport had been unsatisfactory and that it had failed to ask itself enough questions about this and to adapt its culture. In this context, it recognised that there needed to be more cohesion and unity across the various disciplines and between the men and women's sports and closer contact with and support for its clubs. I agree.

Why was Gymnast Welfare not at the Centre of the Culture of the Sport?

34. Overall, I detected an inadvertent but real failure within BG and the gymnastics community to recognise the fundamental importance of gymnasts, including elite gymnasts, to the popularity and commercial success of the sport. Without gymnasts, (and regardless of the industry of committed coaches), the sport, the medals and BG would not exist. There has been a collective failure by BG and by some clubs and coaches to appreciate that the feelings and experiences of children and young people engaging in gymnastics really do matter. This improved in the last four years of the period of Review, but issues remain. There has also been a collective failure by BG and by some clubs and coaches to appreciate and mitigate the risks attached to certain features of the sport which have contributed to the lack of focus on wellbeing and welfare. I was told repeatedly that gymnastics is a unique sport. This is reflected in various ways. It is an early specialisation sport. To compete at senior level in international Artistic Gymnastics, men must turn 18 in the year of the competition, but women need only be 16. The intense volume of repetitious training begins early and has an intrusive impact on the gymnast's social, personal and educational development. The role of aesthetics, the physical risks and the strain on immature bodies is all part of this narrative. It is a sport which requires resilience and is aiming for perfection – as one contributor put it, gymnastics is '*based on perfection and then you deduct from perfection*'. Despite best efforts to reinforce objectivity, competitive performance is still judged in part using inevitably subjective elements. These features of the sport are not of themselves barriers to a positive culture. They do however have clear welfare ramifications which, as my report demonstrates, have not been adequately scrutinised for the purpose of devising mitigating or protective measures.
35. Another feature of the sport is that the elite programmes are, generally speaking, not centralised (explored further in [Lack of centralisation](#).) This means that many of the most talented gymnasts train in a number of regional clubs rather than at one dedicated facility. Whilst this has obvious advantages, including proximity to home and school, it results in individual gymnasts working regularly with one

personal coach upon whom they can become excessively dependent. This exacerbates the already intense coach/gymnast relationship that exists for many high level gymnasts who have been coached from a very early age by the same coach, in some cases spending more time with the coach than with parents. This relationship can, if properly managed, be hugely rewarding and positive. However some gymnasts and parents have shown great deference to coaches who, in turn, have failed to respect and, in some cases, understand a gymnast's progression into adolescence and adulthood. Some successful gymnasts have grown up being infantilised by determined and dominant coaches. This process has deprived too many gymnasts of the essential decision-making skills that they need to prepare them for life beyond the gym or podium. It has also led at times to the exclusion of parents from important decision making. A number of the coaches who featured in submissions had been able to operate with a surprising degree of autonomy. I have concluded that the de-centralised nature of the sport has inadvertently contributed to the empowerment of coaches, rather than gymnasts. Re-calibration of this fundamental relationship is required.

36. If BG intends to maintain a de-centralised system for training its elite gymnasts, it needs to articulate the risk factors associated with that system and take steps to mitigate them. This includes:
- a. Formalising the levels of management and communications between the national coaches and the personal coaches;
 - b. Educating all coaches, gymnasts and parents involved with performance or development pathways about relevant risk factors and ensuring they are kept up to date with developments relevant to welfare;
 - c. Ensuring that there are formal structures for managing and assessing the welfare of high-performance gymnasts both at Lilleshall and in their respective regional clubs.
37. BG clubs were and are required to allow parents to view training, for obvious reasons. An inaccessible training environment has the potential to increase the power or control of coaches and can lead to situations where it is easier to behave in an inappropriate or abusive manner. It is also likely to cause parents to become detached. Numerous clubs have failed to provide the necessary parental access during the period of Review, citing sometimes spurious health and safety concerns. BG has not adequately monitored this requirement, despite being on notice that clubs were regularly in breach of it. This has discouraged open training environments in some key instances and contributed to an unnecessarily closed culture (see the section of my report regarding [Restrictions on Parental Access to Training](#)).
38. The recruitment of significant numbers of coaches from, or from countries previously influenced or occupied by, the former Soviet Union has had some adverse cultural consequences, as this and other reviews into the sport have found. Many submissions I received made reference to this issue. The technical skill and experience of these coaches, whilst formidable, was sometimes accompanied by an attitude to the gymnast which was autocratic and dismissive and left athletes feeling like commodities.

The ability of these coaches to produce medal-winning gymnasts was admired and emulated by crop after crop of home-grown coaches both in the regions and at Lilleshall, the national training centre. The sport is still living with this legacy. The long-standing under-supply of gymnastics coaches has probably also contributed to the toleration of apparently harsh coaching techniques. Dependency on a particular coach or club, and a willingness to abide by their rules, will increase where a gymnast and their parents feel there is no viable alternative coach or club through which they can maintain their participation in the sport.

39. I have made recommendations to ensure that BG provides relevant and up to date information to the gymnastics community about expected standards of conduct by coaches, about the key policies affecting gymnast welfare and the pathways for reporting concerns.

The Welfare of Elite Gymnasts

40. Elite gymnasts face their own additional challenges which add to their vulnerability and the measures that should be taken to safeguard their wellbeing. The welfare and safeguarding of elite gymnasts has not, until very recently, been viewed by BG as a discrete or required area of focus (see [Insufficient Consideration of Elite Gymnasts](#)). I believe this failure was bound up in the coach-led culture that was allowed to prevail. My Review received multiple submissions about gymnasts experiencing a negative culture in their home clubs, at Lilleshall and during training and competitive events abroad. There has been insufficient recognition, until recently, of how to manage the heightened mental, physical and, at times, financial vulnerabilities that accompany high-performance gymnastics. Parents and gymnasts ought to have been included in the type of more detailed inductions to the World Class Programme that are now being improved by BG, so that they could identify and understand the risk factors involved. I was not persuaded that national coaches had been adequately or consistently managed or that the channels of communication between personal and national coaches had been as structured and solid as they could have been. Some (not all) coaches have prioritised success and performance over gymnast welfare. Ironically, in some cases this has been done with the interests of the gymnast at heart because coaches have, wrongly, assumed that striving for and achieving success is the same thing as wellbeing. There has at times been a failure to see the bigger welfare picture because there has been too much focus on success as the goal. Since 2014 BG has acknowledged in its policies that these athletes faced additional pressures and risks. Its failure to consider what should be done about these heightened vulnerabilities represents a long-standing failure of BG, including in the leadership of the World Class Programme. I am pleased to note that this is now being worked on and a cultural blueprint being developed.
41. I should note at this point that the governance of the World Class Programme has, for some of the period of Review, had its challenges. The structure of the World Class Programme involved a conflict of interest from 2012 because the Executive Director of Sport with ultimate responsibility for the programme was married to the WAG Head National Coach. This created line management delicacies that became more pronounced from 2015 to 2017 when the same Executive Director stepped in as

interim Performance Director, thereby becoming technically responsible for his own management as well as his wife's. BG responded to this situation by requiring the WAG Head National Coach to report to the former CEO, which was less than ideal. From 2017 the conflict persisted albeit with a different structure when a new Performance Director was appointed and was required to line manage the wife of his own line manager. He was instructed to take any line management issues about the WAG Head National Coach to the former CEO and from early 2020 he too was required to report into the former CEO. This meant that two key posts in the World Class Programme that ought to have been line managed by the Executive Director of Sport were line managed by a CEO who had a busy day job herself. It was a protracted situation that required formal mitigation and transparency, both of which were lacking.

42. To make matters worse, from 2013 until 2017, there was disrupted recruitment of a Performance Director within the World Class Programme and this should have been apparent to BG, its CEO and to UK Sport. This role is a very important one and should bring cohesion to the entire Programme. As it happens, these issues within the World Class Programme coincided with impressive medal hauls for British gymnasts on the international stage, but they impacted adversely upon the appropriate management of coaches, the optimum involvement of sports science support, the encouragement of athlete autonomy and on the development of a positive and open culture, as events would prove. The Performance Director role came back on track from 2017 onwards and should continue to be the focus of close attention by both BG and UK Sport. I have made recommendations to improve the welfare provision to elite gymnasts, including the use of an independent disclosure service and a dedicated Welfare Officer. I anticipate that UK Sport will retain tight links with the BG World Class Programme and that its relevant Performance Adviser will have the necessary time and capacity to assist BG with the issues identified in this report.
43. Elite gymnasts in some disciplines of gymnastics do not have access to the World Class Programme. Rhythmic Gymnastics and Acrobatic Gymnastics are not Olympic funded sports and rely upon BG for funding. The negative cultures described in this report permeated both. As disciplines, it might be said that they have had the status of poor relations. Their gymnasts face some of the same risks and vulnerabilities as those in other disciplines but this has not been properly recognised by BG until recently. Historically, there has been far less sports science and sports medical support for the elite gymnasts in these unfunded disciplines than in the funded ones. This requires attention and I have made a recommendation that it is reviewed by BG.

Education of Coaches

44. I have also concluded that gaps in coach education have had an adverse impact on the protection of gymnast welfare. I was informed that some 58% of coaches are former gymnasts. BG is now recognising that inappropriately coached gymnasts are at real risk of coaching inappropriately themselves. I have concluded that during the period of Review, BG has not invested sufficient thought into the co-ordination

and content of [coach education](#). The links between coach education, Standards of Conduct and gymnast welfare were not recognised organisationally or adequately developed. This matters because of the complexity of the sport itself and the early specialisation that I have referred to. The formal education of coaches working in BG clubs and at Lilleshall national training centre has been predominantly technical and has concentrated on 'what' should be done rather than 'how' it should be done, as BG now realises. I believe that coaches would benefit from clear and detailed education about what constitutes acceptable and unacceptable coaching behaviour and about the boundaries between appropriate discipline and abuse. I have concluded that coaches have not received sufficient education about:

- a. Standards of coaching conduct, what they mean, why they matter and the consequences of breaching those Standards;
- b. The known or potential consequences of early specialisation within the sport;
- c. The stages of development through childhood and adolescence including growth maturation and how to adapt styles of coaching as the gymnast grows up. This is particularly relevant where a coach stays with the same gymnast year after year;
- d. Appropriate training periods, loads and training on injury;
- e. Best practice in flexibility management and weight management;
- f. The risk of harm to gymnasts arising from excessive restriction of diet and excessive weighing;
- g. Interpersonal and communication skills with gymnasts and parents;
- h. The vulnerabilities of elite gymnasts and how their inclusion on a performance or development pathway should be staged and managed;
- i. The potential power imbalance between coach and gymnast and how to ensure that this does not tip into abusive and controlling behaviour;
- j. The line between discipline and physical and emotional abuse;
- k. Collaborating with sports sciences and sports medicine expertise, where appropriate, and encouraging a multi-disciplinary approach to gymnast development. A failure by some coaches to embrace this type of expertise has been pronounced, especially in relation to Performance Lifestyle and weight management;
- l. Safeguarding and what it means and looks like in gymnastics;
- m. The contents of relevant BG welfare related policies.

45. From my engagement with BG, I am aware that it recognises the need to reform its coach education materials in order to equip coaches for teaching gymnastics in a modern and balanced way and it has already started work on this. Courses have been held more recently for performance and high-performance coaches in subjects such as coach-athlete relationships, duty of care and preparing gymnasts for high performance.
46. Continuing Professional Development ("CPD") for coaches has been virtually non-existent, even for the most senior coaches in the sport. It is difficult to think of any child educational environments where this would be considered acceptable. Such CPD as exists (mandatory safeguarding refresher training and a uniform positive coaching course) has not been tailored to the seniority of coach, the particular features of gymnastics or to the standard of gymnast likely to be coached. These courses are now mainly online, some with no human interactive element. However well intended and well received, there is a risk of window dressing here. Many of the coaches who have been subject to criticism obtained their qualifications years, sometimes decades, ago. Deficits in education have therefore been compounded by BG's failure to update the knowledge and practice of these and other coaches, especially senior coaches. As a result, influential coaches have not been adequately educated about the relevance of societal changes on coaching and about developments in practice, standards and sports science and sports medicine. Accordingly I have made recommendations designed to plug the current gaps in mainstream coach education. I have recommended that BG appoints a Director of Education with responsibility for education and training.
47. Sports coaching has no chartered or other formalised status and is yet to be recognised as a profession. No-one currently accepts formal responsibility for regulating sports coaches. This void in regulation does nothing to maximise the protection of gymnasts and is unlikely to enhance professional standards.

Welfare Assurance by Funding Bodies

48. Bodies funding sport (in the UK this is primarily UK Sport and Sport England) face challenges in obtaining accurate insight about the welfare and experience of sports participants, especially elite athletes. This is because they are naturally dependent upon what NGBs know about this and tell them and also because elite athletes are often reluctant to be frank about their experiences, even during exit interviews.
49. Funding bodies for Olympic and Paralympic sports and NGBs must also grapple with the scrutiny that comes when medals are the main metric of success. The understandable tension between public funding of elite sport and the imperative to succeed cannot come at the expense of athlete welfare. That being so, NGBs and funding bodies need to reassure and persuade athletes and the public that success rests on a demonstration of excellence across all aspects of a World Class Programme, not solely on medal hauls.

50. The assurance systems operated by UK Sport to measure culture and athlete welfare within the gymnastics World Class Programme did not identify, until relatively recently, the longstanding cultural problems described in this report (see [Oversight from UK Sport](#)). This suggests that the leadership of NGBs along with the leadership of funding bodies must keep under review and find alternative ways of defining and measuring culture and of ensuring that athlete welfare is being safeguarded.
51. By 2019, uncertainties about the culture in the WAG Programme led UK Sport, with BG's agreement, to conduct a detailed cultural assessment of the entire gymnastics World Class Programme called [Walk the Floor](#). It is to be commended for doing so. The results were concerning and exposed deep-seated cultural problems (especially in WAG) which placed BG at considerable reputational risk and which mirror many of the issues revealed in this Review, including a culture of fear. UK Sport and the Board of BG took the results very seriously and put in place an action plan to address the issues identified in the Walk the Floor report. However no-one from BG appeared to really look into how these problematic cultures had been created and maintained and why it had taken outside intervention to identify something that should have been apparent to the leadership of the World Class Programme and to those working within it. The Executive Director with responsibility for the Programme (and married to the Head National Coach of WAG) was not challenged by BG (or anyone else) about what had been happening on his watch. No-one appeared to ask whether the issues identified in the report were also affecting the non-funded disciplines or the sport at grass root level. BG's involvement in the Walk the Floor process is discussed in my report in some detail.
52. The annual system by which the Child Protection in Sport Unit ("CPSU") assessed safeguarding standards within BG lacked the means to audit how safeguarding was actually working in gymnastics, including at the elite end, and it failed to detect most of the problematic safeguarding issues described in this report (see [External Oversight from the CPSU](#)). Throughout the period of Review the CPSU lacked the resources to audit or quality assure the delivery of safeguarding within sports. The CPSU annual review system relied primarily upon BG's self-assessment of its safeguarding standards and performance which carried a risk that form filling for funding would take priority over genuine annual organisational reflection about safeguarding processes. BG, like other NGBs, was marking its own safeguarding homework. This system resulted in BG receiving consistently favourable ratings about its safeguarding functions, from which BG then took publicly stated comfort and which justified, in part, its continuing funding from Sport England and UK Sport. Yet, the positive ratings awarded to BG by the CPSU did not match the reality, as both BG and the CPSU now accept.

Safeguarding Policy and Practice

53. As the reader of this report will discover, the protection of the welfare of gymnasts and the management of complaints from 2008 to 2020 has been the subject of a plethora of policy documents developed by BG.

54. BG's Child Protection Policies and the Health, Safety and Welfare Policies were designed, apparently, to apply to and to be understood by the entire gymnastics community (regardless of role and age), by parents whose engagement and interest may naturally vary and by voluntary Welfare Officers who played a vital role in safeguarding at club level. BG's Standards of Conduct were designed to ensure and inform good practice amongst members. All BG members (regardless of employment status) were and are required to adhere to BG's Standards of Conduct and those Standards in turn, require members to adhere to BG's key policies. These policies and Standards overlapped sometimes and were supplemented by a significant number of other welfare related documents or statements.
55. The actual definitions and examples of poor or abusive practice towards gymnasts were contained in an unnecessarily confusing number of documents, including the Standards of Conduct, Safeguarding and Child Protection Policies, Health, Safety and Welfare Policies, coach education handbooks and individual club documentation. It is not realistic to expect the average member to knit together so many separate sources of information about the characterisation of standards of behaviour. It therefore made it hard for the community to understand what these standards were.
56. During the period of Review there were different complaints procedures which operated simultaneously. In addition to all of this, each club had been encouraged to have its own individual policies and codes of conduct. Although these lengthy documents were no doubt well intended, I have found them confusing to reconcile and understand, despite significant time spent unravelling them. Therefore it would be no real surprise if the gymnastics community had found them the same. The more confusing a policy or procedure, the less likely it is to be applied. This can never be a desirable state of affairs in the context of welfare and safeguarding.
57. BG no doubt hoped that its clubs and coaches would familiarise themselves with such policies. Yet, the anecdotal information that I received suggested that where BG policy did exist, it was not uncommon for gymnasts, parents, coaches and some clubs to be unaware of its contents, including provisions directly relevant to gymnast welfare. I was less than confident that most of the gymnastics community were familiar with the Standards of Conduct. This suggested that the measures in place at BG and within its clubs to disseminate policies and to educate the community about them have not been working.

58. In reaching this conclusion I recognise that dissemination, revision and monitoring of policies which are designed to promote gymnast welfare represents a daunting prospect for BG. As a large club-based organisation, the challenges are pronounced and it must be tempting to assume that if the policy is available online, it will be applied. Gymnastics clubs vary enormously in size and resources. Some are located in village halls, some in large privately owned centres. There are some clubs that have paid employees and others that are run entirely by volunteers. Yet each is required, as a condition of membership, to comply with complex frameworks affecting gymnast wellbeing and with what, I have concluded, was a surfeit of policy. I have recommended that BG reviews and updates its policies relating to gymnast welfare in order to remedy the issues identified in my report.
59. BG required each club to appoint a [Club Welfare Officer](#). This person was usually a volunteer, often the parent of a gymnast registered at the club. They sometimes, but not always, lacked any relevant previous safeguarding experience or training. They were given detailed and what I consider to be onerous responsibilities which included helping to put in place club policies and implementation plans for safeguarding and being the first point of contact for club staff, children and parents for any issue concerning safeguarding, poor practice and potential or alleged abuse. They were also supposed to ensure that all 'relevant club members access appropriate safeguarding training' and they themselves underwent mandatory safeguarding training. BG also had a network of [Regional Welfare Officers](#). These individuals were also volunteers and they were required to offer advice and support to clubs about child protection and welfare issues and to deliver relevant training. BG therefore expected what I consider to be an unrealistic degree of commitment and expertise from a large number of volunteers.
60. I recognise the need to rely upon volunteers for the provision of recreational sport. But the wholesale reliance by BG and most of its clubs on volunteers at club and regional level to implement safeguarding and to monitor welfare has not been working. This is not a reflection upon the contribution and efforts of those volunteers charged with these responsibilities, but rather on the scale and scope of what they have been asked to do without adequate training and support. With an individual membership of between 300,000 to 400,000, the vast majority of whom are children, this is safeguarding on the cheap. As a safeguarding system, it lacks accountability and is highly unlikely to deliver the necessary protections consistently. The current Welfare Officer system was not adequately resourced by BG and its clubs. Whilst some clubs plainly took their safeguarding duties very earnestly, it has felt at times, as though others viewed safeguarding as some sort of necessary evil which could be discharged so long as there was a relevant policy, poster or training course in place and a volunteer to act as Club Welfare Officer. I believe that some clubs and coaches confined their approach to safeguarding and athlete welfare to the need to prevent opportunities for sexual assault and to ensuring that technical aspects of health and safety were complied with. Whilst these, of course, are important, physical and emotional forms of harm have not featured enough in safeguarding education and training for the gymnastics community, including Welfare Officers. I have recommended that such training is revised to focus more upon the sport of

gymnastics. I have also recommended that BG re-assesses the level of responsibility it requires of its voluntary Welfare Officers and introduces mandatory safeguarding training for all club owners.

61. The BG department responsible for delivering safeguarding at organisational level has gone through various restructures but during the period of Review was too small given the size and demographic of the membership (see [Failures in the Resourcing of Safeguarding Work](#)). Until 2018 it was expected, unrealistically, to deal with all complaints received by BG, not just those relating to safeguarding. Trying (and not always succeeding) to manage such a caseload left the department with little capacity for the more proactive aspects of safeguarding such as club contact, policy monitoring, education and obtaining insight. Given BG's reliance upon volunteers and the size of its membership, BG has not employed sufficient safeguarding officers and Regional Welfare Officers, full-time or otherwise, to support its clubs and members. Contact with clubs about safeguarding has been mainly reactive, i.e., in the wake of a particular problem and this contact has also depended too heavily upon volunteers. Since the 2020 crisis, BG has recognised that its employed safeguarding provision was insufficient and it has recruited more officers including a National Welfare Officer. I have made recommendations about the level of provision. I note that BG is in the process of deciding how to structure its safeguarding unit.
62. The Standards for Safeguarding and Protecting Children in Sport established by the NSPCC in conjunction with the CPSU require NGBs to implement policy and procedure relating to the welfare of participants. One way of doing this is by monitoring how policy is being implemented both within the organisation and in the clubs. I found little evidence that BG had done this in any co-ordinated way. This is not acceptable when one considers that BG's membership consisted predominantly of children and that the number of children participating increased significantly during the period of Review. BG may have been reluctant to audit the way in which clubs complied with policy because it feared that such clubs would choose to operate outside BG membership. I have concluded and BG now acknowledges that there is evidence of failings in its implementation of safeguarding policies during the period of Review. It also accepts that the functioning of safeguarding mechanisms has in some instances fallen short during the period of Review. This is linked closely to my findings about how safeguarding complaints have been managed.

4(a)(ii): Management of Safeguarding Concerns and Complaints

63. The culture of a sport will be defined, in part, by how its NGB and clubs respond to complaints and concerns about welfare and safeguarding. Unfortunately, the majority of those who contacted the Review about complaints handling at BG, described a frustrating and underwhelming experience in terms of complaint handling.
64. I was able to assess BG's approach to the handling of welfare related complaints from a number of sources: the information supplied in submissions to the Review; from the minutes of BG case

management team meetings; and from my analysis of the complaints files that I sought from BG. I was also able to discuss this issue with various individuals from BG.

65. Although it was apparent from all of these sources of information that there were some serious systemic issues affecting the quality of complaints handling, I wish to note at the outset that:
- a. BG took careful and responsible steps to educate its community about the mechanisms in place to refer conduct that placed children at risk of serious harm to social services and to the police;
 - b. BG took allegations of sexual abuse seriously and was relatively consistent in the way it handled complaints about sexual misconduct;
 - c. BG provided clear and detailed guidance to its community about the importance of criminal records checks and operated competent systems for recording and maintaining accurate records about such checks and for safe recruitment generally.
66. The question of whether alleged misconduct by a club coach should affect that individual's membership of BG, is a matter for BG. The question of whether alleged misconduct by a club coach should affect his or her employment, is a matter for the individual club. When I refer to complaints, it is a reference to complaints or concerns about BG members, including coaches, which involve conduct that has the capacity to cause harm to the wellbeing and welfare of gymnasts. This includes therefore, cases falling below the usual threshold for referral to social services and it includes cases which would not normally be referred to the police. Complaints received by BG were assessed through the prism of its Standards of Conduct. Reported breaches of these Standards of Conduct have been governed by various iterations of BG's Complaints and Disciplinary Procedures. The advice to clubs about which types of behaviours they are required to report to BG (following which BG would handle these complaints internally) has been less than clear and this has obscured my understanding, at times, of how 'lower-level' complaints have been handled.
67. There is no accurate way of assessing how many separate complaints were received and handled internally by individual gymnastics clubs during the period of Review. BG estimated that it had received some 3500 complaints during the entire period but conceded that it had no overall record of complaints received between 2008 to 2016. Inadequate case management systems and a history of poor record keeping prevented accurate assessment of the nature and volume of relevant complaints received by BG between 2008 and 2020, although the information relating to 2017 to 2020 is organised in a more accessible way. It was obvious from the available data that a very significant number of complaints, throughout the period, related to allegations of abusive behaviour which whilst not justifying statutory child protection referrals or police involvement, were serious nonetheless.
68. A number of themes emerged from my assessment of BG's complaints handling. I identified the following issues with its processes and decision making in relation to complaints:

- a. Inactivity in the management of some complaints;
 - b. Inadequate investigation of some complaints;
 - c. Unwarranted delay in the management of some complaints;
 - d. Poor standards of record keeping and poor levels of communication with those affected by some complaints;
 - e. Over-reliance on volunteer Club Welfare Officers to investigate less serious complaints even though they were not trained to do this and such activity did not fall within their terms of reference. It was clear from submissions that some of these officers lacked independence because they were connected to the very coach about whom a complaint had been made;
 - f. Over-reliance on volunteer Regional Welfare Officers to liaise with clubs and to monitor various outcomes of complaints at club level, which again was outside of their role profile;
 - g. Lack of coherent case recording and management systems;
 - h. Lack of consistency in the management of complaints.
69. In some cases, very real delay was caused by the involvement of the police or social services. This type of delay is obviously outside the control of BG. In other cases, there was no demonstrable reason for the delays that were apparent. Such delays, coupled with a lack of communication from BG with those affected by the complaints process had led to very real frustration with BG. Some complainants understandably felt, as a result, that BG did not take their complaints seriously. In some cases, coaches were subject to interim suspensions, the prolongation of which caused them very real anxiety and their clubs financial and logistical hardship. Accordingly, I have recommended that BG ensures that complainants and respondents are promptly and consistently notified of actions, developments and outcomes in complaints they are involved in.
70. I have concluded that BG has historically failed to invest sufficient human and financial resources into the management of safeguarding and welfare concerns. This contributed to the issues identified above, compromised BG's ability to take some complaints as seriously as it needed to and has resulted in a justified loss of confidence amongst the membership. As identified earlier in my report, it has also impacted upon the capacity of BG's Safeguarding Team to adequately undertake proactive safeguarding work, including in relation to complaints handling.
71. One of the proactive roles of the Safeguarding Team was the development and implementation of safeguarding policy. I found there to be a multiplicity of poorly co-ordinated policy which contributed to some of the issues with complaints handling. Throughout the period of Review there was a mechanism for convening a disciplinary panel (or equivalent) to hear cases 'when appropriate' and after 2016 there

was a route of referral to the panel available in certain safeguarding cases. It was apparent from my enquiries that the formal disciplinary panel was reserved for the most serious cases where expulsion was a possible outcome. For reasons that remain unclear, these panels were rarely used. BG was unable to identify with any ease or timeliness which cases had been referred to a panel. This is not acceptable.

72. A range of case outcomes existed from the less serious, such as a reprimand, to the more serious, such as mandatory mentoring or revocation of membership. In reality, most complaints and disciplinary issues about members were dealt with by BG officers and case management teams.
73. Issues with complaints handling were also due in part to the absence of adequate guidance about how complaints should be handled within BG. Despite the volume of policy, the policies that did exist between 2008 and 2020 lacked adequate guidance and instruction about:
 - a. The type of conduct or suspected conduct that had to be reported by clubs to BG;
 - b. The signposting of complaints and about which team or officer within BG would handle and determine a particular complaint;
 - c. The way in which complaints which fell below the threshold for referral or which had been subject to no further action by social services or the police would be handled by BG;
 - d. Whether a club could or should manage a particular complaint or suspected breach of Standards of Conduct;
 - e. How BG would categorise misconduct for the purpose of deciding how best to manage a complaint;
 - f. How BG would investigate a complaint especially in the context of conduct concerning children and young people;
 - g. How BG would assess the information underlying a complaint and resolve conflicts of evidence;
 - h. What, if anything, needed to be established before an outcome was imposed by BG;
 - i. What factors BG would consider when determining the correct sanction or outcome, if any, to be imposed following a complaint;
 - j. The circumstances in which a complaint would result in a formal disciplinary hearing before a panel;
 - k. How BG would communicate with the complainant and ensure that each was provided with adequate information about their complaint and its progress and outcome;

I. The importance of thorough record keeping;

74. The gaps in guidance about how to conduct investigations and how to approach information gathering have led to a lack of rigour in the way safeguarding complaints have been approached by BG, especially where there was a conflict of evidence. The reluctance or inability of decision makers at BG to resolve conflicts of evidence has been one of the most significant barriers to effective management of complaints. Together and in isolation, these issues have affected the quality and consistency of complaints handling and have led to confused signposting of safeguarding concerns. This in turn, has fed into the culture of the organisation and has made it easier for some coaches and clubs to behave in a way that has lacked accountability.
75. Insufficient attention has been given by BG to the management of [low-level concerns](#) and complaints within clubs even though these make up the majority of complaints. The management of such complaints has not had sufficient prominence in available policy and guidance and the Board was not provided with enough information about these types of complaints. I am confident that had earlier examples of low level, poor practice, especially amongst the coaches of elite gymnasts, been identified and appropriately managed, those same coaches would not have continued to use obviously inappropriate coaching techniques.
76. Since 2016, BG has endeavoured to improve its complaints handling systems. The arrival that year of a dedicated Safeguarding Manager and in 2018 of an Integrity Director were positive steps. Record keeping became more consistent, communications with complainants improved and there were signs of increased confidence in managing safeguarding concerns. BG took steps to provide more education and guidance to Welfare Officers, especially about recognising problematic behaviours. Towards the end of the period of Review, BG adopted Globocol as a bespoke software platform to record and manage alleged breaches of Standards of Conduct. It has recruited more staff to manage its heavy case load and to assist in proactive safeguarding. These are all welcome and long overdue developments but as this report demonstrates, there is still considerable work to be done to ensure that complaints are managed consistently and efficiently. The implementation of my recommendations about complaints handling and safeguarding will help to achieve this.

Complaints Handling at Club Level

77. Historically BG has not been very engaged with the management of complaints at club level. This is challenging territory for BG because of the number and variety of clubs. BG has not imposed upon its clubs any obvious minimum requirements about the content or quality of complaints procedures operating at club level. BG relied upon clubs to use BG policies to (i) report child protection concerns to the relevant statutory authority (ii) refer certain safeguarding concerns and complaints to BG and (iii) handle certain low-level complaints internally without recourse to BG and BG's complaints processes.

78. It was evident from submissions and from information provided by BG that there was a distinct lack of quality and consistency in complaints handling at club level and that BG had struggled to maintain suitable levels of contact with clubs in this context.
79. BG now accepts that it has failed, in part, to implement its complaints policies and to monitor how they operated even though it had a duty to do so. Had it monitored the way in which complaints were being handled, both internally and by its clubs, it would have been aware that:
- a. Some clubs appeared not to follow any specific procedures or policies when complaints were made;
 - b. Some Welfare Officers lacked independence or had a potential conflict of interest in responding to the complaint which meant that some complaints were not, or were not perceived to be, taken seriously or dealt with robustly;
 - c. Some complaints were simply not acted upon;
 - d. There were clear patterns of misconduct within the sport involving physical and emotional abuse.
80. I have made recommendations that are designed to increase BG's use of suitably skilled employed personnel, to monitor trends in complaints in order to inform best practice and to improve policy and guidance about the investigation and management of complaints. I have recommended the operation of a 'low level concerns' policy (sometimes called a 'neutral notifications' policy) in order to create a culture where lower level misconduct is responsibly identified and managed. I have also recommended that BG should make clear to clubs when they are required to report concerns to BG and require clubs to have a complaints policy for safeguarding concerns. More broadly I have recommended that BG increases its direct contact with clubs to promote and monitor compliance with BG Standards and policies.

Complaints About BG Coaches

81. The way in which an NGB handles complaints about its most senior coaches is obviously important (see [Employee Disciplinary Proceedings](#)). These complaints attract public scrutiny and the outcomes can characterise the culture of the NGB, its leadership and the sport itself. Any procedure must be fair to both complainant and coach. Where a complaint is upheld, there should be consequences which are sufficiently visible to instil confidence in the process itself and in the NGB's willingness to tackle poor practice or abusive conduct no matter how successful the coach. The management of the complaint should not be influenced by the governing body's dependence on the coach to deliver medal success or on the fact that such a coach may lack an obvious successor.
82. The personal coaches of elite gymnasts are usually employed by individual clubs. The national and Head National Coaches of the funded disciplines of WAG, MAG and Trampoline are employed by BG.

Regardless of employment status, all are BG members and therefore bound by BG's Standards of Conduct, alleged breaches of which would fall to be managed under BG's Complaints and Disciplinary Procedure. As employees, any misconduct by employed national or Head National Coaches is also covered by a separate HR procedure. I was provided with no useful evidence about how these two separate processes operated practicably alongside each other and BG, surprisingly, was not able to clarify the position adequately.

83. I was also limited in my ability to scrutinise the way in which BG had approached some safeguarding complaints about Head National Coaches because of the existence and operation of confidentiality clauses accompanying settlement agreements between coaches and BG. Nonetheless, it was apparent that in two particular cases involving Head National Coaches who left BG employment following allegations made against them (and both of whom denied any wrongdoing):
- a. The coaches in question were not subject to the Complaints and Disciplinary Procedures even where the alleged conduct, if proven, could have amounted to serious breaches of Standards of Conduct;
 - b. Both coaches therefore retained, or were entitled to retain, membership of BG;
 - c. One coach was not even subject to HR disciplinary proceedings;
 - d. Transparency was compromised by the use by BG of confidentiality agreements.
84. It was also apparent in three cases concerning Head National Coaches (including the two referenced above) that the Safeguarding Manager and team had not been involved in the handling of the complaints at all, even though the complaints plainly related to gymnast welfare. Whilst I appreciate that employment and membership are distinct issues, I could not identify any reason for this, let alone a good one.
85. The handling of complaints about such senior coaches matters. Before 2020, it was not done well and it lacked transparency. The use of confidentiality agreements by BG to regulate the end of an employment relationship where there are unresolved misconduct allegations that touch upon the management of the welfare of young athletes is inappropriate however risk averse it may be. To the gymnastics community and to me, it appeared as though BG lacked any appetite during the period of Review, to subject its employed coaches to formal disciplinary proceedings. This has caused reputational damage to BG and a loss of confidence amongst gymnasts. I have recommended that all welfare related complaints about BG employed coaches are investigated and determined independently. This will have the advantage of protecting BG from suggestions of mishandling such complaints and will provide both gymnasts and coaches with formal reassurance that difficult issues will be determined impartially.

4(a)(iii): Inability or Reluctance to Raise Complaints

86. I was able to speak with a wide range of people about the historic and more recent reticence of gymnasts to express their concerns to people in authority, including BG. A significant number of gymnasts and parents confirmed that they had found the confidence and desire to speak openly about their past experiences of gymnastics only after watching the Netflix documentary 'Athlete A' which aired in the UK in June 2020. Many of these disclosures related to the experiences of gymnasts who had competed at a very high level but who had not made previous complaints. The documentary prompted a public conversation on the #gymnastalliance Twitter forum and this also saw gymnasts coming forward publicly and sharing their experiences of mistreatment within gymnastics.
87. Some athletes cited fear of de-selection, of demotion and of consequential loss of funding as reasons for not raising concerns earlier. Some sections of the community, including gymnasts, some parents and some sports science and sports medicine practitioners were fearful of the way in which a coach would react if they complained. Some gymnasts feared that their coaches would punish them if they complained. Although the careers of elite gymnasts are more prolonged now than they used to be, these athletes faced additional pressures which increased their vulnerability and made it potentially even more challenging for them to confront and report unacceptable conduct.
88. It was clear from my work that the young age at which (especially female) gymnasts commence their training has adversely affected their ability to report concerns about a coach. A significant number of gymnasts, historically, have been discouraged from any role in decision making. They forge intense, protracted and quasi-parental relationships of dependence on just one coach who often stays with them right up to international competitions. Some have little other life experience that enables them to see beyond the confines of the gym despite being in full time, albeit disrupted, education. Their decision-making skills can be untested. All of this has the potential to sap the personal confidence of young people, unless their engagement with the sport is carefully managed. It is not surprising that many gymnasts of all ages have not felt comfortable with the idea of challenging or disagreeing with their coach.
89. Some members of the elite gymnastics community who spoke to me felt that BG lacked the appetite and leadership to discipline and potentially sanction senior coaches who were seen to be integral to medal success. The way in which complaints about some very senior coaches were handled by BG reinforced this perception as I have touched on above. BG now accepts that this was the perception and that inadequacies in the complaints system sometimes meant that this perception became the reality and that, in some cases, BG *'did not follow through and enforce our own rules strongly enough so we left a situation in which we sort of had rules but people broke them and they broke them regularly and repeatedly nothing really happened'*. This had the obvious capacity to stifle complaint.
90. It is also my view that the willingness of individuals to raise concerns and criticisms was impacted by the ways in which BG responded to criticism over the years. I have concluded that a defensive and myopic

approach was adopted towards criticism. Together with the insular reputation of the organisation, this was unlikely to provide reassurance that concerns would be openly received and considered, especially complaints about more senior coaches.

91. The reluctance or failure, at times, of other adults such as club staff or coaches to call out visible poor coaching practice has contributed to a culture where gymnasts and their parents have felt unable to express concerns. This is, in part, why I have recommended that BG operate a low-level or 'neutral notifications' policy so that Standards of Conduct can be respectfully maintained and breaches of Standards adequately monitored.
92. Other cultural factors have contributed to the reluctance of some gymnasts to make complaints. These have included:
 - a. A cultural disregard for what is now referred to as 'the athlete voice'. This disregard was often accompanied by excessive levels of coach control;
 - b. The historic coach-centred philosophies that have prevailed, compounded sometimes by the over dominant personal style of some coaches;
 - c. A lack of confidence at club level in the independence of Club Welfare Officers or in their ability to confront coaches;
 - d. The closed training environments that have characterised some clubs, including high-performance clubs and at times Lilleshall, especially in WAG. This has contributed to the relative lack of parental involvement in training issues; and
 - e. Problematic coaching styles being so prevalent in some environments, especially at elite level, that some gymnasts and parents assumed that they were acceptable and necessary to achieve success, when, in fact, they were not. In this way inappropriate or abusive practices were normalised and not deemed worthy of complaint.
93. For the future, BG as an NGB must devise safer and better mechanisms for gymnast disclosures about safeguarding concerns. My report makes a number of recommendations about this, which I hope will be accompanied by a change in culture. This should enable and encourage participants to be confident in the future about voicing concerns without fear of adverse consequences.

Governance

94. During the period of Review, the Board presided over significant financial and membership growth. This was due, in no small part, to the industry of the former CEO, appointed in 2010 and in post until 2020. The organisation became financially stable, participation in the sport soared and BG worked hard to

support clubs to open or to expand and modernise their premises. The more clubs and members, the greater the revenue for BG via subscriptions, merchandise sales and ticket sales at BG events.

95. Regrettably, the focus on financial security, whilst undoubtedly important, was not matched by a focus at Board level on culture, safeguarding, welfare and the gymnasts' voice during the period of Review. These aspects of the sport were not commercially productive and representation of them at Board level was not previously a condition of funding from organisations such as Sport England and UK Sport. The lack of emphasis on culture, welfare and safeguarding featured heavily and negatively in submissions and their neglect has cost BG dear. Until the leadership of the organisation concerned itself and invested more in such areas, there was an obvious risk that they would remain overlooked by the rest of the organisation and by the sport.
96. BG's Board was provided with quarterly reports which contained some information about safeguarding complaints (see [BG Board Engagement with Safeguarding](#)). The quality of these reports varied although they became more detailed over time. Ordinarily they contained some information about the most serious types of cases, such as sexual allegations. The Board did receive limited data about the volume of less serious cases, but this did not tend to include information about *the types* of conduct occurring and I saw no evidence that the Board had ever asked for it. There was no demonstrable sense of enquiry about either safeguarding or complaints. In this way, really useful information about emotional and physical abuse was absent and this may have contributed to the sense that the Board was somewhat detached from what was happening in BG's clubs.
97. When I pressed various Board members about what the Board could and should have known of the extent of cultural malaise and the prevalence of emotional and physical abuse in the sport, I was met more than once with the rhetorical response 'we only know what we know'. This is no answer. Gaps in Board room knowledge start and end with the Board and with the CEO. I have identified in this report, certain [red flags](#) about culture and practice which were raised throughout the period of Review. Separately but certainly cumulatively, these should have put the CEO and Board on notice by the later years of the period of Review, about many of the problematic issues identified in this report. If the Board had wanted to know what was happening in its organisation's clubs and in its World Class Programme, it could have found out. BG should not have been taken by surprise about the culture laid bare in the 2020 allegations. I note that BG now accepts that, as an organisation, it did not pay enough attention to available warning signs and is taking steps to improve governance of athlete welfare. For example, I understand that there is now a safeguarding lead at Board level and there will be a Safeguarding and Welfare sub-committee of the Board. BG is developing Coach and Gymnast Advisory Groups to gain more insight about the views of its community. I have made recommendations to ensure that BG has relevant safeguarding and welfare expertise on its Board and has in place governance pathways that enable the Board to take into account the views and interests of gymnasts and effectively oversee BG's handling of complaints.

98. It has felt at times as though people of influence in BG have neglected the concept of culture. Had the 2019 Walk the Floor exercise not occurred and had the 'Athlete A' documentary not encouraged and empowered gymnasts to speak out in 2020, thereby prompting this Review, I have little confidence that BG would have gained the necessary understanding of, or acknowledged the negative realities of, the culture within the sport. Despite the positive contributions of the former CEO, her tendency to defensiveness and over-protection of the organisation in the face of legitimate criticism, can hardly be said to have helped.
99. From my conversations with BG, I do believe that it is committed to and capable of further reform and to learning lessons in a post 'Athlete A' landscape, just as I believe that gymnastics will continue to be an exciting and rewarding experience for the vast majority of individuals who practice and coach the sport. BG must realise that positive change is not just dependent upon improving policy and systems, as I have recommended, but on developing individuals who possess the maturity and confidence to define and deliver gymnastics safely, in the widest sense of the word.
100. I have recommended that the BG Board publish at 6, 12 and 24 months an update on the progress that has been made in implementing my recommendations. In the absence of a sporting regulator to support BG and oversee the changes which need to be made, I would invite both UK Sport and Sport England to give serious consideration to the extent of their involvement in monitoring BG's implementation of my recommendations. Although I hope it would not be necessary, I would also ask them to address the question of whether BG's funding should be tethered in any way to the effective implementation of my recommendations. This is an important moment for gymnastics and I hope the sport seizes the opportunity for change. To do otherwise would be to ignore the courage of the gymnasts and individuals who have come forward to express their concerns in the hope that the sport of gymnastics can learn from past mistakes and set a new course for a successful future.

RECOMMENDATIONS

101. My recommendations for BG focus on four key areas that require changes in order to shift the focus of the sport to gymnast welfare and wellbeing: safeguarding and welfare; complaints handling; standards and education; governance and oversight. They are as follows:

SAFEGUARDING & WELFARE	
1.	<p>BG must:</p> <ul style="list-style-type: none">• Reassess the level of responsibility delegated to volunteers in the sport and must employ sufficient staff, especially at regional level, with appropriate professional expertise and training to support the safeguarding of gymnasts.
2.	<ul style="list-style-type: none">• Revise and update its mandatory safeguarding courses to be more relevant to the sport of gymnastics and, for coaches, to the seniority of coach. In doing so it must consider the gaps and weaknesses that I have identified in this report. BG must introduce mandatory safeguarding training for all club owners and managers.
3.	<ul style="list-style-type: none">• Revise and improve welfare provision for high performance gymnasts, and their parents, including:<ul style="list-style-type: none">○ a more thorough induction process;○ access to an independent disclosure service; and○ access to a dedicated Welfare Officer from outside a gymnast's club.
4.	<ul style="list-style-type: none">• Review the types and level of support provided to non-Olympic disciplines and ensure these are improved in light of the findings of this report.

COMPLAINTS HANDLING	
5.	<p>BG must:</p> <ul style="list-style-type: none">• Ensure its case management system for complaints is fit for purpose and enables a record to be kept of the nature and number of complaints received in order that complaint handling performance can be (and is) monitored and patterns of behaviour identified.

6.	<ul style="list-style-type: none"> • Provide better guidance in its internal policies about how to investigate complaints and concerns, including specific guidance for when a complaint is brought against a coach employed by BG. In doing this BG must remedy the gaps and weaknesses in this area specifically identified in this report.
7.	<ul style="list-style-type: none"> • Require its clubs to have a complaints policy for safeguarding concerns (and make this a clear requirement within the relevant policies and standards for clubs), operate a system for the neutral reporting of low-level concerns about adult conduct towards children and vulnerable adults and make clear to clubs the circumstances in which they are required to report concerns to BG.
8.	<ul style="list-style-type: none"> • Ensure that all welfare related complaints about its employed coaches are independently investigated and, where relevant, determined by a wholly independent panel.
9.	<ul style="list-style-type: none"> • Ensure that it notifies complainants and respondents involved in a complaint about actions, developments and outcomes in a consistent and prompt manner.

STANDARDS AND EDUCATION

10.	<p>BG must:</p> <ul style="list-style-type: none"> • Appoint a Director of Education with overall responsibility for the education and training of coaches and Welfare Officers and for ensuring that education is adequately co-ordinated with BG Standards of Conduct and policy.
11.	<ul style="list-style-type: none"> • Review the policies it currently has in place that affect gymnast welfare and update them to remedy the issues identified in this report. These policies should include clear guidance to the gymnastics community about what conduct is and is not acceptable in the sport.
12.	<ul style="list-style-type: none"> • Produce and make available to the gymnastics community a Gymnast Handbook which should be reviewed and updated at least every four years and must include: <ul style="list-style-type: none"> ○ BG's Standards of Conduct; ○ An explanation of all BG's key policies affecting gymnast welfare and links to these policies (as updated under Recommendation 11); ○ Information about the role of Welfare Officers and obligations to report, and pathways for reporting, safeguarding concerns; and

	<ul style="list-style-type: none"> ○ Any other information that BG considers it is important for the gymnastics community to be aware of, in light of my report.
13.	<ul style="list-style-type: none"> • Revise and update its educational programme for coaches and Welfare Officers to address the gaps and weaknesses that are identified in this report. In order to ensure that experienced coaches who are already qualified benefit from these updates, BG must ensure that all coaches currently holding a qualification of level 4 or above undertake training based upon the updated educational programme within two years of its introduction.
14.	<ul style="list-style-type: none"> • Increase its direct contact with registered clubs to promote and monitor compliance with the information set out in the Gymnasts Handbook and provide policy updates.

GOVERNANCE AND OVERSIGHT

15.	<ul style="list-style-type: none"> • The BG Board must assume responsibility for implementing these recommendations and publish at 6, 12 and 24 months the progress it has made to comply with the report's recommendations, by which time these recommendations should have been implemented.
16.	<ul style="list-style-type: none"> • BG must appoint independent Board members with relevant professional expertise in safeguarding and athlete welfare.
17.	<ul style="list-style-type: none"> • BG must introduce effective governance pathways to ensure that the views and interests of athletes and parents; any patterns and trends in complaints; and BG performance in complaint handling, are known to the Board and are taken into account in relevant decision making.

ACRONYMS AND ABBREVIATIONS

BG	British Gymnastics
BAC	British Athletes Commission
CIMSPA	Chartered Institute for the Management of Sport and Physical Activity
CMT	Case Management Team
CPD	Continuing Professional Development
CPSU	Child Protection in Sport Unit
CPSS	Centre for Child Protection and Safeguarding in Sport
CRM	Customer Relationship Management System
CRMG	Case Referral Management Group
DBS	Disclosure and Barring Service
DCMS	Department for Digital, Culture, Media and Sport
ESRC	Economic and Social Research Council
EIS	English Institute of Sport
FIG	Federation Internationale de Gymnastique
LADO	Local Authority Designated Officer
NGB	National Governing Body
NSPCC	National Society for the Prevention of Cruelty to Children
MAG	Men's Artistic Gymnastics
UKCC	United Kingdom Coaching Certificate
WAG	Women's Artistic Gymnastics

GLOSSARY

Different terminology has been used over the years to reflect the most talented members of the gymnastics community: high-performance, elite, pathway, world class etc. and views now differ over the most appropriate choice of language in this context. References to “high-performance” or “elite” gymnasts include gymnasts attached to Performance Pathways/World Class Programmes, competing at national and international level.

Where parent or parents are referred to, this includes alternatively carer/carers and guardian/guardians.

A number of different individuals have taken on the role of 'Performance Director' during the period of Review. The report refers to the following individuals who held this post:

- Tim Jones – Olympic Performance Director (2008 to 2012) and Head of Performance Sport (2012-2013);
- Martin Reddin – Interim Performance Director (2015 to 2017);
- James Thomas – Performance Director (2017 to March 2022).

The report refers to the following individuals who have held the post of CEO during the period of Review:

- Jane Allen – Former CEO (April 2010 to December 2020);
- Alastair Marks – Interim CEO (December 2020 to October 2021);
- Sarah Powell – new CEO (since October 2021).

“*Safeguarding Children*” is described in *Working Together to Safeguard Children 2013* as the action taken to promote the welfare of children and protect them from harm, which involves:

- protecting children from maltreatment;
- preventing impairment of children’s health or development;
- ensuring children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

“*Safeguarding and Promoting the welfare of children*”

BG defined this as: *'The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances with the provision of safe and effective care that enables children to have optimum life changes and enter adulthood successfully.'*

“*Child Protection*”

BG defined this as: *'Child protection is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering or are at risk of suffering significant harm as a result of abuse or neglect. Effective child protection is essential as part of the wider work to safeguard and promote welfare of children. However, all agencies and individuals should proactively aim to safeguard and promote the welfare of children through good practice so that the need for action to protect children from harm is reduced.'*

METHODOLOGY

Origin of the Review

1. Throughout the summer of 2020 several British gymnasts and former gymnasts made public disclosures to the press about alleged abuse within the sport of gymnastics. These disclosures followed the airing of an American documentary called 'Athlete A' about sexual abuse within the sport of gymnastics in the U.S.A and the failure of the sport to address such abuse and to protect and support its own gymnasts. The allegations made by British gymnasts included descriptions of emotional and physical abuse by coaches. One of the common themes running through these disclosures was a sense that the governing body for the sport of gymnastics in the UK, BG, had not only failed to prevent or limit such behaviours but had condoned them in the pursuit of national and international competitive success.
2. In August 2020, I was appointed by UK Sport and Sport England to conduct an independent review into the concerns that had been raised in relation to BG with specific Terms of Reference. By paragraph 5, these Terms of Reference required me to investigate for the period August 2008 to August 2020 (the period of Review) the:
 - a. nature and volume of complaints received by BG, including (but not limited to) allegations of mistreatment, sexual, mental (emotional and neglect) and physical abuse, bullying, harassment and discrimination;
 - b. approach taken by BG to resolving complaints;
 - c. reasons for any delay in complaints being raised;
 - d. adoption and application by BG of safeguarding and complaints procedures, including how compliance with safeguarding standards by clubs and member coaches was monitored and assessed;
 - e. culture and practices of BG, including its registered clubs, in relation to its treatment of gymnasts and consideration of their welfare.
3. The intended outcomes of the Review (the "Outcomes") set out at paragraph of the Terms of Reference were:
 - a. To determine whether:
 - i. gymnasts' wellbeing and welfare is (and has been) at the centre of the culture of BG, its registered clubs and member coaches and if not, why not;

Origin of the Review

- ii. safeguarding concerns and complaints have been dealt with appropriately in the sport of gymnastics and if not, why not;
 - iii. gymnasts, or their parents, carers or guardians, have felt unable to raise complaints with appropriate authorities and if so, why.
 - b. If any failings are identified at 4(a)(i), (ii) or (iii), then the Reviewer shall make recommendations to ensure that for the future:
 - i. gymnasts' wellbeing and welfare is at the centre of the culture of BG;
 - ii. safeguarding concerns and complaints in the sport of gymnastics are raised with the appropriate authority and appropriately resolved in a timely manner;
 - iii. gymnasts have appropriate pathways and the necessary support to raise concerns and complaints.
4. In general, references to complaints have been interpreted by me as including concerns and/or complaints as to gymnast welfare.
5. I have been assisted by two advisers, Mike Cave and Tonia Couch, who have brought individual and independent sports administration and performance expertise to inform my work. These advisers have not examined the information received by the Review and have not been involved in formulating any of the determinations set out in my report.
6. Mike Cave is the Academy Director at Fulham Football Club and works as part of a multi-disciplinary team of staff whose objective is to support the development of children and young adults in their aspirations to become professional footballers. His current role includes the strategic management of sports staff across a wide range of disciplines, ensuring that the Club provides a safe environment for all of its participants. He has relevant commercial and coaching expertise and has held the positions of Performance Manager and Head of Player Development at Fulham. He therefore has a detailed understanding of the structures underpinning high performance sports and the pressures and expectations involved for all its participants.
7. Tonia Couch is a former British Diver who competed at the 2008, 2012 and 2016 Olympic Games during a highly successful 12-year senior career. She took up diving at the age of 10 having previously focused on gymnastics. After her retirement in November 2017, she coached diving to young children, in addition to managing a successful business away from the sport. She is currently no longer coaching. As a former elite athlete in a sport which has parallels with gymnastics and as someone engaged, until very recently, in coaching, she has brought her own personal perspective to the issues engaged by the Review.

Launch of the Review

8. My Review has been supported by a Secretariat whose work was summarised in my Letter of Appointment by UK Sport and Sport England ("the Commissioning Organisations") and by Joanna Warwick, Junior Counsel to the Review. I would like to thank all of the individuals who have supported me throughout the work of the Review.

Launch of the Review

9. The Review commenced on 25 August 2020 with the launch of its website and the Call for Evidence, which requested anyone with information relevant to the Review's Terms of Reference to submit their information.
10. In advance of this launch, the Review created a website to keep the public informed about the work and progress of the Review (<https://www.whytoreview.org>). The Review drafted and published important information on this website including FAQs, a Privacy Policy and an Appropriate Policy Document. These set out in as much detail as possible how the Review would use the information provided to it, as well as information about the processes being followed by the Review and the scope of its work. The Review also produced for the website a Safeguarding Statement and Protocol, setting out how the Review would deal with safeguarding issues.
11. In the initial stages of the Call for Evidence it became apparent that a significant proportion of the gymnastics community was somewhat hesitant to share their experiences with the Review. The Secretariat spent time addressing questions about how the Review would use an individual's information and whether a person had the right to remain anonymous throughout the process. I updated the Review's FAQ page to provide further information about information handling and published video updates informing the public about the Call for Evidence and encouraging them to come forward.
12. The original closing date for the Call for Evidence of 25 September 2020 was extended to 9 October 2020 to ensure that individuals had sufficient time to make their submissions. I felt this was particularly important in view of the reticence some people had initially expressed about providing information.

Call for Evidence: the Nature and Scale of Information Received

13. In total, my Review received information from over 400 individuals in response to the Call for Evidence. Over 270 of these were received directly by the Review, with more than 100 of these arriving on the final day of the Call for Evidence. In addition, over 100 separate submissions were received via the British Athletes Commission, through a joint hotline set up with the NSPCC. I am extremely grateful to all of the individuals who took the time to engage with my Review.
14. A number of the submissions received were out of scope because they lacked sufficient substance and they were therefore not considered further. Others were deemed to be out of scope because they concerned events predating the period of Review. Some of these related to practices, clubs or coaches

who were referred to in other submissions. They were taken into account only to the extent that they provided relevant context to submissions that fell within the period of Review. In total there were submissions from 54 individuals which were determined to be broadly out of scope. Some submissions did not identify the precise date of the issues described and I have factored this into my findings.

15. Information was submitted by gymnasts, parents, coaches, Welfare Officers and other people connected with the sport of gymnastics across the country. The Review analysed this material and categorised the information via a document review platform. All of the written information received in the Call for Evidence was reviewed and summarised in a central spreadsheet, which provided me with a high-level overview of the individuals, clubs and behaviours at the centre of individual submissions. This spreadsheet also recorded any requests for anonymity, privacy concerns and the basis for processing that individual's data. Collating the information in this way has allowed the team to analyse the information and identify themes. It also informed the strategy for holding meetings with individuals who provided information to the Review.
16. In February 2021 I produced an Interim Report for the Commissioning Organisations which was published on the website for the Review. The purpose of the Interim Report was to provide a summary of the nature and scale of the information received and whether the Terms of Reference required any changes. My view was that no changes were required at the time and the Commissioning Organisations agreed in their response of 1 March 2021.
17. Since my Interim Report was written, I have received additional information via meetings and in writing. A small amount of the information that I received after the Interim Report was in the form of written submissions that people sent to the Review after the closure of the Call for Evidence. This was usually because they had only just felt able to overcome any concerns or anxiety that they had about providing their information. Where the information that they provided was relevant to my Terms of Reference, I considered it appropriate to accept and review this information as part of the response to the Call for Evidence.
18. In total the Review received submissions from over 400 individuals. The breakdown of the number of submissions received is as follows:
 - Current and former Gymnasts: 133;
 - Parents, carers and guardians: 146;
 - Current and former Coaches: 60;
 - Individuals associated with BG: 10;
 - Current and former Welfare Officers: 8;
 - Registered clubs: 11;
 - Others (unidentified, volunteers, sports photographers, members of the public etc.): 41.

Meetings following the Call for Evidence

19. Many individuals spoke from a position of holding a number of different roles so the above categories are not entirely representative of the depth of the submissions I received. From the 355 in scope submissions, 70% of those were primarily negative about their experiences, 13% were primarily positive, 9% were mixed and 8% were either neutral or unknown. Of the 252 negative submissions, 125 related to WAG, with the majority of those (79) relating to elite gymnastics.
20. I was conscious of the possibility that my perception of issues within that discipline might be greater as a consequence of having received a numerically greater number of submissions. I therefore also looked at how the number of submissions received about a discipline compared to the number of gymnasts participating in that discipline during the period of Review. In simple terms, WAG is over-represented in terms of the number of submissions raised to the Review when compared to the number participating in the sport. Conversely, Trampoline generated a low proportion of submissions compared to those participating in the discipline. The greatest proportion of the information about participation in the sport related to the experiences of female participants (227 submissions). The Review received only a small number of submissions about Disability Gymnastics. I received more submissions about female coaches than male (60/40 split). This is not surprising given the number of submissions from female gymnasts (who tended to be coached by females).
21. From those who informed me about abusive behaviour, 67% spoke of emotional abuse, 49% of physical and 9% of sexual abuse. Many spoke of more than one type of abuse. Only a small number spoke of discrimination which generally occurred within the context of emotional abuse, consisting mainly of racist or homophobic comments. There was only one submission received speaking of disability discrimination.

Meetings following the Call for Evidence

22. Following receipt of the written submissions in response to the Call for Evidence the Review held meetings with a significant number of the individuals who had provided written information. I invited 271 individuals to meet with me and my team, representing over 75% of those who had submitted written information that fell within the Terms of Reference. Some individuals did not respond to this invitation or declined for a variety of reasons. In total, I held meetings with 190 individuals who responded to the Call for Evidence. I considered this to be a proportionate number of meetings in order to obtain a sufficiently clear understanding of the issues being raised that fell within the Terms of Reference.
23. The individuals invited to meetings were selected based on a number of different considerations, including whether there were questions that I wanted to ask them arising from the written information that they had provided. I ensured that a representative selection of individuals were spoken with, in terms of the nature of their involvement in gymnastics, the issues that they raised in their submissions, whether their experiences were positive or otherwise, the geographies and individuals involved and the discipline and level of gymnastics. In total my team and I spoke with 46 gymnasts, 68 parents of gymnasts, 39 coaches, 8 clubs, 6 Welfare Officers and 23 others. Many individuals we spoke with held more than one role

within the gymnastics community, which does not come across in the categories above, with some parents being coaches or Welfare Officers and many coaches also being former gymnasts or judges. These meetings were hugely helpful in enabling me and my team to ask questions about the experiences of the individuals, for the individuals to provide further information and for me to engage face to face with members of the gymnastics community.

24. Where individuals were not invited to meetings following their written submissions, this was either because they did not wish to engage further with the Review or because I felt I had received adequate information from that individual to understand their experiences and it was not necessary or proportionate for me to take their time with a meeting. In some cases, I requested further documents or written information where I had specific questions but did not consider a meeting to be necessary.
25. Many individuals providing information and attending meetings have been significantly impacted by their experiences within gymnastics and found it challenging to recount difficult and sometimes traumatic experiences. The Review endeavoured to make individuals feel as comfortable as possible about assisting the Review. I provided an information sheet to each individual in advance of any meeting, which set out details about the process for the meeting to allow people to understand and think about the interview in advance. When inviting individuals to interview, the Review offered the opportunity for a support person to join the meeting and signposted individuals to access independent support and advice from the BAC.
26. Following these meetings, the member of the Review team who attended the meeting completed a summary sheet setting out the key points arising in the meeting. This provided me with a good basis for pulling out relevant information from each meeting, including emerging themes and issues. Any follow-up points from the meeting were flagged in order that these could be considered and actioned where necessary. Any safeguarding matters arising in meetings were also flagged internally within the Review team so that these could be appropriately assessed.
27. Transcripts of the meetings were produced after the meetings in order that the Review had a searchable word for word record of what had been discussed. These transcripts were sent out to the individual who had spoken with the Review and they were asked to consider the transcript to check that it was an accurate reflection of what had been covered in the meeting. They were asked to respond within 2 weeks either confirming that they were content with the transcript or to provide their comments or proposed amendments. If amendments were proposed, then these were incorporated by the Review team and the transcript was kept on the file as a final record of that individual's account to the Review. If no response was received within the requested time period, then the Review sent one further email to confirm that if no response was received, the Review would assume that the individual had no comments on the transcript. These transcripts were then finalised in the Review's records after another couple of weeks if no further response was received.

28. The transcripts and summary sheets for the meetings were stored on the Review's secure systems alongside the written submissions received in the Call for Evidence. They formed a detailed and searchable information source for me to refer to in my analysis and assessment of the matters relevant to my Terms of Reference.

Engagement with BG

29. In order to investigate the issues identified in the Terms of Reference, I also requested and received a significant quantity of material from BG about (a) the nature and volume of complaints received by BG (b) the approach taken by BG to resolving complaints (c) the adoption and application by BG of safeguarding and complaints procedures and (d) the culture and practices of BG, including its registered clubs.
30. Some of the detail of this engagement and the information/material I received is set out in later sections of my report. However, I have also summarised my engagement with BG in the following paragraphs to give an overview as to the nature and extent of that engagement.
31. Before BG provided substantive amounts of information to the Review, the Review settled with BG a Data Sharing Protocol, identifying the basis upon which information would be provided and how it would be handled by the Review. This was to ensure that BG and the Review complied with their data protection obligations. Work on the Data Sharing Protocol commenced in October 2020 and was completed on 8 March 2021.
32. The volume of information that I needed to request from BG was significant and I recognise and acknowledge the time and resources that BG invested in responding to these requests. On 17 September 2020 I made my first request for documents and information to BG. Further schedules of requests were sent on 12 February 2021 (Schedule 2), 25 March 2021 (Schedule 3), 19 May 2021 (Schedule 4) and 18 June 2021 (Schedule 5). The number of requests for information in my schedules amounted to more than 200 in total. I also made supplemental enquiries and sought clarifications at various times between and after these dates. I made requests about BG's policies and processes, its structure and organisation, and the systems it had in place during the period of Review for handling complaints and concerns. At an early stage, I also made requests for statistics and data about complaints received by BG during the period of Review. This material then formed the basis for additional requests for information.
33. In the schedules sent on 12 February 2021 and 19 May 2021, I asked for all of the complaints files held on the BG systems about 26 individual coaches and 7 individual clubs. The time between the two requests was spent exploring with BG whether there was a more proportionate way to obtain the necessary information as the first request had revealed challenges for BG around record keeping and data protection obligations. I asked for these files to be provided to me with the names of individuals included, in order that I could properly understand the roles and identities of those involved in the complaints,

and the handling of the complaints, and recognise any crossover in personnel involved in different files. Before providing me with these files BG undertook a significant exercise to ensure compliance with its data protection obligations prior to disclosing the files to me and this resulted in significant delay.

34. The files were provided to me on an ad hoc basis between April and September 2021. All files that I requested were provided to me other than those which were withheld as a result of concerns about the operation of a confidentiality agreement in place. This issue is covered in more detail in ([Complaints about BG Employees](#)). In total this request resulted in the provision of over 130 cases, comprising 32,213 pages of material.
35. After reviewing available statistics and data from BG about complaints it had received during the period of Review, I requested on 18 June 2021, a further 66 individual complaints files. I did this to ensure that I had seen a representative quantity of files both in terms of the nature, date and seriousness of the complaint. BG was not involved in choosing the files that I reviewed. The files requested in June 2021 were provided to me with names anonymised, in order to avoid some of the data protection issues, and resulting delays, that had arisen with my earlier request for complaints files. It was possible to anonymise these files as I wished to assess how BG had handled that particular complaint in isolation, rather than to understand how patterns of complaints or concerns had been dealt with by BG. This had not been the case with the files relating to specific coaches and clubs. These files also took some time to be provided, with the first file received on 23 July 2021 and the last on 7 October 2021. One file contained no documents and two requests were duplicates of the earlier files I had requested so did not need to be disclosed again. Therefore 63 dip sample files were received in total, comprising 5,036 pages of material.
36. In total I received 195 separate files that had been opened by the BG Integrity Unit (and its predecessor teams) during the period of Review. This was greater than the number of requests made, because for many of the coaches and clubs about whom I requested files, there was more than one file held on the BG system. Equally, some files contained a number of complaints which had been amalgamated so overall the number of complaints that I had access to was greater than the number of files provided. 61 of these complaints were raised with BG after 1 July 2020 and I decided to exclude them from my analysis due to their proximity to the end of the period of Review, which meant that the way in which the complaints were substantively handled would likely fall outside the scope of my Review.
37. BG informed me that, as at 28 September 2020, it had 327 open complaints, over 3,500 closed complaints from August 2008 to 2020, and in the period 2015 to 2020 received an average of 300 complaints per year. For the period of Review I therefore understand it to have approximately 3,800 complaints. In total I reviewed about 5% of the files held by BG for the period of Review. I concluded that this was a proportionate number to enable me to reach a view of how BG had been handling complaints it had received, when considered alongside the additional information provided by BG and others who had

experienced BG's handling of complaints. The review of further files would have had diminishing benefit and would not have been proportionate to the time and cost involved for BG and for the Review.

38. In some cases, there were minutes within the file of meetings that had taken place with the LADO. These were removed from the file by BG until consent had been received from the LADO for them to be provided. In a small number of cases consent was not provided or there was no response. I nevertheless had an adequate sense from the rest of the file as to how the matter had been handled by BG. Redactions were made to some of the files by BG where redactions were believed to be necessary for data protection reasons and where the information was not relevant to the work of the Review. Where redactions were applied, the reasons for the redaction were explained by BG and I had the opportunity to discuss these and request un-redacted versions of the material if I felt they were unnecessary or obscured my understanding of the file. Overall, I was satisfied that the redactions did not impact upon my work and I did not need to request these to be removed.
39. My team reviewed all of the individual files and produced a summary sheet for each. These summary sheets included an explanation of the concerns raised by the complainant(s) in the file, the way in which BG had handled the concerns and what the outcome of the matter was. Certain key pieces of information were also identified and highlighted. From these summary sheets I was able to obtain a good understanding of how the complaints in the files had been handled by BG. Clear themes and patterns emerged from these summaries which have informed my views and determinations around how safeguarding concerns and complaints have been dealt with (see [section \(4\)\(a\)\(ii\)](#) of this report).
40. In addition to the complaints files, I received responses from BG to all of the questions I had asked and requests that I had made. In total I received 1,058 documents totalling 26,696 pages from BG.
41. In addition to the requests for information and material, I also requested meetings with various individuals employed by, formerly employed by or associated with, BG. I selected these individuals on the basis that I believed they would each be able to provide different information and different perspectives about matters relevant to my Terms of Reference. I made this assessment on the basis of the information and material I had received from BG to date, as well as information received from other sources.
42. Everyone who I requested to meet with from BG (whether currently or formerly employed) did so, with the exceptions of a former employee of BG, Martin Reddin and a former High Performance Coach Development Manager. I repeated my request to meet with Martin Reddin after he initially declined my invitation, as I believed he was an important individual for me to speak with given the longevity of his work at BG, and the relevance of his roles to the Terms of Reference. He was Director of Coach & Judge Education, Education & Technical Director, Interim Performance Director and Executive Director of Sport during the period of Review. It was disappointing that he chose not to engage with the Review. Martin Reddin retired on 31 March 2021.

43. The process for these meetings was in many ways similar to the meetings held with individuals who had submitted information to the Review. The individuals had the opportunity to be accompanied to the meeting by a support person or lawyer. In all cases a lawyer who was also acting for BG was in attendance with the individual to advise and support them. I did initially have valid concerns that completed meetings were being discussed with individuals I had yet to meet. I did raise with BG my concern about the risk of, or at least the perception of a risk of, information from one meeting being shared with individuals in advance of other meetings. I was reassured *'that prospective interviewees will not be informed of the questions that have been asked, or any other information disclosed or knowledge gained, in interviews that have already taken place'*. My concerns were responded to promptly and overall I was satisfied with the integrity of this aspect of the process and felt that I could place weight upon the accounts provided as being honest and independent. Where I had had any concerns about independence, I took this into account when deciding how much weight to place on what I had been told.
44. For the meetings with individuals from BG, I provided them with the broad topics that I wished to cover with them two weeks in advance of the meeting. This was so that I could get as much relevant information as possible from the meeting and to minimise the number of questions that had to be taken away and responded to after the meeting. I also felt it was appropriate to provide these topics given that I had specifically requested to speak with these individuals and they were entitled to understand in advance of the meeting why they had been asked to meet with me. By contrast, where I met with individuals who had provided information to the Review in response to the Call for Evidence, they were aware that the meeting was to ask questions about, and expand upon, the information they had already submitted. In some meetings due to time constraints or the nature of the questions, it was agreed that some responses could be provided in writing by way of follow up after the meeting.
45. I met with individuals from the Board, with the former, interim and current Chief Executives, with members of the Integrity Unit, the Education team, the Community Services team and the Performance team (including coaches). The topics covered in the meetings varied from person to person but included the governance of BG, the roles and responsibilities of each person, the interaction between teams and individuals, personal experiences of complaints handling by BG, the interaction between BG and its member clubs, the BG safeguarding structure, the understanding and application of relevant policies and procedures and experiences of the culture of BG and the sport more widely.
46. These meetings helped to build my understanding of the organisation and how it had been operating. They also gave me the opportunity to ask questions that had arisen from my review of the material provided to date by BG. I purposefully held these meetings after the majority of the meetings with individuals who had responded to the Call for Evidence. This meant that I was also able to ask individuals from BG about some of the themes and issues that had been raised by the gymnastics community in response to the Call for Evidence. I am grateful to all of the individuals from BG who gave up their time to meet with me and share their knowledge and experiences, and answer my questions about their roles and understanding of events at BG in a professional manner.

47. After these meetings had been completed and I had requested the information I believed to be relevant to my work, BG was given the opportunity to provide me with any further information or put anyone else forward for a meeting with me, where they believed such additional engagement would be relevant to my Terms of Reference. In response, BG confirmed that they would provide final submissions which were received in January 2022 and I also met with their new CEO to discuss future developments and plans in the areas of safeguarding and welfare.

Engagement with Other Organisations and Individuals

48. In addition to BG, I have also engaged with all of the organisations listed in paragraph 13 of my Terms of Reference. They were invited to provide me with information they considered relevant to my Terms of Reference and they all responded to this invitation. It was often necessary to revert to these organisations with requests for further documents or material. I was able to meet with individuals from a significant number of these organisations. I am most grateful for the assistance provided by them. It has expanded my understanding of how BG operates both internally and within the wider sporting community.
49. In particular I would like to thank the BAC for its tireless work in supporting the individuals who contacted them in often difficult circumstances to disclose their experiences in gymnastics. The BAC encouraged and supported many of these individuals to engage with the Review, and supported other individuals who reached out to the BAC for support following a referral from the Review.
50. I would also like to extend my particular thanks to the EIS for assisting with the provision of a significant number of academic articles that were relevant to the issues I was covering as part of my Review.
51. Paragraph 13 of my Terms of Reference contains a non-exhaustive list of organisations from which I was able to request relevant information and this included UK Sport and Sport England. These are the organisations that commissioned this Review and appointed me to lead it. I engaged with both organisations in the context of paragraph 13 and made various requests for information. This engagement was entirely separate to the comparatively limited engagement that I had with them around my appointment and role in leading the Review. I took extra care to ensure that I remained objective when assessing the information provided to me by the Commissioning Organisations and when considering their role in relation to welfare in gymnastics during the period of Review. I am aware that the Commissioning Organisations were similarly conscious of ensuring that my independence from them was maintained and am grateful for the helpful and professional manner in which they engaged with the Review to assist my work.
52. In addition to the organisations listed in paragraph 13 of my Terms of Reference, I contacted other individuals and organisations and asked them to engage with the Review. I was able to speak with the QC who is leading the Independent Complaints Process set up by BG to handle existing complaints

about gymnastics and the team from the Australian Human Rights Commission undertaking the Independent Review of Gymnastics in Australia. I invited information from organisations including Welsh Gymnastics, Scottish Gymnastics, Northern Ireland Gymnastics, the CIMSPA, UK Coaching, the Centre for Child Protection & Safeguarding in Sport, the Children's Commissioner, the FIG and Sport Resolutions. I am very grateful to those who responded to this invitation because engaging with these organisations enabled me to understand the structures in the sport of gymnastics, the support available for different members of the gymnastics community including coaches and the current landscape around safeguarding in sport.

Referral of Information to Statutory Authorities

53. Paragraph 11 of the Terms of Reference required me to consider the need to refer to the relevant statutory authorities any information received by the Review that I considered to be of a criminal nature, raise immediate safeguarding concerns or be a potential violation of anti-doping regulations.
54. The Review did not refer any information onwards relating to potential violation of anti-doping regulations. However, the Review did receive information during the Call for Evidence and after that, in meetings, that gave rise to a significant number of safeguarding concerns. The Secretariat kept all such information under review to determine whether it was necessary to refer information to a relevant authority. This process continued until all evidence had been gathered and all meetings completed.
55. In consultation with expert safeguarding advisers, the Review developed a Safeguarding Statement and Protocol, which can be found on the Review website. This has informed the Review's approach and decision-making with regard to making referrals. These advisers also provided advice about how to identify and deal with safeguarding issues that were likely to arise or had arisen. The Review developed an internal decision-making document to support team members handling safeguarding issues. This identified the most appropriate approach to any ongoing safeguarding concerns and enabled the Secretariat to make responsible decisions when assessing the risk of significant harm both for the individual providing the information and for those vulnerable adults or children who might be at risk more broadly.
56. The Review analysed both written submissions and oral interviews to identify any safeguarding issues that required a referral to the relevant authority. Before making a referral, the Review always asked for consent from the individual to pass on the information and contact details to the relevant authority. In some circumstances, the Review referred information even if the individual had not consented to this, if it was felt that a child or vulnerable adult might currently be at risk of significant harm. Where an individual did not respond the referral was ordinarily made on an anonymous basis to provide further time to have this discussion.

57. Due to the sensitive nature of the submissions and the desire to avoid causing further distress or trauma to potentially vulnerable individuals, these conversations about consent were delicate and required experience in speaking with vulnerable individuals. Many individuals requested that the referral initially be made anonymously with the primary reason provided that they remained involved in gymnastics and feared repercussions. At the time of the Interim Report in February 2021, the Review had made 39 referrals to the statutory authorities. This figure has since increased to 70 referrals, involving 46 local authorities, and reflects the additional referrals made as a result of information received during the meetings which post-dated the Interim Report.

Confidentiality and Representations

58. I received all evidence from individuals on a confidential basis in line with the Review's Terms of Reference. Many individuals were extremely anxious about the risk of their engagement with the Review becoming somehow public or apparent to the gymnastics community. As a result, I have been extremely careful when referring to anecdotes of individuals, sometimes using gender neutral language or omitting certain identifiable features where this was necessary to ensure anonymity. I spoke with many elite gymnasts including some Olympians. The number of gymnasts attending the Olympic Games is an obviously small cohort of gymnasts and I have generally, but not exclusively, removed any reference to this, to reduce the risk of identification, when referring to their submissions.
59. By paragraph 17 of the Terms of Reference, any individual or organisation who it is proposed will be named in the Report is to be notified of this in advance of publication and given opportunity to comment on applicable references before the Report is finalised. Paragraph 3(c) of the Annex to the Terms of Reference states that *'the report will only name individuals and organisations where this is necessary in order to fulfil the Terms of Reference'*. I have conducted an individual assessment in relation to each organisation and individual whose data features in this report with a view to deciding whether they should be named, or whether they are identifiable either directly or indirectly. In doing so, I have taken into account the Review's obligations under UK data protection law. I have only named or identified individuals where I have considered it to be necessary, fair and reasonable and where I consider that their identity cannot be removed without compromising my ability to deliver upon my Terms of Reference.
60. Any individual who is or might be identifiable in the report or organisation named (other than in passing reference) was notified in writing that I was minded to name or otherwise identify them or that they were at risk of identification in order to allow them to make representations before the report was finalised. I have considered carefully all of the responses that I received before finalising the report.
61. Similarly I provided any individual or organisation who I was minded to criticise with a fair opportunity to respond to that criticism before finalising my report. Many of these criticisms had been ventilated in my meetings with organisations and with BG personnel but in light of the number of criticisms involved, I ensured that each was conveyed in writing along with an explanation of the context in which the

criticism was being made. Where I received responses, these were carefully considered before I finalised the report.

Approach to Making Findings

62. The conclusions that I have reached in this report are based solely on the evidence that I have received. It is important to remind the reader that it is not part of my function to decide whether any of the complaints made about a particular club or coach have any merit. I have considered with care, the weight that I should attach to the human narratives provided by all individuals whether in writing or during meetings. I have also considered with care the independent corroboration available about certain issues, themes or individuals that have punctuated some of those human narratives, where they are relevant to the Terms of Reference. As part of this, some of the general concerns or criticisms about which I received information during the Call for Evidence were put to those who were the subject of that criticism or concern, without getting into the specifics of individual instances of alleged poor practice or failures.
63. I have applied the civil standard of proof to my decision making. That means that where I have made findings, I have done so on the basis that something is more likely than not. It is important to remember when reading this report that the period of Review extends up to August 2020. BG has embarked upon various new processes since that date and has made relevant changes to its structures and systems. My findings and criticisms, howsoever expressed, are limited in time to that date of August 2020. I have not investigated in detail every change that has occurred within BG since August 2020 and have not examined the impact of any such changes.

Approach to Recommendations

64. My focus in formulating recommendations has been on coach education, safeguarding at club and high performance level, complaints handling and governance. I have avoided where possible wide overarching suggestions that amount to no more than urging BG and its clubs to do better. I have tried to ensure that all recommendations are realistic, bearing in mind the size of BG's membership and the fact that it has limited resources. The staffing structures and resources of clubs vary widely and whilst I have remained alive to this, I also remind myself that gymnastics clubs are in the business, predominantly, of providing sporting facilities to children. I have considered with care the various suggestions made by the individuals who contacted or met with the Review team.
65. I have tried to avoid making recommendations which are dependent upon the agreement and involvement of other agencies or organisations or are otherwise so 'sports-wide' that it would be unworkable to require just one sport to implement them. I have concentrated on what I believe BG, as the NGB, can do to improve the culture of the sport. Baroness Tanni Grey-Thompson recommended the creation of a Sports Ombudsman in 2017. Five years on, this remains an aspiration rather than a

Approach to Recommendations

reality. One wonders how many sporting scandals it will take before the government of the day appreciates it needs to take more action to protect children who participate in sport, a sector where coaches do not have a central regulator and where most complaints lack independent resolution. An Ombudsman is an obvious step in the right direction.

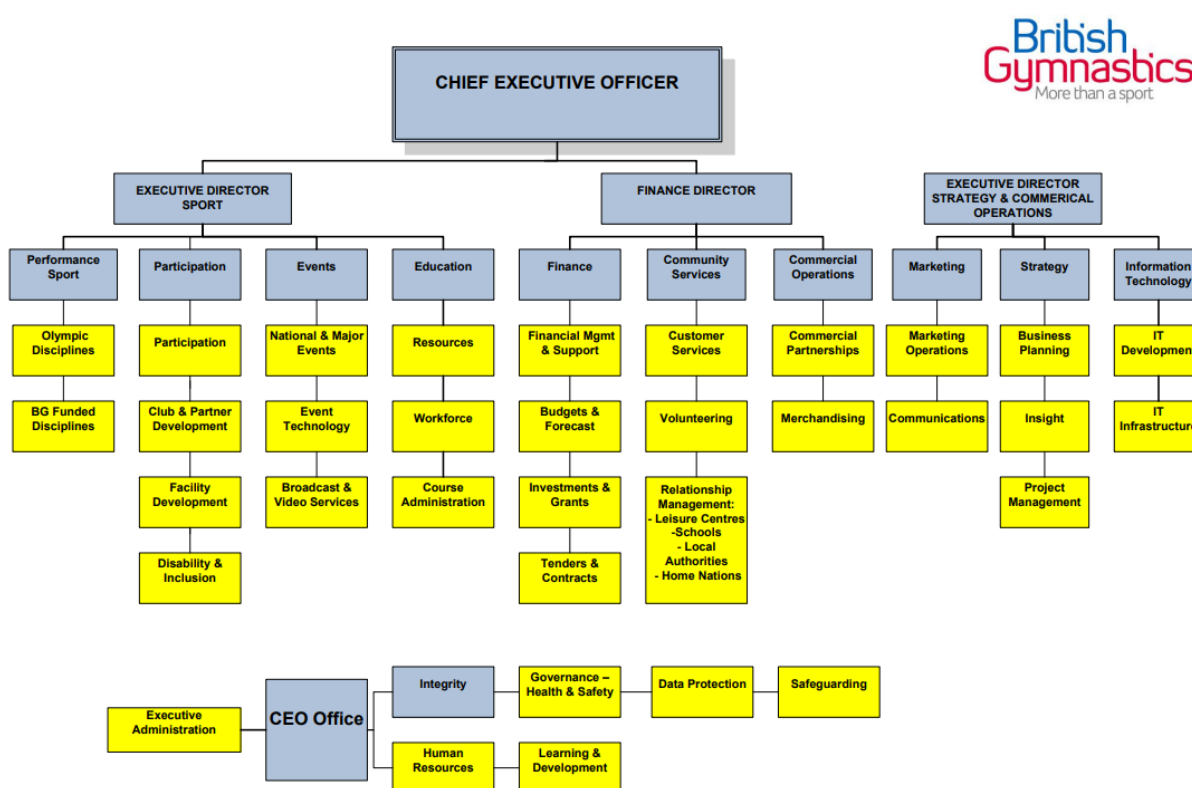
66. I have also considered whether I should recommend the introduction of a coach licensing scheme. I was informed repeatedly by the organisations I met with that there is an obvious appetite for such a scheme yet this is another of Baroness Tanni Grey-Thompson's 2017 recommendations to remain in the in-tray. In November 2021, the House of Lords Select Committee report on a National Plan for Sport, Health and Wellbeing recommended that work continue to develop a national register. BG is contemplating the creation of a gymnastics-specific register. Until there is wider and more tangible organisational development of a register or licence, there seems to me little merit in recommending one purely for gymnastics, however superficially attractive. I hope that, in the interim, the recommendations that I have made about coach education will provide the enhanced credibility that the sport and its coaches need.
67. I have carefully considered whether I should recommend that the current senior minimum age restriction for the women's sport should be increased from 16 to the men's minimum age of 18. I believe that this would have a number of advantages and that it would reduce the disproportionate training pressures on young girls. I was unpersuaded by FIG's approach to this issue but I have concluded that it is not realistic to bind BG in this way when other countries will continue to operate under the current age restrictions. FIG and other international gymnastics bodies need to confront this issue in a collaborative and forthright manner. Until they do, female gymnasts will always be exposed to earlier and greater risks than male gymnasts. I note in this context that the International Skating Union is currently considering a proposal to increase the minimum age from 15 to 17 for major competitions including the Olympics.
68. No organisation accepted responsibility for regulating the sport of gymnastics. I have borne this in mind when formulating recommendations.
69. Finally, there has been a change of guard in significant posts at BG since 2020 and I am aware that BG has already made various improvements to the high performance programs, to defining and delivering a more positive culture and to recognising the importance of education and of safeguarding and complaints handling. This landscape of change can be fast moving and it is possible that by the time of publication some recommendations have already been anticipated or even implemented. Wherever this may occur, I will consider this a step in the right direction for the organisation and the sport more widely.

AN INTRODUCTION TO BG

70. BG is the NGB for the sport of gymnastics in the UK. The organisation provides a national structure for the sport. It stages events, oversees the education of coaches and judges and it provides business support for gymnastics clubs. BG represents gymnastics on the international stage, using high performance pathways and frameworks. This involves hosting national camps and employing national high-performance coaches. BG produces sport-wide policies, guidelines and coordinates the sport at a national level.
71. BG disciplines include: Acrobatic Gymnastics, Aerobic Gymnastics, Disability Gymnastics, MAG, WAG, Rhythmic Gymnastics, TeamGym, Trampoline, Double Mini Trampoline and Tumbling.
72. BG operates in the United Kingdom, the Channel Islands, the Isle of Man and Gibraltar. In many sports, the World Class Programmes are located in specific training venues (referred to as Elite Training Centres) separate from community level sport. In gymnastics the athletes and their personal coaches are based in any number of gymnastics clubs in the UK, and periodically come together for training camps at BG's National Sports Centre at Lilleshall and for competitions. Some refer to this as a semi-centralised or de-centralised system. I shall adopt de-centralised for ease.
73. BG represents the four home nations at the Olympic Games, at the Federation Internationale de Gymnastique and European Gymnastics. It has several affiliated associations including the Home Countries (England, Scotland, Wales and Northern Ireland) and Isle of Man and the British Schools Gymnastics Association. As an organisation, it has working partnership agreements with the respective gymnastics bodies in Wales, Scotland and Northern Ireland, each of which include different provisions around safeguarding and complaints handling.
74. There are a range of management models for clubs. Some are private companies, some have charitable status. Some own their gyms and facilities, others rent them from landlords including local authorities. Clubs typically deliver both recreational and high performance (including international stream) programmes. Gymnastics clubs and other community groups generate their own income, usually, through membership fees, fundraising or by applying for grants. Property-owning clubs can raise funds by hiring their facilities to other groups. Reliance on volunteers as coaches, administrators and Welfare Officers is a defining characteristic of many local grassroots ventures (as it is for many sports).
75. BG is in receipt of public funding from UK Sport and Sport England. This means that it is required, as a condition of funding, to uphold the standards set out by the Code for Sports Governance and to have '*clear, legally compliant athlete disciplinary and grievance policies*'. The Code contains specific obligations concerning safeguarding and requires appropriate policies and procedures to be put in place. Due to its funding, BG must also implement and adhere to the *Standards for Safeguarding and Protecting Children in Sport* issued by the CPSU. This requires an NGB to have up to date child protection and safeguarding policies in place and to have a lead safeguarding officer.

76. BG is a membership association. This means that individuals and clubs pay a fee to BG and obtain various membership benefits in exchange. These can include access to BG clubs, insurance (including legal liability insurance), discounts on various merchandise and access to tickets for BG events. The type of membership available depends upon the level of gymnast (pre-school, recreational or competitive), or level of coach or type of post held within a club.
77. In 2008, according to figures provided by BG, there were 185,558 individual members (over 75% of them female and over 70% aged under 12). In 2020, there were 364,178 individual members (over 81% female and over 78% aged under 12) which is an increase of 96%. Between 10-11% of those gymnasts were classified as 'competitive' as opposed to community or recreational gymnasts. Interestingly, the number of clubs holding membership has not grown at the same rate. According to BG's own figures, in 2008, there were 1,376 clubs and in 2020 there were 1,550 clubs (an increase of 12.5%). Given the figures supplied by BG, that must mean that the capacity within existing clubs has grown significantly during the period of Review. Despite this, the number of people wishing to engage in gymnastics far exceeds the number of available places within clubs.
78. More tellingly, the total number of coaches has actually decreased from 10,088 in 2008, to 8,554 in 2014 and yet further to 7,389 in 2020 (a decrease of 26%). The average number of coaches per club has dropped from eight in 2008 to six in 2020. This would tend to suggest that fewer coaches are available to teach the ever-expanding numbers of gymnasts. This chimes with numerous submissions to the Review that there is an under supply of gymnastics coaches.
79. Before 2017, there was a club-based membership system with clubs providing BG with details of their own individual members. After 2017, all members, both club and individual had to register separately with BG and pay an annual fee. All members are bound by membership rules, by the Complaints and Disciplinary Procedure, the applicable Standards of Conduct and any other regulations, policies or guidelines, published by BG and associated with membership. Membership (and membership rules) applies to a wide variety of individuals including gymnasts, club officials, coaches and assistant coaches. The number of staff within BG has grown from 127 in 2008 to 210 in 2020.
80. BG is a not-for-profit private company limited by guarantee and regulated by articles of association. The organisation is run by a Chief Executive Officer ("CEO") who is appointed by the Board of directors. By 2020, there was an elected President, eight Non-Executive Directors (including a Chair) and four Executive Directors including the CEO. The Board is there to set the vision and values of the organisation and to ensure that the necessary human and financial resources are in place. It is also there to ensure the financial stability of the organisation and to manage any risks to the organisation. Non-Executive Directors should scrutinise the performance of the Executive Directors and senior management and monitor the interests of all stakeholders. The Chair has an important role in co-ordinating the Board's activities and spheres of influence, managing any conflicts of interest and in monitoring the Board's effectiveness and the performance of the CEO.

81. The CEO's roles and responsibilities are governed by a formal role profile in line with normal employment practices. The CEO reports to the Chair and in turn, the Executive Directors report into the CEO.
82. BG has various directorates. The functions of the Sports Directorate and CEO office are highly relevant to the work of the Review. The Sports Directorate function organises competitive opportunities at all levels and for all abilities, oversees the 'quality and quantity' of coaches and judges, develops talent and has overarching responsibility for the World Class Programme. The CEO office has various functions. Relevantly, it oversees all staffing and training requirements, and implements standards via the Integrity Unit including complaints and disciplinary, safeguarding, health and safety and general governance. An organigram showing the organisational structure is below:



83. BG's funding comes from three main sources: government, membership and other (including online shop, ticket sales, cash sponsors). Its annual directors' reports and accounts are public documents.
84. As a condition of public funding, BG submitted to a full financial and governance audit from time to time by independent chartered accountants.

Modernising BG

85. Jane Allen was appointed CEO of BG in 2010. At that stage, it would be fair to say that gymnastics as a sport was not overly professionalised. Part of the new CEO's remit was to lift the profile of the sport,

to increase participation (the number of people taking part in gymnastics and the number of members) and to improve engagement with all relevant stakeholders. Financial stability and operational effectiveness were also important aspects of her role, as were good governance (including policy and procedure) and integrity in how BG went about its business.

86. I discussed with Jane Allen the financial challenges facing BG on her arrival as CEO. They were considerable. The organisation had no reserves, it was over reliant on public funding, and she inherited a serious pension deficit which would take a further nine years to balance.
87. Without doubt, under Jane Allen's stewardship, the scope and stability of the organisation developed impressively. Jane Allen felt that the staff that she inherited were de-motivated and lacked pride in their work and she said that she encouraged them to feel part of a brighter organisation where change and hard work would reap rewards. Membership and staffing increased significantly during her tenure, the financial reserves built up and dependence upon public funding lessened. The relationships with the Home Countries were cemented with working partnership agreements.
88. Jane Allen stated that she had worked hard to ensure that BG balanced its focus between recreational and high-performance gymnasts. The reform of the membership structures in 2017, in her view, helped the organisation to form stronger links with parents and gymnasts. The national training centre at Lilleshall in Shropshire was refurbished. Jane Allen took steps to try and showcase the high-performance athletes, to ensure that they could compete in appropriate and larger venues and to mark their achievements. Both she and others worked hard to raise the profile of BG and the sport on the international stage. Before 2008, no British gymnast had ever won an Olympic Medal. The successful performance of British gymnasts at various European and World Championships and at the Olympic Games started to attract positive headlines. Male and female national gymnasts became household names, especially after the capture of seven medals at the Rio Olympics in 2016. The popularity of the sport increased year on year as did the number of people participating in it.
89. Jane Allen's arrival in 2010 coincided, in general terms, with change to the Board of directors. An independent audit into BG's finance and governance in 2010 had identified a need to reduce the size of the Board and the number of Executive Directors and to recruit Non-Executive Directors with more relevant skills. Jane Allen went about this promptly and by 2011 the Board had been reduced in size from 24 to 12 Directors (8 Non-Executive and 4 Executive) and a competency-based appointments system was introduced, reinforced by a Nominations Committee.

4(a)(i): HAS GYMNAST WELFARE BEEN AT THE CENTRE OF THE CULTURE OF THE SPORT UNDER BG?

Introduction to 4(a)(i)

90. I have been asked to determine whether gymnasts' wellbeing and welfare is (and has been) at the centre of the culture of BG, its registered clubs and member coaches and if not, why not.
91. According to paragraphs 5(d) and (e) of the Terms of Reference, this required me to investigate the adoption and application by BG of safeguarding procedures, including how compliance with safeguarding standards by clubs and member coaches was monitored and assessed; and it required me to investigate the culture and practices of BG and its registered clubs, in relation to its treatment of gymnasts and consideration of their welfare.
92. In exploring the above, for the period of Review:
- a. I examined the experiences of those who provided written submissions in response to the Call for Evidence where those experiences were relevant to issues of welfare and wellbeing. This included the experiences of gymnasts, parents, club owners, coaches and club volunteers.
 - b. I requested to meet with specific individuals from BG and analysed the information provided by those who were prepared to meet with me. I also considered various written narratives provided by BG to the Review;
 - c. I considered the BG Rules, Regulations and Standards of Conduct applicable to members;
 - d. I investigated the content of BG Safeguarding, Health, Safety and Welfare and associated policies and procedures. Where risks of potential harm arising from facets of the sport were obvious and known, I examined whether guidance had been made available to participants about such risks;
 - e. Sport England and UK Sport invest significant public funds in gymnastics. I investigated the funding requirements that they imposed around athlete welfare and safeguarding, and the steps taken by BG to meet those requirements. This included an examination of BG's relationship with the NSPCC's CPSU and an examination of how the World Class Programme was funded and structured;
 - f. I examined BG governance around safeguarding and integrity, including the engagement at Board level with such issues;
 - g. BG acknowledges in its Standards of Conduct, that part of its role and function as the governing body for gymnastics is to ensure the safety and well-being of all of its members or associate

members who are under 18 or otherwise vulnerable. Likewise, in each of its safeguarding policies, BG acknowledged its duty of care to participants and its responsibility to implement safeguarding policy and monitor compliance with it. I therefore explored how BG had done this at club level and within the World Class Programme;

- h. I examined BG's Welfare Officer system. I spoke with both Regional and Club Welfare Officers who made submissions in response to the Call for Evidence. I examined the associated policies developed by BG for such Welfare Officers;
 - i. I investigated BG's approach to resolving safeguarding and welfare complaints. This aspect of my work is considered in more detail in the section ([The approach taken by BG to resolving complaints](#)).
 - j. I investigated the training and education (including CPD) about safeguarding and welfare, where it existed, of coaches, Welfare Officers, gymnasts and parents. This included an examination of what participants understood welfare and safeguarding to mean.
93. As is clear from the above list and the methodology section of the report, I was given access to a very wide category of information from multiple sources. Although not all of this material will be referred to, it has all been considered in formulating my conclusions. I also had access to a large body of academic literature about the sport and used this to form an impression of the available levels of awareness about certain characteristics of gymnastics. Again, although it will not be necessary to refer to this literature in any detail, I have borne it in mind when assessing the issues arising.
94. These enquiries enabled me to assess the culture operating within BG and its clubs from top to bottom and whether gymnast wellbeing and welfare has been at the centre of this culture. I am conscious that 'culture' is an overused word in an organisational context. We all think we know what it means but it probably means different things to different people. In using the term, I adopt the Health and Safety Executive approach² of it broadly meaning '*the way we do things around here*'. This includes the way an environment and organisation looks, sounds and feels.
95. In this section I have set out:
- a. What I mean by '*wellbeing and welfare*';
 - b. Submissions about wellbeing and welfare;
 - c. The culture in gymnastics;

² Health and Safety Executive (2019) Organisational culture at <http://www.hse.gov.uk/humanfactors/topics/culture.htm>

- d. The features/factors that have created or reinforced the culture, as I have found it to be;
- e. The systems/structures in place for managing gymnasts' wellbeing and welfare and how they have or have not worked.

What is Wellbeing and Welfare?

96. It is important that those who participate in sport, regardless of ability, can enjoy a positive and safe experience. Safety, in this context, includes protection from conduct or practices that might risk causing physical, emotional, mental and sexual harm. This encompasses a huge variety of issues, from conduct that would amount to a criminal offence, to practices or behaviours that in isolation might not cause concern but when repeated over time amount to unacceptable and potentially damaging behaviour. Keeping participants safe requires everyone engaging in the sport to maintain appropriate standards of behaviour and it requires a culture in which such values are not just promoted but implemented. Where standards are potentially breached, it is important that participants feel able to make disclosures to this effect. It is also important that clubs and BG deal with such suspected breaches appropriately in order to send out the necessary signals to the gymnastics community that there will be appropriate consequences for proven breaches.
97. In this context, it is important to recall that throughout the period of Review the majority of BG's members were children under the age of 12 (ordinarily over 75% of the membership). It goes without saying that the younger a participant, the more vulnerable they are and the less able they are to identify inappropriate behaviour or to make disclosures about it. It follows that sufficient steps should be taken by those around them, and those overseeing the sport, to ensure that their wellbeing and welfare is at the centre of the sport.

Submissions about Wellbeing and Welfare

Introduction to Anecdotal Submissions

98. In total I received 355 in scope submissions in response to the Call for Evidence. A breakdown of these submissions is in the section of my report entitled: [Call for Evidence: The nature and scale of information received](#). It is important to recognise that the 355 submissions I received represent a small proportion of that membership. I am very conscious that as a sport, gymnastics has provided and continues to provide wide benefits and pleasure for most of the people who participate in it. Those benefits are the direct result of the hard work, enthusiasm and commitment of many of the coaches, club employees and volunteers who administer the sport in clubs and gyms up and down the country. It is important to remember that there are many positive aspects of gymnastics. I am sure for most of the people who have not contacted the Review (and for some who have) it has provided opportunities and experiences from which they have benefited physically, emotionally and socially.

99. Whilst it is very clear that many gymnasts during that period have had nothing but positive experiences of the coaching community and the sport, I have unfortunately concluded that the same cannot be said for significant numbers of the more talented and high achieving gymnasts and for some recreational gymnasts. I consider that the number of concerns received about abusive behaviour are sufficient in volume and consistency for me to draw reliable conclusions from them about patterns of behaviour within the sport. It is also important to remember that it has not been the role of the Review to decide what happened in relation to any of the individual allegations that have been submitted to me.
100. There has been much publicity and understandable shock about the impunity with which Dr Larry Nassar sexually abused many gymnasts in America. This turned the spotlight on the opportunities to abuse in a sport involving very young children, where intense coach-gymnast relationships exist, where gymnasts sometimes need brief instances of physical support during training and where medical examinations, physiotherapy and more controversially, flexibility management afford opportunities for physical contact with children and young people. The opportunities for adults to behave in a sexually predatory fashion were and are obvious. I would like to say at the outset, that although I did receive submissions about instances of alleged sexually inappropriate behaviour by coaches, the collective tenor of material that I received, focused on emotional and physical abuse.
101. I am very conscious that morale amongst gymnastics coaches is at an all-time low and that my descriptions of coaching behaviours in this report will do little to improve that. Additionally, there has been persistent adverse publicity in the press and on social media about negative coaching methods which continues to leave coaches feeling vulnerable and undervalued. It is important that the sport looks forward and it is vital that there is respect for and understanding of the role of the coach from everyone in the gymnastics community. Elsewhere in the report, I discuss the fact, that, historically, sports coaching has not been viewed or regulated as a profession. Today, coaches across all sports, including gymnastics, are expected to have skills and attributes which are very different to those of twenty or thirty years ago and which require commensurate educational provision.
102. What follows in this section of the report (and in other associated sections), is not intended to demoralise gymnastics coaches any further. I am, however, required to explore the state of athlete welfare and wellbeing between 2008 and 2020 and to identify the issues which may have adversely impacted upon that. It is clear that there are many issues within the sport that must be carefully considered in order to ensure that all gymnasts are able to enjoy their sport in a positive and safe environment.
103. The following section of the report is based on the collective written submissions of the individuals and organisations that contacted me and on the meetings conducted with a significant number of them. The most proportionate way of communicating the resulting information, is to group it in themes and within categories of abusive behaviour reported to me. As well as setting out these behaviours, I have identified the cultural issues which I believe have impacted upon gymnast welfare and wellbeing. Given the number

of submissions received and the confidential basis upon which they were made, it is not possible, or necessary, to refer to each individual submission or anecdote. They have all been considered and drawn upon to identify and set out the themes and behaviours in this section. I have set out in the following sections the types of abusive behaviours that were reported to me, under the main headings of physical abuse, emotional abuse, excessive weight management, sexual abuse, harassment and discrimination.

Physical Abuse

104. In BG's Safeguarding and Child Protection Policies that have been in force during the period I am reviewing, the definition of physical abuse has variously included:

- a. Physically hurts or injures a child intentionally by hitting, shaking, poisoning, burning, biting, scalding, suffocating, drowning or any other physical harm;
- b. Gives alcohol, inappropriate drugs or poison to a child;
- c. Uses drugs to enhance performance or delay puberty;
- d. Inappropriately restricts a child's diet out of a desire to increase chances of success but without concern for the child's health and nutritional needs;
- e. Inflicts a type and intensity of training which exceeds the capacity of the child's maturation;
- f. Inflicts pain on a child that is beyond an acceptable level of discomfort involved in physical preparation and training.

105. Over 40% of the submissions received by the Review described physically abusive behaviour.

106. The following types of physical abuse were reported to me by many gymnasts, parents and others in the gymnastics community:

- a. Physical punishment (often in the form of further training requirements) for perceived transgressions;
- b. Physical chastisement involving physical contact between the coach and gymnast;
- c. Requiring gymnasts to train on known injuries thereby causing avoidable pain and sometimes exacerbating injury;
- d. The enforcement of excessive training loads and training hours leading to physical pain and exhaustion beyond acceptable boundaries;
- e. Over-stretching as a form of flexibility management;

- f. Withholding of food/water/access to the toilet during training.

107. Obviously, these issues are also capable of causing emotional harm. Excessive weight management and measurement also featured repeatedly. Given the number of submissions received and the severity of the concerns about weight management issues, I have chosen to address issues relating to weight management in a separate section of the report (see [Excessive Weight Management](#)).

Physical Punishment & Chastisement

108. This was a common theme. I was informed that some coaches had inflicted forms of physical punishment on gymnasts in inappropriate circumstances. Much of the anecdotal evidence about this related to high performance clubs. The sort of transgressions which were said to provoke physical punishments included:

- a. Being late for training or returning late from a break;
- b. Perceived under-performance;
- c. Being injured;
- d. Reluctance or fear about performing higher risk skills;
- e. Expressing disquiet or unhappiness to a parent;
- f. Weight gain;
- g. Needing to go to the toilet during training.

109. The nature of the punishments reported to the Review included:

- a. Making the gymnast stand on the beam or hang on bars for excessive amounts of time;
- b. Making gymnasts climb ropes or run on the treadmill until the point of exhaustion;
- c. Extra conditioning in the form of running laps both inside and outside;
- d. Making the entire group of gymnasts perform extra conditioning because of one person's perceived transgression.

110. In many cases the activities required as 'physical punishment' were not in themselves inappropriate, for example I am informed that rope climbing can be used to improve physical fitness, strength and stamina and 'standing on the beam' in itself is part and parcel of gymnastics. However, it was the circumstances and the manner in which these punishments were imposed which were inappropriate – the length of

time for which the gymnast was required to undertake a physical activity, the emotional state that they were in when doing so or the reasons behind the punishment being imposed. For example:

- a. One former elite gymnast described being made to stand on the beam for 2 hours because she was frightened to attempt a particular skill. There was more than one submission about gymnasts being strapped to the bars for extended periods of time, sometimes when in great distress;
- b. Gymnasts of different ages told me that they were made to climb the rope for needing a lavatory break or for exceeding a break time. One former Olympian gymnast told me that if they had to go to the toilet during training they were allowed a maximum of 3 minutes and that if they exceeded it, they would receive some form of punishment such as extra conditioning. Another elite gymnast explained that her coach would refuse to let her go to the toilet, usually as a punishment;
- c. Another gymnast related how she finally plucked up the courage to tell her coach that she would not train again on a particular piece of equipment on a particular day because of visible injuries sustained and the pain involved. As a result, she was sent out of the training area and told that she must perform extra conditioning for over an hour as a punishment.

111. I remained alive to the possibility that gymnasts might not be aware or open about the reason for a coach imposing sanctions. That said, I heard no reports of gymnasts being verbally insubordinate, unruly or deliberately under-performing. There was sufficient anecdotal evidence to conclude that physical punishments were imposed, sometimes on very young gymnasts by various personal coaches, in circumstances which were not appropriate. Occurrences of this behaviour were mostly reported from WAG and Rhythmic Gymnastics and much of it from the first half of the period of Review.
112. I appreciate that views will differ, reasonably, on whether the imposition of extra conditioning and further physical training, such as rope climbs, on an already fit gymnast amounts to inappropriate physical punishment and I also appreciate that a coach must have some cards to play in the event of gymnast misbehaviour or misconduct. These factors have undoubtedly complicated this issue and may have enabled coaches to offer justification when, in fact, there was none.
113. In many cases the punishments appear to have been deliberately utilised to exert control, for inadequate reasons, on gymnasts who already felt subdued and they were sometimes reported to be accompanied by emotional abuse. In most cases such punishments were reportedly played out publicly, which only increased gymnast humiliation.
114. I was also told of some instances in which physical pain was directly inflicted on gymnasts in response to perceived indiscretions or to coerce the gymnast into performing in a certain way. A parent of a recreational level gymnast recalled her daughter being pinched and squeezed because she had been late to training and had been crying. A male gymnast said that he would be slapped for un-pointed toes or

bent knees. Another gymnast also said they would be physically slapped if they had not '*stood to attention*'. The Review was informed of a practice by some coaches of hitting gymnasts on the leg if they did not perform satisfactorily. I heard about a gymnast being physically thrown out of the gym, deliberately being dropped from equipment and being dragged across the gym floor by their arms. Invariably the context of the alleged incidents reported to me was the frustration of the coach about levels of effort or achievement.

115. It is not the role of the Review to decide if individual allegations of physical punishment or chastisement are true. However the collective weight and consistency of submissions about this demonstrates that a limited number of personal coaches, predominantly at high-performance clubs, resorted to physical punishment or chastisement of gymnasts. It is likely that this occurred in circumstances where other adults, including other coaches and on occasion, parents, were present, or at least aware, and in a position to say or do something about it. I am not able to assess in general terms what, if anything, coaches were taught about the inappropriateness of this conduct and when. From the limited coach training resources that I was able to access, it was not obvious that physical punishment or chastisement had been the subject of clear guidance in course materials. The 2013 level 2 coach training material did make clear that slapping was inappropriate, but this was an isolated reference. If the offending coaches had read BG's Child Protection Policies, as they were required to, they would have known that any form of physical chastisement was prohibited. Likewise, Welfare Officers and club staff should have known this. Even without any guidance or education on this point, I would expect any individual working as a coach to children, to know that hitting, slapping and other such behaviours are not acceptable.

Excessive Training

116. Training can be excessive in various ways and getting the balance right is a difficult aspect of the coach's role. If training is too lengthy or intense, it can cause unnecessary fatigue and an increased risk of error or injury. It might consist of the wrong type or number of exercises putting the gymnast at risk of overuse injury. It might be inappropriate given the age and stage of maturation of the gymnast and it might involve demanding that a gymnast continue to train despite being injured. All these things matter to the mental and physical health of a gymnast. I appreciate that, particularly at the elite level, there are difficult judgments about using training to maximise performance, without straying into detrimental or damaging levels of training. Many coaches work hard to achieve this balance and engage with sports scientists, gymnasts and parents in order to do so. However, it is evident from the information I have received that this has not always been the case.

Training Hours

117. The complexity and nature of gymnastics is such that talented gymnasts are required to train for considerable periods of time, not least to acquire skills that can only be perfected after significant repetition. As gymnastics is an early specialisation sport, this means that young gymnasts are also required

to train regularly each week. The numbers of hours spent training is relevant to the work/life balance of the gymnast and to their physical health too. The Child Protection and Safeguarding policies adopted by BG during the period of Review identified excessive training as a form of physical abuse and as a breach of coaching best practice.

118. The 2005 BG Health, Safety and Welfare Policy provided guidance about weekly training hours. This policy remained in force until 2012, four years into the period of Review. The guidance was as follows:

Up to 8 years – 1 to 4 hours;

7-9 years – up to 10 hours;

10-13 years – up to 15 hours;

14 -15 years – up to 20 hours;

16 years and over – up to 25 hours.

119. This guidance did not appear in subsequent versions of this policy which means, as I understand it, that it was no longer accessible to inquisitive parents or gymnasts. However, in subsequent versions, BG recommended that for gymnasts under the age of 8, training sessions should not exceed 2 hours and that where they did, clubs should notify the local authority that such sessions were occurring. I note that educational materials for levels 3 and 4 coaches did contain guidance about training hours. Each level of coach training was accompanied by a 'resource pack' which contained information specific to a particular discipline and which the coach was expected to be familiar with and to apply to their coaching practice. The 2008 level 4 resource pack suggested the following:

Up to 6 years – 1-4 hours;

6-8 years – 4-6 hours;

8-10 years – up to 10 hours;

10-13 (Pubertal) – up to 15 hours;

13-15 (late pubertal) – 13-15 hours – up to 25 hours.

120. The current level 4 coach resource pack provides the following weekly suggestions:

Aged 8-10: up to 10 hours;

Aged 10-13: up to 15 hours;

Aged 13-15: up to 25 hours.

121. The current level 3 coach resource pack has a table which stipulates anything between nearly 18 hours and just over 27 hours per week but it provides no age or talent groups in this context.
122. It can be seen therefore that at either end of the period of Review there was an approximate maximum of 25 to 27 hours per week for training from a minimum age of 13. The guidance was that anyone under the age of 10 should not be training for more than 10 hours per week. From 2012 that guidance was only to be found in specific coach training materials which would not have been available to parents, gymnasts or club owners, unless they were coaches.
123. The anecdotes I received about the training hours of artistic gymnasts on Performance Pathways (or their equivalents) flew in the face of this guidance. I was told that it was not unusual for female artistic gymnasts to train for long hours from a very young age. I was informed about some 7-8 year olds training for 20 hours a week or more. The impression I obtained was that it was not unusual for high-performance teenage female gymnasts to train up to and over 30 hours a week. One former gymnast turned coach said that she is aware of girls as young as 9 training for 30 hours a week. Once on the elite pathway, she said that some over 11-year-olds were training up to 35 hours a week. A gymnast at national level since the beginning of the period of Review told me that they regularly trained for 30 hours plus per week during their teenage years. On three school days this would often consist of 3 hours before and 4 hours after school.
124. As one parent with experience put it:
- 'the only time they see their parents generally speaking is when they leave school, you pick them up at school, you drive them to gym, they get changed in the car because there is no time to go home, they eat in the car, they then go in to gym. They train for 3 or 4 hours and they come out and you collect them and you feed them in the car and they get into their pyjamas often in the car and then they go home and jump in to bed and then they do the whole thing again the next day and the next day. They get very little downtime and from a really young age on the elite pathway they are encouraged not to take holidays unless the coach has said like you can take a holiday in this particular period. A lot of elite kids are told that they can't have more than 1 weeks holiday.'*
125. This description, both about timetable and very little holiday, accorded with submissions from other former gymnasts. For example, a former national gymnast told me that holidays were discouraged – a week at most. Similarly sick days were also unacceptable and disapproved of. She considered that the training hours should have been far less and that results would have been unaffected.
126. I asked as many current or recently retired gymnasts as possible about this. Whilst some felt unsure of their ground on this issue, others considered that the number of training hours and some of the restrictions on family activities and events had probably been unnecessary. These accounts of excessive training hours occurred throughout the period of Review.

127. A national judge and level 4 coach thought that at 'the elite end', any training limit was ignored because it was not realistic to attain the skills within the hours suggested. In her view, coaches, parents and the gymnasts were all complicit in wanting to exceed these hours in order to maximise the chances of success.
128. I discussed this issue with an individual closely associated with the Women's Technical Committee. This person acknowledged that they had recently become aware of primary school age children who had been required to train in excess of 20 hours per week. This is not something that this person had heard of previously and suggested a disconnect between the hierarchical structures of the organisation and what was and is happening on the ground in clubs (an issue which is discussed further in other parts of my report).
129. The views of the senior coaches that I met with varied. Different coaches and individuals held different views on this point and there was an acknowledgment that further work was required to reach a settled scientific consensus. I suspect that some past and present coaches, particularly in WAG, clung obdurately though genuinely to a belief that any time spent out of the gym was wasted time. This probably reflected how they had been coached as gymnasts. However, the prevailing view, whilst tentatively expressed, seriously questioned the need for gymnasts to train for 30 hours and above per week. Two senior current coaches were quite categorical on this issue. I spoke with some practitioners from the EIS, which provides sports science and medical support to the Olympic and para Olympic programmes. They did not support the assumption held by some coaches that the optimum performance can only be achieved through 30 hours plus training per week. The lockdowns enforced by the Covid-19 pandemic in 2020 seem to have caused the sport to reflect further on this issue. Having reviewed the available academic material about training loads in gymnastics, it is obvious that there are very real gaps in reliable data about the physical and social impact of training hours, the way in which training hours should be varied during different stages of maturation and about the effect of training periods on injury prevention. It was apparent to me from the information I received that, as a rule, coaches, clubs, gymnasts and parents were not aware of any guidance around appropriate training hours at different stages of their gymnastics development. There was a general sense of the longer the training, the better. BG has not done enough to educate and guide the gymnastics community about the length of time gymnasts should be training. Even allowing for the many variations that must attend this issue, this is information that clubs, coaches, gymnasts and parents ought to have been able to access.
130. There appeared to be a tacit assumption that what little guidance about training time as did exist, did not apply to the elite gymnasts. If this is right, then there ought to have been separate guidance for the elite athletes and it ought to have been public. As it was, the guidance in coaching educational materials was not followed consistently. BG was certainly not checking to see whether the hours set out above were being exceeded. I do not think that parents or gymnasts at high-performance levels (involving at times children as young as 8) were appropriately informed about acceptable and age-appropriate training hours. Rather, they were expected to trust the coach and get on with it, which is what they usually did.

This was not appropriate given the punishing impact that training regimes could have on the gymnasts' developing bodies, their family life and social development and on their educational attainment. It was also not appropriate because excessive training hours could put the athletes at risk of physical harm through fatigue and injury.

Training Loads

131. Training hours and training loads are closely linked concepts, but while hours focusses purely on the amount of time being spent by gymnasts in training, training loads refer more to the nature and volume of training undertaken and the physical pressures and forces that gymnast's bodies are put through.
132. In its 2005 Health, Safety and Welfare Policy (and in successive policies) BG cautioned coaches about this:

'Due to the complex nature of the sport and the need for frequent, repetitive practice of skills or movements, participants in gymnastics are susceptible to overuse injuries. This is particularly relevant during the pubescent growth spurt periods. Coaches must be conscious of the need for meticulous physical preparation, a varied programme, use of appropriate techniques and a suitable environment to reduce the risk of overuse related injuries. Coaches must be continually vigilant in observing the growth pattern of young participants and sensitive to signs of soreness or pain particularly in growth plate areas. Advice should be sought from a qualified physiotherapist or medical practitioner. Excessively repetitive exercises, poor facilities or bad technique may lead to "overuse injuries". Coaches must take the necessary precautions to reduce the possibility of this type of injury by varying the programme, ensuring correct techniques are taught, adequate fitness is developed and suitable apparatus is used. The coach must take into consideration the age, stage of maturation and psychological and emotional state of the performer with regard to the demands of the training programme.'

Fatigue: The principle of "overloading" by gradually increasing the physical demands of training is an accepted process for improving fitness, but a coach must be conscious of the onset of fatigue during training as this may have a deleterious effect on performance and may increase the risk of injury.'

133. I include this extract because the Review received a significant number of submissions which suggested to me that numerous coaches had failed to appreciate (or had ignored) this advice and that they had imposed excessive training loads. Several individuals provided information about the incidence of overuse injuries in the sport. They reported that such injuries were prevalent, trained on and were being ignored, or brushed away by coaches.
134. Overuse injuries in gymnastics are known to be high because of the nature of skills required and the repetitious nature of training. Examples include stress fractures, hamstring injury, Osgood-Schlatter

disease and 'gymnast's wrist'. Throughout the period of Review, it is clear from its own policies that BG was aware that such injuries were prevalent and that it expected coaches, when devising training plans, to try and reduce the incidence of such injuries. A BG presentation to level 4 and 5 coaches about 'Gymnastics Injuries: Principles of Prevention and Management' in 2019 covered the management of overuse injuries and flagged the repetition involved in gymnastics as an issue. The available archived written coaching materials again informed coaches to check for injuries at the start of each training session but did not provide detailed guidance about this issue. One coach told me that the knowledge about overuse injuries that they did have, came from other sources and not from gymnastics courses they had completed.

135. I was able to meet with a representative number of sports science and sports medicine practitioners from England and Wales including practitioners past and present based at Lilleshall and Cardiff. During the London 2012 and Rio 2016 cycles, when strength and conditioning and physiotherapy support increased within the high-performance sections of gymnastics, I heard that there was initially some resistance from various coaches. I was told that the resistance was most notable in WAG. There will, naturally, be two sides to this sort of narrative but the prevailing sense from submissions was that coaches could, on occasion, resent the expertise of sport science practitioners either because they feared it would undermine the coach's authority and domain or because it would interfere with what the coach wanted to do, even if the advice was intended to improve the wellbeing and welfare of the gymnast. Some of the experienced coaches I met with had reflected on this and agreed that some of these tensions were borne of coaches' educational insecurity. They did not want their lack of knowledge about such issues exposed. At Lilleshall, I note that the EIS and coaching staff were located in separate sections of the premises which is unlikely to have assisted in collaboration and which a BG staff member agreed was 'unhelpful'.
136. I received reports that some coaches were of the view that because a particular practitioner had worked in other sports, they were somehow unqualified to pass an opinion about gymnastics. Elsewhere in the report, I comment upon the insularity of the sport of gymnastics. I am quite confident that previous coaching resistance to sports science input was yet another facet of this insularity. Practitioners said that they were regularly told that they 'didn't understand' and 'this is how it is in gymnastics'. I am fortified in the accuracy of this and what follows because it accords with various independent submissions made by gymnasts and other coaches. The Performance Director in post between 2017 and 2022 was well aware of previous limitations in collaboration between senior coaches and EIS personnel and the Review received submissions about the work that has been and is being done to unite the two sections of the community.
137. Although the coaching community slowly but surely became more receptive, even in WAG, to strength and conditioning and physiotherapy intervention, I was informed that there was demonstrable resistance as recently as 2018 to the notion that training loads ought to be monitored tightly and that they should conform to equally carefully monitored growth maturation. Those tasked with trying to improve and

supervise awareness about training loads, especially for gymnasts whose bodies were still developing, were left feeling as though they had to fight to get their job done and that some influential personal and national coaches saw any discussion about injury and training load as a threat because it might result in data which would show that the gymnasts were training too hard and/or too early.

138. This plainly impacts on the welfare of gymnasts.
139. Interestingly, submissions of a similar nature were also received about the high-performance WAG Programme in Wales. These gave me the impression that a multi-disciplinary approach to strength and conditioning was not particularly welcome and was for too long, unnecessarily discouraged by the coaching leadership, thereby keeping the gymnasts themselves uninformed about the progressive steps that could be taken to help reduce the risk of injury. Whilst I acknowledge that not everyone in the environment shared this experience, my overall impression was that it was an issue for at least some of the period of Review. I note that collaboration on this front seems to have improved significantly over time.
140. The collective submissions about the management of training loads revealed that the response from the Trampoline community was quite different, with an openness and enthusiasm about learning and adapting training accordingly. The reaction from MAG was described as sitting somewhere in between the receptiveness of Trampoline and the reserve of WAG. My understanding is that this issue is now much improved and that there is greater co-operation and collaboration between sports science practitioners and the coaches of elite gymnasts in all disciplines. I also understand that this initial resistance to expert input from sports scientists and sports medicine practitioners is not unique to gymnastics and has occurred in other sports. Some of those working in this area considered it was part of their job to deal with this reluctance. Whilst this does not make the resistance acceptable, it serves as a reminder that change is often hard to bring about. In some disciplines of gymnastics it appears to have been harder than it should have been.

Training on Injury

141. The Review also received a significant number of submissions, mainly from high-performance gymnasts and their parents, about the practice of requiring athletes to come in and train despite carrying an injury. I note that this was a feature in the Independent Review into Australian gymnastics. In both Australia and the UK gymnasts shared that they were commonly instructed to continue training whilst injured, sometimes to the point of increased injury and in extreme cases to the point of causing chronic, life-long injuries. Similarly, gymnasts reported that they were made to feel as though their injuries were not real. I was told on multiple occasions that coaches would question the veracity of the gymnast's complaints of pain or injury. In some cases, gymnasts were pressured to continue training when they had in fact sustained injuries including fractures, dislocations or broken bones, or had developed diseases which

were subsequently diagnosed. The majority of reports about this related to events prior to 2018 but that is not to say that the issue is not still occurring.

142. This is not a straightforward issue. Gymnastics is a painful sport. A senior sports science/sports medicine practitioner, close to the sport for several years, confirmed that it is possible to continue training, responsibly, with an injury because gymnastics is a multibody-part sport. I have been able to see this in practice for myself during a club visit. Decisions about this, however, need to be taken with care and in consultation with the coach, gymnast, sports science team and, for minors, a parent. The practitioner supported the impression I had formed from other sources, that there could be a tendency among coaches to view injured gymnasts or gymnasts who complained of pain as 'weak' and that gymnasts have not always been given enough time to recover from their injuries because of the constant pressure to perform, sometimes in trials months before competitions. Another experienced support staff member told me:

'I remember coming in and then just some of the questions that I had received from coaches surprised me shocked me, scared me. I will give you an example, I remember going to a club and talking to a personal coach in club and saying 'what can I do to help you improve you know improve athlete care and athlete wellbeing and athlete performance' and he said to me "can you actually get boxes of anti-inflammatories sent straight to the club so we can give them out to athletes rather than them to take the time out to go to a doctor to be prescribed an anti-inflammatory" and it was the epitome of where I felt we have got to start from here.'

143. I received multiple submissions from elite gymnasts who were made to feel lazy, a failure, and 'mentally weak' when it was acknowledged that they had sustained an injury. These experiences were spread across the age spectrum. They felt as though their resulting inability to compete was considered more important than recovering from their injury and general wellbeing.
144. This is an important issue because it has the capacity to demonstrate the way in which gymnast welfare and wellbeing appears at times to have been instinctively subordinated, by some of the coaches of elite gymnasts, to inflexible training regimes. The coaches in question probably considered that they were doing the right thing for the gymnast, but in doing so they were putting what they wanted (and on the face of it, what the gymnast and/or parent might have wanted) first, rather than what was truly best for the wellbeing of the gymnast. This is not a case of one or two over emphatic coaches. The submissions related to multiple clubs, including high-performance ones, and to Lilleshall during the period of Review. They related mostly to the disciplines of WAG, Rhythmic Gymnastics and Acrobatic Gymnastics.
145. I received submissions which suggested that this had also been a problem in the WAG national squad in Wales, as recently as a couple of years before the end of the period of Review. I was told by multiple sources of concerns about gymnasts training on injuries and about the pressure that gymnasts felt from

national coaching staff to continue training despite the effects of injury. There were also informed concerns about the number of injuries (including compensatory injuries).

146. Problems with training on injury were also apparent to the parents of some gymnasts. Those who engaged with the Review appear to have trusted the coaches to know best about the management of their child's injuries and wellbeing. Some were implored by their child not to say anything about an injury. It is possible that some parents, though they are in the minority, allowed their own aspirations, or those of their child, to take priority over their child's long term wellbeing.
147. In the interests of balance, I should make it clear that one former elite gymnast, from the early period of Review, provided very positive evidence about her experience of having her training program varied to accommodate her injury. She would have preferred to train and compete despite her injuries but was prevented from doing so by her personal coach in order to protect her recovery.
148. If the collective submissions are accurate, it appears as if the guidance in the BG Health, Safety and Welfare and Safeguarding Policies was not adequately understood or followed. The recommended reading for coaches did include publications containing material about preventing injury but I have no way of knowing whether any coaches read such materials. It does not appear as though BG took proactive steps to monitor and enforce this aspect of policy.
149. The collective body of evidence about excessive training and training on injury is such that I am quite satisfied that some personal and national coaches demonstrated an inflexible and uninformed approach to training content and dealt with injuries in a way that thoroughly displaced gymnast welfare and wellbeing. Overall, my sense is that the short term success of the gymnast was prioritised over their long term well-being, in many cases in situations where gymnasts were too young or too powerless to make an informed contribution to decisions about training.
150. To call injured athletes 'weak' or to question, without good reason, their credibility when complaining of pain, is disrespectful and likely further to suppress the athlete 'voice'. The coaches in question, were reported to have said this to very young children and to experienced senior athletes who are old enough to know their own bodies. It directly contributed, on occasion, to a situation whereby gymnasts were scared to report pain and injury. It appears to have contributed to the control exerted by coaches over gymnasts, including young adults. The personal and national coach community have, naturally, had very real autonomy, historically, over the scale and content of training regimes. I note that in late May 2022 BG published on its website new and clear guidance for the community about training Pain and Injury in Gymnastics, which is to be welcomed.

Over-Stretching

151. Flexibility and strength are necessary for gymnasts to perform routines without injury. The development of flexibility has historically caused concern because some coaches have deployed techniques, which have

involved the use of their body weight on gymnasts during stretching exercises. The difficulties in this are obvious and the potential for causing pain and injury is significant. Even if the gymnast in question is not in pain or distress, the bodily interaction can be misinterpreted by onlookers and is in any event, contrary to policy and best practice. These issues do not appear to be unique to gymnastics in the UK, they feature in the Independent Review into Gymnastics in Australia and I was told by more than one person that over-stretching was evident when they had visited other countries or seen gymnasts from other countries training or competing.

152. I received many submissions about overstretching that had at times resulted in pain and distress for the gymnast, sometimes to the point of tears and injury. Several gymnasts described situations where a coach would use the force of their own weight to extend a particular physical stretch. One individual reported that her coach had sat on her when she was 7 years old and a parent reported two coaches at once pushing their child's legs down into a split. One international gymnast explained that their personal coach sat on a gymnast's lower back, forcing their hips into the floor and then lifting up their knee causing severe pain or used body weight to push the gymnast down into splits. I was told that at no stage was the gymnast asked about the process or how it was affecting them. Another gymnast said they didn't know how their legs didn't 'snap' when being stretched. One gymnast told me that 'Over stretching was just part of the training' and that the coach '*...would put excessive force on us ([their] whole-body weight) in order to stretch us in splits, or stretch our knees for example. To do this we would sit on the floor with our heels up on a block a few feet off the floor, and the coach would often stand on our knees. I just thought this was part of the training process.*'
153. A parent told me how she witnessed overstretching for herself in a recreational club context. She saw her child's coach induce stretches that made gymnasts cry and threatened them with more stretches if they continued to cry. She felt it was not her place to intervene because she assumed this was normal tough discipline. This conduct took place in front of an assistant coach who did not appear to think it was inappropriate. A sports practitioner who witnessed stretching that was causing tears and discomfort to the gymnast, challenged this and was told it was acceptable practice that was necessary from a young age in order to produce a flexible gymnast.
154. Over-stretching appears to have been an issue in Rhythmic Gymnastics, amongst other disciplines. One individual who worked with Rhythmic Gymnasts said it seemed like the pain that they went through with stretching was somehow deemed to be part of their pathway as a gymnast. I mention this in particular because as a non-funded discipline of BG, Rhythmic Gymnastics receives less attention and sports science support than the Olympic funded disciplines.
155. Some individuals reported their impression that overstretching had become less prevalent in the later years of the period of Review. I received a small number of submissions describing incidents of overstretching after 2018 and I am aware of at least one formal complaint about this from my limited

review of the un-named files, dip sampled from BG. It was, therefore, still being reported, but I am unable to assess whether its prevalence was reducing.

156. Unfortunately, at their request, it was not always possible to explore this issue with the coaches I met with. A current senior coach who trains both male and female gymnasts told me that there should be no hands on stretching by coaches at all. Conversely another coach told me that coaches had stretched gymnasts routinely, in front of lots of other coaches, including at national and international competitive events especially in Rhythmic Gymnastics and Acrobatic Gymnastics and that the practice was known to BG. They considered that it was an acceptable practice and that coaches would be best placed to use their own skill and expertise to assist in administering stretches.
157. It is clear from the documents made available to me that BG was aware, well before 2008, of the risks that flexibility management could pose to gymnasts and was also aware of associated parental concerns about it. BG has provided various forms of guidance about flexibility training throughout the period of Review although confusingly it came in various guises. This guidance was uploaded in wider policy documents onto the BG website and was, in that sense, accessible to all clubs and coaches.
158. The 2005 Health, Safety and Welfare Policy (which I understand was in place until 2012) provided some brief guidance. This included an instruction to avoid exercises that place the coaches and gymnasts' body in 'close proximity' and might be seen as unnecessary by the less-informed parent or observer and it contained an instruction to use partner exercises with more experienced gymnasts where possible.
159. The 2009 Safeguarding and Protecting Children Policy identified excessive or inappropriate stretching as a breach of best coaching practice. In a separate section it included guidance on flexibility/stretching exercises. It recognised that there was a range of techniques and types of exercise for extending flexibility that involve the application of force. These techniques could also lead to the person applying the force coming into proximity with the gymnast and having prolonged contact with areas of the gymnast's body. Coaches were given detailed guidelines designed to protect gymnasts, encourage use of partner exercises and prevent coaches placing themselves in physical situations that might be misinterpreted.
160. This guidance essentially remained in force throughout the period of Review and it was also contained in subsequent versions of BG's Health Safety and Welfare Policies. For example, in the 2012 Health, Safety and Welfare Policy it stated:

'Flexibility/Stretching Exercises: BG has received a number of enquiries from concerned parents, regarding the techniques and types of exercise that BG promotes as correct practice. Concerns have been expressed about the coaches using their full body weight or excessive force during flexibility training. There are also concerns about the close proximity of the coach's body and hands to sensitive areas on the gymnast's body. Therefore, BG has issued the Flexibility Training for Gymnasts document which can be downloaded from the Ethics and Welfare downloads section on the BG website.'

161. I was provided with a copy of the Flexibility Training guidance which is undated but may have originated in or around 2001 to 2003. It repeated that '*many concerns*' had been expressed recently about what is acceptable practice with regards to stretching exercises and flexibility training for gymnasts. BG stated:
- '...To protect the gymnasts in our care and to protect ourselves against possible allegations of poor practice, coaches must carefully consider their actions and how they might be perceived by an observer.'*
162. There followed a series of bullet points containing detailed and clear information and guidance for coaches. This included a direct prohibition on coaches using their body weight to push down on gymnasts, a prohibition on causing excessive pain or discomfort and an instruction to ensure that stretching positions did not leave the gymnasts feeling '*exposed*'.
163. The 2019 Safeguarding Policy and Procedure was consistent with previous policy but also included overstretching within the definition of '*neglect*'. Inappropriate/excessive supporting or stretching was again, listed as a breach of best practice. Inflicting pain on a participant that is beyond an acceptable level of discomfort involved in physical preparation and training was also listed in the same policy as a form of physical abuse.
164. I read the educational material available to coaches as they qualified through the various levels. It was not clear to me from this information, precisely what instruction was given, over the years, about coach/gymnast contact during flexibility training. Examples of stretches were provided but little information existed about overstretching. There was no explicit warning about inappropriate physical contact or using the coach's weight to enforce a stretch. From what I could tell, there was no adequate instruction or parameters laid down in the coaching materials about the coach's own physical involvement in flexibility training.
165. It is clear from its own policies that since at least 2012 it has been recognised by BG that full body weight should not be placed on a gymnast and that stretching should not involve excessive pain. BG had the policy and guidance in place to avoid incidents of overstretching by coaches in all disciplines of the sport. That guidance was not easily located and I saw no evidence that it was brought to the attention of club coaches. It was buried deep within a plethora of other issues and in more than one policy (e.g. it was the Safeguarding Policy and it was in Health, Safety and Welfare Policy). There is little to show that clubs were proactively implementing the guidance, if they were aware of it. Overstretching would have been visible to other adults, coaches, and club staff. Despite this, the practice was not being checked and reported as it ought to have been. As is apparent with other issues of best practice and gymnast welfare, simply making the policy available on a website and having a rule that all members comply with it will not result in effective implementation. I did not find evidence of BG proactively checking to see if clubs were complying with it, despite knowing about parental concerns.

166. The coach education materials that I have seen did not suggest that the policy content about overstretching was reinforced to all coaches. This would have been relatively easy to achieve and given the risk of harm and reputational perils, it would have been helpful as well as practical. Some parents plainly articulated concern to BG. Some deferred to the coaches. A number of personal coaches of elite gymnasts, certainly in WAG, Rhythmic Gymnastics and Acrobatic Gymnastics engaged in overstretching because they assumed that they knew best and imposed their own notions of what was necessary above informed best practice and guidance. Others may have been unaware of the guidance in this area, but in my view, should have taken the time to make themselves aware of best practice. Even without reading guidance and without education on this issue, coaches should have appreciated that it was not acceptable to stretch a child's muscles with their whole body weight or to induce pain or tears in the process. Despite this, coaches have engaged in overstretching and in doing so have placed their own misconceived ideas about the benefits of this practice above the wellbeing of the gymnasts.

Withholding Access to Food, Water and the Toilet

167. I received over 90 submissions describing the deprivation of water, food or access to a toilet during gymnasts' training sessions. The overwhelming majority of these submissions concerned female elite gymnasts, particularly in WAG, Rhythmic Gymnastics and Acrobatic Gymnastics. Over 50% of those contacting the Review about Rhythmic Gymnastics reported concerns about this type of conduct. Over 40% of those contacting the Review about Acrobatic Gymnastics reported the same.
168. The submissions were made mainly by parents and gymnasts and what follows is just a small snapshot. The submissions shared the theme of coaches being very controlling about the consumption of food, water and access to the bathroom during training. The names of certain high-performance coaches and clubs featured repeatedly in some of these submissions. Having said that, over 30 clubs were referenced in relation to this behaviour so these were not isolated instances.
169. I should note that almost all of the individuals who reported these behaviours, also reported some form of body shaming or extreme weight management as part of their experiences (which is discussed further in the section [Excessive Weight Management](#)). This reinforces my view that this behaviour was often related to control over the gymnasts, particularly in relation to their weight. It also emphasises the fact that such behaviour would have had both a physical and emotional impact upon the gymnasts. Some of the gymnasts at the centre of these submissions said that they had developed eating disorders. There was a strong correlation between statements about the withholding of food/water/access to the toilet and those individuals who reported long term negative consequences because of their gymnastics experiences.
170. One Acrobatic gymnast said that she was required to run laps around the gym floor and perform intense cardio exercise but would be refused water during or afterwards. I heard that gymnasts could be told that they would 'get heavier' in training if they drank any water. Some coaches also prohibited any food

during what could be long and intensive training sessions. A parent of a former elite WAG gymnast said that she had learnt recently that her daughter's food was confiscated from her in training. One individual told me that she was stopped from going to lunch because she had not completed the number of clean routines that the coach had asked her to do.

171. Toilet breaks appear to have been seen by some coaches as a time-consuming distraction, which took the gymnast away from the gym. I heard of gymnasts being refused access to the toilet because the coach in question considered they had previously taken too long on a toilet break.
172. Access to food, water and the toilet as required, are basic rights and requirements for any human being. A coach depriving a gymnast in this way is failing to put the welfare and wellbeing of that gymnast first. Such conduct is particularly egregious in circumstances where young people are often pushing their physical and emotional boundaries and may lack the confidence to challenge the coach.

Emotional Abuse

173. In its Safeguarding and Child Protection Policies throughout the period of Review, BG defined emotional abuse as:

'The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.'

174. BG provided other examples of emotionally abusive behaviour such as the belittling and humiliating use of language, shouting and constant criticism. This category of abuse featured the imposition of excessive control and expectations and serious bullying. In its policy, BG explained that bullying and harassment occur where repeated deliberate actions by one or more people cause hurt to an individual or group and where it is difficult for the bullied person(s) to prevent or deal with this person's actions. It was noted that damage inflicted by bullying can frequently be underestimated and can cause considerable distress to young people, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm).

175. Over 50% of the submissions that I received in the Call for Evidence reported an element of emotional abuse. Again, these submissions concerned conduct spanning the period of Review. The following types of emotional abuse were reported to me by many gymnasts and parents:
- a. Inappropriate verbal communication;
 - b. Gaslighting;
 - c. Emotional punishment;
 - d. Suppressing the athlete's emotions and opinions;
 - e. Excessively controlling behaviour.
176. In almost all instances the reported behaviours amounted to bullying under the definition applied by BG.

Inappropriate Verbal Communication

177. BG's definition of emotional abuse, contained within various policies included, as I have explained above, the following forms of behaviour:
- a. Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
 - b. Continually belittling a child's efforts;
 - c. Shouting, laughing at, humiliating a child;
 - d. Seeing or hearing the ill-treatment of another and failing to act upon it.
178. Both archived and current coaching materials emphasised the coach's fundamental role in ensuring the 'total wellbeing' of the gymnast, the need for mutual trust and respect between coach and gymnast and the importance of providing constructive and positive feedback. There was some basic advice that shouting or ranting was inappropriate and counter-productive. The 2013 level 2 coach resource pack reminded coaches that '*Frequently shouting or taunting, use of derogatory remarks, constant criticism or bullying, is not acceptable and may lead to allegations of emotional abuse.*' Current coaching content does not provide much more by way of detailed guidance about the content of communications but emphasises the importance of listening skills and positive messaging and this was reinforced by the introduction for all coaches of the mandatory Positive Coaching Course in 2019.
179. Coaches and club personnel, from a combination of policy and educational content, should have been in no doubt about the importance of appropriate forms of communication. Despite this, the Review received a high volume of submissions about inappropriate verbal communications from coaches towards

gymnasts. This included shouting, swearing, sarcasm, name calling and threatening verbal communication. Examples of the comments that gymnasts reported being made to them included that they were a 'waste of space', 'a joke', 'pathetic', and that they always 'let the coach down'. One gymnast reported being sworn at regularly from the age of 9. There were other examples of this behaviour such as:

- a. Reports that the coach would tell the gymnasts that the coach was going to 'put their size 9 feet up our arse' if they weren't performing as the coach felt they should. The coach 'would shout and scream in our faces so close that I could smell [their] breath and feel [their] spit landing on my face';
- b. Coaches would refer to gymnasts as 'retard' or 'stupid' or 'chicken';
- c. 'If a gymnast was struggling with a skill, often a mental block over a dangerous move, they would be left on the equipment to work through that skill, crying, bleeding, exhausted or even injured, until they either did it, or were shouted at so much that they broke down, or the coach became so frustrated and enraged that they called the gymnast off the apparatus and told them to 'sit out of sight' in the changing rooms or 'go home'. Their disappointment in the gymnast was palpable and crushing.' This treatment of the gymnast would take place in front of the rest of the gym: coaches would not attempt to hide their anger and would make comments about how 'lazy', 'weak', 'embarrassing', 'disgraceful' that gymnast was.

180. The tone of such reported communications was every bit as deliberate as the content, according to submissions about this issue. Gymnasts described feeling belittled and humiliated in front of others. This left them in fear and made them feel worthless, even though several of them were, at various stages, in the national squad and likely to compete at the highest level. I also note that the submissions about inappropriate and aggressive verbal communications were mirrored in the complaints files that I reviewed.

181. The submissions about negative verbal communication styles covered the entire period of Review and related to a very significant number of personal coaches, especially in WAG. These submissions also related to senior coaches employed by BG. The individuals describing these forms of communication were not just gymnasts past and present (from all levels within the sport) but included coaches, parents, and sports science/sports medicine personnel who had witnessed this behaviour or been told about it from those experiencing it. These contributors observed that gymnasts were regularly spoken to as commodities rather than as individuals and young people.

182. It is not the function of the Review to test the veracity of the individual submissions about inappropriate verbal communications and I have not done so. The number and consistency of submissions about this from gymnasts and parents supports a finding that inappropriate and at times abusive verbal communications took place on a regular basis, especially towards elite gymnasts. The accounts about these behaviours shared the same striking common denominators with other potentially abusive behaviours:

- a. The offending verbal communications were made in the gym in the presence of other coaches and club staff. The apparent failure of these adults to remark upon or challenge inappropriate use of language, normalised such language, and made it highly unlikely that any gymnast or parent would complain about it. On occasion, I was told that it would occur in the presence of national coaches from Lilleshall when they were visiting high-performance clubs;
- b. There were policies which defined emotional abuse, and which prohibited these methods of communication. Too many coaches were either ignorant about this or chose to ignore it, and BG did not adequately (or successfully) educate the gymnastics community about the content of these policies and monitor compliance with them;
- c. Coaches were either careless about the effect that their words could have on gymnasts or that they genuinely believed that persistently negative and personal comments would improve performance and deliver 'success'. Either way, it implies a deficit in coach education, and it implies a serious deficit in ethos and welfare, in various clubs, including high-performance clubs.

Gaslighting

183. There were several submissions from gymnasts and parents, referring to a tendency by some coaches to 'gaslight' both gymnasts and their parents. One parent described being 'hoodwinked' into not taking action against the coach because over time the coach had undermined the parent's trust in the child's account, which they now believed had been true. A number of gymnasts reflected on the fact that they had previously been blamed for, and made to feel guilty about, issues that were not their fault and were sometimes the fault of the coach. For example, being told that they were mentally weak when in fact they were injured; being told off for crying when they were in pain from being overstretched; and being blamed for an injury when in fact it was the result of overtraining. One gymnast felt that she had repeatedly been made to feel guilty if she was tired, or injured, or fearful of a routine.
184. I was told that when a concern or complaint was finally expressed, either formally or informally, about a coach, at times the coach justified their offending words or actions on the need to make the gymnast in question psychologically and mentally stronger. Thus, the gymnast in question was made to feel as though any abusive conduct was due to their own shortcomings. This resulted in a highly negative and complex form of dependency on the coach, it reduced athlete autonomy, meant that gymnasts did not recognise behaviours as inappropriate and it was a real barrier to raising complaints.

Emotional Punishment

185. I received many reports of gymnasts being punished by being isolated, humiliated, belittled or ignored in response to perceived failures to perform or act as expected by the coach. The nature of some of the emotional punishments reported to the Review included:

- a. Making gymnasts who could not complete a move or who had an injury, train with younger gymnasts, including in one case making a teenage gymnast go and train and line up with 6 to 8 year olds. One gymnast reported that if unable to perform a skill, the coach would find a younger gymnast who could successfully demonstrate, in order to cause humiliation. Another reported that after making a complaint to her parents, she was told that if she wanted to act like a toddler then she could train with them and was made to train with a preschool class;
- b. Punishing children for crying in class. For example, making female gymnasts watch themselves cry in front of a mirror, punishing a young gymnast for crying by giving them a watch and telling them to sit on their own and time how long they cried for and calling them a 'cry baby' in front of the whole group;
- c. Being told to go home for alleged under-achievement;
- d. Making gymnasts wear a 'dunce's cap', face the wall or de-selecting them from a competition.

186. Whilst it is not the function of the Review to analyse the circumstances of each example given of this type of conduct, there were enough submissions to conclude reliably that emotional punishment was deliberately used on occasion by a number of coaches in circumstances which were not appropriate. This pointed once more to a power imbalance and a use of control in an unnecessarily toxic way, which could potentially harm the gymnast.

Suppressing Athlete Opinions and Emotions

187. Numerous gymnasts referred to situations in which they felt they had no voice, no ability to express their feelings and no power to make choices affecting their training and life. This was also reported by some parents. These observations were regularly made in the context of a coach exercising a very high degree of control over a particular aspect of training. As referred to above, expressions of emotion including crying were reported to be frequently reprimanded and punished. In the interests of balance, I note that one former elite gymnast stated that they had always felt and been made to feel as though they could discuss their feelings and wishes with their coach.

188. The concept of the 'athlete voice' has far more traction now than in 2008. BG as an organisation and some its coaches now recognise that low athlete autonomy is one of the legacies of imported coaching methods referred to in the section of the Report called [Historic Coaching Philosophy](#) and that it has persisted for too long. Some of the EIS practitioners that I spoke with felt that athletes had started to find their voices after the 2012 and 2016 Olympics. The CPSU has witnessed in numerous sports, including gymnastics, a failure to listen to and engage with what children in sport have to say.

Excessively Controlling Behaviour

189. It was apparent from submissions that some coaches exercised excessive control over many facets of gymnasts' lives, in some cases even once the gymnasts were well into their late teens. This included reports of coach control over the content and duration of training, management of injury, diet, permitted trips to the toilet during training, school curriculum issues, family and holiday time. I was told how some personal coaches dictated which school trip or family wedding a young gymnast was allowed to attend. Even compulsory school expeditions, such as geography field trips were on occasion in the gift of the coach. Whilst of course, there will be challenging diary clashes, given the rigours of the sporting calendar, squads, competitions etc, the levels of control being described were, on the face of it, disproportionate and inflexible. There appeared to be numerous occasions when the coach was exerting far more influence over the life of the gymnast than the parents. Gymnasts described being made to feel guilty by their coach if they expressed the desire to attend family or school events.
190. It appears that control over gymnastics can quickly develop into control over other aspects of the gymnast's life. Parental absence from the training environment increases the gymnast's reliance on the coach. The coach may have difficulties coping with the advancing emotional development and maturity of the gymnast which might explain the many observations I have received about coaches treating their wards like little children even when they were in their late teens. This 'infantilising' effect is problematic and stifles the development of the gymnast as a person. Again, it is not unique to BG. The equivalent Review into Australian Gymnastics noted:
- 'Members of the community told the Commission that coaches would control the behaviour of gymnasts, particularly young and teenage female elite gymnasts, on day-to-day and broader life matters including what they could eat, whether they could engage in social activities and how they would progress through their gymnastics careers. Many commented that this often involved treating older teenage and adult female gymnasts as though they were still young children.'*
191. Control could be exerted in other ways too. The practice of lining gymnasts up before a training session is a common feature of the sport, borne of the sport's historic military origins and it is one adopted by the most respected coaches. This in itself, is not necessarily objectionable but the way in which the line-up is conducted can be the opportunity for controlling and even humiliating behaviour. An experienced and respected coach from the sport said: *'It became quite normal to line gymnasts up like soldiers, discourage feedback, and to push to maximise volume and repetitions, with little regard for or input from the athletes themselves'*.
192. A sport science practitioner working in a UK national programme told me that they had witnessed a senior coach who is still in post line up the gymnasts. The coach then went down the line making negative and personal comments about some of the gymnasts and as the coach did so, the practitioner could see how scared and miserable the gymnasts looked. The whole impression was dispiriting and deflating with

the gymnasts being, wrongly, treated like young children and described as commodities. This atmosphere was corroborated independently by another medical practitioner working in the same environment. Line-ups were referred to in submissions on a number of occasions in the context of weight management by coaches. Some gymnasts reported being prodded, commented upon and criticised in relation to their weight in front of everyone else in the line-up. Others referred to the line-up as an opportunity for the coach to make unpleasant or humiliating remarks about gymnasts.

193. Whilst I fully understand that the training environment of gymnasts must be controlled and disciplined to a degree that protects the safety of gymnasts and maximises their concentration, the collective tenor of submissions from various sections of the community suggested that in some cases control was used excessively and unnecessarily. I have little doubt that this suppressed the autonomy of gymnasts, had a negative impact at times on the training atmosphere, contributed to unhealthy weight management, and to a sense of fear in some gymnastics environments. Excessive control formed part of BG's definition of emotional abuse and its prevalence, especially in WAG, was detrimental to gymnast wellbeing.

Excessive Weight Management

194. This is an issue that has attracted a great deal of publicity, with media reports of 'fat shaming', oppressive weighing activities and excessive dietary restrictions. Over 25% of submissions received by the Review concerned this issue. Many reported long term health issues, including mental health issues and eating disorders. I have therefore dealt with this issue in some detail. In almost all instances, complaints about this were directed at coaches. The anecdotal material related to the London 2012, Rio 2016 and Tokyo 2020 Olympic cycles, and although there were some examples concerning male gymnasts, most were about female gymnasts at the elite end of the sport.
195. The history of the problem is relatively straightforward and was summarised by one contributor in the context of the Artistic disciplines:

'The men's team go through maturation, and it all works in their favour, they develop muscle, they gain weight and they get strong and it all works positively for them. For a female it is way trickier and that is a really challenging time. In the early days, the physiques that everyone was looking to on the sort of world stage was that of the pre-pubescent, smaller lighter frames. Over the years that has changed massively and people view artistic as more of a power sport. Now it is less of that petite frame. Aesthetically people do still, they may not voice it, but they still view the lighter frame as an aesthetically pleasing frame but there is much more acceptance that gymnasts are powerful and they need muscle and they need strength. Their bodyweight, their physique has changed to accommodate the skills and the technical element of the sport as it has progressed. There has been a huge change in what is accepted as an optimal physique. But it did mean those early years were massively tricky because there was a lot of pressure, a lot of emphasis and focus on, on the physique and it being, a lighter frame.'

196. This chimed with the collective submissions, namely that it was primarily a problem affecting women's gymnastics, rather than men's. The pressure to resemble the medal winning teenage gymnasts of the 1970s, was particularly acute in WAG, Rhythmic Gymnastics and Acrobatic Gymnastics. WAG has acquired much of the limelight when it comes to this issue. In my view, it was and is just as serious in Acrobatic Gymnastics and it is also prevalent in Rhythmic Gymnastics. Despite the fact that Rhythmic Gymnastics and Acrobatic gymnasts face very similar risks to WAG gymnasts, these disciplines are not funded externally and receive less public attention and less sports science/medicine input and support and this needs to change. The highest number of submissions relating to weight management and body shaming came from WAG, but proportionate to the number of submissions and the number of participants in the discipline, more instances were reported from Rhythmic Gymnastics. It is important to note that I have been told anecdotally from a number of sources that inappropriate weight management seems to have become less prevalent in the last few years, although I cannot be sure about this and it is clear that it has not been eradicated.

197. In this section:

- a. I will summarise the nature of submissions about weight management received from individuals who responded to the Call for Evidence and how these reflect upon athlete welfare and wellbeing and on the culture in BG and its clubs. This will include consideration of the support available from sports science/sports medicine practitioners;
- b. I will explain how BG addressed the issue in policy and in coach educational materials;
- c. I will summarise BG's responses to the Review about this issue.

Anecdotal Evidence

198. I heard about weight management and measurement from the following sections of the gymnastics community:

- a. Gymnasts past and present from MAG, WAG, Trampoline, Tumbling, Acrobatic Gymnastics and Rhythmic Gymnastics disciplines;
- b. Parents of gymnasts;
- c. Past and present coaches: club, personal, national and Head National Coaches;
- d. Sports science and sports medicine personnel past and present;
- e. Academics.

The Gymnast Perspective on Weight Management

199. Gymnasts reported examples of excessive weight management measures, including humiliation tactics as a form of weight control and punishment inflicted for weight gain, at high performance clubs by personal coaches, many of whom are still employed as such. These included claims of:
- a. Weighing gymnasts weekly, daily or sometimes more than once a day, in differing types of public view and using the frequency of weigh-ins to make the gymnast feel ashamed about weight;
 - b. Lining the gymnasts up, making public comments about their weight and picking them out of line to be weighed if they *'looked fatter'*;
 - c. Publicly announcing weights, including shouting them across the gym, without any thought to the sensibilities of the gymnast/s in question. In one case, I was told that even when the coach was aware that the gymnast had an eating disorder, they continued to name and shame her in public;
 - d. Making gymnasts perform extra conditioning immediately after failing a weight target;
 - e. Excessive levels of control over food availability and intake such as routine checking of lunch packs and suitcases on trips abroad and berating younger children for eating unhealthy snacks packed by their parents;
 - f. Shouting at gymnasts if they consumed certain foods, such as carbohydrates or juice;
 - g. Acrobatic and other gymnasts instructed not to drink water during training and training for up to 6 hours without any food intake;
 - h. Making gymnasts wear waterproof clothing or extra layers when exercising in order to reach the desired weight or punish them for weight gain. At times this made the gymnasts feel ill and dehydrated;
 - i. Asking gymnasts to send photographs of themselves in order to prove that they had lost weight;
 - j. A coach telling gymnasts to ignore the advice given to parents by a nutritionist;
 - k. Coaches making gymnasts wear ankle weights during training representing the weight they had put on.
200. In addition, many gymnasts reported inappropriate verbal communication about their weight or the weight of others. For example, it was suggested that poor performance in a routine was because the gymnast was *'fat'* or they were told not to wear certain leotards because they could make them look *'fat'*. I heard about derogatory language being used, such as *'fat arse'*, *'you look like a whale'*, *'you look like you have a beer belly'*, *'your thighs are disgusting'*, *'you are spilling out of your leotard'*. A female gymnast told

me that reference would be made to their developing breasts and *'being hit in the face with them'*. A male gymnast reported being subject to abusive language and humiliating practices in relation to his weight.

201. Some of the WAG gymnasts told me they had had negative experiences both in relation to their personal coaches and whilst at Lilleshall. Reported examples of reported conduct at Lilleshall when WAG gymnasts were attending squads and training during the period of Review included:

- a. Conscious praising of an athlete's weight where the athlete was, according to other gymnasts and EIS personnel, unhealthily underweight. Gymnasts understood that this was in order to motivate other members of the squad to emulate the gymnast's physique and similarly lose weight;
- b. Numerous gymnasts being shouted at publicly, in a humiliating and controlling way by a coach who was under the impression that a national gymnast had eaten a dessert;
- c. Inappropriate language being used to describe body weight and shape;
- d. A coach taking gymnasts to one side and telling them in a raised voice that the coach could be nice or unpleasant and then handing each gymnast the results of their DEXA scans³ with a target weight written on it;
- e. I reviewed contemporaneous reliable evidence which reflected real gymnast anxiety about the weight target demands of a coach. The gymnast in question had genuine anxiety about the weight she was being asked to achieve by the coach and the effect that this would have on her strength during training. She also had insight about the risk of developing an eating disorder but at the same time was very worried about disclosing any of her anxiety to the coach in question.

202. I was told about various ways in which food intake was rationed or controlled, including bedroom bins being searched for food wrappers, being refused second portions, including of vegetables, and briefly providing gymnasts with children's plates to eat from, with sections and ridges to reduce intake of food. This was viewed as particularly demeaning by the gymnasts. Gymnasts also reported being told not to eat grapes because they are the *'highest fat fruit'* and that their meal should be *'the size of the palm of their hand'* including the vegetables.

203. I was informed that excessive control of eating was often more pronounced during trips abroad where coaches had even more opportunity to restrict intake. One summarised it in the following way:

'I would hide food in my toiletries bag, wrap cereal bars up in my socks and knickers, and underneath the lining of my suitcase as I was petrified that the coaches would come in and do a search of our luggage for food. I was 18/19 at the time. Throughout my whole gymnastics career, I was genuinely

³ Dual Energy X-Ray Absorptiometry scan which records body composition in terms of fat and fat free mass.

concerned that we were not allowed to bring food on trips, over constant fear that our luggage would be checked... I would not eat the night before to ensure I was lighter on the scale the next morning. I would take laxatives to ensure I could poo prior to weigh-ins, or I would limit my consumption of water to ensure I was not counting much water weight. Our time of the months were never accounted for either. Being on my period meant I could add one or two kilograms to the weight on the scale. Immediately I would be shunned for this, as it seemed to show I was not dedicated to losing weight. This was not the case as I had used the above methods to ensure I was the lightest possible, regardless of my menstrual cycle. I know this was unhealthy, but it was what I had to do. Today, eating remains a constant daily task I have to struggle through.'

204. More than once, I heard extreme accounts of gymnasts hiding food, for example in ceiling tiles or in or under the bed in their rooms. I received accounts of coaches checking hotel rooms 'army style' and travel bags for food. I was told that excessive control could be exercised at competitions too.
205. The focus on weight was primarily reported to me from the elite level of gymnastics, but there were examples when concerns about weight management and 'fat shaming' were reported at lower levels as well. The Head Coach of a club that operates mainly at recreational level was shocked to hear judges at a regional competition make derogatory remarks about the weight and appearance of children. The casual and public nature of this made her realise that they considered such attitudes and remarks to be normal as well as acceptable, to the potential detriment of gymnasts. On one view, this casual attitude to language was evident in newspaper reports of a senior national coach in post from 2008 to the present day, making a passing remark, in the context of an email exchange about Olympic medallist Amy Tinkler in 2017: '*I will get back to my skiing knowing that Amy is not turning into a fat dwarf!*'. I understand that the coach in question now appreciates that the language he used was inappropriate and insensitive. For a coach with so much experience and influence to express himself that way, even if he did not intend the subject of his remark to see his comment or to be offended, speaks volumes for the culture around weight and body image.
206. The combined nature of the submissions suggested that some coaches, including very senior ones, believed, in a rigid way, that a gymnast would under-perform if they gained the slightest weight. The perceived link between weight and performance was overtly communicated to gymnasts by some coaches and lacked both nuance and at times, scientific justification. As one gymnast put it; '*weight targets seemed to be plucked from thin air, it was nothing to do with a rule book or nutrition*'. I was struck by an anecdote from a senior coach who appears to have taken a more enlightened approach to weight management who told me that they were amazed when an experienced elite gymnast asked the coach whether they could have a piece of bread.
207. Unsurprisingly, some gymnasts developed a dysfunctional relationship with food, weight and body image. A significant number of the gymnasts I spoke with knew other gymnasts with either disordered eating or eating disorders and some of them admitted to their own disorders, past and present. I am extremely

grateful to those athletes who were prepared to discuss this difficult and personal subject with me. Some are still affected to this day.

208. More than one told me that they had resorted to throwing up to lose weight. Reports of purging were not uncommon. Gymnasts said that they stopped eating and drinking on the day of a weigh in and would use the toilet immediately before being weighed. I heard of one gymnast who would be excited when they had their hair cut because of the perceived weight loss. Conversely others reported that they resorted to stealth eating of foods which were not particularly nutritious because they were so hungry. One told me that on some occasions, they just wanted to eat pure butter to satisfy food cravings and another said they would stop eating after receiving comments from a coach but then be so hungry that they would eat five chocolate bars. An Acrobatic gymnast told me that as a teenager, food controlled their life. Their training weight was under 40 kg and their competition weight several kg less than this. They would starve themselves to make these weights. I heard that competition attire was made purposely small to make gymnasts fit into them. One gymnast told me that they deliberately lost 3kg in one weekend before a competition by starving themselves for 2 days and exercising excessively. The attitude of their coaches to weight made some of these young people feel as though any semblance of individuality had been stripped away.
209. I note that the experiences of the gymnasts who met with me coincided with those of Australian gymnasts. The Human Rights Commission there noted:

'To achieve and maintain the ideal physique of a gymnast, the Commission heard from current and former gymnasts of strict dieting and other weight management practices. This included being weighed on a daily basis or multiple times each day, and at times in front of other athletes. The Commission heard from several former athletes about the pressure to maintain an ideal physique and the monitoring of their weight which resulted in a number of practices, including not drinking water.'

210. I should note that two former elite gymnasts provided positive evidence about this topic. One explained that that she had never been berated about her weight and that any advice or instruction she had received about this had been accompanied with a cogent explanation, usually along the lines that if she gained a couple of pounds, it would affect the forces going through her body.

Perspective of Parents on Weight Management

211. This was an uncomfortable topic for some of the parents of high achieving gymnasts who I spoke with. The anecdotal evidence from parents related to gymnasts aged as young as 8 years old. Some, plainly, felt with hindsight as though they had been complicit in potentially harmful weight management regimes. Most felt guided by the coaches, having assumed that such regimes, and the regular weigh-ins, were part and parcel of intensive training and elite competing in gymnastics. I was told that some parents were

either actively involved in the culture of frequent weighing or at least in the controlling of food and dieting outside of the gym, to varying degrees. Some of the parents that I spoke with were unaware of the full extent of the problem until after their child had left the sport. It was apparent that in some instances, parents of under 18-year-old gymnasts were not always fully consulted about weight management decisions.

212. I was able to speak at length with the parent of a gymnast who had first-hand experience of the weight management systems in their child's club. The parent described how everyone would have to be weighed in the club. The results would be recorded. They said that even the gymnasts who were not in a national squad had to be weighed. They knew that it could cause embarrassment and that their own child hated it. At the time the parent did not say anything because they thought it was normal. If their child put just a couple of pounds on, they knew that it would be '*horrendous*' with the coach questioning it, even when a sports science professional involved was supportive because the weight gain was just a facet of puberty. Their child wasn't allowed carbohydrates after training. The parent was aware of the personal coach using weigh-ins to suggest to gymnasts that their weight had caused low performance. I was informed by a parent that this could occur at Lilleshall as well.
213. Another parent told me that they would be informed a few weeks before a competition that their child was not on target for her competition weight and that the parent would need to help the child achieve this. One parent reported being informed by the coach that their child had put on more weight than other any other squad member and would have to do an extra hour of running as a result.
214. The submissions of parents on this topic correspond culturally with the narratives of a significant number of gymnasts. It appears that often parents either did not know the extent of the focus on their child's weight and the potential impact on their child, or chose not to object to the approach to weight management for a variety of reasons. These included not wanting to jeopardise their children's prospects, assuming that the coach knew best and believing that they were over-reacting if they expressed concern.

The Coach Perspective on Weight Management

215. Several, though not all, of the coaches I met with, declined to discuss the issue of weight management with me though some were prepared to talk about peripheral aspects of it. This was unfortunate because it would have been very useful to know whether the coaching community accepted the accounts received by the Review and to understand their point of view. Accordingly, my ability to consider and represent their perspective on this issue is limited to the views of the small number of coaches who did discuss this with me.
216. One of these coaches, who has direct experience of the WAG World Class Programme in the earlier years of the period of Review, stated that everyone was aware of the culture of repetitive weighing. This coach witnessed a personal coach in a high-performance club line up gymnasts and publicly tell them that

they needed to lose weight. The coach I spoke with didn't think it was the right thing but felt too junior to intervene and thought that some coaches were simply too strong willed and dominant to be effectively confronted about it.

217. Coaches mainly justified any weight management routines on the need to protect the gymnast from injury and one suggested that any conduct perceived as 'fat shaming' had been motivated by a well-intentioned desire to maximise performance. I note that the Australian Commission heard throughout their Review that weight management practices were, purportedly, undertaken for the purposes of injury management also. It was also explained that in Acrobatic Gymnastics there is also a need to monitor weight, to a certain extent, in order to manage the necessary balance between the between the 'top'⁴ and the 'base'.
218. Whilst I had no reason to doubt that these coaches were genuinely keen to ensure that gymnasts did not injure themselves during training, invariably they could not tell me about any technical or scientific information even of the most basic kind that supported their practices to measure and manage weight. The approach taken by these coaches did not appear to allow for the age of the gymnast or the fact that each gymnast is different. All of the coaches I spoke with agreed that further education or CPD would assist with this issue. To their credit, one senior national coach told me that they had changed their practice in relation to weight management after hearing and then understanding how negatively the gymnast community had felt about weight measurement practices in the sport. This particular coach stated that they have now completely stopped weighing gymnasts.
219. I felt that weight management was an important issue to explore with sports science/sports medicine practitioners and academics during the course of my Review. I also wanted to understand the nature and extent of education and support that coaches were given in this area.

The Sports Science and Sports Medicine Perspective on Weight Management

220. I was able to obtain from BG and from the EIS some information about the availability of nutritional expertise within the sport during the period of Review. BG's new and improved weight related policies do in fact apply to all disciplines but the EIS support was available to WAG, MAG and Trampoline gymnasts. Funded expertise has not been available to other disciplines in the same way, which is an undesirable state of affairs, particularly given the excessive weight management issues that are prevalent in some of these other disciplines. BG informed me that some sports science support has been available

⁴ 'Tops' so named because of their position in a group or pair of gymnasts, are those thrown and balanced upon other gymnasts and considered to be under the most pressure to maintain a certain body weight.

in response to issues identified with individuals and via the Chief Medical Officer but I received little tangible evidence of how this operated in practice.

221. The prevalence of eating disorders amongst elite athletes has been the subject of some academic interest within sports medical journals and in relation to gymnastics certainly for over 20 years. By 2003 an article about gymnastics in the *European Journal of Sport Science*⁵ concluded that the risk of eating disorders was more pronounced in Rhythmic Gymnastics, Acrobatic Gymnastics and WAG, especially Rhythmic Gymnastics and this was related to the perfectionism that accompanied the sport. Three years later an article in the *Journal of Applied Sport Psychology*⁶ examined the attitudes of coaches, parents, judges and retired gymnasts to issues of weight and eating patterns in women's gymnastics. Retired gymnasts were far more likely to report their past experiences than current ones. The article concluded that a change in mind-set was required about 'body image' and that the community wanted better education for coaches about nutrition and weight status. It also concluded that coaches explicitly endorsed what is described as 'disordered eating behaviour' and it recommended that work be done to investigate the precursors of clinical eating disorders and finding better ways of eliciting information about such matters from coaches and gymnasts. These are just a couple of examples of academic material which explored the relationship between the sport and eating disorders. There is more recent work around the effects of disordered eating and restricted food intake on young athletes including distorted menstruation, energy deficiency and stress fractures/bone weakness.
222. From 2002-2010 an EIS nutritionist was contracted to work for BG for 20 days a year. In 2009 another nutritionist commenced work for BG, through the EIS, for one day a week, increasing to two days a week in 2011 and then three days a week. The post is 0.6 full time equivalent. I have been informed by BG that an additional nutritionist is now being sought. There has been relevant support, then, from 2009 but this support was only available to performance gymnasts in certain funded disciplines and on a part time basis. The nutritionist was based at Lilleshall but did also conduct some visits to the clubs where the national squad gymnasts were training.
223. The experiences of sports scientists in gymnastics reinforced the perspectives recounted to me by gymnasts. One sports scientist told me that they sometimes saw gymnasts taken off a piece of apparatus, mid-session, and weighed. This usually occurred when the coach felt the gymnast was under-performing. If the gymnast had gained even the slightest weight, they reported that some coaches would effectively say 'that's why you can't complete your skill'. This supported the impression from gymnasts that some coaches would link one-off performance differences to minor weight changes when addressing gymnasts.

⁵ Nordin, S., Harris, G., & Cumming, J. (2003). Disturbed eating in young, competitive gymnasts: Differences between three gymnastics disciplines. *European Journal of Sport Science*, 3(5), 1-14.

⁶ Kerr, G., Berman, E., & Souza, M. J. D. (2006). Disordered eating in women's gymnastics: Perspectives of athletes, coaches, parents, and judges. *Journal of Applied Sport Psychology*, 18(1), 28-43.

224. I was informed that the EIS tried to encourage reliance on other forms of assessment of body composition other than physical weighing and also tried to ensure a more flexible approach given the differing needs and body composition of individual gymnasts. There is no universally desirable weight management tool because gymnasts have different preferences and different nutritional needs and there is nothing to say that every gymnast has to be a specific weight. Some gymnasts had no difficulty being weighed so long as there was a clear rationale for it and so long as it was achieved in a way that respected their dignity and privacy. Some disliked the DEXA scans, apparently because they were too informative. Others disliked the prevalent skin fold test using callipers. The whole issue therefore of taking reliable measurements about body composition can be somewhat fraught and if it is to be achieved in a progressive way, requires open and respectful dialogue with each gymnast in question and this dialogue should involve relevant members of the team. For a nutritional plan to be effective, it obviously requires mature discussion involving the coach, gymnast, sports science practitioners and, depending upon the age of the athlete, the parent/s too.
225. The engagement between coaches and sports science/sports medicine practitioners on the issue of weight management does not appear to have been straightforward. My impression was that some EIS practitioners felt that, instead of there being a two-way equal and respectful dialogue, certain influential coaches were allowed to dictate to sports science personnel on the issue of weight control, as on other issues. None of this was helped by the fact that each relevant club had its own weight management system.
226. The balance of evidence suggests that the EIS struggled at times to convince certain senior coaches that a measurement of weight on scales of itself was not going to be particularly useful and depending on how it was done, could be harmful to the welfare of gymnasts. There seems to have been very little objective evidence to justify the frequent weighing that some coaches appeared to have considered necessary. Practitioners were able to see, in ways that some coaches could not or would not, that gymnasts were disempowered by the weight management process. By that I mean that coaches were not asking the gymnasts what they felt and thought, and it was having a de-humanising effect on them. In circumstances that I detail elsewhere (in the section [Walk the Floor 2019](#)) this came to head in late 2018 and early 2019. After a detailed examination of how gymnasts themselves were feeling, steps were taken to improve the levels of collaboration between national coaches and EIS practitioners and to encourage high-performance coaching staff to consider the views of athletes. This progress was then further developed with the introduction of specific policies about weight management in 2019 and 2020.

BG Policy around Weight Management

227. As part of my consideration of the issues of weight management I have reviewed the guidance and policies published by BG for the gymnastics community on these topics.

228. From 2004 BG's definition of physical abuse included the inappropriate restriction of a child's diet out of a concern to increase chances of success. BG was plainly aware therefore of inappropriate dietary restriction as a risk factor.
229. From 2005, though quite deeply buried in the Health, Safety and Welfare Policy, BG stated (with my emphasis added):

'NUTRITION

Coaches should encourage a balanced healthy diet that includes the appropriate quantities of carbohydrate, fat, proteins, vitamins, minerals and fluids to ensure the replenishment of energy resources and efficient functioning of the body. Ideally a gymnast should not carry excessive body mass since this may lead to under performance, ineffective technique and increased risk of injury due to excess loading on the body structure. The body weight of children and adolescents can fluctuate considerably due to growth related activity. Consequently the practice of weighing gymnasts to monitor fat gain is not reliable, since the total body weight is not an indication of the percentage of body fat. In the case of post pubescent gymnasts, monitoring weight before breakfast and before and after training can provide comparative measurements on weight and indicate the loss of body weight (usually fluid) as a result of training. However where it can be evidenced that a weight loss would be in the interest of the gymnast, this should be achieved through careful dietary planning. The advice of a dietician, nutritionist or appropriate medical professional should be sought to ensure that an appropriate diet and monitoring procedures are followed. Tact and diplomacy must always prevail when monitoring weight. The use of such phrases as "you are fat" or "you need to lose weight" etc. are inappropriate and can be emotionally abusive and lead to long-term psychological damage. Coaches must be extremely vigilant for symptoms that may be an indication of a dietary related illness such as Anorexia or Bulimia Nervosa.'

230. This extract was repeated in subsequent versions of the policy including the latest one dated 2016. A reader could take away from this that it is acceptable to weigh post pubescent gymnasts three times a day despite BG stating that the practice of weighing gymnasts to monitor fat gain is not a reliable way of monitoring body fat.
231. From 2009 BG's Safeguarding Policy identified the 'excessive' monitoring of weight as poor practice. The policy did not explain why this was poor practice and did not define 'excessive'. As with overstretching therefore, guidance about the issue was inadequate and, confusingly, was contained in more than one policy.
232. In 2019 BG produced a DEXA Scan (Dual Energy X-ray Absorptiometry) Policy which emphasised the importance of body composition and the limitations of weight as an index. The introduction and contents of this document were primarily the work of sports science/sports medicine practitioners attached to

the EIS. This policy document was designed to inform gymnasts, parents, coaches and practitioners about the role of body composition in performance and how body composition could be legitimately assessed.

233. The document stressed the importance of health over appearance and the need for athletes to take the lead on how and when, if at all, body composition was measured. To facilitate athlete autonomy, gymnasts had to opt into the body composition service provided by the sports science/sports medicine team rather than opt out. The method and frequency of monitoring body composition would be the subject of discussion with the gymnast and a clear procedure for this was set out. The policy raised the issue of choice of language and the need to ensure that consideration was always used, not least because of the prevalence of disordered eating patterns and body image concerns in the sport. Instructions indicated at what age body composition could be assessed and in which gymnastics disciplines. The policy acknowledged directly that over measuring and under measuring could adversely affect health and performance. This document was important not only for the utility and application of the information it contained but for the way in which it placed the gymnast at the centre of decision making and dialogue about body composition assessment.
234. Early in 2020, BG also published a Position Statement about Weighing Gymnasts. This provided welcome clarity, couched in transparent language. It bore the stamp of sports science and medicine expertise. In its introduction it referred to '*misconceptions around weight*'. It continued: '*BG acknowledges the complexities surrounding weighing in gymnastics. Weighing gymnasts may cause psychological distress and risks the development of mental health problems such as eating disorders, anxiety and depression. We have a duty of care to safeguard the physical and mental health of the gymnasts.*' In bold red font it stated at the outset: '*the weighing of gymnasts should only be undertaken with clear reasoning and with the gymnast's optimal long-term development in mind.*' This was followed by key recommendations. These included advice about obtaining consent to weigh gymnasts, keeping parents informed, ensuring that weight was not measured too frequently and occurred alongside other types of measurement such as height. It endeavoured to shatter some myths and in doing so confirmed that BG knew about these myths and about some of the prevailing misconceptions, which have featured all too regularly in submissions to the Review and in the press. The document explained that body weight is not a measure of aesthetics, that the act of weighing had to be justified and that there are various reasons why a gymnast's weight might change from day to day. The policy warned of the dangers of being underweight and in particular of relative energy deficiency in sport (RED-S) which can result in adverse symptoms and performance. The policy reiterated that adolescents experience more pronounced weight changes (girls 9 to 15 and boys 12 to 16) and that weight in such instances could appropriately be measured every month.
235. Later in 2020, BG published a Body Composition Policy which explained how body composition could be assessed. BG also published a Disordered Eating Policy in 2020. This document outlined the multidisciplinary pathway for the prevention, identification and management of eating disorders. It explored the roles that education, use of language and respectful relationships can have in preventing disordered eating and signposted the reader to various introductory and other videos about the services

that the sport science and sports medicine team provide. I also note that in late May 2022, BG published on its website succinct recommendations about weighing gymnasts and staying hydrated, designed to be understood by the entire community, which is a welcome step.

Coach Educational Materials about Weight Management

236. Given the accounts I had received about weight management, I was interested to understand how much information coaches had been given about weight and nutrition.

237. BG coaching qualifications range from level 1 (Assistant Coach, aged over 16) to level 6 (honorary level, international performance coach). BG was not able to provide me with a complete set of resource packs for all coaching levels before 2013. The material that they were able to provide did not contain any information about weight management/measurement for any level of coach. After 2013, the BG level 1 and 2 coaching qualifications were developed by BG in partnership with an Awarding Organisation called Ist4sport qualifications which is part of UK Coaching Solutions (a wholly owned subsidiary of the charity UK Coaching).

238. In 2013, the UK Coaching certified level 1 resource pack stated in a section on nutrition that inappropriate dietary restrictions risk fatigue, injury, stunted growth and poor bone density. It also said:

'It is important not to suppress a participant's weight through dietary restrictions. Whilst weight provides a good measure of change over time, it does not provide any detail regarding body composition – the important aspect for performance. A gymnast who gains weight through an increase in muscle is very different to a gymnast who gains weight through body fat. This assessment of body composition cannot be done through the assessment of body weight alone. In order to provide the best support to your participant, specialist advice from a qualified nutritionist/ dietician should be sought.'

239. This advice did not feature at all in the available respective resource packs for levels 2 to 5, i.e. for coaches who could act as head coaches of a club and for coaches who were coaching elite gymnasts.

240. In any event, this was very undetailed advice and open to an assortment of interpretations. It gave no steer on how growth of any description should be measured and for what purpose. It gave no advice on whether to weigh and if so, how often, for what purpose and in what circumstances. This appears to be the only reference to weighing in any coaching materials at any levels of coaching, prior to the versions that are currently in force (and detailed below).

241. The level 1 guidance referred to above still exists in the current resource pack dated 2020 and contains nutritional information about what gymnast should eat and drink during training. The current level 2 resource pack is dated 2019. It contains quite detailed nutritional advice but no information at all about

whether gymnasts should be weighed and if so, in what circumstances or how body composition may be relevant.

242. The level 3 resource pack from 2020, does, however, contain more information. There is quite a detailed nutritional section which warns of risks of over restricting intake or depleting energy. It repeats that measurement of weight will not inform the coach about body composition and that diet should not be suppressed. There is also some guidance on weight fluctuating throughout the day by as much as 1-2kg for all sorts of reasons, including hydration, menstruation, bowel movements and that for young maturing gymnasts there can be unpredictable weight changes. There is a list of common nutritional issues arising in gymnastics including a high risk of disordered eating and fad diets related to achieving or maintaining small and lean physique. It was recognised that before competitions gymnasts might be nervous about body weight and appearance. I believe this is the first reference in the written training materials to eating disorders.

243. The undated current level 4 resource pack gives more detailed advice about issues such as balanced diet, hydration and how body weight and composition may change, especially during teenage years. The guidance includes:

'Measuring total body weight on a set of scales does not identify the % of body fat and as a sole measure, it is not a reliable indication of appropriate body composition. A measure of the skin fold thickness in specific areas of the body will indicate the % of body fat and this will be a better indication of the need to control weight. On no account should a coach tell a gymnast they are "fat and need to lose weight". This insensitive approach may lead to dietary illness manifest as either Anorexia Nervosa or Bulimia. If dietary problems are suspected, it is essential that professional advice is sought.

Weighing the gymnasts before and after training allows the coach to calculate the gymnast's fluid loss and thus rehydration requirements.'

244. Whilst therefore more informative than previous resource packs, in my view this did not really provide any useful information about the practice of weighing gymnasts. The level 5 resource pack dated 2021 was very undetailed. Whilst reminding the student that weight alone was not a reliable index of body composition, it provided some nutritional guidance including around training times.

245. In one of its detailed responses to the Review, BG stated:

'Coaches are now advised that weighing gymnasts should only be conducted as part of a series of physiological profiling measures related to body composition, alongside other measures such as height, skinfold thickness, muscular endurance and cardiovascular fitness. They should be told during training courses that focussing on weight alone is completely inappropriate but should discuss correct nutrition with gymnasts and their parents. When new policies are developed, they are placed on

the website; however, we have noticed that there has sometimes been an inconsistency of further messaging across the gymnastics community. We are therefore taking measures to widen the publicity, when new policies are launched, including the use of various social media channels, the recent development of Club Hub (a specific area available to all clubs and containing all the information they need) and the updating of the BG website, which went live on 22 April 2021.'

246. The period of Review is 2008 to 2020 which incorporates three Olympic cycles. As identified above, BG was plainly aware by 2005 that weight management and weight measurement were sensitive issues which if, mishandled, could lead to emotional and physical harm, including the development of eating disorders.
247. I also note that in a document submitted by BG to UK Sport in 2010 as part of its self-assessment process to justify the ongoing funding of the World Class Programme, it said under a section relating to athlete welfare: *'With the recent appointment of Head of Sports Science & Medicine, we will investigate being more proactive with eating disorders and wider physical development issues, particularly in our young Women's Artistic Gymnasts.'*

Economic and Social Research Council work with BG

248. Linked to this was a project in 2011/2012 funded by the ESRC in partnership with BG, designed to investigate eating attitudes and habits in elite gymnastics and to inform policy in gymnastics and in the wider elite sport domain. This was in the run up to the London 2012 Olympics. A panel was assembled to conduct the research, and this included an academic in Applied Ethics, a Psychiatrist, A Mental Health Nurse, and individuals with a background in sports ethics and biometrics. Fifty-one gymnasts participated, both male and female and aged between 10 and 21. This number is fairly small in comparison to other studies that use statistical analysis of the kind and the results need to be interpreted with some caution.
249. One of the key contributors to the project and authors of the report, Professor Mike McNamee, told me that although the main point of contact at BG was committed and professional, it was felt by the research team that his hands were somewhat tied in terms of the assistance and co-operation he could provide. The researchers felt as though they did not have the contact with elite gymnasts in high-performance clubs that they would have wished to have in order to progress their research. It was as though there was a gatekeeper preventing access. The report explained in its preamble that access to the gymnasts was negotiated with BG but was not always a straightforward process with the panel being unable to access competitors from within the highest echelon of artistic gymnastics. Some of this was justified by BG on the grounds of intense pre-Olympics training.
250. The report detailed the forms of various eating disorders encountered in elite sports. The findings of the report were based on interviews and questionnaires and were mainly confined to the disciplines of Tumbling, Acrobatic Gymnastics and Rhythmic Gymnastics. The report revealed a pattern of highly functional eating disorders – meaning unhealthy attitudes to eating, weight and body shape whilst

maintaining high performance intensive training. It was also clear that some gymnasts had full blown eating disorders. Participants genuinely believed that judges in Rhythmic Gymnastics and Artistic Gymnastics deducted points if gymnasts failed to meet the perceived aesthetic ideal. The pressure to remain small, slight and pre-pubertal began when gymnasts were very young and along with dietary restriction, was quickly normalised and contributed to development by adolescence of eating disorders in some gymnasts. Public weighing was complex because it could foster competitive attitudes in gymnasts about weight loss but could also cause shame. There was a tendency to measure weight and not height without any regard to the utility of recording just weight or to the developmental stage of the gymnast.

251. The panel made various recommendations. These included:

- a. Gymnasts who do not receive Olympic Funding lack medical supervision and monitoring. While greater supervision may be restricted due to lack of funding this could be overcome to some extent by recommending regular trips to the GP and accessing NHS facilities via GPs as required;
- b. Given the limited expertise of GPs in relation to elite sports generally, and eating disordered athletes specifically, a dedicated Sports and Exercise Medical faculty was recommended to consider the development of educational materials and intervention strategies to assist gymnasts (and other eating disordered athletes) in need;
- c. More specifically, all gymnasts under 16 years who are on an intensive training schedule should be placed on a standard protocol that could be administered by suitably trained personnel. This protocol might include: yearly charting of weight and height on growth charts, as well as inquiry into menstrual status for females;
- d. Adolescent girls who have not had menarche and also boys who appear small and physically immature for their age, and those who have sustained a fracture, should be referred early to GPs for assessment and consideration of bone density assessment;
- e. Weighing should NOT be conducted daily or twice daily but a maximum of weekly, but ideally monthly or fortnightly - there is good evidence to suggest that daily weighing fosters more weight concern. Furthermore, there is no apparent utility to frequent weighing as fluctuations in daily measurements merely measure fluid status and (in 40 girls) hormonal fluctuations and do not reflect changes in fat or muscle. The purpose of weighing practices should therefore be challenged in terms of their particular function and evaluated in the light of performance and training schedules;
- f. Gymnasts did report having to drag themselves through training due to low energy levels. They also reported an apparent ambiguity regarding how many calories they should be consuming. Nutritional advice is required for young athletes and their parents concerning the need for

sufficient calorific intake for their growth and training, with practical suggestions regarding optimal nutrition for intensive training schedules;

- g. Older gymnasts in this sample were often very aware of their responsibilities to younger gymnasts. Educational provision should be established in order to enable experienced gymnasts to develop as effective mentors or ambassadors as part of the drive to foster healthy norms within elite gymnastics.

252. I was told by Professor Mike McNamee that, once written, the report was meant to be the subject of feedback meetings between BG and the authors. However I was informed that the BG response to the report was cursory and defensive and was accompanied with the suggestion that the researchers were not capable of understanding gymnastics and how weight can affect performance. As Professor Mike McNamee said:

'so they said "you're coming in from the outside, you don't understand the science of performance, you don't understand what an extra half a kilogramme makes to a performance, you don't understand how carefully we look after these athletes when they're in camp" and so forth. Nothing touched them. Nothing touched them. Some of the coaches were really really caring people and some, they were tough and all they were doing was reproducing all the norms that they suffered under.'

253. It has not been possible to obtain from BG a meaningful response about its reaction to the report. Those BG personnel who were asked about it, could not recall any details due to the passage of time since it was produced. At the time, it was reported in the media that BG *'welcomed the report'* and a member of the medical team was reported as saying: *'It is important that those involved in the sport have a good awareness about the risks, and the BG Medical Team has developed a pathway of care for any elite gymnast who develops an eating disorder.'* According to the information that I received, BG would have been in possession of this report in 2012 (and at the latest in 2014 according to the date of the media reports) and its contents would and should have confirmed that aesthetic pressures were culturally embedded within the sport and capable of causing serious harm and that the frequency of weighing was a relevant issue about which clarity was required for the gymnastics community. It should also have reminded BG of the importance of educating coaches, gymnasts and their parents about such issues and of the risk of harm to gymnasts from disordered eating including mental health issues and physical injury.

254. I can also say, with confidence, that my impression from the ESRC report and hearing about BG's alleged response to it, coincided in material ways with submissions from other sources that I received to the effect that:

- a. Certain personal and national coaches, at least in WAG, would be obsessive about the slightest weight gain and would display what I shall call micro aggressive behaviour about it in clubs, at Lilleshall and on trips abroad;

- b. When preconceptions about weight were challenged by those from scientific/academic backgrounds, it would be suggested that the person challenging them '*didn't understand gymnastics*'.

BG Perspective on Weight Management

255. I was able to ask senior Performance Pathway BG staff and the former CEO, Jane Allen, about weight management. Jane Allen's perspective focussed on a need to weigh gymnasts purely for safety purposes and on a recognition that communications about weight needed to be improved. There appeared to be no insight about the remarkable regularity with which many gymnasts were weighed and how this cannot, realistically, have had anything to do with physical safety.
256. There was a consensus among the other BG personnel I spoke with, that although things were improving, there had not been enough progress on this front. There was also a recognition that coaches required more education about this and that for some, the frequency of weighing was an additional control mechanism. There was organisational recognition from BG that it still had some way to go in terms of cultural progress and policy content on these issues.

Conclusions on Weight Management

257. Whilst I am not required to decide the veracity or accuracy of every anecdote that I received about weight control during the period of Review, I was able to assess the combined whole of the accounts that I received to make findings about weight management at BG and within its clubs. I corroborated the themes arising from these accounts by speaking to BG, reviewing the coach education material available and the policies BG had in place. This in turn informed me about whether athlete wellbeing and welfare has been at the centre of the culture of gymnastics. I repeat that the accounts that I received came from a wide number of sources, many of them independent of each other.
258. It is apparent from the BG policies that were in place, that from well before 2008, BG knew, as an organisation, of the perils of eating disorders within gymnastics particularly amongst adolescent females and BG knew that the way in which weight was measured, mattered. There was nothing to stop BG seeking academic or expert advice on such issues.
259. BG also knew that weighing alone was not a profitable index of body composition. The 2012 ESRC report confirmed this and helped inform some of the ongoing issues and problems. Nothing that I have seen suggests that BG implemented or even considered implementing any of its recommendations.
260. Despite awareness of the pitfalls of excessive weight control, BG's guidance about weight management in policies was undetailed and until 2020, lacked clarity. In one of its responses to the Review, BG relied upon the fact that its various policies and statements about weight would have been available to all the gymnasts and coaches within the three Olympic Disciplines programmes (MAG /WAG /Trampoline and

to the relevant EIS Practitioners supporting them. I do not consider this an adequate response to the scale, duration and consequences of the issue.

261. The sparse guidance that was available was diffusely spread over more than one policy. BG was not monitoring implementation of policy, in any event, and I am not aware that it took cogent steps to educate gymnasts about this until very recently. If BG had wanted to send a message out to clubs, coaches, parents and gymnasts that daily or even weekly weighing was unnecessary and potentially harmful, there was nothing to stop BG categorically saying so. Likewise, if BG had wanted to say that the weighing of pre-pubescent gymnasts was rarely, if ever, justified or ought always to be accompanied by monitoring other aspects of growth such as height, there was nothing to stop it saying so. Such instruction as did exist in policy, was, judging from the submissions received, either not known about, regularly ignored or deemed open to quite different interpretations. Some personal coaches and national coaches appear to have weighed gymnasts as matter of course, often daily, sometimes weekly. Parents and gymnasts were not informed that this was unnecessary and potentially harmful. The issue of weight management does not appear to have been explored with gymnasts exiting the sport so that BG could gain a more frank sense of the gymnasts' experiences.
262. Weight can affect performance in gymnastics because of the forces going through the body and, in the case of Acrobatic Gymnastics, the weight being placed on other gymnasts. However this needs to be put in context and it needs to be considered as part of an assessment of body composition. Historically, some less than informed coaches have simply counted in kilograms. In doing so they were possibly recycling attitudes they had experienced as gymnasts. There are ways of assessing weight which respect the dignity of the gymnast, and which reflect modern sports science understanding. As one sports science practitioner observed *'you cannot get away from body composition in sports....you can have the ability to talk about body composition in a very healthy way'*. The grievance of most of the gymnasts I met with, was not that they had been weighed. It was about the language used by coaches, the frequency of being weighed and the lack of autonomy over decisions concerning their weight and diet. Some gymnasts knew that there was no science behind their coaches' conduct. In too many instances weight measurement and management occurred without consideration for the gymnast and without properly consulting the gymnast or sometimes the parents.
263. This misinformed tyranny to a particular body shape was driven by sections of the coaching community and perhaps more tacitly by judges' scoring. It was also a facet of the sport on a global level. It was allowed to continue, unchecked, until 2019. I am confident that it was the influence of the EIS, combined with the arrival of a new Performance Director in 2017 that slowly but finally created the atmosphere in which gymnasts were able to start expressing their views on this issue. The educational materials that I have seen suggest that coaches received inadequate guidance and boundaries about the practice of weighing gymnasts.

264. It proved very difficult for EIS staff to change some coaching hearts and minds and at times I think this put a strain on the relationship between the EIS and some gymnasts. This reflects negatively on the Performance Sport leadership at BG as well as on the coaches and it was allowed to prevail for far too long. The situation was probably not improved by the absence of a full time Performance Director between 2015 and 2017. Despite the welcome arrival of an official BG Weighing Statement in 2020, there remained a real and, in my view, justified concern that coaches remained under-educated about weight and body composition and how management of this could impact upon the welfare of the gymnast. It is important that the concepts in the Weighing Statement are understood by the wider club and coach community and positively implemented. There appears to be a realisation now both within the World Class Programme and at BG Board level that parents, gymnasts and coaches need to be better educated about what is and is not acceptable in terms of coach conduct, including weight measurement and control.
265. I spoke to various people about the potential motivation for excessive weight control. I was told that some genuinely believed that the 'lighter and smaller', the better and safer the performance, possibly influenced by the culture from other countries. I heard that some coaches knew or thought they knew that judges would score the thinner gymnasts more favourably. It is difficult for me to form a view one way or another on whether some judges have played their part in perpetuating this culture.
266. I also consider that in some instances excessive weight management was used as a deliberate control mechanism. Whatever the motivation for excessive weight control, the methodology did not respect the wellbeing of the gymnast and reflected a priority of performance over welfare.

Sexual Abuse

267. As I have stated previously, sexually inappropriate behaviour was reported to the Review far less frequently than physical or emotional abuse. Nevertheless, I received over 30 submissions that referred to this type of conduct. The submissions came from club owners, coaches, gymnasts, parents and others within the sport. The issues raised ranged from reports of grooming and sexual assault to sexual remarks and inappropriate relationships between coaches and gymnasts. Other examples of the behaviours reported to me were gymnasts being tickled, touched on the bottom unnecessarily during gymnastic moves, threatened with being kissed as a punishment for not following instructions and sexualised comments of a personal nature.
268. Whilst of course very serious, none of these behaviours appeared to be systemic or condoned in the sport during the period of Review, in the way that emotional and physical abuse appears to have been. As with emotional and physical abuse, the recognition and management of lower-level inappropriate sexual practice has at times, as it unfortunately is in most environments, been a demonstrable challenge for the sport and such conduct has, as a consequence, occurred and recurred in some circumstances where it could and should have been addressed. Although not universal, in general I had the impression that there was a much better understanding within the sport of the seriousness of any allegations of

sexual abuse and the fact that such behaviour was unacceptable. I have set out in [Cases dealing with sexual Allegations](#) in more detail, my view on the handling of complaints relating to sexually inappropriate behaviour.

Harassment and Discrimination

269. The Standards of Conduct applicable to members throughout the period of Review prohibited discrimination against an individual or group of people as a direct or indirect result of their gender, age, ethnic origin, religion, sexual orientation, disability or political persuasion. They also prohibited abusing, harassing, bullying or victimising others.
270. Simultaneously BG's Safeguarding and Child Protection policies identified harassment as a form of bullying and poor practice and included within its definition of bullying, conduct, in particular verbal communications, designed to discriminate on the grounds of sex, disability, sexual orientation or race.
271. I received a number of submissions which detailed racist or homophobic comments being made to gymnasts. The comments that I was informed about included ignorant and hurtful references to anatomy and body shape, sometimes accompanied by comments, for example which implied, that black gymnasts were less likely to succeed. Such comments were reported to be made by coaches and in one instance a Head Coach of a club.
272. I received separate submissions which clearly spoke about a young gymnast being subjected to a grossly offensive homophobic insult by a coach after coming out as gay. This was used behind their back to others and sometimes within earshot, and the coach insinuated that the gymnast was only in the sport so they could 'perv' on other gymnasts. I am also familiar with press reports alleging that a former Head National Coach allegedly used homophobic slurs including 'fairy' and 'puff'.
273. One parent told me about their child being called 'faggot' on a daily basis along with 'gay boy'. When the parent reported this to the club's Welfare Officer, I was told it was shrugged off as a joke by the very person who was supposed to take it seriously. If correct, this had the potential to normalise or trivialise such behaviour and would suggest that it was not being taken as seriously as it ought to have been within the club and it was not being properly managed by club staff.
274. Though obviously such behaviour would be offensive, unacceptable and capable of harming gymnasts, there was nothing in the information I received to suggest that this sort of conduct was endemic within the sport.

Anti-doping

275. The Review did not receive any submissions about anti-doping issues, therefore this was not a particular area of investigation. Some individuals did note, wryly, that if the same resources and independent

regulation existed for safeguarding in gymnastics, as existed for anti-doping, BG would not be facing its current crisis. The recent House of Lords Select Committee report on a National Plan for Sport, Health and Wellbeing quoted one former CEO as saying that the sports sector currently cares *'more about what someone sticks in their arm than we do about someone protecting a child'*. Aside from this bigger picture issue, no information of relevance in relation to anti-doping was received by the Review and, therefore, I have no reason to believe this to be an issue within the sport.

Health and Safety

276. The Review did receive some submissions which included anecdotes about clubs taking a careless attitude to certain issues such as damaged or worn equipment, coach to gymnast ratios or failing to report/record accidents. I received multiple submissions raising concerns about coaches teaching moves to children that they were not qualified to coach, including somersaults and beam work. On occasions, I was told that some coaches had no qualifications at all. These were not isolated incidents. I heard about a ratio of one or two coaches to 32 children and about a club deliberately saving money on coaches by inappropriately increasing gymnast class sizes.
277. Different incarnations of what can conveniently be described as a Club Development Team existed at BG throughout the period of Review to support clubs with club operations, including health and safety policy. Review of policy was, from 2004, the responsibility of the Ethics and Welfare Committee, later the Standards Committee. As the report details elsewhere, the policy was amended and re-written several times during the period of Review. Dissemination and implementation of the policy sat within the Ethics and Welfare Department and from 2018, the Integrity Unit. In later years, the Board was updated in Corporate Services reports about the number of RIDDOR⁷ reported accidents.
278. In 2016 a bespoke Health and Safety Management System document was produced by the Ethics and Welfare department and uploaded to the BG GymNET section of the website. This contained detailed practical guidance for clubs and affiliated organisations on how to comply with health and safety law and BG's Health, Safety and Welfare Policy.
279. Clubs did have access to policy information and to advice from BG about how to comply with its safety related obligations. Clubs and coaches would and should have been in no doubt about the need to ensure adequate coach to gymnast ratios and about the importance of ensuring that every coach was appropriately qualified.
280. This was an area in which BG had supplied its clubs with detailed and useful information and support on how to comply with relevant health and safety requirements. There was little or no evidence demonstrating that BG had in fact monitored implementation of the essential requirements set out in

⁷ Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.

these policies, beyond the basic information contained in the GymMark process, which clubs did not have to sign up to and which is described in the section of the report regarding [GymMark and GymNet](#).

Conclusions in relation to Anecdotal Submissions

281. It is important to remember that I am not tasked with resolving individual complaints about coaches. The volume of information about coaching methods, communication techniques, and training environments did allow me to identify the themes described above and to form what I consider to be reliable impressions and conclusions about coaching practices in some clubs and about the experiences of gymnasts, particularly at the elite end of the sport. I recognise that many coaches do not engage in inappropriate conduct and provide a healthy and positive environment and experience for participants. It was however, apparent during the period of Review, that negative coaching techniques, as described above, had become embedded within the sport. In its written communications with me, BG acknowledged this. It accepted that harsh coaching methods had been used by some coaches and that this had been allowed to continue for too long. Such methods had become normalised and had been used in pursuit of success.
282. Although the anecdotal material concerned a wide variety of clubs, levels and types of gymnastics, there was a focus on the experience of talented female gymnasts. The names of certain personal coaches and clubs cropped up repeatedly. There are a limited number of high-performance gymnastics training centres in the country, and it was also quickly apparent that within some of these, a culture had been allowed to develop in which the dominant personality and autocratic coaching style of successful personal coaches had been allowed to characterise the training environment and to overshadow the experience of the gymnasts. Competitive success and the reputation of club and coach were, if the submissions were accurate, deliberately allowed to prevail over athlete individuality and wellbeing.
283. In November 2021, when I had already analysed much of the information that I had received, I was provided with a copy of a report by BG. It was commissioned by BG as part of the organisation's response to the issues being considered by this Review and was in response to various complaints concerning 11 coaches made to BG by Rhythmic gymnasts who had been part of performance squads from 1995 to the present day. Many of the complaints post-dated the 'Athlete A' documentary. BG's review of these complaints identified consistent themes and this too has informed my view that BG needs to ensure that the non-funded disciplines receive more cultural attention and more investment in sports science and medical support, even though they do currently come under the umbrella of BG's Chief Medical Officer.
284. BG concluded in its report that national coaches had worked '*very much in isolation with little or no supervision*'. The largest number of complaints related to weight management and the second largest to emotional abuse and the creation of toxic training environments. There were worrying levels of long-lasting eating disorders, post-traumatic stress disorder, anxiety, body dysmorphic disorder, depression and obsessive-compulsive disorder. There was a notable level of ignorance amongst the coaches both

around diet and hydration and a resistance to external expertise on such issues. BG accepted anecdotal evidence that food was controlled to very high levels with fear being used as a tactic to extract obedience. Water was restricted constantly. BG also accepted that gymnasts had been shouted and sworn at regularly. There were serious issues of physical abuse including inappropriate stretching and sometimes physical violence. The gymnasts had been ignored and subject to extreme psychological pressure. In summary, BG felt that the testimonies it had received were reliable and concluded:

'The athletes were often in an environment where they had no voice and no one to turn to. They were starving, exhausted and in fear of losing their place on the squad. In essence the wellbeing of the athletes was ignored. In the set-up of this system a perfect storm was unintentionally created which allowed practices to go on over an extended period of time. It is concluded that there was a systemic failing by BG (at all levels) which led to Institutional Abuse which has had a long-lasting impact on many of the gymnast's lives.'

285. The experiences of these gymnasts and the conclusions reached in the report, reflect many of the patterns of behaviour that I have identified above from a larger number of submissions, on a larger scale and in different disciplines of the sport.

Recommendation: BG must review the types and level of support provided to non-Olympic disciplines and ensure these are improved in light of the findings of this report.

The Culture in Gymnastics

286. Having considered the abusive behaviours that were evident in the sport, particularly at elite level, I now analyse other features of the sport and its culture which I consider directly relevant to gymnast welfare and wellbeing.

The Culture of Fear

287. The expression 'culture of fear' has featured repeatedly in recent media reports about gymnastics, and it was also used quite regularly in submissions and meetings held with the Review. Throughout my investigations, I remained alive to the risk that it was being used too freely. I was also mindful that the expression might be misused, to justify a self-interested failure to report obviously inappropriate conduct.
288. My conclusions about such a culture are informed by accounts received from all sections of the gymnastics community. I was particularly struck by the fact that despite maturing into adults, some former gymnasts (both male and female), were still in fear of specific coaches, some of whom continue to coach. The fear of speaking out is also dealt with in the section of the report regarding [Gymnasts' & Parents' Anecdotal Reasons for Reticence](#) that deals with the reluctance to make formal complaints.

289. Much of the anecdotal information about this related to high-performance gymnasts during the period of Review. The fear in question was a fear of speaking one's mind or taking one's own decisions. The persons feared were the coaches of elite gymnasts. The fear was complex and included fear of rejection or overreaction, fear of de-selection, fear of punishment and fear of being ostracised within a club or organisation seen as protective of powerful coaches. It was not just gymnasts who reported these fears, but also parents. The fact that emotionally and physically abusive behaviours appear to have been evident throughout the sport, suggest that these fears were not unfounded, particularly at elite level.
290. This was a topic that I explored with as many coaches as possible. A few were not prepared to discuss this issue. Some seemed bemused by the suggestion that gymnasts might have been in fear of them, or their compatriots, and explained any such fear on a legitimate need to instil discipline in the gym from a health and safety perspective. Others pointed to expressions of thanks and endearments in cards from gymnasts or to lack of contemporaneous formal complaint as if that disposed of any suggestion that gymnasts had been in fear. This suggested to me that there was a lack of awareness about the way in which the coach/athlete power imbalance could work. A small minority of the coaches I spoke with, had reflected on the public statements of gymnasts, or on the content of ongoing complaints about them and found themselves able to acknowledge that they had not always appreciated the effect that their words may have had on an individual. Academic research has shown⁸ that coaches may not understand the definition of emotional abuse and may not realise that the pressure to reach high performance levels can increase a coach's desire to use questionable methods in ways that decrease the likelihood of a gymnast challenging such methods.
291. In some cases junior coaches reported to me that more senior coaches would attempt to exert control and power over them in the gym. Given the influential position of more senior coaches, these junior staff are likely to have felt inhibited about challenging inappropriate behaviours and possibly even under pressure to condone those practices. Similarly, the reported nervousness of other individuals, such as sports scientists of voicing their opinions, reinforces my impression that a culture of control and fear existed in some gymnastic environments, including Lilleshall at times. This too would have likely reinforced any fears gymnasts were feeling because they could see highly qualified professionals unable to challenge over-dominant coaches.
292. This is a complex subject because I recognise that gymnastics is a highly disciplined activity, entailing obvious physical risk. I also appreciate that coaches do need to exert a reasonable degree of authority given their role and the physical complexity of the skills involved. Coaching can attract strong personalities. I am satisfied that a not insignificant number of gymnasts, including high-performance gymnasts, and others in the gymnastics community have been fearful of speaking their minds and of

⁸ *In the pursuit of Mental Toughness: Is Creating Mentally Tough Players a Disguise for Emotional Abuse?* (Frank Owusu-Sekyere*, Brunel University, U.K Misia Gervis, Brunel University, U.K 2016 International Journal of Coaching Science Vol.10 No.1 January 2016. pp03-23).

questioning the methods of some coaches in circumstances when they would have been justified in doing so. Often, or so it seemed to me, the gymnast's fear was borne of the power imbalance in the relationship between talented gymnast and successful coach and it had taken root early in the relationship. It was easily maintained because some coaches continued to treat adolescents and young adults (especially females) like children and failed to involve them (and their parents) sufficiently in decision making and in discussion. Used to treating gymnasts in this way and to keeping parents at arm's length, the coaches in question treated other adults similarly.

293. The gymnasts' desire to succeed at competitive events and to gratify such coaches co-existed with fear of the coach. So, at times, it became quite normal for a highly successful young gymnast to be frightened of the very person towards whom they simultaneously felt immense gratitude and affection. One gymnast said that she worshipped the ground that her coach walked on and simultaneously lived in constant fear of that same person. This is dysfunctional and as a dynamic almost impossible for a child or young person to understand and process. It needs to be talked about in the sport and addressed honestly in educational materials.

Insularity

294. I was repeatedly told, by sources both outside of and inside BG, that as organisations go, BG was remote and insular. A sense prevailed that in order to belong, especially at Lilleshall, an individual had to be steeped in gymnastics, in other words to come from a gymnastics background. This was reinforced to me in one of my first meetings, with a former Olympic gymnast who I considered to be very well placed to assess the culture of the sport and the organisation. This individual observed that prior to 2017, one would struggle to identify any senior leadership figure in the Performance Pathway who had ever worked outside the sport of gymnastics. The obvious exception to this was Tim Jones, who was Olympic Performance Director 2008-2012 and then Head of Performance Sport 2012-2013 and came from the world of British Swimming and British Athletics. Since 2017 (and until March 2022) James Thomas was the Performance Director and had a background in other sports including judo and rugby. According to submissions received from various observers, it was obvious that both men faced resistance from the gymnastics community owing to their non-gymnastics background.
295. I have referred above, in the context of an external report into eating behaviours, to an alleged dismissive attitude within BG to the opinions of people from outside the sport who '*didn't understand gymnastics*' and to the failure of BG to address any of the findings in that report. Other individuals informed me in various contexts that expressions of dissent could be met with '*That's just how it is gymnastics*' or '*You don't understand gymnastics*'. Some individuals also referred to a culture within the organisation of favouritism and a sense that you are either '*in or out*'.
296. The sense of disconnect between BG and its members, including clubs, also featured in my discussions with individuals and in submissions and it added to the sense of insularity. There appeared to be a strong

sense of disconnect between the organisation and its clubs, something which BG acknowledged in its meetings with me and which Sport England has recognised in the context of safeguarding. I note that BG does have two Relationship Managers who were tasked with visiting clubs. The precise purpose of this role was not clear to me. Although it involved connecting with clubs, it was in part reactive, with club visits occurring when a club appeared discontent with the level of support from BG. The role also related to increasing participation in the sport and enabling clubs to take in members. Welsh Gymnastics operates a system of Club Development Officers⁹. The Officer, who is an employee, conducts a minimum of two visits a year to each club, although the ideal is to conduct quarterly visits. The visits are usually announced so that they are not perceived as too much of a test and they are not confined to safeguarding. During a typical visit, the Officer observes activities, speaks to participants and staff and researches the club for any issues prior to attending, including coach qualifications and the workforce matrix. The clubs are given feedback. Any safeguarding issues identified are reported back to the central safeguarding officer. Whilst I appreciate that the adoption of such a system in England is daunting and costly, given the number of clubs involved, it is a system which plainly has much to commend it.

297. I was informed by the BG Director of Community Services that the sense of disconnect between BG and its clubs is something of which BG is aware. Club Satisfaction Surveys had consistently shown that clubs felt as though BG did not communicate enough with clubs and did not understand their needs.¹⁰ He said that from 2018 BG tried to improve this by introducing a system of telephone club interviews designed to assist clubs in addressing any gaps in services or frameworks and by improving its own software so that it could maintain better records of such calls. There was no evidence available to the Review about how this was working in practice. This disconnect has reflected itself in other ways – the lack of visits to clubs by BG, the lack of monitoring of club implementation of policy, the lack of contact with Club Welfare Officers. If BG is disconnected from its clubs, it risks being disconnected from the welfare of the gymnasts.

298. There was also a disconnect between different departments within BG which, despite their separate functions, shared some common interests such as education, safeguarding, club activity etc. Senior staff/personnel within the organisation observed what they considered to be a tendency to work in silos, in other words, operating independently and avoiding sharing information. This affected the levels of contact and collaboration between coaches and the sports science and medicine team (with a 'them and us' culture described) and it was also noted to be relevant to the provision of coach education to more senior coaches. It also meant that, on occasion, safeguarding concerns which had been raised with BG within an individual department, were not always shared with BG's Safeguarding Team.

⁹ BG previously used such officers to assess club compliance with GymMark.

¹⁰ As a result in late 2019 BG established a Club Stakeholder Advisory Group to ensure that BG better understands the issues confronting clubs, the type of support that clubs might need from BG and to ensure that the club perspective is filtered through to the Board. It has not met many times and by the time I was conducting my meeting with the interim CEO on 19 July 2021, it had, by his own admission, not yet achieved an enormous amount. It is currently undergoing a re-vamp.

299. The disconnect also existed between the disciplines of gymnastics and between the men and women's sport, especially at the elite end. In a 2008 document prepared as part of the 2012 Mission process UK Sport noted:

'The three funded disciplines have operated quite independently to date. The OPD (Olympic Performance Director)...is attempting to look for solutions which encourage and promote more "joined up thinking" and approaches. The sport (and the disciplines) have traditionally been quite inward looking and have not adopted processes that allow for constructive challenge and reflective practices. As the OPD creates the environment for this to happen, managing this amongst staff will be challenging and the OPD will need the support of the CEO and the Olympic Performance Steering Committee (OPSC) to endorse the approach he is taking. Linked to this is the need to provide CPD opportunities for existing staff whose experience and knowledge of performance sport is largely from within gymnastics. The OPD will be seeking help from UK Sport to build a relevant CPD Programme.'

300. These observations, made in the context of the high-performance funded disciplines chimed with submissions from individuals well placed to assess the culture within BG. They are also consistent with the findings of a Walk the Floor panel commissioned by UK Sport in 2019 to review the culture in the funded disciplines. This cultural void and lack of cohesion and constructive challenge was allowed to continue therefore for over 10 years, despite BG being aware of it and UK Sport being on notice about it. I understand that from a practical point of view, it would be extremely difficult to bring all of the disciplines together in any meaningful way. They have to train at different times and to stagger attendance at camps at Lilleshall. That said, developing connectivity does not have to be all or nothing and there was nothing to stop BG from bringing the senior coaches together to share experience and information. I do not think that very much thought has ever been given to improving the level of contact that male and female athletes and coaches from all disciplines have with one another. Regrettably, I consider that the issues identified in the quotation above persisted through to 2020. Although they related more to the World Class Programme, they reiterate the insularity observed by various individuals contributing to the Review.

301. An insular culture is rarely a healthy one, either for the organisation at stake or the individuals associated with it. As a general rule, the individuals I met with, who had some experience from outside of gymnastics, brought a fresh, more enlightened and objective perspective to the sport. The application of different views and experiences is vital to the sport and assist in developing a more positive and inclusive culture. In its open letter of 17 August 2022, BG accepted that it had failed to be close enough to the gymnastics community. In its written communications with me, BG observed that aspects of the culture within the sport had been unsatisfactory and that it had failed to ask itself enough questions about this. In this context, it recognised that that there needed to be more cohesion and unity across the various disciplines and between the men and women's sports and closer contact with and support for its clubs.

Coach-led Culture

302. Whilst I appreciate that expressions such as 'coach-led' or 'athlete-centred' invoke different reactions (the sport being about both athletes and coaches and unable to function without either), I have adopted such terms for ease. The current BG material for some of its coaching courses explains the difference between a coach and athlete-centred approach, as follows:

'There are a number of different approaches to coaching. The traditional approach is very much coach centred, with coaches typically directing their athletes towards what they want them to achieve, akin to the classic 'I say, you do' teaching style, or worse still, the focus being on what the coach themselves wants to achieve. In this case, gymnast decision making is minimal and the coach often considers the gymnast only as a performer, rather than a whole person. Over the course of the past 10-15 years there has been a movement away from the traditional approach to coaching. As a coach you are now encouraged to adopt a gymnast-centred approach. A gymnast-centred approach involves creating the right philosophy and atmosphere in the clubs – the club should be seen as caring, inclusive, engaging, consultative and democratic....A gymnast-centred approach requires you to involve your gymnasts in the decision making process, thus empowering them and creating more independent and motivated learners. Based on age, maturity and experience, you should question your gymnasts, prompting them to identify their own performance strengths and areas for development and the strategies for improvement. Gymnasts should understand and buy-in to agreed goals. ...Finally, you should adopt a holistic approach recognising the gymnast as more than just a performer... While a gymnast-centred approach to coaching has been found to lead to improvements in gymnast decision making, confidence, motivation and prolonged engagement, it is not without its difficulties. For example, coaches could feel that their authority and due diligence towards their gymnasts is compromised and there is the risk that gymnasts might lose faith in, and respect for, their coaches. Whilst these are real risks, a number of strategies can be put in place to overcome them.'

303. Coaching philosophies must naturally adapt to the age and personality of the gymnast and the responsible balance between coach authority and gymnast autonomy will presumably tilt alternately at different stages (and ages) of the relationship.
304. A significant number of submissions described relationships in which the gymnast was rarely included in decision making and at times made to feel like a commodity, even though the coaches in question no doubt cared genuinely for the gymnast. One gymnast told me that the longevity of their relationship with their coach accounted for their sense of feeling so indebted to the coach for her development and success in the sport, that it was more about the coach than herself. It appeared to me that it was as though there was a convention that some coaches' opinions mattered more than athlete welfare. I was particularly struck by the fact that, according to the Performance Director, who arrived in post in 2017, the main gymnast reviews on the World Class Programme in WAG and also MAG were usually

conducted in the absence of the gymnast. These were meetings at which gymnast plans and progress were discussed and developed. The failure to include the very person at the heart of the review is not only 'strange' to quote that Performance Director but demonstrates precisely the lack of regard afforded to gymnasts historically.

305. Similarly, there was such a controlled focus on gymnastics and time spent in the gym, that some gymnasts were not treated as a 'whole' person, leaving them unnecessarily excluded from life outside of gymnastics and stripped of healthy decision-making skills and self-confidence. As detailed above, training regimes and decisions do appear sometimes to have been centred around what the coaches wanted rather than what was actually best for the gymnasts. This coaching outlook increased the control exerted by coaches at the expense of the gymnast 'voice'. The same could be said for injury management, communication methods and weight management. As I have observed elsewhere, some coaches seem to have ignored (or failed to be adequately informed about) the educational materials and BG policies around issues such as emotional abuse, training on injury, developing the whole person, and instead took their own course and perhaps, adopted the coaching methods they were subjected to as former gymnasts. In some cases this included exerting an unhealthy level of control over their gymnast's lives, without due consideration for the gymnast's long term welfare. In these circumstances, even some parents felt beholden to the coach and unable to challenge, or even discuss, the decisions that were being made about their children. Some parents reported difficulties with even being able to view their child's training ([see paragraph 333 to 340 below](#)), let alone provide input to it, which appears to have been yet another example of ways in which coach control was retained.
306. Most young participants would not be able to recognise this culture for what it was and would therefore not be equipped to complain about it. Some understood it only once they had left the sport and gained more experience of life. As one individual observed: *'I thought that (the behaviour) was just part of the Sport. That being disciplined, silenced and doing what I was told was what made you get better'*.
307. I discussed this issue with various BG personnel and Board members. The interim CEO in 2021 agreed that it was now obvious that the sport had not been athlete-driven. He felt that there were gradations to this with WAG being 'coach-dictated' and MAG and Trampoline being more collaborative. He also believed that many coaches will only ever have wanted the best for gymnasts and will have thought that they were helping gymnasts to fulfil their dreams, without necessarily realising that the means used were now out of date.
308. BG has been able to reflect carefully on many cultural aspects of the sport in the last 18 months. In its final submissions to the Review, BG said:

'We accept that aspects of the culture within the sport of gymnastics have been unsatisfactory. We would like to emphasise that there are many examples of excellent coaching within the coaching community and most of the coaching is of a high standard. However, there have been certain

prominent cases which have highlighted harsh coaching methods... There was a coach-led high-performance culture in which gymnasts were expected to follow directions rather than coaches being expected to identify and address their desires and needs...we recognise that there are problems, particularly (but not only) with WAG. Performance athletes have not always felt valued as individuals, or that they would be listened to.'

309. This welcome acknowledgment accorded with the collective evidence received by the Review and my impression of the culture within the sport.

BG's Perspectives on Culture

310. I was keen to explore with BG Board members and other senior personnel whether the culture revealed by the 2020 crisis which engulfed the sport, had come as a surprise especially given the occasional adverse media reports from 2017 onwards, the departures in 2017 and 2018 respectively of the Trampoline and MAG Head National Coaches and the 2019 Walk the Floor report, which identified serious cultural flaws within the World Class Programme (see [paragraph 718](#) below for more detail). Some responded by saying that they had never personally witnessed anything untoward. I did not find this to be a particularly satisfactory response. The current President (who had been a Non-Executive Director 2004-2012) agreed that if each Board member and senior member of staff was going to say to the Review that they had no idea of the culture revealed by the crisis then it would suggest that BG was '*totally not fit for purpose*'.
311. No-one did say in straight terms that they had been aware of the culture that has now been exposed. The interim CEO in 2021 said that he found it staggering that an environment had been created whereby problematic coaching behaviours were not '*called out*'. He questioned whether the Board ought to have requested more information about the prevalence of certain types of disclosed concerns and complaints. He thought that it was implausible that the organisation lacked knowledge of the culture. I asked the interim CEO whether he thought that gymnasts' welfare had been at the centre of the culture of the sport. He said that it had not. He did not think that anyone had '*gone out to harm athletes*' but he felt that there had been a lack of focus on the training environment, on the behaviours occurring in such environments and on the welfare of the athlete. The CEO for much of the period of Review, Jane Allen, denied that the organisation had failed to listen and asserted that both it and she had not been aware of the issues revealed in 2020. I have considered this awareness (or lack of awareness) in further detail later in my report.
312. I specifically discussed with Jane Allen, the issue of a culture of fear within the sport. Whilst she acknowledged that lines of communication between coaches and other sections of the community could be improved upon, she denied that there had been a culture of fear and unrealistically, I felt, attributed any negative publicity about this to press reports which she considered had been informed by one or two coaches who had been attacking her leadership in 2017.

313. At the time of media reports in 2017 and 2018 about a culture of fear, BG publicly responded by referring to its robust policies and fair and effective complaints handling. Since this Review, BG's tone and perspective appears to have altered. In its final written submissions to the Review, BG said: *'We are also concerned that more should have been done more to understand why allegations of a 'climate of fear' were made by Dan Keatings and others in 2017 and were too slow to respond to these athletes' concerns. In particular, BG was too focused on pushing back against what were seen as hostile media stories rather than understanding the athletes' perspective.'* In its final written submission to the Review, BG accepted that it needed a *'cultural reboot'* and that it had failed to explore the culture in the sport adequately, particularly after 2017 when press reports emerged about a culture of fear.
314. In short, BG's lack of enquiry in 2017 if not before, about the culture of fear, was myopic. It was motivated from the top by defensiveness and it has contributed to BG's damaged reputation. The recent acknowledgment of organisational failing in this respect is an important step for BG and will hopefully reassure the gymnastics community that fear of coaches has no place in the sport and will not be tolerated by its governing body.
315. It is evident to me that the culture within the sport of gymnastics has not had the interests of the gymnasts at its centre, particularly at the elite end of the sport. This is already evident from the prevalence and tolerance of the behaviours described above. In view of this conclusion I have carefully considered why gymnast's welfare has not played a more central role in the culture of the sport. Some of the reasons have already been touched upon in the preceding sections of the report. In the next section, I examine a number of features and factors that I believe have caused or reinforced the culture that has pervaded the sport. Generally, these features are not an issue in isolation. Combined and neglected, they have the capability (as we have seen) to create a culture that fails to put the athlete's welfare or wellbeing at the centre of the sport.

What Features have Resulted in or Reinforced the Culture?

Early Specialisation

316. Gymnastics is an early specialisation sport, especially for females, even though there is no maximum age limit. It is common for children to start competing before they are 10. The men's route is more straightforward than the women's in the sense that males compete at club and regional level and then at national level U12s, U14s, U16s, U18s and seniors. In the women's sport the ages are categorised differently: Espoir 12–13-year-olds, Junior 14-15-year-olds and Senior 16 years and above. The women's regional event level is a lot more competitive because of the numbers participating, compared to the men's sport. The females pass through compulsory routes and the level of skill is more complex at an earlier age. 7 year-olds can compete at county level, 8 year-olds can compete at home country level (i.e. for England/Wales/Scotland or Northern Ireland), 9 year-olds can compete in British championships. To

compete at senior level in international artistic gymnastics, men must turn 18 in the year of the competition, but women need only be 16.

317. It appears to be accepted in MAG that male gymnasts develop the necessary full muscular strength after puberty. The development of the male gymnast is therefore usually longer than that of the female and traditionally male gymnasts have peaked at a later age. In Trampoline, the male and female gymnasts can and do peak at later ages. In WAG, Rhythmic Gymnastics and Acrobatic Gymnastics, conversely, female puberty has often been seen as a negative development although this is changing.
318. The international age of competition and long held beliefs around the ideal physique, particularly in WAG, has created pressure on gymnasts to achieve high levels of skill at a young age. It is an issue about which there has been much recent debate and has featured in other Independent Reviews into the sport. The Ropes Gray report into American Gymnastics said:

'Because the physical demands and rigours of the [female] sport are difficult to sustain over longer periods, it is generally believed that gymnasts "peak at an early age" and that the period between ages 12 and 16 is particularly critical for their career development. Although the sport is again shifting in ways that provide more opportunities for older athletes – including through rule changes that allow athletes to specialize in a specific event, as opposed to competing in all events, and an increasing emphasis on power moves that rely on muscle developed after puberty – the vast majority of elite gymnasts who represent the United States in the World Championships and at the Olympic Games are still children. In the words of one gymnast, 'I think we have to remember, yes, these are world-class athletes, but they're also little girls.' And little girls have vulnerabilities, including a limited capacity to recognize and protect themselves against inappropriate behaviour by trusted authority figures.'

319. I met with the WAG Technical Committee President of FIG (who is also the Chair of FIG's Safeguarding Working Group) who informed me that the organisation had considered the age limits in the women's sport and the disparity for senior male and female gymnasts. FIG decided in 2020 to raise the age limit for the Junior Competitions in WAG from 13 to 14 years old, because 13 was considered too young to perform the specific elements of the Code of Points for juniors in international competition. Due to the delays caused by the pandemic, this change appeared in the Technical Regulations 2022, and therefore it has now been implemented. FIG informed me that it had no objection to nations amending their own national rules (as the Dutch have done). However it informed me that after consideration and research, it was retaining the senior age limit on the basis that females mature earlier, there are different cultural considerations across the many competing nations and that even if the age limit were raised to 18, female gymnasts would still have to train intensively from a very young age. Anyone hoping that the internationally imposed minimum age limit is likely to change, will therefore be disappointed, as things currently stand.

320. There are demonstrable consequences to this early specialisation, many of which have been the subject of academic research.
- a. Children and young people cannot necessarily understand and distinguish adult behaviour that is acceptable as opposed to behaviour that is unacceptable. If subjected regularly to the latter, they will assume that it is normal;
 - b. According to submissions from some gymnasts, parents, sports science and medical personnel, the sense of needing to 'rush' the development of female gymnasts, due to a perceived relatively brief chronological span in which to succeed, has contributed to oppressive training loads and instances of unnecessary training on injury;
 - c. The role of parents is crucial given the early age at which a gymnast might start serious training. They need to be fully informed therefore about the sport and training and they need to understand what is acceptable and normal and what is unacceptable and abnormal. They also need to place the welfare of their child ahead of their own aspirations or the aspirations of their children and advocate for their children, even in extremely difficult situations;
 - d. The relationship between coach and gymnast can begin when the gymnast is a young child and can last until the end of the adult gymnast's career. This can lead to a dependency and a power dynamic which can, if unchecked, be unbalanced and emotionally harmful. The inability of both coach and gymnast to recognise this, can be particularly challenging;
 - e. The coach needs to be able to respect the developing maturity of the gymnasts and to adapt their personal and coaching style to include the maturing gymnasts in decision making, which it appears has not always happened;
 - f. Given the strictures of the training regimes, the gymnast can quickly become socially isolated at a very young age, thereby feeling more reliant on the sport and potentially on a coach who may be exhibiting negative behaviours;
 - g. The relative lack of exposure from a very young age to other relationships and activities may deprive the successful gymnast of crucial life experience. This can contribute to a lack of autonomy, a lack of confidence and fail to prepare a gymnast adequately for life beyond the sport. It also means that the gymnast may be more fearful of raising concerns or complaints about their gymnastics experience because they feel that they have more to lose due to their perceived dependency on gymnastics.
321. Overall, the early specialisation means that competitive gymnasts are particularly vulnerable to abusive behaviours and coaches need to understand this. Without the appropriate support from the adults

around them, gymnasts are unlikely to possess the power to influence or control their gymnastics environment.

Intensity of Coach/Gymnast Relationship

322. The coach is in a position of real influence over young gymnasts, which makes the child and young athlete very vulnerable if this is misused. BG knew this. From 2009, BG's Safeguarding and Protecting Children Policy highlighted the perils of close relationships and the bonds of trust between gymnast and coach. The Standards of Conduct, by which all coaches were bound, required participants not to abuse or misuse any relationship of trust or position of power or influence.
323. There has been considerable academic research both in the UK and abroad about the coach/gymnast relationship. From well before my period of Review, it was recognised that the scope for power imbalance between adult coaches and child gymnasts was considerable. In the constant struggle for success, gymnasts train longer and harder, often whilst very young. They risk social isolation and educational deficit due to their training schedules. Gymnasts can spend as much, if not more, time with their coaches, than with their parents and we have seen that sometimes coaches appeared to have more control over a gymnast than parents. Indeed, the athlete may even perceive the coach to be more important than their parents.
324. The intensity of the coach-athlete relationship has parallels with personal relationships. The child can quickly feel (or be made to feel) as though they cannot achieve without that coach. Even when a gymnast most resents the coach or realises the potentially abusive nature of the relationship, the dependency and desire to please is such, that the cycle just maintains itself. This phenomenon is by no means confined to gymnastics in the UK.
325. This coincides precisely with submissions that I received about the approach of specified coaches during the period of Review. Former national and international gymnasts described what they now consider to be an unbalanced relationship with their coaches although they did not recognise this at the time necessarily. It was not obvious to me, from my meetings with high-performance coaches that they fully appreciated the potential power imbalance and its characteristics.
326. Although appreciated as a characteristic within gymnastics by BG, I do not think that the coach/athlete power imbalance was given the organisational attention that it deserved, until relatively recently. As we shall see, the vulnerabilities facing elite gymnasts were not identified sufficiently in policy and guidance and in training materials. Gymnasts and parents were not adequately educated about it so that they could understand and monitor the potential dynamics and imbalances within the relationship.
327. The intensity of the coach/gymnast relationship appears to have contributed to environments where, in some cases, abusive behaviours were able to occur and continue over an extended period of time and where some gymnasts felt their entire lives were controlled by their coach.

Lack of Centralisation

328. English gymnasts selected for national and international squads spend most of their time training in the gym of their choice. Each gymnast has a personal coach who is usually based in a particular club. This model is used in many other countries.
329. Gymnasts as young as nine years old, can be selected to join what is now known as the Performance Pathway, which they can remain on for years. There are currently 464 gymnasts on the Performance Pathway. Being on the Performance Pathway will involve the gymnast attending, usually with their personal coach, the national training centre at Lilleshall in Shropshire for set periods of time throughout the year.¹¹ Different disciplines operate different systems in this regard. For example before London 2012 (but not after) there was a limited centralised model for three MAG gymnasts. Trampoline gymnasts spend more time training at Lilleshall than other disciplines. During attendance at Lilleshall, gymnasts are coached by the national coaches and the Head National Coach for their respective disciplines, usually in the presence of their personal coach (save in Trampoline). They will also have immediate access to the range of sport science support available from practitioners from the EIS including medical, physiotherapy, strength and conditioning, psychology, nutrition, lifestyle etc. Attendance will be timed, often to coincide with preparations for major competitive events.
330. Additionally, national coaches visit squad gymnasts in their individual clubs though I was not able to gauge reliably how often this occurred in practice. A limited number of clubs have their own physiotherapists. Since 2016, some clubs have had access to regional EIS physiotherapy and other assistance and a few have a special arrangement relating to medical cover. Even for those gymnasts on the Performance Pathway, the majority of their training will take place with their personal coach at their club. It follows that for significant periods of time, gymnasts are in one club, often with one coach.
331. There are obvious advantages and disadvantages to both centralisation and de-centralisation and the merits of each are beyond the scope of this Review. I have identified the issues that arise in this context because they are relevant to athlete welfare and wellbeing. The disadvantages should be obvious to BG and as a NGB, it should be in a position to take adequate steps to mitigate them. The de-centralised model does potentially limit gymnast access to sports science and medical support. It requires there to be a mature and constructive line of communication between the personal coaches operating in the clubs and the national coaches operating in Lilleshall. It does mean that BG is not line managing the personal coaches who spend the most time with its pool of talented gymnasts because those coaches are employed by individual clubs and beyond the employment reach of BG. I consider that this has contributed to a culture of coach rather than gymnast empowerment, despite the input that national

¹¹ The situation in Wales is different in that MAG is de-centralised, WAG and Rhythmic Gymnastics are centralised though there are still squads for all centrally and the regional high-performance clubs are visited by the central coaches.

coaches have both during club visits and at Lilleshall. There is less opportunity for BG to assess first-hand the environment in which the elite gymnasts are training. This all reinforces the importance of the role of Performance Director as the glue, holding coaches, sports science personnel, gymnasts and pathway staff together.

332. In a de-centralised system, it is important that BG policy and procedure is responsibly implemented in the clubs and by the personal coaches, of elite gymnasts. It requires BG to have a meaningful relationship with its clubs, especially those where elite gymnasts train. Coaches operating in such clubs should be properly educated and undergo relevant professional development. Such a system also requires the maintenance of a positive culture from the top of the organisation, which is promoted and supported throughout the clubs. I note that each of the issues identified here have presented real challenges during the period of Review, as I detail, elsewhere, and this appears to have increased the risk of training environments evolving which do not put the welfare of gymnasts at their centre.

Restrictions on Parental Access to Training

333. Parents obviously play an important role in protecting their children from unsafe and unsatisfactory behaviours, particularly in a sport such as gymnastics with such a young demographic of participants. In discussions about the role of parents in sport, a representative of the CPSU described them as '*absolutely key*' and '*experts of their own children*'.
334. BG was aware from before 2008 that an open training environment reduces the risks of bullying, abuse and of poor coaching practice and said as much in its early Child Protection policies. As early as 2009, BG made the policy statement (my emphasis added):

'BG will not support clubs who actively discourage parents from viewing by:

- *Obscuring windows*
- *Refusing reasonable requests to view*
- *Asking parents to leave without due cause*
- *Justifying the prohibition of viewing on spurious health and safety grounds.'*

335. BG was obviously aware by this date of the practice of obscuring windows and restricting parental access to the training environment. I note the language used by BG. Unless BG's language explains the effect of non-compliance, '*will not support*' does not really mean anything. The 2009 Child Protection policy stipulated that clubs without viewing areas should designate a small area of the gym for viewing. It advised that an alternative way of providing viewing is to use CCTV technology because this would allow parents to view what is going on inside and if appropriate, outside the building, without taking up space in the

gym. I also note that the mandatory safeguarding training for Welfare Officers and coaches also refers to the importance of parental access to training. The 2014 and 2016 guidance on 'Safe Environment' reminded clubs of the need for open training environments and said in terms: '*Clubs should welcome parents who wish to observe and in the case of new or potential members encourage them to view a session and remain with their child until the child is happy to be left. In some facilities there may be logistical problems in providing a suitable area for viewing. Clubs without viewing areas should designate a small area of the gym for viewing. This will need to be carefully managed and there may need to be limits on the number of spectators that can be safely accommodated. Clubs should also ensure that a viewing policy covering acceptable standards of conduct is in place. An alternative way of providing viewing is to use CCTV technology.*'

336. Some parents do not wish to watch their child training, and some parents do not have the time. Some do. The long training hours at elite level may mean that parents are less likely to stay and watch their children practise gymnastics. I understand from speaking with coaches that some have found that it can be difficult to handle the expectations and conduct of parents who are too involved in their child's training which may explain why some coaches have not particularly encouraged or embraced parental presence during training.
337. I was told by some parents that they had sometimes been discouraged from viewing training. I was told by several sources that some clubs deliberately limited the physical viewing opportunities by papering over available glass panels or by simply refusing entry into the gym. This was almost always on the basis that it would be too distracting or dangerous for the gymnasts to have parents physically present in or near the training area. In other words clubs and coaches were doing just what the policy prohibited: justifying exclusion on sometimes spurious health and safety grounds.
338. In premises where space was limited, clubs sometimes failed to take alternative measures to allow parents reasonable access. Some clubs are still deliberately restricting access and BG is aware that this is still an issue. For example one large club had been the subject of multiple submissions about glass panes being papered over and a closed-door policy into the actual training area. The club continued to justify very restricted viewing on health and safety grounds but had taken no steps to install CCTV. This aspect of the sport has been recognised and made the subject of recommendations in reviews about gymnastics in Australia and New Zealand.
339. Unfortunately, I am left in little doubt that during the period of Review some clubs have consistently restricted parental access/viewing and have failed to provide an open training environment, in breach of BG's policies. BG accepted in my meeting with its Safeguarding Manager that its monitoring of this issue was purely reactive (i.e. when someone made a complaint), despite the fact that breaches of its own guidance could obviously put participants at increased risk of harm from adverse coaching behaviours. My review of the complaints files which concerned this issue, did not fill me with confidence that BG had adequately addressed or resolved the alleged breaches of the policy about parental access. Most gymnasts are children, some of them very young. BG took insufficient steps to monitor compliance with a

requirement which was designed to protect children. I was not aware of Club Welfare Officers being proactive about this requirement. Some clubs operated and still operate in breach of the requirement to provide an open training environment.

340. The tendency in some clubs to breach BG guidance and to limit parental access and viewing, appears to have contributed to the maintenance and normalisation of negative coaching techniques. In some cases, it exacerbated the unhealthy degree of gymnast dependency on coaches and the control and influence of the coach over the gymnast. It would also have made it harder for parents to get a real insight into the environment in which their children were training in these clubs.

Understanding of Performance Lifestyle

341. This is an issue concerning gymnasts whose talent has been identified, often at a very early age and who are placed on quite intensive training programs. The number and duration of training sessions in the gym necessarily curtails the time available to engage in other extracurricular activities and it also has a significant impact on education and on family and social life.
342. The Review did receive a couple of positive submissions about how this was handled. One former elite gymnast said that her coach was very supportive of her educational development and communicated regularly with her mother about the parallel processes of attending school and training. Other gymnasts described a very different experience with the same coach, who they felt was dismissive about the importance of education. The gymnasts were doing up to 35 hours in the gym per week whilst trying to study for their GCSEs.
343. Very few current high-performance gymnasts are engaged in tertiary education whilst competing. In the course of meetings, I only heard of a handful of examples though there may be others. Several gymnasts had concentrated more effort on educational attainment after leaving the sport. The issue of managing education alongside elite sport is not unique to gymnastics.
344. Most of the submissions about training/lifestyle balance were negative. Again, parents and gymnasts reported excessive levels of control exerted by some coaches. I think that it is important to note that whilst it may well be that the training/lifestyle balance was coach-led in certain instances, it was also something that parents could have a say in, if they chose to.
345. The lack of focus on education and a balanced life, described in some submissions, is troubling, especially when one considers the rather brutal attrition rate in the sport. Most of the gymnasts prioritising the gym over education and other interests do not make it to the national team. Once this becomes a reality, it is difficult to catch up educationally. As one parent put it:

'Their school work suffers. I mean one of the things that I think gets lost in this is [that] gymnastics is a triangular system so you feed lots of children in at the bottom and then as you get more elite

you get less and less kids so it's triangular. At the top there is only like a really small number and it also spits kids out at each level. At each level kids who can't keep up or don't like it anymore don't want to put up with the coaching get spat out of the system. But because it's such an elite sport at such a young age I really do believe that kids' education suffers and for every child who makes it ...there is hundreds that have been spat out of the system and... they'll have missed a lot of their schooling. They might have been taken out of school to train...and they you know they are they are really going to struggle to get qualifications and skills and because of the way the system works.'

346. This imbalance is also problematic because it potentially isolates gymnasts from the non-gymnastics world and makes them too dependent upon their coach and upon gymnastics for social, emotional and financial wellbeing. For many successful gymnasts, it leaves them with few options upon leaving the sport, other than to train as coaches themselves or find other jobs in the sport. In some cases, it also has the unintended consequence of under-developed decision-making and life skills.
347. The need to balance an elite sporting existence with lifestyle had already been recognised before 2012. Given the high risk of injury in gymnastics, the transition out of the sport might arise with little notice which makes lifestyle support even more important. Throughout the period of Review, BG had the benefit of support from the EIS in what is known as 'Performance Lifestyle'. This provided an individual coaching and mentoring service to all World Class Programme funded athletes in the three funded disciplines. It aimed to ensure that world class athletes remembered or learned to be more than athletes. It provided support across five primary areas: managing transitions, career development, education, supporting wellbeing and personal and professional development. Some examples included emotional support, developing personal identity, CV preparation, interview skills, practical courses such as driving lessons, additional education opportunities such as part-time university courses or vocational skills or pursuing their own interests such as woodwork courses or barista training. The Review received several submissions about the positive impact that the Performance Lifestyle support had provided.
348. According to the EIS, the level of support for Performance Lifestyle for gymnastics has generally remained the same (Full Time Equivalent 0.7, i.e. 70% of a full time position). Funding for Performance Lifestyle has come, predominantly, from UK Sport. It is a 'core funded' service. More recently, BG agreed with UK Sport that it would contribute to enhance delivery. There is now a full-time equivalent service divided between two part-time staff.
349. Despite these services being available I note that in 2010, BG indicated in a funding review document to UK Sport: *'We have struggled to see any significant engagement with Performance Lifestyle for some period of time now, noting poor levels of understanding and buy-in from Technical/Programme Directors, coaches and gymnasts. Engagement data from the EIS Athlete Services Database backs this perception'*.
350. It will be seen that BG recognised that the difficulty lay with its own personnel, not with the EIS. BG went on to say in this document that it was looking forward to rectifying this upon the replacement of a

departing EIS practitioner. A Lifestyle Adviser was duly recruited but the anecdotal evidence suggests that the previous lack of engagement continued.

351. In or around 2012, the EIS provided the BG World Class Programme staff with a report about the importance and positive impact of Performance Lifestyle on elite gymnasts. It highlighted the isolation experienced by gymnasts due to their training schedules, especially in WAG and Rhythmic Gymnastics and the erosion of self-reliance and individuality that could follow over-dependence on a coach. It explained that to date the Performance Lifestyle service had achieved little traction among the World Class Programme gymnast community and that this was in part, down to coaches who were treating gymnasts in the way that they had been treated, despite knowing that their own experiences had been harmful. The problem was illustrated, in part, by an analysis of the Performance Development Award. This is a UK Sport subsidy available to World Class Programme athletes to spend on something that will assist with their personal development away from the sport (such as driving lessons, IT lesson or other educational courses etc.). The author of the report analysed the take up of the award in all UK Sport funded sports for 2009 to 2011. Only one Trampoline gymnast and one WAG gymnast had accessed the award. Before 2012, no MAG gymnasts had accessed it. I was informed that a number of WAG gymnasts during this general period were utterly blank about how they could spend money outside the sport because they had no aspirations beyond gymnastics.
352. The report stressed the under-developed life skills of gymnasts and advocated a much closer working relationship between performance advisers and coaches. It explained, rationally, why and how lifestyle advice and development benefits performance. It then set out a series of recommendations to facilitate gymnasts' access to this type of support. I was informed that the author of the report presented its contents in high-level format to key BG personnel including the CEO. The presentation was less than 10 minutes in duration and I was informed that the EIS never received a response. None of the BG personnel that I spoke to about this, including the former CEO, was able to recall the report.
353. I was able to discuss the role of Performance Lifestyle with various individuals, including gymnasts, parents, coaches and EIS personnel. The impression that I formed after speaking with what I consider to be a sufficient number of informed individuals, was that gymnasts in the World Class Programme were not, traditionally, encouraged to take up the support available from the Lifestyle Advisers. For too long the EIS and BG operated as two teams instead of one when it came to Performance Lifestyle. Anecdotal evidence suggested that specific coaches were wary of allowing the EIS access to gymnasts about Performance Lifestyle, in the misguided belief that it would distract the gymnasts from training and affect performance. One individual from the EIS was particularly frustrated by a senior coach's tendency to ignore all emails on the subject and went to the extreme of manufacturing a chance meeting within the training environment in order to try and have a conversation. There was also a sense that coaches were only interested in using the Performance Lifestyle service to define the minimum schooling that elite gymnasts could get away with rather than establishing what was best for the gymnast and developing them as a person.

What Features have Resulted in or Reinforced the Culture?

354. As with nutrition, weight control and training loads, certain key coaches tried to dictate about this instead of accepting the expertise and support of qualified and committed sports science personnel. Again, I was told that the most resistance was encountered within WAG, less so MAG. Trampoline appears to have been much more positive about the advantages that came with such support.
355. Parents were probably not as involved as much as they should have been, in understanding what Performance Lifestyle could provide. This may have been in part because they did not tend to stay for any length of time at Lilleshall, where, traditionally, the EIS services were most available and there had not been much parent facility time. It was likely also in part due to the lack of an adequate induction process for high-performance gymnasts (and their families) until quite recently. The induction process is designed to inform the gymnast and where relevant, parents, about the operation of the Performance Pathway/World Class Programme and what they should expect from it.
356. According to the EIS, athlete engagement has increased over the years and the scope of the role has evolved. This has enabled better and more impactful delivery of Performance Lifestyle within the sport. There is a more detailed and thoughtful induction process which explains to the gymnast the benefit of Performance Lifestyle. There is a comprehensive system of cross-disciplinary meetings and more contact with the gymnasts themselves who are slowly realising the benefits of the support available. Use of the service has been encouraged by the Performance Director and by more national coaches than previously. The available support is complemented by a BG Development Hub which contains online learning modules about issues such as mental health literacy, entrepreneurial skills, networking skills.
357. Performance Lifestyle has only really started to improve meaningfully in the last couple of years of the period of Review, which is dispiriting given the length of time during which the service has been available. The service was there to help develop athletes into more rounded people, who were prepared for a life beyond gymnastics. It was also there to enable athletes to have more power about decisions that have a direct impact on their welfare and development. As such, it should have been encouraged by BG, by the Head of Performance Sport, by Head National Coaches, Performance Directors (including Interim Performance Directors) and by personal coaches. Sadly, it seems that this was not always the case.
358. Without this support, elite gymnasts risk depriving themselves of necessary life experience which only increases their potential vulnerability. The historic apathy about Performance Lifestyle among a number of influential senior coaches, has contributed to the culture of the sport and has deprived some gymnasts of support which would have potentially improved their development as gymnasts and as individuals.

Historic Coaching Philosophy

359. Several contributing individuals (including elite gymnasts, coaches, judges and other participants) talked about the impact of former Soviet bloc coaches on the sport. I am satisfied that these individuals had

been and in certain instances still are, in a prime position to understand the legacy created by the influx of such coaches.

360. I was informed that an orthodoxy prevailed in the sport in the 1980s and 1990s that Eastern European and Russian coaches knew best how to secure medals. These coaches were assumed to be very technically gifted and educated but arguably some lacked certain interpersonal skills. The more notorious aspects of this coaching style can be seen in the television documentary called 'Over the Limit' (2017). This revealed the unapologetically domineering style of a national coach towards Russian Rhythmic gymnast, Margarita Mamun, and the uncompromising physical demands made of her in training. This somewhat hard-edged style appears to have been copied by some coaches to one degree or another, in other countries, including the UK, with a view to achieving success.
361. A significant number of coaches arrived in the UK after the collapse of the Soviet Union and the harsh and abrasive techniques and communication styles (at least by domestic standards), of some of them, became normal in the sport, particularly at the elite end. The imported coaching style tended to suppress the 'athlete voice' and demanded unqualified obedience. It permitted an unfortunately negative way of communicating with young and aspiring gymnasts. It involved a focus on training repetitions which risked avoidable injury. It made assumptions, now considered by many to be incorrect, about the length of time gymnasts needed to train in the gym. In some cases it also delivered 'success' in terms of competitive achievements.
362. The cultural impact of this filtered down from Lilleshall, through the national pathways and into some clubs. This affected the Olympic-funded disciplines as well as the BG funded ones. In some cases, home grown coaches, of all ages, were exposed to these influences and assumed that their application would improve chances of success. In turn, the gymnasts often accepted this style of coaching as a price to pay for improved results and replicated it when they themselves stopped competing and became coaches. According to the Performance Director in post from 2017 to 2022, it had also had a significant impact upon the content of coach education materials because many of these coaches had been instrumental in writing them, hence the disproportionate emphasis on the technical side of education and standards. Although I am not aware of any public acknowledgement by BG about this, in its final written submissions to the Review BG indicated its awareness of the over emphasis on control and discipline exhibited by such coaches and of the influence that they had had on the sport in the UK and elsewhere.
363. After reaching these conclusions about the cultural effects of imported coaching styles, I was provided with the copy of the report by BG about complaints in relation to Rhythmic Gymnastics, referred to at [paragraph 283](#) above. The report noted that this discipline had been heavily influenced since the 1990s by foreign coaches. The gymnasts often spent summer camps in Bulgaria and British coaches in attendance will have been exposed to the techniques operating there. The report stated that:

'At the heart was an ambition from BG for medals to be won and performance levels to be improved. Largely uneducated high-performance coaches from within the British system who had in effect trained each other were pulled aside to work with and under coaches from Russia and Bulgaria. These coaches were simply mapped across and awarded a high level of qualification with little or no requirement to undergo any further training. There was scant regard given to cultural differences and the non-technical elements of coaching which at this level make up the bulk of the work. These coaches were expected to deliver with the inevitable consequences given their background and training.'

364. The author of this report has, independently, formed very similar views about the long term impact of coaches from different cultural backgrounds, to those formed by myself. It is positive that BG has internally acknowledged this issue. The legacy of this issue will not be erased until BG acknowledges it in a more public way to the gymnasts and coaches most affected by it.

Inherited Culture

365. In sport, the number of successful athletes who transition out of the sport, straight into coaching is high. This is the case in gymnastics for many reasons, including because of the technical nature of the sport, the extent to which the sport has been all consuming for the individual and because the life experience of many elite gymnasts has been sufficiently narrow, that, for some, there seems no other obvious vocational choice. Whilst this has the advantage of retaining expertise, it carries with it the obvious risk that gymnasts who have experienced bad practices from their coaches will apply the same practices themselves.
366. The Review has, on more than one occasion, received complaints about a coach and also about the coach who trained that coach when they were younger. It appears that in some cases the culture and behaviours reported to the Review, have occurred because they are a repeat of how the coaches in question were taught many years ago. This has resulted in the unnecessary prolongation of inappropriate behaviours. Where this has occurred, it must be the case that some coaches have either ignored training on how to conduct themselves or that such training has failed to inform them adequately about appropriate coaching and communication techniques.

Drive to Develop 'Resilience'

367. Gymnastics is a tough sport. Gymnasts compete as individuals and within teams. Each discipline has its own peculiarities and forms. In Artistic Gymnastics, the gymnast, traditionally, competes on various apparatus, each involving its own skill set and training regime. In Rhythmic Gymnastics, the gymnast performs on the floor using a variety of apparatus. The sport therefore requires complex physical skills ("elements") to be performed, with gymnasts at all levels striving to learn new elements and push the boundaries of their abilities. The process of learning and perfecting a skill can require hundreds or

thousands of attempts, with ongoing repetition required to retain this level of skill. A high level of general physical conditioning/fitness is required to underpin the gymnastics skills and routines performed. Overall, a high volume of training has historically been considered essential for competitive success in the sport.

368. This training is therefore long and repetitive. It is physically and psychologically demanding. Many coaches have the technical and personal skills and the maturity to understand how to motivate athletes of various ages. They understand how to communicate in a positive but authoritative way and in so doing enable the athlete to push themselves to their legitimate limits. However I also had a sense from some of the submissions that I received that some coaches may have felt that young gymnasts should expect to endure harsher training and communications than was actually strictly necessary in order to be strong enough to confront the challenges of the sport. I also had the sense that some coaches genuinely assumed success would only be achieved through a certain amount of physical and psychological suffering.
369. The following is taken from an article called 'In the pursuit of Mental Toughness: Is Creating Mentally Tough Players a Disguise for Emotional Abuse?':¹²

'It is plausible that coaches may interpret the process of developing mental toughness as an invitation or encouragement to overlook ethical boundaries and be particularly harsh, uncompromising, or insensitive to the young athlete's physical and emotional needs. It is possible that this could occur with or without an intention to do harm,the power imbalances between athlete and coach are such that young athletes often submit to unrealistic expectations and accept abuse while suppressing their own feelings and thoughts...they become normalised and accepting of demands that were previously considered damaging or undesirable. The acceptance of these demands is said to be based on the belief that in order to be successful they must embrace the demands of the culture.....harsh coaching practices may develop the mental toughness of young athletes is the possibility that coaches may be unknowingly exhibiting the types of behaviours that can be described as cruel or emotionally abusive. Coaches may do so based on a failed understanding of when their actions cease to be developmental and become emotionally abusive... (American Professional Society on the Abuse of Children, 1995). These behaviours can be placed into eight categories; Belittling, humiliating, shouting, scapegoating, rejecting, isolating, threatening, and ignoring.'

370. This article captures, consistently, the tenor of submissions that I received about emotional abuse, the coach/athlete power imbalance and the reported tendency of some coaches to equate a gymnast's injury with weakness. It is entirely conceivable that some of the more negative aspects of coaching that I have

¹² Frank Owusu-Sekyere*, Brunel University, U.K Misia Gervis, Brunel University, U.K 2016 International Journal of Coaching Science Vol.10 No.1 January 2016. Pp03-23.

described in this report (such as criticism, sarcasm, punishments, unnecessarily long training, training on injury etc.) were motivated by the coach's desire to strengthen the gymnast in some way.

371. I understand that elite sportspeople by their very nature possess the sort of mental and physical stamina that other individuals do not necessarily possess and that the adjustments that they need to make to their lifestyles (and those of their families) are considerable. But the parameters of the stamina and the impact on lifestyle need to be choices made by the athlete, not the coach. I am confident, from my meetings with BG personnel in 2021, that the organisation understands the dangers of drawing simple comparisons between success and sacrifice. However, as recently as summer 2020, when BG was aware of the crisis engulfing the sport, it was still using curriculum materials circulated to individuals associated with the Performance Pathway referring to resilience as the '*ability to suffer*'. This use of language does little to move the culture on.
372. I do understand that there are times when gymnasts (as with any sportsperson) need to be pushed to achieve to the best of their abilities. However, it seems to me that there have been times when some coaches have taken this too far, and the pushing of the gymnast has gone beyond that which the gymnast would choose to condone if they felt able to voice their views. At this point there is a risk of the behaviours becoming abusive and the environment becoming more about what the coach wishes the gymnast to do, than what the gymnast wishes to do or what is best for the gymnast.

Perfectionism

373. Gymnastics is a perfection sport. Skills, elements and routines are coached and scored from the perspective of finding faults and deducting marks. As one individual remarked to me '*the way gymnastics is marked is based on perfection and then you deduct from perfection.*' This often leads to negative feedback, the central theme of which is that the gymnast was not good enough. As the Independent Review into Gymnastics in New Zealand observed, young athletes do not usually have the emotional maturity to understand the difference between critique of their performance, and criticism of them as a person. When exposed to this multiple times a session, multiple times a week it can contribute to a gymnast believing '*I am never good enough*' and spending much of their adolescence and even adulthood lacking self-esteem despite competing at impressively high levels. This tends to make for compliant athletes who lack autonomy and are more vulnerable to a coach-led culture.

Focus on Aesthetics

374. Gymnastics is an aesthetic sport and female competitors wear attire which is relatively revealing. As described elsewhere, female gymnasts turn senior at 16 but will have been performing and competing for a long time, usually, before reaching that age. Historically there has been an imperative, well documented, to be as thin as possible, especially in the Rhythmic Gymnastics, Acrobatic Gymnastics and

WAG disciplines. The prevalence of eating disorders in the sport is well known and the subject of an established body of academic research.

375. As in other sports, there are rules relating to competition attire in gymnastics. It might be said that in gymnastics, for women, these rules are particularly detailed. Some of the rules are geared towards the safety of the gymnasts. Traditionally the sport has justified its clothing rules on the basis that judges must see the line and length of the gymnast in conjunction with movement and skills to judge the artistry of a female's performance. Even allowing for the different apparatus and skills involved, the men's sport is plainly capable of being judged without the same degree of sartorial prescription. I note that the current FIG rules about the leotard still include the following graphic requirement: *'The leg cut of the leotard may not extend beyond the hip bone (maximum). The leotard leg length cannot exceed the horizontal line around the leg, delineated by no more than 2 cm below the base of the buttocks.'*
376. The requirement (or perceived requirement) to train and compete in leotards has caused some, but by no means all, gymnasts to feel vulnerable or embarrassed, particularly during menstruation. It might be said that the sport has not been particularly progressive in this regard and that the previous emphasis on leotards has perpetuated the infantilisation of women and deprived them unnecessarily of a sensible range of choice.
377. FIG rules have also allowed the use of unitards since well before the period of Review. Initially, this was designed to improve the inclusion of women of faith rather than to give all female participants freedom of choice. Until very recently, there has been a notable lack of uptake for this alternative to the leotard. It was not possible to determine whether this was because gymnasts genuinely preferred leotards, felt unable to voice a preference or feared that their performance would be subtly marked down if they broke with convention and wore unitards.
378. Some countries have taken steps to address the situation over the last few years, including the Royal Dutch Gymnastics Federation, who revised leotard rules in competitions for girls in 2018 and Gymnastics New Zealand, who in late 2020 allowed female gymnasts to compete in bike pants and shorts. It remains to be seen whether this will develop into a wider practice.
379. In January 2021, BG published for the first time a policy called Competition Attire at Events for Gymnasts Policy. It was designed to modernise the rules and make the competition attire that gymnasts could wear at events more inclusive and accessible to all who wish to participate, irrespective of any of the protected characteristics (i.e. age, disability, gender reassignment, marriage and civil partnership, maternity and pregnancy, race, religion, sex and sexual orientation). It was also aimed to balance the need for accessibility and inclusion with the underlying need to maintain the safety of the gymnasts and the integrity of the judging of their performances. The policy applied to national and regional events but not to events governed by FIG rules. Leotards, unitards, shorts, leggings or gymnastic trousers or longs were now acceptable Competition Attire in all disciplines, subject to them being in keeping with safety,

ethical/cultural standards and to allowing performance evaluation. Photographs at the conclusion of the document provided examples of acceptable and unacceptable clothing.

380. In April 2021 some German artistic gymnasts wore unitards at the European Championships in Basel explaining that they were '*taking a stand against sexualisation in gymnastics*'. They repeated their use of unitards at the Tokyo 2020 Olympic games hitting back against what they described as the '*objectification and policing of sportswomen's bodies*'. There was some support expressed in the media by Dutch and British gymnasts but little by way of institutional response.
381. I saw no evidence that national or international leaders within the sport actively encouraged the use of alternatives to leotards during the period of Review. Judges and coaches have a key role in this and need to encourage athlete autonomy and freedom of choice over attire. This is not a question of there being anything wrong in principle with leotards if this is the choice of the gymnast. It is important that they feel empowered to make their own decisions without fear of judgment or being penalised. BG informed me that since 2021 it has consulted more extensively with gymnasts and with kit providers to discuss alternative designs. These and the new policies introduced at national level and referred to above are welcome steps, yet to be embraced by FIG.
382. The other issue relating to aesthetics is the impact that many feel it has upon the scores given to gymnasts in competition. Gymnastics performances are assessed at competitions by a panel of judges who use a complex scoring system, the Code of Points, which is revised every four years. This can leave gymnasts feeling very much at the personal mercy of judges, even though judges are required to be independent, unbiased and to score with integrity. I was informed by various gymnasts and indeed by some coaches that although judges are not supposed to score gymnasts on their personal appearance (including their body shape and weight), there was a prevailing sense that this did occur tacitly when judges scored artistry within WAG and within Rhythmic Gymnastics. Individuals from BG acknowledged that the 'aesthetic' element of the sport (in this context meaning body shape and weight) had the potential to subjectively infect the judges' scores. It was felt by some individuals from the gymnastics community that the subjective elements within judging implicitly influenced or caused dietary restriction to an unhealthy degree. This needs to be talked about and honestly addressed in judge educational materials. I was informed that FIG is working hard to educate its judges about how to score ethically and in accordance with the rules. It remains to be seen how, if at all, this will result in changing perceptions and attitudes.
383. Overall, the focus on aesthetics appears to be a factor that has resulted in some gymnasts, and no doubt their parents/coaches, feeling they need to control carefully, in some cases excessively, what they eat and what they wear in order to maximise their results in competitions. There appears to have been a general fear amongst gymnasts that there would be an impact upon their competition results if they strayed outside of the 'norms' expected of them in these areas, even if their capabilities remained the same.

Club Dynamics and Moving Clubs

384. Gymnastics is a club sport. This is unremarkable of itself and is a common feature of most sports. The reputation of both club and coach will, naturally, improve if an associated gymnast competes successfully. The ability of a medal winning gymnast to influence the number of children and young people wanting to join a particular club should not be underestimated. The coaches of successful gymnasts are influential and are usually employed by a club rather than by BG. It is not unusual for a coach to qualify as a judge at competitive events, thereby increasing his or her perceived influence.
385. Submissions suggested (as did BG surveys taken in the latter part of the period of Review) that clubs can be overprotective of coaches deemed to be capable of training gymnasts with medal prospects and can also conduct themselves in quite a territorial manner in relation to both coaches and gymnasts. During the period of Review, the Standards of Conduct prohibited coaches from poaching gymnasts. The same Standards stated that where a gymnast requested alternative coaching from a different coach, agreement to that would not be unreasonably withheld by the existing coach.
386. Gymnasts or their parents may wish to move clubs for many different reasons, including because of proximity to their home or workplace, a change in family circumstances, personality clashes or a desire to learn from a new coach or in a new environment. The Review was told by several gymnasts and parents of the practical issues with trying to move clubs. For some the main difficulty concerned the lack of alternative clubs in their geographical area. I was told that demand for clubs outweighed supply, and so at times, particularly at the lower level of the sport, it was not possible to switch to another club without joining a long waiting list. A number of submissions referred to coaches causing difficulty about a gymnast moving club and also to a fear '*because everyone knows each other, all the judges know all the coaches*' that there would be some form of adverse consequence if a gymnast '*left*' a coach or club.
387. Individuals also recounted difficulties with their current coach facilitating a move to another club and with other clubs taking them on, often because the proposed new club was '*friends*' with the other club and didn't want to be seen to be '*taking*' their gymnasts. The Review was informed about some unnecessarily negative fallouts when gymnasts moved clubs. Unsurprisingly, the worst offending arose when a particularly talented gymnast wanted to move. Concerns about being ostracised and criticised for moving clubs was another reason cited by some gymnasts or their parents for not wishing to change.
388. I retained, I hope, a healthy detachment about these sorts of anecdotes and allowed for the local rivalries and personality clashes that can trouble most sporting and commercial contexts. I was struck by the immaturity and unpleasantness that reportedly followed a change in club on some occasions. This could be played out in unattractive social media exchanges, some of which I was able to read. These exchanges involved a variety of club owners, coaches and parents.

389. An individual who runs their own club and acts as a coach and judge explained that gymnasts may need to move clubs for a multitude of reasons but that they had observed a culture whereby gymnasts would be made to feel excluded at future competitions if they moved, to the point of not being spoken to by members of the former club. I heard this from other individuals as well. I was told about an open agreement between two clubs to the effect that they would not take gymnasts from each other's clubs, though this was denied by one of the clubs in question. A former member of one of these clubs also recalled that when a close friend of hers left their club at a young age, her coaches instructed her to try and stare her friend out at forthcoming competitions and to try and make her feel uncomfortable. If correct, this type of culture reinforced the possessive and controlling atmosphere permeating some clubs and competitions.

390. I spoke with a current and senior coach who had first-hand experience of this side of gymnastics and who showed me an email in which a successful personal coach made explicit reference to their closed-door policy. I asked why this was the case:'

'I think it comes from the control aspects and the fact that you do have to put, if I put my own sort of personal feelings on this, you do have to spend 10 sometimes 15 years working with an athlete and you do have to go well over and above, if you want, it you want to get them to a high level, there is a lot of commitment, I know with my athletes I have spent a lot of time developing them as people, as well as athletes because I spend more time with them, than their parents do and I think that is a red flag, I think we could do better in the sport to protect the coaches, clubs and the athletes with that, but traditionally that is what is done, that is what has been done and when you have spent that much time and you get to the point where your athlete is starting to become successful and they say okay thank you, we want to move on, it is hurtful sometimes and it does make you.... And normally on the men's side they are fluid, people come and they go.... On the women's side there was an unwritten rule that if anyone leaves your club, they do not go to another club and we know they boycott their training and they are done.'

391. This closed and somewhat possessive culture, where it existed, reflected badly on the club owners and coaches who indulged in it. I met with BG's Community Services Director who explained that he was aware that, historically, there had been negative experiences for gymnasts moving clubs and that some clubs had engaged in overtly anti-competitive activities and policies. He considered that there were still issues, sometimes, when coaches moved clubs and gymnasts followed the coach but that this was less of an issue now that it had previously been.

392. I include this issue because it reveals another context in which the welfare and wellbeing of the gymnast appeared at times to be suborned to the self-interest of clubs and coaches. There is relatively little that a NGB can do about this until such time as a complaint or concern is raised, except to make explicit in its Standards of Conduct and related policy that gymnasts and their parents have every right to move

club, without fear of repercussions. Where a complaint is upheld in this context, the NGB should be consistent and firm in relation to sanction.

393. The fact that at least some gymnasts and their parents felt that they had little choice but to remain at their club contributed to a culture where the gymnast had little autonomy over their career, they felt somewhat beholden to the coach/club at which they were training and the power imbalance swayed even more towards the coach/club.

Inter-Relationships at BG

394. The Review received a significant number of submissions which referred to the perceived closeness of particular individuals within BG and the impact that this had on the culture of the sport and the organisation. Despite the high volume of members and participants in the sport, the competitive community, certainly from regional level upwards is relatively small, as is BG's workforce. A number of married couples worked for lengthy periods, at a very senior level¹³ either within BG or in close association with the Performance Pathway. I recognise that it is not unusual for individuals with a shared interest or workplace to meet and engage in personal relationships and that no-one should be discriminated against on the grounds of their marital status.
395. In addition to these influential marital connections, I was informed that there were visible close friendships between some of these individuals and the CEO. The job of CEO can be a lonely one in terms of ultimate responsibility, especially for someone who, like Jane Allen, has moved continent, to take up the post. Where close or marital relationships do exist in the senior leadership and at Board level, it is for the leadership, including the CEO and Board to consider the potential consequences and to take formal and transparent steps to mitigate the risks and consequences that might follow.
396. I have considered this issue because it was perceived as something which had influenced the culture of the organisation in a negative way and in a way that could affect athlete welfare. It is difficult, of course, to gauge the reasonableness of others' perceptions. Having considered all of the circumstances and information available to the Review, I do consider, as I set out below, that some of the relationships in question, and conflicts of interest (real or perceived) which arose as a result, were not appropriately managed and that this did impact upon governance and the management of the World Class Programme. In turn this affected the culture in the sport, certainly at the elite end.
397. One particularly significant example of such a relationship is the fact that the WAG Head National Coach appointed in 2012 was married to an Executive Director and Board member of BG. He was, at the time the 'Executive Director Technical and Education' (later re-named as 'Executive Director Sport'), with the UK Sport funded and BG funded disciplines all reporting to him, including WAG. These were both

¹³ Both in coaching, at Board level and in other key departments.

incredibly significant roles and the Executive Director would have remained very close to the World Class Programme in which his wife worked, close to the technical committees for her discipline (and other disciplines) and close to the selection process for international teams.

398. The line management of these individuals is relevant. The Executive Director Technical and Education worked very closely with the CEO and in terms of governance, reported into the CEO's office. From 2012, he line managed his wife's line manager, namely the Performance Director. To compound matters, between 2015 and 2017 he was appointed interim Performance Director in the wake of the unexpected departure of the previous Performance Director and he performed these duties in addition to his own executive duties. During this time, he therefore not only had technical responsibility for managing his wife, but due to his position as 'Executive Director Sport', he was technically managing himself. Between 2015 and 2017, BG 'mitigated' this by arranging for the WAG Head National Coach to be line managed by the CEO which will have increased the visible proximity between them and the proximity of the CEO to the World Class Programme.
399. When James Thomas was appointed Performance Director in 2017 he should have been line managed by the Executive Director of Sport (formerly Technical and Education). However at the same time, James Thomas had responsibility for line managing this Executive's wife, the WAG Head National Coach and so he was told by the CEO to bring any issues about the WAG Head National Coach directly to the CEO. BG's view was that this had not caused the Performance Director any difficulties.
400. I was told by one Board member that the Executive Director of Sport would leave the boardroom when the WAG Programme was being discussed but this did not accord with the recollection of other Board members that I spoke with who said that the only time he ever left a meeting, for the purpose of a conflict, was in 2019 when a Walk the Floor exercise, particularly critical of his wife and the culture in WAG, was being discussed. Given that he was ultimately responsible at executive level for the WAG Programme, this example, of itself, illustrates the depth of the problem.
401. I asked senior BG personnel about this situation and received mixed responses. Jane Allen did not see that having to line manage the WAG Head National Coach between 2015-2017 was particularly problematic. She said that it had not occurred to her (or anyone else) that this situation and any perceived closeness to the WAG Head National Coach, or her husband, could have the effect of stifling legitimate complaints. She felt that the revised reporting structures mitigated any risk. During my meeting with Jane Allen, she agreed that it would have been better to formalise this in writing.
402. Until it was highlighted in the Walk the Floor report in 2019, she had not considered that the structure of the Performance Director being lined managed by the husband of someone that he in turn line managed had the potential for a conflict of interest. Jane Allen reviewed the transcript of our meeting and added that she could now see that the issue is not whether there is a conflict but whether there is potential for a conflict. She said 'I now realise and accept that [the Performance Director's] reporting line was

a concern for some parties and that I should have been more alert to this perception and removed the conflict earlier'. Another senior executive said that the situation was 'incredibly compromised' but probably tolerated because both the husband (the Executive Director) and wife (the WAG Head National Coach) were seen as highly successful.

403. BG, as an organisation did not take any steps to demonstrate to the outside world and to its own community that it recognised the hazards of this situation and had constructed meaningful contingencies to minimise them. Neither did the Executive Director of Sport at the time of, or following, his spouse's appointment. It was only after the Walk the Floor report that the current Chair, who was relatively newly appointed to his position, amended the reporting structure so that the Performance Director reported to the CEO rather than to Executive Director of Sport, which is again undesirable. Even after this was changed, the Executive Director of Sport remained the Executive ultimately responsible for the performance and delivery of the WAG Programme being led by his wife.
404. I have no doubt that the situation had the potential to stifle criticism about the WAG Programme and undermine the authority of the Performance Director. It most likely exacerbated BG's insular reputation and culture. It also created the risk of a perception that certain individuals were over-protected, that there was a lack of objective line management and appraisal for key individuals within the World Class Programme and that there was inequity of decision making around team selections, promotions and appointments. It therefore had the ability to impact upon athlete welfare.
405. This was not the only close connection within BG. From 2016 until 2019 the other two Executive Directors on the BG Board (the Executive Director of Corporate Services (who led on the handling of complaints about coaches) and Executive Director of Strategy and Commercial Operations were married to one another. They had separate areas of operation but both reported into the CEO. Both of these Directors, particularly the Director of Corporate Services, were and are close personal friends of the CEO. The visibility of this friendship featured in submissions made to the Review which appears to have come as a surprise to the former CEO. Therefore, for a number of years, the four Executive Directors of BG, comprised a married couple who were very friendly with the CEO, the CEO and the Executive Director of Sport who was the executive in charge of his own wife's area of responsibility, and also perceived to be very close to the CEO.
406. I reiterate that it is understandable that such marital and social relationships will develop at work. Whilst the appointment of Executive Directors was no doubt in good faith, and whilst BG had, in theory, a conflict of interest policy and register, these did not address the situations described above. No-one appears to have thought about the 'optics' of such arrangements, particularly the potential it had to deter challenge at the top of the organisation (particularly at Board level) and contribute to the sense of a closed rather than an open culture.

What Features have Resulted in or Reinforced the Culture?

407. I explored whether these potential side effects had been recognised for what they were by BG at the time. There did not appear to be any organisational recognition at the time that this 'interconnectivity' might compromise the appearance of fair recruitment or objective decision making. Nor did there seem to be awareness that such connections might inhibit the ability of others to check and challenge or to make complaints.
408. There was a theme in some submissions and in my meetings with some but by no means all individuals from BG that the CEO's personal style deterred reasonable challenge and this, combined with the closeness of her relationships with Executive Directors, could deter such challenge. The Chairman at the time took the view that if someone wanted to complain about something of substance, they would use the complaints procedure and he told me that he had not seen evidence that any close personal relationships had impaired effective working at Board level. Other current and former Board members agreed and felt that it was not a situation that required reform. Since those meetings, BG has had the chance to reflect upon these issues. In its final written submission to the Review, it conceded that the arrangements that I have described could in principle deter others, including Board members, from questioning practice and that it had not addressed the issue of conflicts of interest at senior level as robustly as it should have. BG agreed that the personal connections could lead to or create the perception of conflicts of interest and that it would have been better if they had been avoided.
409. I have no doubt that each of the individuals that I have referred to in this context considers that at all times they acted in a professional manner. I am also sure that each would say that their respective appointments have been open and competitive. It is extremely unfortunate, given the perceptions that I was informed about, that some of these individuals either led or worked in the very departments which most needed to be scrutinised: Ethics and Welfare, the World Class Programme (especially WAG) and Education. Each of these functions, in turn reported into the CEO.

Conclusions about Features of the Sport that have Impacted the Culture

410. I understand from UK Sport and Sport England that they would expect BG as the NGB to be aware of the facets of the sport that might impact upon athlete wellbeing and to take the appropriate steps to mitigate them. The factors that I have listed in this section of the report were identifiable risk factors which BG knew, or ought to have known, about. These factors have had a negative impact on athlete welfare and on the culture of the sport because they were not adequately managed or mitigated.
411. There were systems and structures in place in the sport during the period of Review which were designed, in part, to manage and address gymnast welfare and wellbeing. I now move on to consider these systems and structures and how they have, or have not, functioned in terms of gymnast welfare.

The systems/structures in place for managing gymnasts' wellbeing and welfare

Introduction to the Safeguarding Landscape

412. Sporting organisations have a duty of care to the children and young people who take part in sport. Funded governing bodies, such as BG, have defined safeguarding responsibilities and protecting the welfare and wellbeing of gymnasts comes within this. In this section, I set out what systems have been in place in gymnastics, both at recreational level within clubs and at high performance level, in order to fulfil these safeguarding responsibilities.
413. During my discussions with individuals, I encountered a variety of preconceptions about what the word 'safeguarding' means. For example, I was concerned to note that an individual employed by BG to work with Olympic gymnasts said that it meant 'caring' which on any view represents a misunderstanding, however well-intentioned, of safeguarding. I had the impression that for some participants it was mainly about protecting children from the risk of sexual harm and protecting adults from possible exposure to allegations of abuse (training alone, giving a child a lift in a car, allowing a child to stay over etc.). I also had the impression that some participants understood the word only to be engaged when it was felt necessary to call the police or to contact the local authority over an allegation.
414. I have adopted the definition of safeguarding as set out in the statutory guidance 'Working Together to Safeguard Children' (referred to further below), which BG also applies and which states:
- 'Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:*
- *protecting children from maltreatment;*
 - *preventing impairment of children's mental and physical health or development;*
 - *ensuring that children grow up in circumstances consistent with the provision of safe and effective care;*
 - *taking action to enable all children to have the best outcomes.'*
415. Safeguarding is plainly a wide concept covering any behaviours and practices which may cause harm or affect the welfare, safety, health and development of a child. It is an umbrella term which includes child protection. It engages proactive and reactive obligations that include policy development and implementation, complaints handling, risk assessment, education and training. Although all cases of child protection and abuse involve safeguarding, conversely not all safeguarding matters will involve abusive behaviours. Unintended behaviours and poor practice (which may not be considered abusive) have

potential to cause harm and/or impact on the welfare and wellbeing of a child and therefore I have considered that these behaviours also fall within the Terms of Reference.

Safeguarding Before 2008

416. I have set out in this section the most significant developments in the years preceding the start of the period of Review in order to set the scene of the safeguarding landscape at the start of the period of Review, in 2008.
417. In 2000 the Child Protection in Sport Action Plan was published by Sport England following an identified need to provide some sort of framework for safeguarding and protecting children and young people in sport. It was designed to create safer sporting environments for children and to provide increased confidence to parents. The BG Director of Coach & Judge Education took responsibility for safeguarding in gymnastics at this time and introduced a Child and Adult Protection Policy as part of the new Health, Safety and Welfare Policy, as well as a Code of Conduct for Coaches.
418. Various safeguarding scandals in sport lead to the formation in 2001 of the CPSU as a partnership between the NSPCC, Sport England, Sport Northern Ireland and Sport Wales. The CPSU works with sports organisations to provide safeguarding support, guidance, resources, training, and advice to help them develop and implement policies and procedures to safeguard and protect children and young people. Initially the CPSU was funded by Sport England to work with grassroots sports only.
419. In September 2002, the CPSU launched the 'Standards for Safeguarding and Protecting Children in Sport' (which have subsequently been revised and re-published). They were endorsed by the NSPCC, Sport England and UK Sport and have effectively become the industry safeguarding standards for the sports sector.
420. Since well before the period of Review, all funded NGBs, including BG, were required to work towards the itemised Standards as a condition of their public funding.¹⁴ These Standards provided the framework for all those involved in sport to create a safe sporting environment for children and young people, to enhance their welfare and to protect them from harm. This included requirements about effectively implementing relevant policy and procedure. The Standards are very wide in their definition and application and emphasise the importance of safeguarding education and training. They do not just apply to the type of concern that might justify formal referral, for example, to another statutory authority,

¹⁴ The standards apply in England. In Wales, the Framework for Safeguarding and Protecting Children in and through Sport in Wales provides an overarching approach to safeguarding children consisting of 5 standards that a sports organisation should demonstrate it undertakes at all levels of its sport. In Northern Ireland, the Safeguarding Standards of Sport are based on the principles in the Code of Ethics and Good Practice for Children's Sport developed by Sport NI. There are 6 standards of good practice for governing bodies to work towards. In Scotland, the Standards for Child Wellbeing and Protection in Sport enables sports organisations to adopt best practice, values and behaviour to create a culture in sport that promotes, supports and safeguards children's wellbeing.

such as a police force or local authority. They apply to any practice that has the potential to affect the welfare of a child or young person or to place them at any sort of risk of harm. They recognise that high performing children and young people are particularly vulnerable. Each standard was accompanied by criteria and essential requirements, designed to enable sporting organisations to create the structures and ethos necessary to protect children and young people from harm. The requirements are progressive and demonstrate insight, now nearly two decades old, into the risks posed to young sporting participants and the action that can be taken to minimise those risks.

421. In September 2004, BG established an Ethics and Welfare Committee as a sub-committee of the Board, responsible for advising the Board and recommending policies on issues of health, safety & welfare, child protection, ethics, and other issues. At around this time and afterwards, it is possible to trace certain safeguarding developments within BG to the requirements set out in the Standards. In October 2004 Ethics and Welfare became a separate department with the Ethics & Welfare Manager reporting directly to the CEO. From 2004, all BG members were required to report all safeguarding concerns to BG. At around this sort of time, BG introduced requirements that anyone who worked or volunteered with children in a position of trust was required to complete safeguarding training and a criminal record check every three years. Between 2004 and 2006 several Regional Welfare Officers were appointed on a voluntary basis. Their role is set out in more detail in the section of my report entitled [Regional Welfare Officer Role](#) but essentially it was anticipated that they would provide guidance and technical support to clubs, maintain lines of communication with other agencies including local authorities and where necessary assist clubs which had experienced safeguarding concerns or issues relating to poor coaching practice.
422. In 2006, the government published 'Working Together to Safeguard Children'. It provided statutory guidance on inter-agency working to safeguard and promote the welfare of children in accordance with legal requirements and principles. This guidance has gone through various iterations.
423. In 2006 the LADO was introduced across all local authorities following guidance in 'Working Together to Safeguard Children 2006'. Every local authority has a LADO responsible for managing child protection allegations made against those who work with children. The LADO is there to ensure that all allegations or concerns about professionals or adults working or volunteering with children are recorded appropriately, monitored and progressed in a timely and confidential way. This was a position which offered guidance and support to agencies such as BG when they were concerned about an individual who may pose a risk to children within their organisation or from outside. Where necessary the LADO would liaise with police and other agencies and monitor the progress of cases.
424. Under Membership Rules, from 1 October 2007, clubs were not able to register with BG unless they had a trained Club Welfare Officer. Their role is critical. They are there to promote safeguarding, to ensure that the club environment is safe for children and adults at risk and to respond to any welfare related concerns that are brought to their attention. Judging from statistics provided to me by BG this

requirement took far too long to be complied with. For example, in 2009, out of 1,376 clubs, 1,023 (i.e. 74.34% of clubs) had no assigned Club Welfare Officers. In 2012, out of 1,359 clubs, 532 (i.e. 39.15% of all clubs) still had no assigned Club Welfare Officer.

Safeguarding After 2008

425. From 2008, clubs could not register with BG unless the Club Welfare Officer had completed a 'Time to Listen' Course. This course was designed by the CPSU to assist volunteers in creating a child centred club environment and in understanding their role as Welfare Officers. It was delivered by BG tutors in clubs and conference centres. In March 2011, Ethics and Welfare within BG became part of the Support Services portfolio and reported into the CEO.
426. Via a combination of BG Membership Rules or Regulations dating back at least to 2010, members had to satisfy BG, as a condition of membership, that all coaches and club staff met relevant criminal record checks (via the DBS since 2012 in England and Wales). The BG Standards of Conduct during the period of Review listed the criminal cautions and convictions which would automatically disqualify a member without the need for any disciplinary procedure. Members were and are required by the Standards of Conduct to notify BG if they are arrested or charged with a criminal offence.
427. The Ethics and Welfare Committee became the Standards Committee. This Committee oversaw the development of policy and practice across Ethics and Welfare, Health and Safety, Data Protection and Equality. It still exists.
428. The CPSU standards were updated in 2016 and in 2018 but the central features remained the same. The government's 'Working Together to Protect Children' guidance was revised in 2018 when new statutory safeguarding obligations were imposed on sports organisations.
429. In 2016 Sport England and UK Sport introduced the Code for Sports Governance, which funded sports were required to comply with. A joint review of this code was launched in July 2020, with the expectation that the safeguarding requirements would be further strengthened. As a result of the review, sports organisations are now required to appoint a director to the Board with responsibility for welfare, safety and 'people'. I note that despite these recent developments, the House of Lords Sport and Recreation Committee in its November 2021 report about Sport, Health and Wellbeing recommended that both UK Sport and Sport England conduct and publish a review evaluating the impact of the revised Code.
430. In June 2018 the Integrity Unit was established by BG. I was informed by BG that at this time, BG realised that the US Gymnastics case relating to Dr Larry Nassar had impacted upon BG with increased scrutiny and public/press awareness. All functions, policies and procedures relating to Safe Sport (the term that has recently been used to cover all aspects of safeguarding within sport following the development of the Safe Sport Authorization Act in the USA), were brought under this new organisational unit focused on the following, amongst other things: governance and policy development, safeguarding children and

adults, health and safety, conduct and discipline, customer complaints, equality and diversity, data protection, anti-doping and anti-corruption. A new Integrity Director was recruited to run the Integrity Unit.

Adults at Risk

431. Although safeguarding children and young people has been addressed in sport for many years with the inception of the Child Protection in Sport Unit in 2001, safeguarding adults is still a comparatively new area of work for the sport and activity sectors.
432. By 2010, BG had a Safeguarding Vulnerable Adults Policy (58 pages). The policy identified categories of abuse and bullying. There was very much an emphasis on practice and procedure at club level. The definition of vulnerable adults did not include elite gymnasts.
433. The Ann Craft Trust is funded by Sport England (from 2015 - present), UK Sport (2019 - present) and Sport Wales (2018 – present) to address safeguarding adults at risk in the sport and activity sector. It is a charity that campaigns and supports organisations to safeguard and protect adults at risk and disabled young people. It works across the statutory, voluntary and independent sector, developing systems for safeguarding adults.
434. BG has worked with the Trust since 2019 to develop awareness about safeguarding adults within the sport and this included the provision of training to Regional Welfare Officers in 2020. Given that BG now recognises that elite gymnasts are particularly vulnerable and that some elite gymnasts are over 18, such gymnasts are potentially adults at risk. ,

Systems/Structures in place at BG

BG Policies, Rules and Regulations

435. Against this background, BG had in place during the period of Review a number of policies, standards and regulations relating to membership, athlete welfare, wellbeing and safeguarding. These are discussed in more detail in various sections below, but in summary were as follows:
 - a. Membership Regulations (2008 – 2012);
 - b. Membership Rules (the successor of the Regulations, 2012 – 2020);
 - c. The Standards of Conduct, which had to be complied with as a condition of BG membership. These Standards of Conduct required members and clubs to comply with BG's policies;
 - d. 2017 Standards of Conduct for Coaches and Officials;

- e. 2017 Standards of Conduct for Clubs;
- f. Safeguarding policies:
 - i. Child Protection Policy 2004-2009;
 - ii. Safeguarding and Protecting Children Policy 2009-2014;
 - iii. Safeguarding and Protecting Children Policy 2014-2017, which was shortened but had associated guidance on 'Recognising and responding to abuse and poor practice' and 'Safe Environment' guidance;
 - iv. Safeguarding and Protecting Children Policy 2017-2019;
 - v. 2019 Safeguarding Policy and Procedures, which reverted back to including all safeguarding principles and procedures in one document;
- g. Health, Safety and Welfare related policies as follows:
 - i. Health, Safety and Welfare Policies in 2005, 2012, 2014, 2016, 2018 and 2020;
 - ii. Health, Safety and Welfare Policy Statement 2010;
 - iii. From 2016 onwards, associated guidance on 'Safe Trips', 'Safe Coaching' and 'Safe Participation';
- h. Other relevant welfare-related policies, including:
 - i. Treatment of Paediatric Patients Policy 2018;
 - ii. BG Dual X-ray Absorptiometry Policy May 2019;
 - iii. Weighing Gymnasts: BG Position Statement January 2020.

The Work of the Safeguarding Team

436. In 2008, when membership figures stood at 185,558, the BG department which dealt with safeguarding was very small, consisting of seven members of staff, five of them part time. The Safeguarding Team dealt with all complaints and concerns raised directly with BG about BG members or referred from clubs, regardless of whether they related to safeguarding.
437. Before 2011 the Safeguarding Team sat within the Membership portfolio. Following a restructuring, it was moved into a new Ethics and Welfare department within the portfolio of Corporate Services. By then, according to an available organisational chart, the size of the team had reduced significantly and

there was one safeguarding and compliance officer. In 2013 the structure was changed again and two Ethics and Welfare Managers were appointed, one dealing with Standards and one with Education and there remained a Safeguarding and Compliance Officer. Managerial duties included leading and developing the network of Regional and Club Welfare Officers and the supervision of complaint case management.

438. This broad constitution continued until 2016 when BG appointed a dedicated Safeguarding Manager. His role profile identified significant responsibilities. These included:
- a. Developing and managing all systems for safeguarding complaints and concerns associated with gymnastics environments and activities (i.e. across the whole sport). This included responsibility for the overall management of all such complaints, overseeing effective communications with the Welfare Officer network and other relevant stakeholders, leading on all cases of suspected abuse, auditing records, and facilitating lessons learned. He oversaw the investigative processes underlying complaints work. He also dealt with complaints himself and liaised with statutory agencies, where necessary;
 - b. Developing, training and supporting a skilled and competent safeguarding workforce across gymnastics environments and activities. This meant developing and supporting all Regional Welfare Officers and any other personnel within BG and at club level with safeguarding duties;
 - c. Managing other designated safeguarding duties. This included overall responsibility for complying with DBS requirements, attending the Standards Committee, contributing to all relevant policy, practice and training plans.
439. The Safeguarding Manager agreed that his role included review and revision of safeguarding and welfare related policy, the inclusion of accessible information about safeguarding on the BG website and ensuring that safeguarding is properly embedded within BG's clubs, educationally and practically. As part of his duties, he also chaired the Home Countries Joint Safeguarding Committee, he was lead signatory on DBS checks and he managed the team budget and assessed coaching certificates whose content was affected by coach conduct or other welfare issues. The Safeguarding Manager was also heavily involved in updating and delivering the online refresher safeguarding training and some Adults at Risk training.
440. The scope of the post was therefore, on any view, wide, although I note that surprisingly, it did not refer to the CPSU annual review process which he also oversaw. The Safeguarding Team at this time, consisted of three members of staff: one manager, one Ethics and Welfare Officer and one Ethics and Welfare Co-ordinator. I was informed by BG's Safeguarding Manager, that the co-ordinator role was an important one, being the first port of call in responding to a concern. The co-ordinator provided administrative support, arranged case management meetings, bundles and hearings and filtered information coming back into the office from Regional Welfare Officers.

441. In reality, this small team of three people was required to manage all complaints and concerns about members (not just safeguarding ones), even though the Safeguarding Manager's role profile, on paper, was confined to managing safeguarding within the organisation and its gymnastics environments. By 2016 BG had over 340,000 members, of whom over 260,000 were aged less than 12. On any reckoning, it seems to me that this team was obviously too small to manage all of the functions designated to the Safeguarding Manager and his team (see [paragraphs 642 to 648](#) further below).
442. In 2017 BG moved from a club-based membership system to an individual membership system. Whereas previously, the clubs had provided BG with membership data, from 2017, anyone who wanted to be a member had to register directly with BG through the BG website. This change was required to bring BG into step with General Data Protection Regulations requirements. The Ethics and Welfare team increased by two in 2017/18. This appears to have been in response to the publicity surrounding the FA scandal into non-recent sexual abuse. Two safeguarding officers were appointed and given geographical responsibility, one for the North and one for the South.
443. As I set out above, in 2018 the Integrity Unit was established, and an Integrity Director was appointed. The Unit was placed under the direct control of the CEO in 2019. There was yet more restructuring and non-safeguarding complaints about members were referred to a new Complaints and Disciplinary Manager. This left the Safeguarding Manager in charge of only those complaints relating to safeguarding, as should always have been the case under his job description. In the same year, the team was expanded to include a third safeguarding officer who was given responsibility for the east of the country. The Safeguarding Manager had intended to divide England into four sectors with a safeguarding officer appointed for each but this did not occur.
444. By June 2020, the Safeguarding Manager recalled that his team had expanded and according to recent information provided by BG this consisted of three field-based safeguarding officers and two office based ones. By this time BG was the governing body for 1550 clubs and 365,494 individual members. It had approximately 200 employees in total. When the sport found itself at the centre of a media storm in July 2020, the Integrity Unit recruited temporary additional staff with relevant safeguarding experience, on rolling six-month contracts to assist with the increased volume of complaints. At the time of writing, BG intends to recruit a further six safeguarding officers from this temporary pool to enhance its capability. Each officer and a team leader will be appointed to each of the ten existing geographical regions which go to make up the English Gymnastics Association. This new team will also support the other home nations.
445. The work of the Safeguarding Team is, theoretically, both reactive and proactive. The reactive element is mainly case work: responding to reported concerns and complaints. In this work, the team has been heavily reliant on volunteers: the Club Welfare Officers who might be the first port of call for a safeguarding concern and the Regional Welfare Officers who assisted out in the field, occasionally visiting clubs where concerns had arisen and monitoring any action plans put in place as a result. Despite the

input of volunteers, the 'reactive' case work of the Safeguarding Team has been significant. BG told me that in the period July 2015 to July 2020, it received an average of around 300 complaints per year.

446. The proactive safeguarding work of the team rested mainly, after 2016, with the Safeguarding Manager. Before then it had been split between the two Ethics and Welfare Managers. This proactive work included the development and implementation of policies relating to safeguarding, interaction with clubs to promote and monitor safeguarding standards, safe recruitment, work with Welfare Officers to support their role and developing and training the gymnastics community on safeguarding. To deliver these functions, the Safeguarding Team would also need to be aware of changes and developments in safeguarding on a more general level. I asked the Safeguarding Manager whether he had to undertake any continuing professional development and I note that he does not. He felt that he kept sufficiently up to date through his contact with outside organisations and during his attendance at conferences and forums.

447. In responding to my requests for information about how BG raised awareness and offered support about safeguarding to the wider gymnastics community, it pointed to the following, all of which are discussed in more detail throughout this section:

- 1) The use of Welfare Officers in clubs and the ability of clubs to promote safeguarding;
- 2) Providing direct advice to clubs through the Safeguarding Team and a free counselling helpline available to all members and accessed through BG insurance;
- 3) Responding to complaints;
- 4) Specific national campaigns such as Anti-Bullying Week;
- 5) Leaflets;
- 6) Athlete insight surveys available at events or online.

448. I would add to this list that education and training and the promotion of Safe Recruitment were also key parts of the proactive work of BG in promoting and supporting safeguarding matters within the gymnastics community.

449. I explored with the BG Integrity function and with BG more generally the ways in which it had gone about the reactive and proactive safeguarding responsibilities described above. Where necessary I sought the views of and information from other organisations including Sport England and UK Sport.

Voluntary Welfare Officers

450. In common with other sports, gymnastics could not operate without volunteers. In some ways, especially at recreational level, they are the backbone of the sport. Most are committed and caring and want only

the best for the participants. What follows in this report about the very real limitations of a system which depends almost exclusively on volunteers to implement safeguarding, is in no way meant to criticise the many individuals who forfeit their spare time in the interest of the sport and diligently endeavour to discharge their duties at club and regional level.

451. It was obvious from the information supplied by BG that it placed significant reliance on Club and Regional Welfare Officers to 'deliver' safeguarding at club level. Throughout the period of the Review it has been a mandatory requirement for any club that is a member of BG to appoint a Club Welfare Officer. The Club Welfare Officer is intended to be the main point of contact at the club for safeguarding, to ensure that safeguarding matters are handled appropriately and that appropriate safeguarding policies are put in place.
452. They can seek advice and support from the BG Safeguarding Team and also from a network of Regional Welfare Officers put in place by BG. The Regional Welfare Officers are there to advise and support clubs, ensure any incidents that should be reported to BG from clubs are reported as required and to help deliver relevant training. They are also unpaid part time volunteers. Event Welfare Officers were recently appointed by BG to attend competitive events and squads and act as 'on call' welfare support. This role was implemented in 2018 when a formal role description was devised and a budget set to provide a professional service at all BG national events. The role has in fact been undertaken either by a Regional Welfare Officer under a contract for service or by a member of the BG Integrity team.
453. BG provides training for Welfare Officers, which is discussed in more detail below. In summary, Welfare Officers were required to have current safeguarding qualifications, which have to be renewed every three years. From about 2008 they were also required to complete the CPSU 'Time To Listen' course and to have enhanced DBS clearance.

Club Welfare Officer Role

454. According to statistics provided by BG, in 2008 there were 425 Club Welfare Officers (for 1376 clubs) and by 2020 there were 1708 Club Welfare Officers (for 1550 clubs). The essential Terms of Reference for a Club Welfare Officer have not changed since 2004. It has been and still is the role of a Club Welfare Officer to:
- a. Assist the club to put in place policies and implementation plans for safeguarding and promoting welfare;
 - b. Be the first point of contact for club staff and volunteers, children and parents for any issue concerning safeguarding, poor practice or potential/alleged abuse;
 - c. Ensure that all incidents are correctly reported and referred in accordance with BG guidelines;

- d. Ensure that all relevant club members access appropriate safeguarding training;
 - e. Ensure that BG procedures for recruitment of staff and volunteers are followed and all appropriate existing staff or volunteers have up-to-date Disclosure and Barring Service (DBS) disclosures;
 - f. Maintain local contact details for Children's Social Care Services, the Police and Local Authority Safeguarding panels;
 - g. Ensure that codes of conduct are in place for club staff and volunteers/officials, children and parents;
 - h. Advise club management on safeguarding issues;
 - i. Ensure confidentiality is maintained and information is only shared on a genuine 'need to know' basis;
 - j. Attend club management meetings to provide an update on safeguarding within the club environment.
455. From 2004, their core skills included: Basic administration and record maintenance, a child-centred approach, communication skills, confidence in relation to referring cases externally and ability to ensure policy and procedures are effectively implemented.
456. The training requirements from 2004 were:
- a. 3 hour Child Protection Awareness to be renewed every 3 years;
 - b. 3 hour Child Protection in Sport '*Time to Listen*' training for designated persons for child protection/welfare in sport (Club Level).
457. Welfare Officers were also recommended to undertake:
- a. BG Child Protection Implementation training;
 - b. BG Club Management Module (includes equity training);
 - c. A Club for All (Equity training).
458. The scale and importance of the task is immediately apparent and as I have discussed in the section of my report regarding [The Role of Welfare Officers in Investigations](#) BG also leant on some Welfare Officers to investigate complaints at club level and to monitor the outcome of some complaints which amounted to a further expansion of their role. It strikes me as optimistic in the extreme, to expect a

volunteer to want to or be able to fulfil such detailed and demanding duties within the technical and important arena of safeguarding and welfare. This observation has to be considered in the context of a governing body whose membership was growing rapidly year on year and in the context of a membership which predominantly consisted of children.

459. These officers are appointed by individual clubs. Sometimes the role of Club Welfare Officer is filled by a parent who may or may not have some incidental relevant safeguarding knowledge. Sometimes one of the club's employees undertakes to perform the duties, either voluntarily or as a contractual bolt on to their employment contract. It is not unusual to find coaches filling the role.
460. BG did provide guidance about the recruitment of Club Welfare Officers. For example, in 2008 BG created *'The Registered Clubs Regulations'*. This specified the training requirements for Club Welfare Officers and made it clear that an officer must not be related to or in a relationship with the head coach or manager of the club or be a member of the club coaching team unless compliance with the latter was not reasonably practicable. In January 2018 BG published guidance about recruiting Club Welfare Officers. The significant scope of the role was recognised as was the need to avoid any potential conflicts of interest. BG stipulated that the role must not be taken on by a *'key member'* of the coaching team or member of their immediate family. This stipulation had also featured in earlier policy from BG about safeguarding vulnerable adults.
461. If there were no other candidates, then a person with more limited involvement in coaching could undertake the role. Police officers, teachers, social workers were identified as ideal candidates. Once appointed, the officers were required to be fully involved in the club's activities. Candidates were supposed to go through a formal and safe recruitment process. The fact that BG stipulated that prospective candidates must be provided with full details of what the role entails and how they will be supported in the position, suggests that Welfare Officers sometimes agreed to perform the role without fully appreciating the onerous nature of it. BG acknowledged in the guidance that it could often be very difficult to find a suitable candidate for the role. This too, was born out in submissions. BG provided some guidance during the period of Review about the sort of steps clubs could take to ensure that club members knew how to identify and contact Club Welfare Officers.

Regional Welfare Officer Role

462. The 2004 Child Protection Policy (in force until 2009) identified in detail the role of the Regional Welfare Officer. Central features of the role included:
- a. Offer advice and support clubs in relation to child protection and welfare issues;
 - b. Ensure that all incidents are correctly reported and referred out in accordance with BG guidelines;

- c. Help ensure adequate provision of BG/Child Protection in Sport Unit (CPSU) child protection training courses;
- d. Deliver relevant training.

463. By 2019, the BG Safeguarding Policy listed the role in the following way:

- a. Ensure club personnel understand what their 'duty of care' towards children actually means on a day-to-day basis, working closely with the Club Welfare Officers to achieve this;
- b. Develop and maintain working relationships with Club Welfare Officers within their region, where possible, and the Safeguarding Team;
- c. Keep up to date contact details for the Safeguarding Team, local details for Children's Social Care Services, the Police and Local Authority Safeguarding panels;
- d. Ensure clubs hold and follow the appropriate Policies and Procedures, including but not limited to, Safeguarding Policy, Anti-Bullying Policy, Equality and Diversity Policy and any other documentation, as asked to review by the Safeguarding Team;
- e. Ensure serious and repeated incidents of poor practice are reported to the Safeguarding Team as appropriate;
- f. Ensure confidentiality is maintained and information is only shared on a genuine 'need to know' basis;
- g. Promote the completion of Safeguarding and 'Time to Listen' training before Club Welfare Officers are appointed and ensure that all relevant training of all staff within the club is kept up to date.

464. Once again, the scale and level of responsibility of this voluntary post is significant. In addition to the duties identified above, I was informed by BG that they also conduct risk assessments at clubs.

465. The training requirements are essentially the same as those for the Club Welfare Officer role. Although the role is voluntary, Regional Welfare Officers go through a formal recruitment process involving an interview. They are appointed by the Region in which they are working (the English Gymnastics Association consists of 10 regions). I was informed by BG's Safeguarding Manager that they include former teachers, police officers, nurses, gymnasts, and club owners. By 2016 there were about seventeen such officers. After the appointment of a Safeguarding Manager, this figure gradually increased to approximately 24 by 2020 and has now reduced to 20, all of them being part-time.

466. I asked about contact between BG and the Regional Welfare Officers and was told that it was mainly through casework i.e. it was reactive when an issue had arisen, although as described below BG did

arrange annual conferences for them. I asked the Safeguarding Manager how BG obtained a full picture of how safeguarding was working out in the regions and how his team stayed in touch with Regional Welfare Officers, given their voluntary status, beyond annual conferences or ad hoc training events. In response I was informed that 2017, Regional Welfare Officers were asked to submit monthly reports to the Safeguarding Team to provide information about any new cases or concerns that they had received. Whilst this is an obviously sensible idea, it did impose yet further on volunteers, many of whom have busy day jobs. Unsurprisingly, there was a low rate of returns and the subsequent loss of the Safeguarding Co-ordinator from the Safeguarding Team meant that the returns that did come in were not analysed. The Safeguarding Manager reduced the frequency of required returns, without much by way of improved response rates. The reports stopped altogether during the pandemic and were replaced with a weekly virtual 'catch-up' with the Safeguarding Manager. Post lockdown, the system of providing returns has resumed.

467. It was quickly apparent to me that the BG Safeguarding Team saw the Regional Welfare Officer workforce as a critical link between BG as an organisation and the clubs. For example, if a complaint or concern was received by BG, it might ask the Regional officer to visit the relevant club to check on its processes, and where appropriate, ensure that any sanction, such as providing a coach with mentoring, was implemented. Regional Welfare Officers were also supposed to be available to provide advice and guidance to Club Welfare Officers in the event of a query. In other words, BG required one set of volunteers to support and monitor another set of volunteers in the context of safeguarding.
468. I received information from a number of regional Welfare Officers about the challenges of the role. These included difficulties in record keeping, not always being informed by BG about case management developments, not having enough time to devote to clubs spread across wide geographical areas, a lack of awareness of safeguarding issues in other regions and therefore a lack of a joined-up approach.

Safeguarding Training

469. There is a foundation safeguarding course specially designed for 16-17 year old coaches who are completing Level 1 and an online refresher course that all coaches and Welfare Officers undertake. Coaches and Welfare Officers are required to complete the 'refresher' safeguarding training at least every 3 years. Club owners and managers who are not coaches or Welfare Officers do not currently have to undertake the training.
470. Well before 2016, BG used to design and deliver its own face to face initial safeguarding course. The Safeguarding Manager candidly told me: *'I understand way before my time and I don't know when it stopped that BG used to deliver its own direct initial face to face but I haven't got the resources to do that and obviously that would have to link in with education.'* In recent years BG has relied on external providers to deliver initial safeguarding training.

471. The BG Board started to receive safeguarding training in 2020.

Training and Education of Coaches

472. Coaches are the individuals who have much of the face-to-face engagement with gymnasts and, as I have seen from the submissions I have received, shape the gymnast's experience of the sport. It is therefore important that they understand BG's role in protecting gymnast welfare and that they understand their own role in safeguarding gymnasts. This understanding should come from a combination of education, training and experience. Education and training will include specific safeguarding training, but I would also expect athlete welfare to be intertwined with the teaching of other skills being developed in gymnastics coaches.

473. At my request, I spoke with senior staff from BG's Education Department. I am extremely grateful for the information and materials that they provided. For most, if not all the period of Review, the education department has reported into the previously styled Executive Director of Technical and Education and in more recent years the Executive Director of Sport. The person who held these roles from 2010 to 2021 was Martin Reddin. Unfortunately, I was unable to obtain his insight into this critical area of investigation because he declined the invitation to meet with me.

474. I was informed that the education department, working in conjunction with other functions within BG, is responsible for setting coach education requirements. The Safeguarding Team was previously involved in preparing safeguarding training for coaches. The fact that responsibility for safeguarding training for coaches has fluctuated over time has probably not assisted with its development and delivery.

475. The education department itself was historically rather small. Its responsibilities have included judge education, coach education and training schoolteachers who teach gymnastics. Much more recently, it acquired responsibility for delivering the 'Time to Listen' course to Welfare Officers and the BG Safeguarding courses. The department developed considerably after 2017, when a resource team was created and when BG intended to provide more internal input into the content of coaching materials, rather than relinquishing that exercise to external agencies. I am conscious that the crisis in the sport overlapped with the pandemic and that both issues will have proved disruptive to the delivery of education within the sport. BG is in the process of re-writing some of its course content. The pandemic prevented face to face training and existing courses were adapted to permit qualification to continue.

476. The landscape is not straightforward because of the number of different gymnastics disciplines and because of the variety of club and employment structures. The levels of coaching certificates apply separately to each discipline which means that some (but by no means all) of the content must be modified according to those different disciplines. I specifically asked about the education of the qualified senior coaches within the non-UK Sport funded disciplines, such as Rhythmic Gymnastics and Acrobatic Gymnastics and was informed that there are no continuing development training requirements imposed

upon them by the education department apart from the safeguarding training, Positive Coaching and DBS clearance.

477. The National and Head National Coaches for Trampoline and Artistic Gymnastics are employed by BG. The most senior coaches for all the other non-funded disciplines are not. The Performance Director can direct the employed coaches to attend courses or conferences. I set out more information about High-Performance coaching below. The personal coaches of gymnasts and all other coaches are usually employed by their clubs rather than by BG. Generally, it is the coaches themselves, in conjunction with their clubs who decide when a new qualification or course should be taken. The systems in the Home Countries are different. Funding also varies. In Wales and Scotland, coaches can apply for grants to cover the cost of certain educational activities. In England, a coach who wishes to progress through the various coaching levels must self-fund, unless their club agrees to cover the cost.
478. It is important to ensure that coaches become aware of changes in policy. The 2009 Standards of Conduct (and its successors) stated that individual participants must ensure that they comply with certain policies including the Health, Safety and Welfare Policy and the Safeguarding and Child Protection Policy. Furthermore, the Standards of Conduct also stated that every participant must ensure that they receive training and understand their responsibilities under the policies concerned as they apply to the activities that they undertake. Participants who are organisations (e.g. registered clubs) must ensure that their staff, members and volunteers do so.
479. BG holds a database of coaches containing details of current qualifications. The GymNet system also allows BG and clubs to see the currency of coach qualifications. This is colour coded to demonstrate the imminent expiry of the mandatory requirements relating to DBS status and safeguarding training.¹⁵ Until now, BG has decided that these requirements amount to a sufficient register so far as coach safety and professional standards are concerned.
480. Given that many of the concerns raised in submissions to the Review related to the conduct of coaches in the training environment, I looked at the safeguarding training and education material provided to coaches at various levels.
481. In summary:
- a. There are six coaching levels, starting at level 1 and finishing at an 'honorary' level 6 or International Performance Coach (ICP) level. Levels 4 and 5 relate to what BG would term 'high performance' coaches working with elite gymnasts. A level 2 coach (who must be over 18) may work as the

¹⁵ Welsh Gymnastics operates a similar system.

Head Coach of a club (but would be confined to coaching level 2 skills). Each coaching stage has its own materials and training course that must be completed in order to qualify at that level;

- b. Each coach at every level is required to demonstrate that they have undertaken a 'Positive Coaching' course, before they can renew their annual membership;
- c. Each coach at every level is required, in order to obtain/maintain BG membership, to demonstrate that they have undertaken an approved safeguarding course and that they have refreshed this training every three years, before they can renew their annual membership;
- d. Additional courses/seminars can be attended should the coach choose to do so but beyond the requirements listed above, there is no other mandatory CPD for coaches.

482. I asked BG to provide me with archived and current coaching course content for Levels 1 to 5 because I wanted to understand the focal points of gymnastics coach education. I note that many of the more senior coaches who were complained about to me, will have achieved the highest level of qualification before 2013, when 1st4sport Qualifications first became involved in developing, delivering and awarding coaching qualifications. By then the courses contained information provided by the EIS Head of Performance Support.

Archived Coaching Course Content

483. These materials were incomplete owing to the passage of time. I tried to obtain a sense of the whole of the content but focused on those issues which might impact upon athlete welfare and the culture of the sport. Where I refer, in this context, to 'technical skills', I am referring to the precise components and dynamics of recognised physical gymnastics routines and skills.

484. The notable relevant features emerging from the available archived information are as follows:

- a. The Level 1 Assistant Coach course was very balanced and in addition to technical skills, covered ethics, safety, safeguarding, and after 2013 useful information about mental and physical and cognitive development, growth spurt issues, overtraining and encouraging gymnasts to develop decision making skills. There was more useful guidance about positive coaching style in the resource pack than in any of the other archived levels;
- b. Before 2013, the level 2 (club head coach) course was almost entirely technical, with less peripheral information than the level 1 course. After 2013, there was a clear steer towards a coaching style which met the needs of the gymnast. The content specifically stated: '*Frequently shouting or taunting, use of derogatory remarks, constant criticism or bullying, is not acceptable and may lead to allegations of emotional abuse*'. It stipulated that slapping was inappropriate. It highlighted the imbalance of power between gymnast and coach and in the 2014 version, it categorically advocated an athlete centred

approach but without providing much by way of advice about either. It reiterated the importance of allowing parental access;

- c. The level 3 and 5 available materials were predominantly technical in nature;
- d. The level 4 materials were also largely technical although they emphasised the need for the coach to monitor maturation rates carefully and to provide positive feedback. Interestingly, the 2008 version did propose a holistic approach to gymnast development. This section included the following advice:

'It is essential as a coach, we do not treat the gymnast as a gymnastics machine and we need to be concerned with the total well-being and whole development of the gymnast, Advice on life style management can also greatly help with the holistic development of the gymnast....it is equally important for the coach to encourage the gymnast to communicate and socialise with their peers in order to develop their own credentials, social skills and life skills. This will ensure that the gymnast will possess greater self-confidence and will be able to cope more readily with new environments and different experiences. These skills are essential in general life but will also be invaluable when dealing with the media etc.'

- e. Although students were advised to become familiar with the BG Safeguarding and Health, Safety and Welfare Policies, this was only once described (in the 2013 level 2 course which was superseded by 2014).

Current Coaching Course Content

- 485. I was provided with detailed written information about the current Level 1 to 5 courses. The current resource packs date variously from 2019 to 2021. The general format of the courses, depending on the level, included a set number of hours of e-learning, specified days of face-to-face learning, post course learning and logbook completion and a practical assessment.
- 486. There was much more of a focus upon the wellbeing and needs of the gymnast. Notably:
 - a. The level 1 course resembles its predecessor though with more emphasis on positive coaching. Students are specifically told that ranting, shouting and ignoring the gymnasts are unacceptable forms of behaviour;
 - b. Details or issues which had never properly featured before, appeared in the Level 3 course. These included:
 - i. A more detailed explanation of the difference between coach and athlete centred approaches though still relatively undetailed guidance about how to adopt the latter:

- ii. Mandating the coach to develop positive working relationships with support staff;
 - iii. Asking the coach to recognise that gymnasts need a lifestyle balance and have other roles that need to be respected within their education and family settings;
 - iv. There is explicit reference to the risk of eating disorders;
- c. In the level 4 materials there is a reference, for the first time to 'soft skills' and there is a new, more conciliatory tone:

'It is important to recognise that we all have egos that need to be satisfied, but we, as coaches must ensure that we do not exploit others to satisfy our own needs. Remember that we should perhaps consider ourselves fortunate to be able to work with other equally committed people within our sport. Our coaching should always ensure that it is performer or participant centred, even though we, as coaches may lead the way'; and

'The coach will also need to develop soft people (interpersonal) skills to enable them to manage the input to the programme from the various support staff.' The resource pack uses the language of 'empowering' the gymnasts and influencing them to make decisions so that they are not over-reliant on the coach. There is more detailed guidance about coaching styles and how to handle poor athlete performance and how to avoid stress injuries.

- d. The level 5 materials are quite like the level 4 materials, but the depth of topic and detail is more adapted to the high-performance context. There is not much more information about weight management but there is guidance about the symptoms of eating disorders, especially in female adolescents. There is also more detail about the use of psychological coaching.

Safe Recruitment

487. The safe recruitment of coaches and volunteers is also within the remit of the Safeguarding Team. The informed and safe recruitment of staff and the use of criminal records checks are obvious and necessary proactive safeguarding tools. Individuals working with children and vulnerable adults within regulated activities are required to make appropriate disclosures involving enhanced level checks and this has generally included all coaches, coaching assistants, and Welfare Officers.
488. Both before and throughout the period of Review, BG had in place policies for safe recruitment. Sometimes these were stand-alone policies and sometimes they formed part of a suite of Safeguarding and Child Protection Policies. They became more detailed after 2009. Club and Regional Welfare Officers were tasked with ensuring that all relevant criminal record disclosures were made and that BG Safe Recruitment policies were complied with. After 2016, the BG Safeguarding Manager had ultimate responsibility for checking that coaches were compliant. Detailed directions were provided for the way

in which clubs should advertise jobs and process safe recruitment. The policies that I have seen dating from 2004 provided clear and technical information about the way in which checks, and disclosures should function. From 2014 volunteers within BG and clubs who worked with children and vulnerable adults were subject to the same recruitment processes as paid staff.

Counselling Helpline

489. The counselling hotline was something referred to me by BG as a method through which it supported the gymnastics community with safeguarding matters. It was not clear for how long the free counselling hotline had been in existence. Enquiries revealed that it was run by a legal expense insurance company utilised by BG. BG was not able, for understandable reasons, to provide any information that would enable the Review to understand how successful the operation of the hotline had been. There was nothing to suggest from the submissions that I received that the existence of this hotline was particularly known to the community or that it had been utilised.

Surveys

490. Surveys can contribute to a proactive assessment of safeguarding and athlete welfare, as well as provide the gymnastics community with an anonymous voice through which to raise concerns that they might not feel comfortable otherwise raising. At my request BG provided me with a variety of survey documents that BG has used to gauge the views and experiences of the gymnastics community over the period of Review. These have included Athlete Insight Surveys that were introduced in 2018, Safeguarding Surveys which started in 2019 for clubs, coaches, children and parents, a 'Club Brand Survey' in 2018 and a survey entitled 'Women and Girls (Parents)' which took place in 2018.

491. The process of surveying safeguarding in the sport therefore began very recently and was interrupted by the pandemic. Since 2020, if a complaint is received about a particular club, BG can conduct a specific and reactive safeguarding survey into that club. As part of this process, the club can be asked to engage its membership in the surveys available on the website. The results of these club specific surveys are available to the Safeguarding Team and can be analysed by the Safeguarding Manager and fed back to the Lead Investigating Officer.

GymMark and GymNET

492. GymNET is an online secured membership system which all clubs must use in order to be registered and for annual renewal of membership. For safeguarding purposes, this means that all clubs must demonstrate DBS clearance and other related criminal records checks for all coaches and specified staff. They must also appoint at least one Welfare Officer. Each year on membership renewal, the club signs a declaration that it has complied with the membership rules. ClubMark is a programme that was created by Sport England to improve operations in clubs with a particular focus on safeguarding. Each NGB

created their own version which needed to meet Sport England's minimum standards. The BG version, called 'GymMark', was launched in 2003 and went under the strapline of "safe, effective and child friendly". At its launch, Sport England pushed this as a benchmark that you would need to have achieved to access certain funding and to be allowed to work in schools. GymMark was a way for clubs to be checked, usually by the Participation department. It was a manual process involving a BG staff member visiting a club to go through a hard copy folder that the club staff would put together containing all the required information which related to safeguarding. The prerequisites before a club could affiliate to BG were strengthened and included areas such as visibility, safe recruitment, DBS clearances, coach membership. As these checks became automated, the GymMark and its associated process, which largely checked the same things, became redundant. BG began to wind down the GymMark scheme from 2017. When its umbrella programme, the Sport England ClubMark scheme, was discontinued in 2019, BG formally brought an end to GymMark. No club had its GymMark removed during the period 2003 to 2019. In my meeting with the Integrity Unit, it was confirmed that while the GymMark process would confirm whether or not clubs had particular policies, it did not involve any audit of whether those policies were being implemented in any way.

493. GymMark received mixed reviews from the BG personnel that I met with. The Director of Community Services felt that it was better than the void that preceded it but that clubs would readily comply showing that they had paper copies of policies and so could approach it from a box ticking perspective just to 'get the kitemark'. Jane Allen, the former CEO had experienced something similar in Australia. When the BG regulations changed and required clubs to demonstrate certain requirements on registration and renewal through its GymNET system, she felt that GymMark had outlived its usefulness. I also received mixed reviews from club staff. Some expressed disappointment that it was no longer used because they felt that it at least motivated clubs to reflect more on policy and procedure. Others, though agreeing that it was a good thing in theory, described it as a lot of paperwork and a form of 'jumping through hoops'.

Role of Other Organisations

494. In addition to BG, other organisations feature in the systems that have been in place to safeguard gymnasts and promote their wellbeing and welfare. These are set out in this section.

Home Countries and Safeguarding

495. BG has separate working partnership agreements with Welsh Gymnastics, the Scottish Gymnastics Association and Gymnastics Northern Ireland. Each retains different models of autonomy.
496. The BG Child Protection Policy in operation between 2004 and 2009 explained:

'BG is a UK wide Governing Body of Sport with affiliate Home Country Governing Bodies in England, Northern Ireland, Scotland and Wales. Although this document describes the principles and

procedures to be implemented and is mandatory for all BG staff, members and volunteers, Governing Bodies in Northern Ireland and Scotland are subject to different legislation. As the core principles are the same, the legislative differences have been built into the BG Policy and procedures. Clubs, Regions and Home Countries may adopt their own policies, but must ensure that they comply with the standards set in BG' policy and/or the relevant national guidance'

497. The subsequent 2009, 2014, 2017 and 2019 Safeguarding and Protecting Children Policy adopted the same approach. The Home Countries were expected to put in place defined structures to deliver safeguarding at club level and to work in partnership with BG to provide timely solutions to the resolution of poor practice concerns and disputes.
498. The safeguarding levels of engagement vary between each home nation. Welsh Gymnastics referred to itself as a 'tadpole' compared to BG and therefore, like Gymnastics Northern Ireland is primarily reliant on BG for safeguarding and other support. Scottish Gymnastics is regarded as more autonomous and seems to be something of a distant, though communicative, cousin. Scotland, essentially, retains complete jurisdiction over safeguarding in the sport.
499. The CPSU Standards apply in England. In Wales, the '*Framework for Safeguarding and Protecting Children in and through sport in Wales*' provides an overarching approach to safeguarding children consisting of five standards that a sports organisation should demonstrate it undertakes at all levels of its sport. In Northern Ireland, the '*Safeguarding Standards of Sport*' set six standards of good practice for governing bodies to work towards. In Scotland, the '*Standards for Child Wellbeing and Protection in Sport*' enables sports organisations to adopt best practice, values and behaviour to create a culture in sport that promotes, supports and safeguards children's wellbeing.
500. Consideration of the safeguarding responsibilities of the Home Countries engages issues that relate also to complaints handling and for convenience, I deal with both issues here.
501. Welsh Gymnastics (with over 20,000 members) resources and manages only a limited type of complaint or safeguarding case. The more serious cases either attract support from BG or require BG to conduct the full investigation and hearing of such matters with the support of Welsh Gymnastics. During the period of Review some 62 Welsh safeguarding cases were solely or jointly handled by BG. Historically there was no Safeguarding Manager at Wales. During the period of Review, the person with dedicated safeguarding responsibilities has performed these duties in addition to other employment or Board duties. More recently, Welsh Gymnastics has appointed an additional Safeguarding Officer.
502. Complaints and safeguarding concerns in Northern Ireland are largely dealt with by BG since Gymnastics Northern Ireland has limited infrastructure to handle complaints.
503. Conversely, Scottish Gymnastics (with some 30,000 members) resources and manages any complaints and safeguarding cases within Scotland although it has various reporting obligations to update BG's case

management system and has the option of obtaining support from BG. Scottish members automatically have dual membership with BG so if Scotland suspends a member, BG has to consider doing the same. BG provides Scottish Gymnastics with safeguarding advice, when it is requested, whereas Wales and Northern Ireland use the BG infrastructure to implement safeguarding. Training and education requirements within the sport differ in the Home Countries. For example, usefully, in Scotland the safeguarding training for coaches is tailored to the level at which they are coaching.

504. I received a number of submissions which revealed an apparent confusion about where the actual responsibility for complaints handling lay between BG and the Home Countries, with some complainants notifying both organisations. There was also evidence of a misconception that if dissatisfied with the way in which the home country had handled the complaint, BG could exercise its jurisdiction to manage the complaint further. As each working partnership agreement is different, this confusion is understandable and the issue of how membership with BG affects complaints handling, (if at all), should be the subject of clear and accessible guidance to members.
505. Following the airing of the 'Athlete A' documentary and the receipt of a particular welfare concern, Scottish Gymnastics commissioned a review of its performance programmes and of the platforms available to athletes to raise concerns. The review took place between November 2020 and February 2021. It was authored by a safeguarding expert who worked with three advisers with backgrounds in strategy and performance and with experience of athletes, all of them from different sports (not gymnastics). The resulting report is in summary form and is short (9 pages). It is not clear from this summary what form the review took and what level of investigation was involved. However, the review sets out a number of recommendations for Scottish Gymnastics.
506. The Scottish review recommended the launch of a three-year safeguarding strategy which would cut across all departments and which would aim to embed good safeguarding practice into the culture of the sport, ensuring that it gained more prominence in written materials and at Board level. It recommended working towards a culture where athletes and parents could raise issues, questions or concerns in a safe space without fear of adverse consequences. It concluded that there needed to be more emphasis, overt and otherwise, on the duty of care and that coaches and gymnasts both needed more structural support. Coaches, in particular, needed support when they were subject to safeguarding allegations and athletes needed more guidance and information about balancing training with life and with wellbeing. It highlighted the importance of gymnast inductions and countenanced introducing support visits at performance and local level. The spectre of coach licensing was canvassed. Changes to the case management system and reporting mechanisms were recommended. I have engaged with Scottish Gymnastics during the course of my Review and am aware that it is now working to implement these recommendations.
507. The BG Safeguarding Manager tries to maintain a close working relationship with the home country safeguarding staff and I understand that this relationship is especially close with Wales. He chairs the Joint Safeguarding Committee which was established in 2019 between all the Home Countries. The

pandemic has compromised the demonstrable output of this committee. The Safeguarding Manager reports its decisions and progress to the Board through the quarterly reporting process. The Home Countries share common issues. Wales has quickly embraced the Globocol Safeguarding software after it was introduced by BG and Scotland has followed suit.

Sport England

508. Sport England is responsible for growing and developing grassroots sport and getting more people active across England. It is also responsible for the development of early potential (often referred to as 'emerging talent') across a broad portfolio of sports. Sport England describes itself as an arm's length body of the Department for Digital, Culture, Media and Sport and is also a National Lottery Distributor Body.
509. Sport England is not a regulator for sport in England. It invests Exchequer and National Lottery money into projects and programmes that support people in England to be physically active. This includes providing funding to NGBs for different sports, including BG. When investing this money, Sport England enters into funding agreements with the NGBs about the use of the money and the conditions upon which the money is being provided. Since 2008 Sport England has invested Core Funding of more than £30 million into BG.
510. Sport England funds access to safeguarding advice and expertise for NGBs from the CPSU and the Ann Craft Trust. In addition to making financial investments, Sport England shares its insight, influence and expertise with the sector and advocates positively around the benefits of sport and being active. Physical and mental wellbeing are two of five core outcomes that it seeks to achieve for those participating in sport.

UK Sport

511. UK Sport is an executive non-departmental public body constituted by Royal Charter and sponsored by the Department for Digital, Culture, Media and Sport ("DCMS"). It is responsible for the development and delivery of performance in Olympic & Paralympic sport. Around 88% of the Exchequer and the National Lottery resources received by UK Sport is strategically invested to help NGBs (currently some 55 sports) and their athletes maximise the chance of winning medals at the Summer and Winter Olympic and Paralympic Games, and at global events preceding them. UK Sport's responsibilities therefore include investment into high performance sport at a UK level. It is not a regulator of elite sport but, as with Sport England, where UK Sport provides funding to an NGB, it will enter into a funding agreement with the NGB which sets out the terms upon which this money is being provided.
512. The Royal Charter grants UK Sport the power *'to encourage and support the adoption of the highest ethical standards amongst persons and teams from Our United Kingdom participating in sport and physical recreation'* (similar wording is contained in the National Lottery Policy Directions).

513. In 2017, on the back of athlete disclosures about unacceptable behaviour, UK Sport established Culture and Integrity Teams. I was informed that this was a 'watershed' moment when UK Sport realised that the tools in place to gauge athlete health and welfare were not picking up the issues that were being exposed by reviews into sports, including cycling and canoeing. The UK Sport Culture and Integrity Teams work with NGBs on a range of issues affecting integrity and welfare including:

- a. Providing ad-hoc advice on the handling of integrity issues or provide feedback where potential issues are identified;
- b. Offering education for NGB staff, including biennial integrity briefings to share best practice, developments and work through practice modules;
- c. Strengthening the landscape of independent organisations in sport through grant funding, including Sports Resolutions UK, UK Coaching and the British Athletes Commission;
- d. Implementation of an annual Culture Health Check process around the World Class Programmes of funded bodies.

514. UK Sport looks at the safeguarding and welfare arrangements for athletes who are 8 years or less from the podium in gymnastics, in other words gymnasts who are near Olympic or Paralympic participation or who are competing at national level. Since 2016, UK Sport also funds the CPSU assessment of safeguarding within the elite sector of the sport. Sport England looks at the safeguarding and welfare arrangements for participants below these levels. The Integrity teams of both organisations work closely with one another. Therefore Sport England and UK Sport look at how organisations they fund are meeting safeguarding standards as part of assessing funding eligibility, but there is no external watchdog overseeing compliance.

515. UK Sport and Sport England are funding partners. They have commissioned this Review. They work alongside three other Sports Councils in the UK - Sport Wales, Sport Scotland and Sport Northern Ireland. They also work alongside other bodies, many of which are partly or wholly funded by the Sports Councils. They include the following:

English Institute of Sport	EIS	EIS enters into service agreements with NGBs to provide specific sports science and sports medicine support and expertise. This includes physiotherapy, nutrition, psychological, strength and conditioning, Performance Lifestyle, and medical services.
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Sport Resolutions	SR	An independent, not-for-profit dispute resolution service for sport.
British Athletes' Commission	BAC	An independent and confidential advice and support service for athletes on a World Class Programme.
UK Coaching	UKC	Provision of developmental support to coaches.
Child Protection in Sport Unit	CPSU	Body which sets and assures the Safeguarding Standards that UK Sport and Sport England require their funded NGBs to work towards as a condition of funding.
Ann Craft Trust	ACT	Body assists with the development of policy, training and case management support for Adults at Risk.

The Child Protection in Sport Unit (CPSU)

516. The CPSU works with sports organisations, including NGBs, to provide safeguarding support, guidance, resources, training, and advice to help them develop and implement policies and procedures to safeguard and protect children and young people.¹⁶
517. I was able to speak with individuals from the CPSU and I am grateful to them for their contributions. I had not appreciated until conducting these meetings quite how small the CPSU is. For part of the period of Review, there were only six consultants. There are currently seven senior consultants who link with various NGBs to assist them in achieving the safeguarding standards required in the CPSU's *Standards for Safeguarding and Protecting Children in Sport*. It will be recalled that working towards the Standards is a condition of funding from UK Sport and Sport England.
518. As part of its work, each year the CPSU conducts an annual check to ensure that the NGB in question is maintaining the set safeguarding Standards as set out in the CPSU's framework. The precise commencement date for these reviews with BG was not clear from the information available but it appears that BG started the process in or around 2003. I have received documents relating to reviews

¹⁶ I was informed that Welsh Gymnastics has worked with the CPSU since 2013 and had achieved, save in one year, a Level 3 rating. The process seems to be similar to that operating in England – namely self-assessment and an annual review.

from 2013. Before 2016, the unit's assessments tended to relate to grassroots sport rather than high-performance sports.

519. As part of this annual review process, BG would essentially assess itself against the individual Standards and then use that assessment to create an annual Implementation Plan which was signed off by the CEO. The Implementation Plan identified the type of actions taken or anticipated in order to meet the Standards, with a time frame for completion. This would be considered by the CPSU, alongside the previous year's Implementation Plan and there would then follow an annual meeting between the CPSU and BG to discuss progress. Such meetings would generally last for a couple of hours and depending on the circumstances would be attended by a variety of people, including sometimes a representative from UK Sport. After the meeting, the CPSU would rate the sport, the categories of which have changed over the years. For much of the period of Review, the ratings consisted of a traffic light system with green being the most positive.
520. The Safeguarding Manager at BG now has ownership of monitoring the CPSU Implementation Plans, in addition to all of his casework and other duties. He explained that where actions remained incomplete, this would generally be because of the demands of his job and limited staffing levels. The CPSU would note it and the relevant action would be inserted into the following year's plan. I noted that the Implementation Plans were not amended or updated as the year progressed so there was no at a glance sense of progress. In 2019, the format of the Plans was changed for the better to a spreadsheet.
521. BG received a 'Green' rating on the 'Safeguarding Red-Amber-Green Rating' scale in the years 2014 to 2018. In 2019, BG received a 'Good' rating on a scale of excellent to inadequate, which resulted in the production of a series of post-review action points. Most recently, on 3 June 2020, BG was awarded, what at the time, was the highest rating of 'Very Good' for its work on safeguarding. The CPSU informed me that as the annual review process has always been the measure of an organisations ability to maintain the Safeguarding and Protecting Children in Sport standards and not more than that, it decided in 2020 to revert to 'not met', 'conditionally met' and 'met'.
522. The CPSU is available to sports outside of the annual audit process and there is nothing to stop a NGB from contacting the unit for advice about a particular safeguarding issue or case. BG agreed and indicated that it had found this a useful resource although the CPSU informed me that BG tended not to seek its advice on an ad hoc basis. The Unit also helps to develop and deliver training.
523. In terms of action that the CPSU can take, as one consultant put it, the CPSU has 'no teeth' but if it has concerns about the way in which a sport is engaging, it can notify Sport England and it can amend the rating of a sport following assessment. I return to the CPSU process at the section of my report regarding [The Child Protection in Sport Unit \(CPSU\)](#) .

The British Athletes Commission (BAC)

524. The BAC is funded by UK Sport. The BAC's funding is organised on a four year cycle to coincide with the Olympic/Paralympic Games. It provides support to the athletes on the UK Sport funded World Class Programme. These athletes (some 1500 in 2020), obtain automatic membership as part of their funding agreement but according to the BAC, knowledge of membership and what it includes is low. The support from the BAC ranges from dispute resolution, grievances, welfare, safeguarding and selection appeals. In July 2020 the BAC launched a temporary joint helpline with the NSPCC in order to support gymnasts who wished to make disclosures about their experiences in the sport. It has also been available to provide independent support to any individual wishing to provide information to the Review.

The English Institute of Sport (EIS)

525. The EIS was founded in 2002. It is a wholly owned subsidiary of UK Sport and has worked with BG since 2009. The investment into the services provided to BG by the EIS has steadily grown from £1.15 million in the London 2012 cycle to an anticipated £2.5 million for the Paris 2024 cycle.

526. On a day-to-day basis EIS practitioners deliver services to a sport and are line-managed by a Head of Performance Support. This person is responsible for working alongside the Performance Director and head coach(es) in a sport to ensure that support is directed in the most effective way and to have the most impact. In the case of BG, the Head of Performance Support has been in place since 2009.

527. In addition to high standards of qualification, the EIS requires all practitioners to maintain their own professional standards and development, set by their respective professional body, as well as the EIS's HCSI Professional Code, which was introduced at the start of the Tokyo 2020 cycle. The Code mandates EIS personnel to make athlete's health and welfare the primary and overriding concern and to observe safeguarding duties. The organisation operates safeguarding policies in accordance with the '*Working Together to Safeguard Children*' framework.

528. I met with a significant number of individuals from the English Institute of Sport, past and present. They were able to speak about their own experiences of engaging with the sport of gymnastics as well as the experiences of those that they had worked alongside. I am extremely grateful for their contribution, the relevant contents of which are set out throughout the report. I noted the professionalism and maturity with which EIS personnel approached our meetings. Where they had negative views about their ability to engage or other issues, these were expressed in a balanced way.

529. In Wales, the sports science and sports medicine support is provided by Sport Wales. The Scottish Institute of Sport provide the same sort of support in Scotland both at training camps and where necessary on a daily basis. The funding for this relates predominantly, as in England, to the Olympic gymnastics disciplines though Scottish Gymnastics does provide some strength and conditioning, nutritional and psychological support to the other disciplines as well. The situation in Northern Ireland

was less clear. I received very few submissions relating to Northern Ireland. I invited submissions and information from Gymnastics Northern Ireland but did not receive any in response. The review is not aware of any systemic issues relating to sports science and medical provision in Northern Ireland.

What Were the Issues with these Systems/Structures?

530. I have identified above the systems and structures that were in place to help to safeguard gymnasts, and the organisations and cohorts of individuals who had a meaningful part to play in those systems and structures. I have already concluded that gymnast welfare and wellbeing has not been at the centre of the sport of gymnastics throughout the period of Review. This suggests that the systems and structures have failed to deliver a culture with athlete welfare at its heart. BG now accepts that the implementation and functioning of safeguarding mechanisms has at times fallen short during the period of Review. In the next section of my report, I examine the reasons for this. These fall into the following over-arching themes:

- a. Failures in training & education;
- b. Failures in policy development and implementation;
- c. Failures in the resourcing of safeguarding work;
- d. Insufficient consideration of elite gymnasts;
- e. Failures in collaboration;
- f. Failures in governance and oversight;
- g. Failures to recognise red flags.

Failures in Training & Education

Coaching Course Content

531. I have considered carefully the content of the qualification courses required to be completed by coaches accredited by BG. Some details about these courses have already been set out above. With regards to the archived coaching courses (i.e. those that have been applied during the period of Review but are no longer used) which were made available to me, there was either no advice or guidance or inadequate advice and guidance about:

- a. The Standards of Conduct and what good coaching should look and sound like (and what bad coaching looks and sounds like). There was virtually no guidance about the boundaries between

positive and disciplinarian styles of coaching and between disciplinarian and potentially abusive forms of coaching;

- b. How to create an athlete-centred environment, how to involve gymnasts in decision-making and how to communicate with children and young people of different ages;
- c. How to adapt styles of coaching as the young child develops and matures into a young person and into an adult;
- d. How to communicate with parents at any level and about the type of information that parents should know about;
- e. Weight management, the relationship between weight and performance and how poor practice and/or ignorance could put gymnasts at risk of real mental and physical harm, including eating disorders;
- f. The circumstances in which a gymnast should be weighed (although the Level 1 course did in 2013 stipulate that weight alone would not assist in the assessment of body composition);
- g. The physical role of the coach, if any, in stretching and the risks of over-stretching;
- h. The significance and risks of growth maturation in males and females and how these might differ depending upon the age and progression of the gymnast;
- i. Appropriate training hours and loads for gymnasts of different ages and ability (with the exception in 2008 of the level 4 coaching course which did list maximum hours);
- j. Training on injury;
- k. The relevant content of BG's Child Protection and Health, Safety and Welfare Policies.

532. These archived course materials are the courses that many of the coaches working in gymnastics today will have undertaken. These coaches have not been required to undertake any refresher training since obtaining these qualifications and so I would assume that the significant gaps in these courses have rarely, if ever, been filled. With each level, student coaches were signposted to sources of further reading, but they were not required to demonstrate that they had read these sources.

533. The more recent additions to the current coaching course material (which I have set out at [paragraph 485](#) above) arrived at the end of the period of Review and are obviously welcome, reflecting as they do, a more progressive and inclusive approach to training gymnasts which was almost entirely absent from earlier versions. There was, I noted, still relatively little guidance about what the Standards of Conduct mean from a behavioural point of view. There was also little information about how to

engage with parents and how to maintain a collaborative triangular relationship with the parents and the gymnast. There remained inadequate guidance in the more advanced qualifications about how to communicate with children and young people and no real guidance on how to educate gymnasts and parents about what to expect from training. As before, there was little information about the content and relevance of BG's own policies around Child Protection and Health, Safety and Welfare.

534. It was clear to me that gymnastics coach education had concentrated on technical skills rather than on the other relevant skills that could obviously impact on athlete welfare. This was a view put forward repeatedly in submissions and meetings. Ms Allen, the former CEO, agreed that this was probably the case and thought that this was explained by the imperative to ensure from day ones that gymnasts are safe given the physicality of the sport and the high risk of physical injury. As noted earlier, it seems likely that the course content was influenced by the historic influx of non-UK coaches whose outdated coaching styles focused almost entirely on the technical.
535. Education, like safeguarding is an expensive process and the returns are not commercially quantifiable for an organisation such as BG. Insufficient resources and thought were invested in devising educational packages which would equip gymnastics coaches with the entire suite of skills required to perform their role. The immediate priority was technical and linked to this, managing the physical risks associated with training and competing. Ensuring that coaches understood the interpersonal skills required to develop gymnasts was simply not a priority and it might be said, that this deficit mirrors the fact that gymnast welfare was not at the centre of the culture of the sport. No individual or department took the time or care to ensure that coaches were educated in, and aware of, matters that were central to gymnast welfare, including critical BG policies about safeguarding and welfare.
536. Individuals from BG accepted in meetings that there was a lack of coach education around 'soft skills'. BG also conceded that coach education had failed to adequately address a) the need to ensure that coaches engage more meaningfully in sports science influences and to learn more about the role of nutrition, training loads, injury prevention, weight management and training on injury b) how the coach/parent/gymnast triangular relationship should work, how to deal with parents and keep them informed c) what unacceptable coaching behaviour looks and sounds like. It was accepted that coach training had not be adequately linked up with BG's Standards of Conduct and that better use could be made of mentoring for coaches. As the Director of Community Services said:

'In terms of coaches having a broader understanding of safeguarding and child welfare and their responsibility really for the holistic development of that child and for that child to have a safe rewarding great experience, I think we're on the journey with coaches. I don't think we're there yet.'

537. Collectively, in my meetings with senior BG personnel it was agreed, to use the words of a former CEO, that *'More should have been done to educate the coaches, that is clear'*. These concessions were confirmed in BG's final written submissions to the Review in which BG stated:

'We have not placed enough emphasis on developing the softer skills of coaching that would encourage a more open dialogue between coach, gymnast and their parents. There has been a significant emphasis in coach education on technical skills and increasingly on sports science, but not enough on adapting styles of coaching as the child grows up, managing expectations of the gymnast and parents, and being clear on the often-tough challenge of trying to make it in performance sport and the expected sacrifices and choices available.'

538. I have been informed by BG that it is in the process of redeveloping the level 3 course, having already added new courses for level 4 and 5 coaches as part of an educational reform drive. That process will include development of CPD courses around eating disorders, working with parents, mental health, coach boundaries in the context of nutrition, injury prevention and flexibility training. If this is achieved, it will obviously reflect an important shift and improvement in the provision of relevant coach education.
539. I would also urge gymnastic coaches to do all they can to develop and educate themselves in these areas and to take up any educational opportunities that come their way. I say this in light of information I received that in some cases training opportunities were provided to coaches by BG which were not always taken up. The Performance Director from 2017-2022 thought that coaches preferred to focus on how they had seen others coach and were reluctant to devote time to education and CPD when that same time could be spent in the gym. I was also told by a senior coach that they did not want to lose gym time in order to attend training and also that they were concerned that the training made available to them would expose their lack of knowledge. I hope that the issues raised in this report will assist those coaches who have previously felt this way, to understand the value, importance and benefits of taking time to develop some of the softer skills required for coaching, as well as the technical skills.

Positive Coaching

540. BG had previously started to recognise the need to educate coaches more about the importance of positive interpersonal skills and in response developed a Positive Coaching Course. This became mandatory for all coaches in 2019 and a condition of a coach renewing their BG membership. I recognise that the mandatory use of this course was a progressive step in the right direction. BG has placed considerable store on the roll out of this course in its engagement with me during the Review. Its perceived importance is reflected in the fact that this is the only mandatory course for coaches aside from safeguarding training. I have been able to take the course myself. I appreciate that it is a challenge to create a course that meaningfully applies to every level of coach within every discipline but would make the following observations about the course:
- a. It is 'one size fits all' – it is therefore taken by the 18-year-old level 1 coach teaching 5-year-olds, as well as the coach of Olympic gymnasts. One can see its application to volunteers and very junior coaches but coaches from at least level 2 upwards require something far more bespoke which

should really be part of their main coaching qualification so that it can be tailored to the age and type of gymnast that they are likely to train;

- b. It is exclusively online – the student can stop and start at any time. The questions at the end are very basic and once answered correctly, result in successful completion. In that sense, however well intentioned, even the most casual student can qualify in a somewhat 'box-ticking' way;
- c. The most undesirable goal orientation identified in the course is the 'low task/ high ego' coach (crudely summarised as: winning matters more than anything else) – this orientation is said to be inappropriate and unsuitable for gymnastics because it creates emotional instability and increases the chance of conflict, frustration and mistakes. The reason the orientation is so negative is because it focuses almost exclusively on outcome. Given the way in which UK Sport funding has been allocated in gymnastics (see further below), this tension between participation and outcome might need more nuanced exploration for the more senior coaches;
- d. The course identified CPD as one of the most important features of a positive coaching strategy. Despite this, BG does not offer or mandate CPD for most coaches beyond refresher safeguarding training.

541. I understand that BG has now given some consideration to trying to tailor this course to individual categories of coach. BG has not, to date, considered using EIS support to inform any aspects of the Positive Coaching course.

542. Until the course content is adapted to take into account the observations above, it will remain something of a blunt instrument with limited utility, however well-intentioned its rollout.

Safeguarding Training

543. I explored the adequacy of the safeguarding training courses provided to coaches and Welfare Officers with the education department, the Integrity Unit and with BG Board members. I considered this to be an important area of focus for the following basic reasons:

- a. Safeguarding is a complex concept. Identifying safeguarding concerns and distinguishing them from other, less serious concerns is not straightforward. Addressing this in a club environment is difficult;
- b. The sport is physically complex, high-risk and hands on;
- c. The participants are predominantly children (sometimes extremely young) and young people;
- d. BG expects volunteers to deliver safeguarding both in clubs and at regional level. These volunteers are not accountable, however diligent they may be;

- e. BG has over 350,000 members. It is a large NGB. According to statistics provided by BG there were 10,088 coach members in 2008 and in 2020 some 7389. That being so it is foreseeable that multiple welfare and safeguarding issues may arise in clubs. Any training provision should be sufficiently resourced given the scale of membership, the nature of the sport and should adequately inform Welfare Officers and coaches about the type of issues that are likely to arise;
 - f. In its dialogue with the Review BG placed considerable reliance on the provision of safeguarding training.
544. The Review received several submissions which questioned the utility of the refresher course in terms of content and delivery. I sought and obtained access to some of the safeguarding education materials used by BG, including the current foundation course specially designed for 16-17 year old coaches and the online refresher training courses that all coaches and Welfare Officers have to undergo. With regards to the current foundation safeguarding training I found that:
- a. It contained some but not many gymnastics specific contexts and there was an emphasis on the risks of sexual misconduct;
 - b. It did not adequately signpost BG Standards of Conduct or relevant BG policy;
 - c. It contained no assistance about having difficult conversations;
 - d. There was relatively little reference to the role of the Welfare Officer or communicating with parents.
545. Both the foundation course and the refresher course were online, basic and involved reading slides. The refresher course was more gymnastics specific but was not tailored in any way to the seniority of coach, as it is in Scotland, or to the age or pathway status of the gymnasts likely to be affected. This meant that the 17-year-old foundation coach dealing with a 4 year old in a small club run by volunteers received the same training as the adult level 5 or ICP coach who was training a 16 year old for the Olympics. It does not reflect the specific vulnerabilities of gymnasts, the central importance of coaching, the inexperience of most of the sport's volunteer Welfare Officers or the standards of conduct imposed on all members.
546. Online courses are advantageous to organisations with educational responsibilities for logistic and financial reasons. Since the pandemic, the advantages of remote education have obviously been felt. The danger with online education containing no human interaction, is that completion of the relevant course is perfunctory, especially if the course is mandatory. It does not require the student to reflect on the subject matter, it does not facilitate an exchange of views and experience and it does not allow for any Q and A.
547. Despite the hard work and very real thought that will have gone into the creation of the foundation and refresher training, they could be approached, readily, as a box ticking exercise by those required to

prove they have taken them. This was the view of a number of the individuals that I spoke with during the Review. One former gymnast, now coach observed: *'The focus felt wrong. It was all about how to protect ourselves from allegations rather than protecting gymnasts'*.

548. The responsibility to monitor the relevance of safeguarding training content obviously lies with the particular NGB. This is not something that other organisations, such as the CPSU, have the capacity to monitor. I invited individuals from BG to reflect upon the content and purpose of the safeguarding courses that it provided. BG acknowledged in its meetings with me that the safeguarding training provided to date to coaches and to Welfare Officers was basic and could be a lot more gymnastics-focused. The Integrity Unit indicated that they felt that there was much more that BG could do in the areas of safeguarding training and education *'we can do it better... we can do more'*.
549. In my discussions with representatives of the BG education department and with the Integrity team, there was a recognition that ideally, safeguarding training for members should be linked to the BG Standards of Conduct in a way that has not historically happened. The BG Safeguarding Manager informed me that BG, like other sports, had only just started to think about aligning safeguarding training to the Standards and Codes of Conduct that members are required to abide by. It had also only just started to consider what it might learn about safeguarding training from the educational sector. BG has now decommissioned its previous safeguarding refresher training and launched a new one.
550. Effective education about safeguarding is an expensive business and for those accountable for the finances of an organisation, it shows no immediate financial return. Whilst BG had technically provided safeguarding training to its welfare offices and coaches, and therefore technically complied with its basic obligations as a NGB, it had not reflected sufficiently on what safeguarding training should consist of in the sport of gymnastics. This is unfortunate not least because BG had chosen to delegate, almost wholesale, the front-line role of safeguarding to volunteers who lacked any accountability. But also because it had not required club owners and managers of BG clubs to complete safeguarding training (unless they are coaches or Welfare Officers). In my view this is a lacuna that needs to be addressed. On one view, with safeguarding training, BG has done what it felt it needed to do to comply with the *Standards for Safeguarding and Protecting Children in Sport* rather than provided its community with what it needed.

Recommendation: BG must revise and update its mandatory safeguarding courses to be more relevant to the sport of gymnastics and, for coaches, to the seniority of coach. In doing so it must consider the gaps and weaknesses that I have identified in this report. BG must introduce mandatory safeguarding training for all club owners and managers.

Training for Welfare Officers

551. The 'Time to Listen' course, a compulsory course for Welfare Officers created by the CPSU, is delivered by BG tutors and in recent years has been the responsibility of the BG education department. As the CPSU now realises, this throws up quality assurance issues that it was previously unaware of and does not currently have the resources to check. The BG version does have the benefit of being somewhat gymnastics specific, but the CPSU knows it is not age staged and may therefore not identify how a participant's needs change and how listening skills need to change commensurately. There was a recognition within BG that the 'Time to Listen' course needed to be more gymnastics specific.
552. There were optional professional development opportunities for Welfare Officers arranged by BG during the period of Review. None of them were mandatory and it is easy to understand why volunteers may not relish forfeiting yet more spare time to undertake training, however useful and organised that training might be. From 2012 annual welfare conferences were held for all Welfare Officers and BG Staff. There were annual conferences for Regional Welfare Officers from 2015 to 2020. In 2018 regional (north and south) safeguarding conferences were introduced for Club Welfare Officers but uptake, perhaps unsurprisingly, was not good. As late as 2019, BG laid on six regional conferences to present to clubs the basics of safeguarding, how to access support and how to implement a positive culture. In addition, the voluntary Regional Welfare Officers had more recently started to provide safeguarding training to Club Welfare Officers but the Safeguarding Manager felt that this had not been as stringent as he would like.
553. I spoke to one Club Welfare Officer who explained that they were the only officer at a club with over 1000 members. No-one else was prepared to fulfil the role. Due to this individual's position outside of gymnastics, they felt that they had the professional and social skills to deal with issues and communications but felt that without this relevant professional background they would struggle.
554. I spoke with members of the education department at BG about the training available for Welfare Officers. It was acknowledged that this training needed to improve and needed to focus more on communication skills, such as having difficult conversations and drawing information out of children and young people. The Safeguarding Manager told me that he had been planning a toolkit for Welfare Officers for over 5 years. This, he hoped, would contain various electronic templates and a centralised body of information so that the massive cohort of volunteer Welfare Officers can find everything they need in one place.
555. It is a sensible and proactive aspiration and if put in place, I am sure, would be of immense use. But it was not in place, despite the aspiration, which I note featured year on year in CPSU annual reviews. The Safeguarding Manager explained that resources, casework and a lack of time had simply not made it possible. This supports my earlier observations about the unrealistic breadth of the current Safeguarding Manager role and the lack of resources within the Safeguarding Team. I have had the advantage of seeing

the current Scottish Gymnastics toolkit for Club Welfare Officers and have no doubt that the introduction of a toolkit in England would be of real and direct benefit.

High Performance Coach Education

556. Given the relatively high proportion of negative experiences described by elite gymnasts and given their increased vulnerability, I have also considered the education in place for coaches working with elite gymnasts.
557. I was informed that in 2012, BG created the post of High Performance Coach Development Manager because the organisation was apparently reluctant to lose the technical knowledge of the then Director of WAG. I have seen the role profile for this position. The overall purpose of the role was to establish, deliver and develop a national programme for the development and preparation of designated high performance/elite coaches to support gymnasts to succeed at international level. The High Performance Coach Development Manager was required to support the organisation to develop a new generation of high-performance coaches who were highly skilled in the art of coaching. They were required to develop tailored CPD plans for designated coaches and generate CPD opportunities to support coaches transitioning to elite coaching. To perform such duties, they needed to work closely with Head of Performance Sport, who was overseeing the role. Success measures included evidence of effective contribution to coach education systems and programmes aligned to the needs of elite gymnasts and evidence of effective contribution to the development of CPD Programmes.
558. I was not provided with material which would enable me to appreciate precisely how the High Performance Coach Development Manager duties were actually fulfilled and line managed between 2012 and 2021.
559. I do note that the High-Performance Coach Development Manager's tenure appears, unfortunately, to coincide with a period during which it is alleged that a disproportionate number of personal and national coaches of elite gymnasts were insufficiently educated and were engaging in unacceptable coaching techniques. It also coincided with the troubling culture which was to be revealed by the Walk the Floor exercise in 2019. It is noteworthy that many of the concerns and the coach complaints received by the Review and reported in the Walk the Floor exercise related to WAG, whose Head National Coach was married to the line manager of the High-Performance Coach Development Manager. When one reflects on this, as well as the way in which this bespoke post was created, one can see how this might add to an outsider's impression of the organisation as insular.
560. The High-Performance Coach Development Manager retired, like the previous Executive Director of Sport, in March 2021. I have been unable to gain the benefit of either person's views on these issues. The former did not respond to my invitation to a meeting and as I have observed previously, the latter declined to meet with me.

561. From 2009, some 15 gymnastics coaches attended a UK Sport high-performance coaching course. One coach who had attended felt that access to the course (which included expertise and learning from other sports) prompted significant self-reflection and improvement in their understanding of progressive coaching techniques and scientific knowledge. Conversely the WAG Head National Coach was offered the opportunity to take this course, but chose not to. BG did not require her to attend which represented insofar as both the coach and BG were concerned an unjustified missed opportunity.
562. In 2018 a Performance Coach Developer was appointed, funded by UK Sport. This post had been introduced in other sports successfully and it was felt that it would add value to the gymnastics World Class Programme. The role focused on supporting a relatively small number of coaches in the three funded disciplines of MAG, WAG and Trampoline, including personal coaches. The Coach Developer reported into the Performance Director and helped identify gaps in coach development. I asked BG specifically who had been responsible for co-ordinating educational requirements for high performance coaches before the arrival of the Performance Coach Developer. BG said: *'Before this post was created, Head National Coaches for the associated discipline coordinated the coaching requirements within the High-Performance teams.'*
563. I was not provided with any evidence that would enable me to assess how the Head National Coaches had actually done this and how this sat with the duties of the High-Performance Coach Development Manager.
564. In addition, each year, BG lays on a national Symposium for its Performance Pathway coaches though again, attendance is not mandatory. As the Performance Director in post from 2017 to 2022, agreed, its impact could fairly be described as *'useful but fleeting'*. It consists of keynote speeches and coach clinics and is generally very well received. I am aware that the EIS are extremely keen for high-performance coaches to undergo more sports science and sports medicine training, especially in strength and conditioning and issues arising from growth maturation and that positive steps are being taken to increase collaboration and the sharing of knowledge and expertise.
565. I was able to speak with BG Board members past and present, including the CEO, and with senior staff from the World Class Programme about education for the coaches of elite gymnasts. It was conceded that more thought needed to be given to educating level 4 and 5 coaches, especially in relation to the vulnerabilities of elite gymnasts and to the way in which young people mature. I am aware from submissions and from available documentation that this is an issue that Sport Wales has also thought about. There, it was recognised that at least one senior coach would benefit from more theoretical and academic development and that this had resulted in access to relevant formal higher education, which I am informed is proving to be a positive and informative process.

Recommendation: BG must ensure that all coaches currently holding a qualification of level 4 or above undertake training based upon the updated educational programme recommended in this report, within two years of its introduction.

Continuing Professional Development for Coaches

566. There is no process through which coaches are required to refresh themselves about the training they received (in many cases years, if not decades, ago) or to learn about developments in the sport that are relevant to their role since they qualified. This is the case even for level 4 or 5 coaches who may have qualified many years ago and are more likely to be working with elite gymnasts. As a result, any prior levels of ignorance or misunderstanding are likely to have continued and changes that have occurred since coaching qualifications were obtained, may be missed. It is precisely these coaches about whom so many welfare related complaints have been made.

567. In the introduction to the 2010 Level 3 technical training materials, there was a welcome from Martin Reddin, the Executive Director responsible, at that time, for education. In it, he said:

'The technical modules are the beginning of a broader Continuous Professional Development (CPD) programme for coaches that BG will develop over the next few years. The CPD Programme will include other areas such as Club Management, Safeguarding Children, generic coaching topics and other relevant subject areas. It is the intention to introduce a Coaching Licence in the future for all BG registered coaches. The CPD Programme will provide opportunities for coaches to update their knowledge as a requirement of renewing their coaching licence. It will also provide coaches with regular opportunities to interact with other coaches and share good practice'.

This form of words remained in subsequent versions of the introduction to technical modules and still exists today, essentially cut and pasted, year on year even though there is no CPD Programme as such and there is no coach licence. This is an example (and not the first) of aspirational language triumphing over reality.

568. There have been some very recent CPD developments for English coaches, across sports, organised by UK Coaching.¹⁷ These include the 'Five pillars of Safeguarding' in 2020 and the 'Sudden cardiac Arrest E-learning' in 2021 (following the on-pitch collapse of the footballer, Christian Eriksen in June 2021). Neither of these is mandatory. BG has also released a new module called 'The Coaching Process' but again this is not universally rolled out and is not mandatory. BG's education department conceded that CPD is 'definitely not big enough yet'. I asked whether there was anything specifically available for the more highly

¹⁷ Similarly in Wales in 2020 there has been more recent (non-mandatory) provision of CPD to improve non-technical skills, such as communications, a recent subscription to UK Coaching and consideration of whether to make Duty to Care training mandatory.

qualified coaches and was informed that such coaches could attend the annual coach Symposium laid on by BG and access the generic coaching course materials in the Academy section of the BG website. When discussing this with the former CEO, she noted that the issue of CPD was sports wide and required attention from government, and that some coaches would voluntarily want to improve themselves in any event. She also expressed the view that mandating gymnastics coaches, whether about education or about inclusion on a register, might prompt resentment unless all sports coaches were required to comply in the same way.

569. I specifically asked the education department about the lack of CPD for coaches who had qualified many years ago and was told '*Currently there is nothing that they have to do*'. It was acknowledged that BG did not possess the educational content available to deliver CPD. When the organisation conducted research in 2015 into a coach licensing scheme, one of the major obstacles was a self-confessed inability to regulate and deliver CPD to its coach members.
570. I asked how, without CPD requirements, coaches would find out about any type of new policy that impacted on them (such as flexibility management, social media or weight management) and there was no satisfactory answer. If a coach undertook a new level of qualification, the new policy might feature but otherwise it seemed as though it was left to club secretaries to scour the fortnightly Community Newsletter for any policy news and to hope that in some way this was cascaded to coaching staff. Alternatively, as I have described above, it was left to coaches to look for policy news on the website. Given the mandatory requirement on all coaches, as members, to be trained in and comply with relevant policy, this seems to have been an undesirably casual approach and one that could give BG no comfort that coaches were aware of policy changes relating to gymnast welfare. Individuals from BG accepted that there could have been more emphasis on refresher training for coaches.
571. I note that in 2020, due to various issues concerning the performance programme in Wales, CPD was provided to all Head National and National Coaches and to the Senior Leadership Team to develop communication skills and to help these individuals better understand themselves and those around them. These were obviously useful and progressive steps. They highlight similarities with the issues arising in the English performance programme – namely an undesirably late formal recognition of the importance of continuing professional development and the need to educate coaches about multi-disciplinary collaboration for the good of the gymnast.

Coach Licensing

572. The issue of CPD for coaches is closely connected to the issue of coach licensing. In her Duty of Care Report in 2017, Baroness Tanni Grey-Thompson recommended that a national coach licensing scheme should be considered across all sports, with the creation of a register of licensed coaches. By November 2021 when the House of Lords Sport and Recreation Select Committee produced its report 'A National

Plan for Sport, Health and Wellbeing', this (like many of her recommendations) had not been implemented and the report recommended that work continue to develop a national register.

573. A distinction needs to be drawn between a national register of coaches and coach licensing. A register would record qualifications, insurance cover and current DBS clearance. A licence would be more akin to an accreditation based upon specific recognised professional standards. All manner of complexities accompany either concept. Sports coaches do not have a chartered institute or regulatory body. Who would regulate the register? Who decides the type of coach to be included within it? Should volunteers be included? What happens if one sport signs up and another does not?
574. Sport England in one of its meetings with me, agreed that there needed to be review of standards of coaching behaviour and informed me that there was now a broad appetite across sport for a national register of licensed coaches. Sport England has been working with CIMSPA, to explore this. Sport England has reservations about how any licensing scheme would apply to and affect (and therefore deter) volunteer coaches. This latter category of coach represents a substantial subset of the general coaching community. Such coaches are often parents who are keen to contribute and to share experiences with their children. They are unpaid but, in gymnastics, have to have undertaken as a minimum the level 1 coaching qualification (and therefore must be supervised by a level 2 coach), hold relevant DBS clearance and BG's recognised safeguarding qualifications.
575. Coach licensing is, apparently, a long-term aspiration within BG which may, as a result of the 2020 disclosures be revisited sooner rather than later. In 2015 BG researched the possibility of introducing a coach licensing scheme. It conducted a consultation exercise consisting mainly of focus group work with affiliated clubs. In the resulting internal report, BG acknowledged that there were complex practical considerations. The coaching workforce is so varied – it consists of volunteers, people who coach for a couple of hours a week up to full-time high-performance coaches. There was a concern that if every single coach required licensing, regardless of status, then many valuable contributors would simply walk away. BG also recognised that it did not have the capacity to offer and deliver CPD for coaches or to evaluate on a formal basis, the self-reflection that diligent coaches should be able to evidence. BG probably favoured a graded licensing system, that is a system where, for example, only level 5 coaches need be licensed. There are currently approximately 496 level 5 coaches operating across all of the gymnastics disciplines (and 998 level 4 and 103 level 6 or ICP coaches).
576. BG concluded after its consultation exercise that a licensing scheme would bring enhanced credibility to bear on the sport and on clubs but that coaches themselves did not perceive any benefit to themselves and would view it as a stick rather than a carrot, especially if licensing became a condition for insurance purposes. Another important barrier to the scheme was the lack of structured CPD and the lack of any sort of formal mentoring scheme. This would make it difficult to set boundaries about any mandatory requirements and about the level of detail to be recorded within the scheme. BG concluded that issues of safety and professional standards were already adequately registered by virtue of its current

membership requirements. It also acknowledged that if 'remaining current' was the purpose of a licence, then it would struggle to put in place the range of CPD, mentoring and resources required to make the scheme workable for already 'time poor' people.

577. I note that the recent Scottish review made the following recommendation – Scottish Gymnastics should consider a licensing scheme for coaches to bring greater governance and strengthen the link between coaches and the NGB.
578. I discussed the operation of licences with various organisations including Sport England, CIMSPA, DCMS and BG. Whilst it is obvious that serious consideration continues to be given to the concept of a coach licence, I have seen little by way of tangible progress to date and less than all out commitment from government. There appears to be no consensus about who would pay for the operation of a licence and what it should look like and aim to achieve. The new CEO of BG is conducting a scoping exercise for a BG specific licence which would record relevant qualification data and impose basic CPD requirements. BG already records relevant qualification data and on that reckoning the only appreciable difference that any sort of register or licence would make would relate to CPD.

Educating Parents and Gymnasts about Safeguarding

579. Parents who entrust their children to sporting ventures ought to have a sense of what poor coaching practice looks like so that they can play their responsible part in addressing it. This is especially so where, as we have seen, gymnasts begin training at a very vulnerable age and talented gymnasts spend significant periods of time training with a coach away from the gaze of the parent. As society recognises now, more so than in 2008, students (the gymnasts) should understand the difference between acceptable and unacceptable conduct. This understanding should be achieved in an age-appropriate way, to meet the needs of the child or young person. Keeping the gymnast informed in this way is positive because it encourages autonomy and should reassure them about their respected place within the sport. The more information and understanding that parents and gymnasts have about safeguarding, good coaching practice and a safe training environment the more satisfied BG could be that it was being proactive in respect of its safeguarding duties. Achieving this in practice, is challenging.
580. I explored the issue of educating gymnasts and parents with BG and with as many club owners, coaches and parents as possible. I am aware that this may be an issue for other sports as well, although there are some topics (such as flexibility management, parental viewing or weight control) which are specifically relevant to gymnastics.
581. I was told that the NSPCC offers online training for parents which BG has helped facilitate. BG sensibly arranged two free NSPCC Safeguarding Parents Courses to be delivered at a club in Manchester and a club in Essex in 2010. The uptake in Manchester was so shockingly low that the Essex event was cancelled.

This goes to highlight the challenges that BG faces in managing and delivering organisational contact with parents.

582. During the early part of the period of Review, BG's Child Protection Policy contained guidance for parents about safeguarding. For several years this consisted of a long list of issues that parents should satisfy themselves about when choosing a club. It was, on any view, entirely unrealistic, including as it did, for example a requirement that parents satisfy themselves that all staff and volunteers have DBS and had attended relevant safeguarding training. In more recent years, BG has included a lot of information about safeguarding on its website, varying in prominence and content. This accessibility is to be welcomed. A concerned parent could easily learn how to go about reporting a concern, assuming they knew how to recognise a concern. It is, however, unrealistic to expect the average parent to scour either a club or national website for policies which might contain something of relevance to their child's welfare. Information has been spread across a bewildering number of documents and some topics that it would be relevant for parents to understand have not been adequately covered.
583. In 2017 BG produced a leaflet for gymnasts called '*Have Fun Be Safe*' ([Have Fun Be Safe Leaflet](#)). This was available on the website, at events and sent to all new members. This was a positive step in that it included the gymnast in 'the conversation' and signposted the reader about very high-level issues such as bullying or inappropriate touching. It would of course, depend on adults and clubs to draw it to the gymnast's attention.
584. In 2018, BG devised another leaflet used on the website and in Membership Packs called '*Keeping Your Child Safe*' ([Keeping Your Child Safe](#)) which signposted parents about reporting concerns and abuse. I note that it said that parents and clubs should work together to create an environment '*where your child knows what is acceptable coaching practice and what is not acceptable practice*' without explaining what that actually means in reality. I do not know whether BG has examined the impact, if any, of these leaflets upon gymnast/parent safeguarding awareness.
585. Given the accounts I received of, for example, inappropriate verbal communications, this might be as basic as knowing that it is never acceptable for a coach to shout at a gymnast (save in a health and safety emergency), or to swear at a gymnast or to call them names. If one episode of shouting is checked, it may prevent recurrence. If checked and another episode of shouting occurs, the club knows it has more than just a low-level problem and so on. Had all leaflets and/or club and members' handbooks contained a simple, consistent one-page list of the issues which were known to crop up in gymnastics, it might have helped, as would having the equivalent document in public places within the gym estate. At the very least, it would have alerted parents, gymnasts, young coaches and other participants of some boundaries which they could recognise and challenge.
586. This is an area where BG accepted that more could have been done and that parents ought to have been more included. BG acknowledged in its final submissions to the Review that there had been insufficient

emphasis on maintaining proper dialogue between parent, gymnast and coach and that BG had not worked hard enough on managing the expectations of parents. The Director of Community Services said in a safeguarding context, 'I don't think we have engaged with parents' although he felt that things were moving in the right direction. The Safeguarding Manager said 'The education of parents has only just begun as far as I am concerned'. I appreciate that it costs time and money and human resources to keep parents informed and to ensure that they understand the risks in the sport. I also recognise that some parents might be less engaged about this than others. Parents are not members and BG cannot regulate them in any way. BG however depends very heavily on the membership of mainly under 18-year-olds whose parents trust BG and its clubs to keep their children safe. The current Chair, Mike Darcey told me that BG was trying to improve its contact with parents and gymnasts using a monthly customer tracker for members to provide feedback to BG on a range of issues in order to 'provide a bit of an early warning that we clearly didn't have around you know where things are going wrong'.

587. I note that there is now a Leadership Academy Programme for young leaders aged 11 to 17 with BG clubs. This is currently operational in about 500 clubs and aims to develop youngsters into leadership roles. Those taking part receive safeguarding training. Such an initiative will, no doubt, highlight the central importance of gymnasts within the structure of the sport and help to raise safeguarding awareness.

Recommendation: BG must produce and make available to the gymnastics community a Gymnast Handbook which should be reviewed and updated at least every four years and must include:

- **BG's Standards of Conduct;**
- **An explanation of all BG's key policies affecting gymnast welfare and links to these policies (as updated under Recommendation 11);**
- **Information about the role of Welfare Officers and obligations to report, and pathways for reporting, safeguarding concerns;**
- **Any other information that BG considers it is important for the gymnastics community to be aware of, in light of my report.**

Conclusions in relation to Training and Education

588. I was informed that some 58% of coaches are former gymnasts. BG is now recognising that if such gymnasts have been negatively coached, they are at risk of coaching negatively themselves unless appropriate education and supervision are provided. There was, during the period of Review, a focus on the technical skills in formal coaching courses at the expense of the human side of coaching and in particular communications and respecting athlete autonomy. Whilst BG recognised that coaches need

to know about safeguarding duties and the physical safety of gymnasts there was a lack of emphasis on broader issues which could impact on gymnast welfare. Where safeguarding refresher training was provided, this was not adequately tailored to be relevant to the coaches and Welfare Officers who were taking the course. In its final written submission to the Review BG accepted that it had failed to ensure that its coaching educational materials reflected modern coaching styles. It recognised that there was a gap in educating coaches about boundaries and the difference between positive and negative styles, about 'soft' skills generally, about appropriate inclusive communications with gymnasts and parents and about how to adapt one's style as the student gymnast develops and matures.

589. The lack of mandatory CPD for level 4 and 5 coaches, for personal coaches of Performance Pathway gymnasts and for national coaches is particularly concerning. The lack of additional training requirements for the senior coaches in the non-funded disciplines is also unacceptable because the risks to athlete welfare are just as real there as they are in the Olympic-funded disciplines. Whilst there are many coaches who are eager to learn more, there are some who have been, and have been allowed to be, dismissive of further coach education. Some have been stuck in an outdated regimen that has failed to keep up with societal change and with developments in sports science and coaching standards. All of this has the potential to impact upon athlete welfare and in particular the welfare of elite gymnasts.
590. I was informed by BG that more recently, courses have been held for performance and high performance coaches in subjects such as coach-athlete relationships, duty of care, preparing gymnasts for high performance. The new CEO was clear during her engagement with the review that the organisation understands the scale of reform required to coach education in order to equip coaches for teaching gymnastics in a modern and balanced way. Welsh Gymnastics is undertaking a culture project at the moment which is designed to refine policy and procedure and to improve overall engagement in the sport. There is a programme focusing on communications skills for coaches and further courses to assist coaches to listen and to engage in and form positive relationships. These courses are being provided by an external body. The sport in Wales is trying to increase and improve engagement with sports science provision. It has also hired a culture change consultant and states that it is committed to meeting recommendations coming out of my Review. It goes without saying, that all of these developments are positive and welcome.
591. Finally, I had a sense that as a NGB, BG has historically not wanted to impose too much, by way of mandatory learning, on coaches, lest the coaches and clubs question the merit of their membership with BG. I note that despite the recent pandemic challenges, the main priority has focused on qualifying the entry level coaches because participation in gymnastics has increased so much. Participation is beneficial because it means that more people are taking part in constructive physical activity but it also means revenue for BG whereas refreshing and improving coach qualifications and developing CPD does not create revenue. This might explain why gymnastics coach education has failed to keep in step.

592. Although BG considers that it has historically invested sufficient financial resources into education, I do not consider that it has invested sufficient human resources and thought into co-ordinating education and into ensuring that course content was directed at issues beyond the technical. As events are now proving, this failure to invest properly in coach education, like the failure to invest adequate resources into safeguarding, represents false economy.

Recommendation: BG must appoint a Director of Education with overall responsibility for the education and training of coaches and Welfare Officers and for ensuring that education is adequately co-ordinated with BG Standards and policy.

Recommendation: BG must revise and update its educational programme for coaches and Welfare Officers to address the gaps and weaknesses that are identified in this report. In order to ensure that experienced coaches who are already qualified benefit from these updates, BG must ensure that all coaches currently holding a qualification of level 4 or above undertake training based upon the updated educational programme within two years of its introduction.

Failures in Policy Development and Implementation

593. Scrutiny of policy and procedure is a dry subject but a revealing one. Standards of compliance with policy and procedure set the tone and cultural priorities of an organisation. Gone should be the days when it is sufficient for sporting organisations to point to the existence of a safeguarding or complaints policy, as if that alone discharged their responsibilities in these areas. An organisation can have any number of impressive policies. It is the visible and consistent implementation of such policies at club and organisational level that matters. Furthermore, the Standards for Safeguarding and Protecting Children in Sport require NGBs to implement policy and procedure relevant to welfare. For a policy to work:
- a. It must be effectively disseminated to those required to comply with it. All policy should be accessible and if practicable, easy to understand;
 - b. Its existence must be publicised to those liable to be affected by it;
 - c. Those tasked with putting it into effect must be sufficiently trained in its content and this training must be refreshed;
 - d. Those imposing it, must monitor compliance with it;

- e. Known non-compliance must be recorded so that it can be remedied and so that patterns of abuse or misconduct can be identified;
 - f. It must be 'joined up' within the organisation and with those implementing the policy. For example, it must be developed and disseminated in conjunction with other functions of the organisation introducing the policy and those who are required to follow the policy, so as to ensure a wide understanding of the policy and that the policy does not conflict with other functions of the organisation or those implementing the policy.
594. It is important to acknowledge that the task of developing practice and procedure within a NGB is challenging, to say the least. The landscape, the legal requirements and the statutory (or other) sources of guidance can change all the time and can affect different functions within the organisation and its clubs. Analysing such changes and monitoring the efficacy of existing policy is a time consuming and expensive process and tends to go unrecognised. Disseminating new policy and monitoring its implementation is also very expensive work. That said, there is not much point in having a policy, unless it is faithfully publicised and applied.
595. In a large organisation, such as BG, which is essentially club based, the challenges are even more pronounced. There are many types of clubs, large and small, rich and poor, with a variety of structures using facilities that range from hired local authority centres, schools, church and village halls to privately owned centres. There are some clubs that have paid employees and others that are run entirely by volunteers. Yet each is required, as a condition of membership, to comply with complex frameworks affecting gymnast wellbeing and BG (as it recognised formally in its Safeguarding, Child Protection & Health, Safety and Welfare Policies) has a duty to develop policies and monitor the implementation and effectiveness of its own policies.
596. It is clear from the sheer number of policies and guidance documents in existence during the period of Review that BG was conscious of its responsibilities, and I am sure, genuinely wanted its member clubs to be able to operate safely and for its gymnasts to have a positive experience. As I explain below and as BG now acknowledges, there have been relevant failures in both policy content and implementation. For many of the behaviours reported consistently to the Review, policy was in place but it was either inadequate or too late coming into force, or it was ignored and/or poorly monitored and enforced.

Development, Content and Volume of Policy

597. During the period of Review, different departments of BG would be responsible for tracking scientific, cultural, societal and sport-specific developments and changes that might require new policies to be introduced. In addition, policies are generally reviewed every three years to check for any updates or amendments that need to be made. These pass through a committee stage and are approved at Board level.

598. BG has accepted that at times it was too slow to recognise the need for policies and procedures to cover topics, including weight management, over-stretching and communicating with parents and gymnasts. It was difficult to detect precisely why this was so. I felt that the reasons were multifaceted and included:
- a. A failure or reluctance to use resources to devise and to provide bespoke guidance particularly about controversial issues affecting gymnasts such as weight and coach/gymnast communication;
 - b. Too much of a focus on sexual forms of abuse or the risk of physical injury and not enough of a focus on emotionally harmful behaviour and other types of physical harm such as excessive training;
 - c. A disconnect with clubs and gymnasts and a resulting ignorance about prevailing conditions in some clubs, especially high-performance clubs;
 - d. A disconnect between the World Class Programme and the rest of the organisation;
 - e. A disconnect between departments and an organisational failure to appreciate that welfare and complaint policy content does not necessarily have departmental boundaries;
599. Despite these omissions from policies and procedures at certain periods, the sheer amount of policy material that was relevant to safeguarding and welfare matters was, at times, hard to digest and simultaneously located in multiple separate documents/policies. I have set out at [BG Policies, Rules and Regulations](#) above the various policies that have been in place during the period of Review that relate to safeguarding and welfare matters.
600. In addition, each document could be very long. For example, the Health, Safety and Welfare Policy 2005 was 54 pages long and covered extremely wide terrain. It contained the sort of instructions to coaches that you would expect to see in coaching educational materials rather than policies designed to inform the entire community about health and safety. It also overlapped significantly with the neighbouring Safeguarding Policy. To demonstrate the plethora of policy and guidance co-existing at any one time, I note that the reader of the 2005 Health, Safety and Welfare Policy was told by BG that the following documents should also be read: 'BG Member's Handbook: The Handbook contains all the Association Rules, Codes of Ethics and Conduct, Disciplinary and Appeals Procedures and the Articles of Association, Child Protection Policy 2004, Anti-doping Policy 2005, Equality Policy.'
601. Even allowing for the complexities of the sport and the shifting landscape of 'welfare', the protection of the welfare of gymnasts from 2008 to 2020 has been the subject of a confusing number of separate and dauntingly long policy documents. The main policies are supplemented by a significant number of other welfare related policies or statements. Each club has its own individual policies in addition to BG's such as complaints policies or documents setting out expected standards of behaviour. It is unrealistic to expect gymnasts and parents to have the knowledge, time or inclination to read so many documents

containing voluminous information which but for very short sections, mainly apply to club owners and staff. It is quite challenging for the most dedicated club official or coach to grapple with the entire suite of policies and any amendments. Likewise for the Club Welfare Officer who is acting in a voluntary capacity.

602. If the Review has found the sources and interplay of policy confusing (which it has, despite significant time spent unravelling them), it is no real surprise that the community might have found it confusing too. It is apparent from reading independent reviews about gymnastics both abroad and in Scotland, and reviews about other sports in the UK, that this multiplicity of source documents is a recurring problem.

Recommendation: BG must review the policies it currently has in place that affect gymnast welfare and update them to remedy the issues identified in this report. These policies should include clear guidance to the gymnastics community about what conduct is and is not acceptable in the sport.

Dissemination of Policy

603. For policy to be effective, it must be clearly disseminated to those who need to adhere to it and to those likely to be affected by it. This means ensuring that any combination of clubs, coaches, gymnasts, parents, Welfare Officers and relevant volunteers are aware of its contents. BG agrees that this is part of its role.
604. The anecdotal information that I received suggested that where BG policy did exist, it was not uncommon for gymnasts and parents to be unaware of its contents, including provisions directly relevant to gymnast welfare. Some clubs and coaches expressed a similar lack of awareness about policies that were directly applicable to them. At times it appeared that even within BG, a lack of communication between teams meant that policy changes were not known about as widely as they should have been. For example, the Coach Education Development Manager did not know about the 2020 Weight Position Statement until it was uploaded onto the BG website.
605. Similarly, I formed a strong impression that many members were either unaware of the contents of the Standards of Conduct or did not consider them a source of vital information. This is despite the fact that they contain the standards expected of all members, including coaches and that a breach of these Standards put gymnasts at risk and can jeopardise a coach's career. Both as a document and as a set of rules and principles, these Standards barely received a mention during submissions and meetings. Although the Standards constituted a well-intentioned high-level device to maintain ethical standards, I am bound to question their utility if they have remained obscure within clubs and the coaching community.

606. I spoke with the Director of Community Services. His department is the 'front door' for members and clubs and is there to develop clubs and to help them to function. When I asked him which department was responsible for disseminating developments or changes in policy, he replied: *'I don't know if I'm really honest. I guess it would sit somewhere between education and performance'*. He accepted, fairly, that it is unacceptable for there to be uncertainty about where this responsibility lies within BG. He felt that there ought to be clearer organisational responsibility and accountability for publishing and delivering policy to clubs and members.
607. I also asked about the profusion of available policy and whether he felt that changes in policy, relating to the care and welfare of the community had been cascaded to clubs effectively and he replied: *'Probably not effectively, we've developed lots of content and lots of guidance and it has probably just been parked on our website in the hope that somebody will find it.'* He linked this to the historic absence of a central point of resources.
608. BG has a website and has traditionally used this to publicise new or revised policies. The Integrity Unit informed me that new policies would be uploaded to the BG website but that recent research had identified that fewer people access the website than the organisation had previously appreciated. BG has now created a 'Club Hub' section of the website which is supposed to be a central repository of information for clubs. It is still evolving but I am bound to say, having been granted access to it, that I did not find it to be as accessible and useful, especially in relation to safeguarding, as BG suggested, though the concept behind it is laudable. The Director of Community Services agreed that BG needed to take material to the clubs and users and not leave it to them to try and *'find out where it lives'*. In my view, this was not yet happening at the end of the period of Review.
609. I was informed by the Integrity Director about club conferences and club seminars/webinars where updates to a Safeguarding Policy or to a Health and Safety Policy would be shared. He agreed that such educational pieces are not mandatory and that it was extremely hard to deal with clubs that chose not to participate. Furthermore delivery of this information was said to be by way of volunteer Regional Welfare Officers, although the Review saw no evidence of this happening in practice. The Regional Welfare Officers, I was told, are provided with the email addresses of all Club Welfare Officers to enable dissemination of safeguarding information. The Safeguarding Manager also took comfort in my meeting with him, from the fact that Club Welfare Officers knew that they could contact their Regional Welfare Officer or BG for advice. It was accepted that in principle there was nothing stopping BG from emailing new policies to every club, which is not something that it has done during the period of Review.
610. When there is a change in policy, a communications plan is also developed by the BG communications team and a summary of the changes, sometimes with a hyperlink, is inserted into the fortnightly Community Newsletter which is sent out to the Club Secretary of each club. There, for the purposes of my Review and from the evidence available, the trail goes relatively cold because the Review received

virtually no evidence about how clubs made use of such newsletters. I received no evidence about how clubs then disseminate such information to its staff, coaches and members.

611. During the period of Review, BG did not notify coaches or individual members by email of policy change. There was a very real dearth of any evidence that coaches were educated or refreshed in the content of policies. This has meant that even where behaviours were identified in BG policies as inappropriate, coaches were not adequately informed about the contents of these policies and their relevance to their role as coaches. The BG education department recognised that, to date, there had not been any consistency about ensuring that coaches were up to date about policy content and changes. Given my previous findings about the prevalence of policy breaches by coaches, it would appear as though policy and policy updates are not reaching coaches, or if it is reaching them, some are plainly ignoring or not reading the contents.

Monitoring and Enforcement of Policy and Standards

612. Once policies have been developed and disseminated, it is essential that compliance with the policies is monitored and appropriate remedial action taken if breaches of the policies occur. If this does not occur effectively then, one could argue, there is a little point in having the policies in place at all. I have already identified a number of standards and policies which set out expected conduct from its members/clubs/coaches but which I have not been consistently followed or enforced.
613. The Standards of Conduct are at the heart of the policies, regulations and standards in place throughout the period of Review. It is important to recall that membership requires all members and clubs to comply with and be trained in the Standards and the BG policies referred to in the Standards. This meant that coaches, as members of BG, were obliged to stay informed. It also meant expressly that clubs were under a mandatory responsibility to ensure that staff, including coaches and volunteers were trained in those policies. This represented and still represents a considerable undertaking. The Standards included the requirements:
- a. Not to abuse or misuse any relationship of trust or position of power or influence;
 - b. Not to behave or conduct themselves in any other manner which is unbecoming;
 - c. To conform to the Standards of Conduct, behaviour, equality of treatment, etiquette and good manners specified in the Standards, in BG Regulations or policies or in accordance with the accepted traditions of gymnastics;
 - d. To promptly report, and provide full particulars to BG of concerns, evidence or other information concerning any abuse or neglect of a child or vulnerable adult or other matter within the scope of the BG Child Protection Policy;

- e. No Participant should victimise or attempt to victimise or encourage the victimisation of any individual (or their parents, guardians or dependents) for raising concerns or making a complaint;
 - f. Participants must not conceal or attempt to conceal evidence of poor practice, abuse or misconduct by themselves or others;
 - g. Participants who act as a coach, and where applicable those employing or supervising coaches, must (a) conform to BG's recommended standards of coaching best practice (b) hold BG coaching qualifications appropriate to the activities they are performing and only coach those disciplines, skills and activities for which they are both qualified and capable (c) not disparage or intimidate gymnasts or seek to poach gymnasts from their principal club.
614. The Standards of Conduct were revised in 2010, 2012 and 2016 although they essentially remained the same, for present purposes.
615. From 2003 to 2017 clubs were required to have in place a Code of Conduct for coaches, officials and volunteers and for gymnasts. It was up to each club to decide upon the contents of such a Code and how to publicise and enforce it. There was an emphasis on:
- a. Treating participants with respect;
 - b. Consideration of wellbeing;
 - c. The display of high standards of behaviour.
616. In 2017 BG published Standards of Conduct for Coaches and Officials and a separate set of Standards for Clubs. Within the former, there were new sections on personal behaviour and coaching which included the following requirements:
- a. Display high personal standards, moderate and responsible behaviour and a favourable image that is befitting to their role in the sport at all times;
 - b. Not behave or conduct themselves in any other manner which could bring the sport of gymnastics, BG, its affiliated associations or registered clubs into disrepute or damage the reputation of BG;
 - c. Not make offensive or abusive remarks/jokes, derogatory comments, suggestive comments, or use unnecessary aggression or intimidation, or carry out unwelcome flirting, sexual advances or unnecessary touching, malicious gossip or call people by offensive nicknames within the gymnastics environment;
 - d. Treat participants and others attending at any gymnastic event with dignity and respect;
 - e. Not disparage or intimidate gymnasts or seek to poach gymnasts from their principal club.

617. The safeguarding requirements of coaches and clubs remained broadly the same and the duty to report promptly to BG any concerns or information concerning any abuse or neglect of a child or adult at risk was repeated.
618. Despite their lack of specificity, the reader of these various sources of conduct related information should, at the very least, have understood, that physical, emotional and sexual abuse of gymnasts constituted a breach of the Standards and various codes. Likewise, it is difficult to see how anyone reading the Standards and codes could think that shouting at gymnasts or belittling them was anything other than a breach of professional standards. Any adult participant witnessing such conduct should know that breaches of conduct should be reported, without adverse repercussions or victimisation rebounding on the gymnast or person reporting.
619. If the Standards are breached, there are, or should be consequences which can include, remedial action, suspension of membership or expulsion from BG. In that sense they are designed to regulate the conduct of members even though BG is not an official regulator of the sport of gymnastics and in most cases is not the relevant employer of the person whose conduct is in question. Had the basic principles contained within the Standards been followed, a significant number of the complaints that emerged in 2020 (and before) would have been prevented. The collective weight of the submissions received would suggest that the Standards were frequently breached in terms of poor coaching practice, failing to report concerns about physical and emotional abuse and failing to ensure that there was sufficient awareness about the contents of applicable BG policies.
620. The Standards serve little purpose if breaches of the Standards are not sufficiently recognised and managed.
621. Policy content demonstrates a relevant awareness within BG, well before the period of Review, of the risks of harm existing within gymnastics, of the collective and individual duties to prevent such harm and of the fact that children and young people find it very difficult to share their concerns. The behaviours identified in the policy and the reticence of children to complain mirror the accounts received by the Review.
622. The definition of physical abuse in BG policies recognised that linking notions of gymnastics success with inappropriate dietary management without adequate concern for a child's health needs was a form of potentially abusive behaviour. The imposition of excessive training on developing young bodies and over-stretching, including to the point of excessive discomfort, also came within the definition of physical abuse. For these issues to be included in a safeguarding policy, there must have been organisational awareness that gymnasts were at risk of harm from them. Yet the evidence I have received suggests that these behaviours continued, contrary to this policy, during this time.
623. Similarly, examples of emotional abuse in BG policies included behaviours that featured time and time again in submissions to the Review. Despite the BG policy stating in terms that such behaviours could

constitute abuse, these behaviours continued to occur at all levels within the sport throughout the period of Review. Those seeing and hearing such conduct but neither querying and/or reporting it, were, according to the term of this policy, behaving in an emotionally abusive fashion themselves.

624. Another example of important policy content which BG failed to monitor concerned parental access to training. I have dealt with this issue in some detail earlier in the report. Essentially from 2009, BG was making it clear to clubs, that parents were entitled to view training. If there were physical drawbacks to this in club premises, clubs were asked to consider providing CCTV facilities.
625. Despite this issue being raised in multiple BG guidance and policy documents, and despite BG being aware that parental access was an important safeguard against abuse, it does not appear to have been tracked and enforced in any consistent way by BG.
626. The 2009 Safeguarding and Protecting Children Policy also required that there should be systems in place within clubs to ensure that all young people and their parents were aware of behaviour that was not acceptable and how they could help to keep themselves safe (this was repeated in later versions of the policy). One of the objectives of the policy was to ensure that all gymnastics staff, volunteers, members, and parents should understand what abuse is. The policy indicated that BG and its clubs needed to develop a culture of listening to and engaging in dialogue with children – seeking their views in ways appropriate to their age and understanding and taking account of those, both in individual decisions, and the establishment or development of services. There was stated to be a focus on consulting children and their parents and including them in decision making. Despite these statements of intent and despite providing policy benchmarks to increase gymnast welfare, as an organisation, BG was not following through in terms of implementation.
627. In explaining how safeguarding policy and standards of coaches were monitored at club level, BG, in one of its formal responses pointed to:
 - a. GymNet;
 - b. The Standards of Conduct which apply to all members and include safeguarding duties, that is to say, duties about their own appropriate conduct towards others and duties to report concerns;
 - c. At each coaching level, coaches are now required to have completed a recognised safeguarding course within the last three years and to hold current DBS clearance. Safeguarding training, as explained elsewhere, is provided by a number of external providers;
 - d. Having a system in place of Club Welfare Officers who can, like all members, report safeguarding concerns;
 - e. Having at its disposal a suite of disciplinary sanctions, monitored, if necessary, by Regional Welfare Officers.

628. I understand that by this, BG was trying to explain that it believed it had systems in place to ensure that members were sufficiently educated about safeguarding and that it had systems in place to report and respond to any breaches of safeguarding standards. Regrettably I have concluded that some of these facets of monitoring were and are not effective. In short:
- a. GymNet, whilst useful, is a device to record up to date details about coach qualifications and training;
 - b. The Standards of Conduct have not been consistently implemented and I have detected prevalent ignorance about their contents. They have not been adequately incorporated into coach education and the membership has not been adequately educated about what they mean;
 - c. Safeguarding training is provided and this is positive but it is generic and does not amount to the monitoring and implementation of welfare related policy;
 - d. Having Club Welfare Officers is not the same thing as BG ensuring that safeguarding and welfare related policy is being monitored and implemented at club level and I have identified elsewhere in this report some of the challenges involved in delegating safeguarding to volunteers;
 - e. BG did have at its disposal a suite of disciplinary measures but in order to reach the stage of considering disciplinary action, the behaviour needed to be adequately monitored in the first place, which it was not. I have set out in the section of my report that addresses the [Approach taken by BG to Resolving Complaints](#) the issues with how concerns and complaints were dealt with if they were raised.
629. I discussed policy implementation with various BG personnel, including Board members. A former Board member felt that there had been a discernible gap between having safeguarding policies and implementing them.
630. Although all members (coaches and clubs) were and are required to be trained in BG policies, including those affecting athlete welfare, there was very little evidence that this was happening on the ground, except in relation to basic safeguarding principles which were imparted during mandatory safeguarding training. BG as an organisation, did not proactively monitor the membership requirement that all clubs ensure that club staff were trained in the policies and that everyone understood what the Standards of Conduct actually mean.
631. BG's Safeguarding Manager accepted that it was BG's responsibility to check safeguarding compliance across the clubs. I asked how this was done and which departments or individuals had that responsibility and the answer, once pieced together remained quite diffuse and included references to training, policies and latterly club surveys. On further questioning, I was told that Regional Welfare Officers might conduct occasional club visits after a particular complaint had been notified to BG, i.e. casework- The Safeguarding

Manager conceded that as an organisation, BG could not really push Regional Welfare Officers because they are volunteers.

632. The Integrity Director accepted that BG is essentially reliant on Club Welfare Officers to implement safeguarding standards and requirements:

'The volunteer Welfare Officers in clubs and regions are absolutely vital to the structure, because there is no way we could have an in-house Safeguarding Team that could reasonably monitor 1400 clubs. But the Club Welfare Officers are our eyes and ears in the club and they have the role within the club of making sure that safeguarding standards are adhered to.'

633. When asked how BG monitored safeguarding in clubs, the Director of Community Services referred to 'monitoring by exception' i.e. checking on a club only, and not always, after a complaint had been raised. He informed me that there had not been any discussion internally about how BG can or should monitor clubs' compliance with policy and procedure and that active, as opposed to reactive monitoring, given the number of clubs, would be a 'mammoth task'. When asked whether specific steps had been identified to monitor clubs, he said: 'Not really no, in terms of the specific around how do we monitor that clubs are following policy and procedure no'.

634. Judging from the anecdotal evidence received and indeed by BG's own admission, the organisation's engagement with the Club Welfare Officer workforce has not been particularly proactive despite their roles in implementing safeguarding and welfare related policy. It is part of a wider disconnect between the organisation and its clubs. Essentially, apart from arranging non-mandatory conferences and setting training requirements, the organisation's contact with Club Welfare Officers was through case work, i.e. when a concern or complaint arose.

635. In 2018/2019, realising this safeguarding disconnect, BG developed a proactive club contact process whereby members of the Safeguarding Team either visited or telephoned clubs in order to check levels of knowledge and signpost support. BG quickly realised that it would need extra help with this and recruited Regional Welfare Officers to assist (adding yet another task to be undertaken in their spare time). This useful work was interrupted by the pandemic and as far as I am aware it has not re-started. To date, and noting that there are over 1,550 clubs (some utilising more than one Welfare Officer), as I understand it only 205 Club Welfare Officers have been contacted.

636. BG will only know about the complaints that are made directly to it or are referred by clubs in compliance with the Safeguarding Policy. Unless it conducts some sort of audit or post-complaint visit, it will not know about safeguarding issues which clubs fail to bring to its attention and it will not know about low-level concerns which if allowed to escalate might become full blown safeguarding or welfare concerns.

637. I explored this issue with the Integrity Director and he confirmed that BG had never monitored complaints that remained at club level. In its final written submissions to the Review, BG accepted 'without

any reservations' that there is evidence of failings in the implementation of complaints policies during the period of Review. Had BG been monitoring implementation, it might have reached this conclusion sooner.

638. To my knowledge, there has been no sports wide recognised evaluation of the effectiveness of safeguarding and complaints policies. As Professor Mike Hartill, Centre Director of the CPSS and contributor to the Review observed '*in no other sector would you continue to rely on policies without assessing their impact and effectiveness.*' I note that this concern that was also shared with the House of Lords Select Committee recently:

*'We heard that the first step to effective monitoring and oversight is understanding what measures are most effective. Professor Hartill told us that "we know too little about what has worked, what does not work and where the weaknesses are" in existing safeguarding and duty of care procedures. He called for "independent monitoring and an evaluation of the systems and processes that are in place" within NGBs and delivery bodies. British Canoeing recommended "greater centralised support" for NGBs to raise safeguarding standards including standardisation of recording methods and data analysis to aid cross-sector safeguarding comparisons.'*¹⁸

639. I recognise the logistical and financial challenge of monitoring club compliance with policy and procedure and the human resources implications of such work. I also appreciate that this type of monitoring activity is not revenue producing and is therefore commercially inefficient. I suspect that BG has worried about the way in which coaches and clubs would react to compliance visits and feared that if they appeared as though they were inspecting clubs, this would cause some clubs to terminate their membership. BG had however declared in policies pre-dating and throughout the period of Review that it would monitor the implementation of safeguarding, child protection and health and safety policy. It was also, just as importantly, required to monitor implementation of safeguarding and welfare related policy under the Standards imposed by Sport England via the CPSU.

640. Reactive visits in the wake of a complaint and asking clubs to confirm that they have policies does not constitute an acceptable system for monitoring compliance with policy, especially policy which is designed to protect children. BG, in my view, did not audit club safeguarding or welfare related policy in any consistent or systematic way and certainly not in a proactive way. In its final written submissions to the Review, BG accepted, without reservation, that there had been failings in the implementation of safeguarding (and complaints) policies during the period of Review. I recognise that the number of clubs (around 1,550 at the end of the period of Review) prohibits a system which guarantees for example one annual visit from BG per year. Nevertheless I do consider that BG needs to have a proactive system

¹⁸ House of Lords Select Committee Report 'A National Plan for Sport, Health and Wellbeing' published 10 December 2021, paragraph 399.

which involves visits to clubs in order to monitor compliance and support clubs to understand the importance of policy implementation and awareness.

641. I should also note, for fairness, that there are some areas where BG appears to have successfully implemented its policy in relation to matters that affect gymnast welfare. For example, I have no sense from submissions and documentation received that there were failures within BG and its clubs about requiring disclosures and performing relevant criminal record checks and maintaining appropriate records in this regard. I note from an independent review of cases conducted in 2017 by an independent safeguarding expert (discussed further below) that the expert considered that BG was robustly fulfilling its responsibilities in this respect. Everything points to BG and, on the whole clubs, taking responsibilities around criminal record checks seriously and performing them diligently. The Review did receive a small number of submissions which referred to the apparent ability of coaches who had been expelled from BG to go abroad to coach or to work in a non-BG gymnastics environment. BG and FIG are aware that this has been an issue and BG has no jurisdiction over members that it has expelled.

Recommendation: BG must increase its direct contact with registered clubs to promote and monitor compliance with the information set out in the Gymnasts Handbook and provide policy updates.

Failures in the Resourcing of Safeguarding Work

642. As set out previously, it was the responsibility of the Safeguarding Team to develop, implement, monitor and enforce safeguarding policies. This required there to be adequate oversight of clubs. It was also the responsibility of the Safeguarding Team to educate the gymnastics community on safeguarding matters and deal with concerns identified about potential breaches of safeguarding standards. Given the concerns I have identified in my report about these areas, I have looked at the resources that BG committed to safeguarding and whether this was adequate. I have already dealt with the size of the Safeguarding Team at the section of my report that describes [The Work of the Safeguarding Team](#).
643. I asked various BG personnel about the extent of resources invested in safeguarding. I am very grateful to those who were frank about this issue. The Safeguarding Manager made no complaint about the level of resourcing. He felt that levels may have been a little low five years ago but he said he had the support and resources he needed. He did say that when he arrived in 2016, he felt as though he inherited a significant backlog of unresolved cases including what he called 'legacy' cases. This of itself, might suggest that the department had struggled, prior to his arrival, to manage the volume of cases. He also acknowledged that targets in the CPSU annual implementation plans were in some cases not completed because of a shortage of resource within the Safeguarding Team. I also saw email exchanges available to the review about specific complaints cases which recorded the difficulty sometimes in Safeguarding

Officers conducting a club visit or other action due to '*competing priorities*' and '*work load*'. These contradict any suggestion that there were sufficient resources.

644. I have seen no evidence at Board, Executive or any sort of operational level that any thought or recognition was given to this under resourcing until 2018. There is also no record of the CPSU considering the resourcing of the team, although the CPSU noted that it would not challenge resourcing unless they felt that the current model was not working.
645. Although a number of Board members expressed an awareness now that too few resources were deployed into safeguarding, this was usually caveated with '*the benefit of hindsight*'. Jane Allen considered that the restructuring in 2013/2014 was a positive development because it meant that the Safeguarding Team could divide its time between reactive case management and proactive work. She appeared to be of the view that BG had invested proportionate resources into safeguarding, into raising awareness about safeguarding and into the provision of sufficient education about safeguarding issues. When asked if BG could have done more, Jane Allen responded that BG could have done more but that she thought it was '*growing in the right direction*' and that it had felt appropriate at the time. She considered that there had been a real and developed focus on a '*proactive approach to safeguarding*' during her tenure.
646. Although there is nothing to suggest that BG's approach to safeguarding was outside the norms in funded club-based sports, I do not agree that BG invested adequate human or financial resources into safeguarding within gymnastics, both for proactive and reactive safeguarding work. The number of staff employed to help deliver safeguarding within BG has historically been surprisingly low when one considers the size and age of the membership, the complexity of what is an early specialisation sport, the variety of clubs involved and the responsibilities placed on those within the Safeguarding Team and the network of volunteer Welfare Officers. The sport is a coach-led activity at all levels and most of the gymnast participants are children or young adults (in 2018 nearly 80% of BG's members were under the age of 12 and this percentage had been at 70% or more since 2008).
647. At any time during the period of Review, the safeguarding team (or its previous equivalent) consisted of a handful of people, often working part-time, managed by someone whose time was predominantly consumed by reactive casework. The Safeguarding Manager told me that despite the many proactive responsibilities of the Team, in practice, the case work was so demanding that at one stage it consumed 85% to 90% of the Team's time although on reflection he thought that more commonly it consumed 65% of the Team's time. The Safeguarding Team at BG was too small to be fit for purpose throughout the period of Review and it should not have been tasked, as it was until 2018, with handling all non-safeguarding complaints which were brought to BG's attention. Even after this was separated out, the resources available to the Safeguarding Team simply could not cover the scale of the work required, despite the best efforts of most, if not all, of those working in the team. The Safeguarding Manager and those working before his arrival, would have been justified in asking BG to increase the size of their team.

648. I do understand that BG does not have infinite resources and has to prioritise what it invests in. However, it seems to me that the issue of additional resourcing was not even raised or considered. There has been no real suggestion that BG wanted to expand its Safeguarding Team but did not have the finances to do so. There was an interim CEO in place at the time of my meetings with BG, and he confirmed that BG was not suggesting that it had lacked the funds to improve safeguarding if it had identified that this was necessary.

Failure to Invest Adequately in Voluntary Welfare Officers

649. I have also considered the extent to which investment was made to resource and support the voluntary Club and Regional Welfare Officers, whose roles were very broad and who would often be personally involved in the clubs they were supporting (often being the parent of a child training there) and be dealing with complex relationships between club managers, coaches, parents and gymnasts.

650. Neither Club Welfare Officers nor Regional Welfare Officers are paid for any attendances that they make on clubs or any assistance that they provide. I was struck that BG's Safeguarding Manager referred to Regional Welfare Officers as 'key assets', and said that they had 'doubled' the size of his team. I asked the former CEO, about BG's dependence upon volunteer Regional Welfare Officers and she said:

'We discussed the expanding of the number of staff out in the field....any notable increase to staffing levels had a big financial impact on the organisation. You had to be clear that it could be sustainable because if it was not viable then in the short term you had to reverse everything and remove services from your members. So, I was very cautious because I believed you grew an organisation on a solid financial foundation rather than providing services that you could not sustain.'

651. When I asked why employing a few more such officers was not sustainable, Jane Allen said:

'Because everything has a push-on effect - if you employed more at grass roots level in safeguarding then the costs associated with that affected another area of the business. I knew we were growing, it wasn't like no increase in resources was made at all, it was just at the time the amount that we put in place is what we thought was appropriate at the time.'

652. Reading between the lines, I felt that these answers really amounted to an unwillingness to spend money on employing regional Welfare Officers. The current Chair of BG volunteered in my meeting with him that it was now apparent to him that the Club and Regional Welfare Officer system had not provided an adequate structure for the disclosure and management of welfare related concerns. The Integrity Director said that consideration would be given to either increasing the number of paid Regional Welfare Officers or contracting the volunteers on a remunerated ad hoc basis to conduct club visits. The new CEO is still examining the workability of the Welfare Officer system. The number of employed Safeguarding Officers based in the regions before 2020 has historically fluctuated between nil and three. BG intends to allocate one employed Safeguarding Officer and Team Leader to each of the 10 English

geographical regions and in Northern Ireland to support and build relationships with clubs and volunteer Regional Welfare Officers and to assist with casework, compliance and safeguarding. It is intended that they will be supported by the existing volunteer Regional Welfare Officers. A number of these new Officers have already been recruited.

653. I am only too conscious that community and competitive sport cannot function without heavy reliance upon volunteers but it felt as though BG as an organisation had as good as abrogated most if not all club and regional monitoring of safeguarding to volunteers, who are not formally answerable either to the clubs or organisation in any meaningful way. This was problematic with such an enormous membership and in a sport enjoyed mainly by young children. BG, by the nature of its operation has to repose significant trust in its clubs to deliver safeguarding but if it is going to do that, it needs an accountable system in place to monitor and support those clubs and the Welfare Officers. This costs money that BG was not prepared to spend.
654. In my view BG has not invested enough money in employing regional support for its volunteer Welfare Officers. If BG wished to consign the complex issue of coal-face safeguarding to volunteers, then it did so without professional salaried regional support for Club Welfare Officers. A larger number of employed regional safeguarding personnel would not only increase the connectivity between BG and its clubs, it would heighten the profile of safeguarding and would present a more formal, permanent and accountable structure. Hopefully this is starting to happen. Sport England acknowledged the scale of the difficulty in having a system where such an important function is mainly left in the hands of volunteers and recognised that this is an area where they need to provide more support.

Recommendation: BG must reassess the level of responsibility delegated to volunteers in the sport and must employ sufficient staff, especially at regional level, with appropriate professional expertise and training to support the safeguarding of gymnasts.

Insufficient Consideration of Elite Gymnasts

655. Until very recently, the references in BG policy to specific vulnerabilities for those competing at elite level were few and far between.¹⁹ I believe the 2014 Safeguarding and Protecting Children Policy was the first time that it was noted that children training at a high performance level within sport may be more vulnerable than other children. This did not come with any dedicated guidance. Although from 2014 and 2016 respectively there was a Safe Environment and Safe Trips policy applicable to all participants, there was nothing specific to national squad gymnasts. On trips to competitions, there would be a 'Head of

¹⁹ I note that as part of its very recent Curriculum for elite gymnasts, BG has now developed a Live, Train, Compete initiative which encourages athlete autonomy, the development of mental skills to prepare for and perform in life, training and competitions, to reduce the risks of injury and to prioritise mental and physical health and to access support. This is a welcome and progressive initiative.

Delegation' with overall responsibility for gymnast welfare. My sense is that BG was content to assume that coaches would perform an overarching welfare role for elite gymnasts. In the 2019 Safeguarding Policy and Procedures document, BG identified its national gymnasts as a specific cohort to which it owed a duty of care in terms of welfare. This policy recognised that even adult elite gymnasts may be exposed to risks of harassment and abuse.

656. Available policy content makes clear that BG, at least for part of the period of Review, did understand that specific, increased risks attached to elite sports participation. The additional vulnerabilities for elite gymnasts that are evident to me include the heightened intensity of the coach-athlete relationship, particularly in the women's sport, the increased influence that the coach is likely to have over the gymnast's life, the greater dependency that the gymnast would perceive themselves as having on the sport and the fewer life experiences outside of gymnastics that they are likely to have had. The Safeguarding Manager informed me that casework has shown that parents can prioritise their child's progression over reporting a concern and this was also a particular risk factor for elite gymnasts.
657. Some elite gymnasts will also enter into an Athlete Performance Award – a funding contract agreed directly with UK Sport for those gymnasts on the World Class Programme. BG is responsible for selecting athletes onto the World Class Programme, and so for deciding who can obtain an APA. The selection has previously been made by differing combinations of Head of Performance Sport, National Coaches, Head National Coaches and Performance Directors.
658. APAs are means-tested and determined by several criteria, with the most important being the level of performance achieved or anticipated in the future. The Athlete Performance Awards are granted for 12 months, at which point funding is re-assessed. A gymnast can be taken off an Athlete Performance Award at any time at the NGB's discretion if they believe they are not meeting the expected performance targets. Limited funding is provided for a period after an Athlete Performance Award has been terminated, during periods of injury and towards personal development. An athlete in receipt of an Athlete Performance Award will be expected to be a 'full time' athlete and as such have very limited time or opportunity to earn additional income through employment. As such the Athlete Performance Award that the athlete receives is normally their income for all life expenses and as such the pressure on athletes to retain an Athlete Performance Award is enormous. This can leave the gymnast's hopes and livelihood 'at the mercy' of those making decisions about their performances and capabilities (often viewed as subjective). The power imbalance between the gymnasts in these circumstances and the individuals coaching, managing and leading their programmes is huge. They are therefore even more vulnerable to unacceptable conduct and less likely to complain, and it is even more important that those working around them on the World Class Programme create a culture that puts the gymnasts' wellbeing and welfare at its centre.
659. The increased risk to elite athletes appears to be reflected in the proportion of submissions that I received which came from the proportionally small group competing at a high level in the sport (over

50% of submissions). If the descriptions of coaching conduct towards elite gymnasts submitted to the Review are accurate, it appears as though other adults or coaches were also not reporting issues of concern despite their duty under the Standards of Conduct and BG Policy to do so. I asked the Integrity Director about this and whether he thought that senior coaches knew how to identify welfare concerns arising in the training environment. He of course can only speak to events after 2018, when he arrived at the organisation. He, fairly, conceded that it must be the case that in some cases they either didn't know how to identify such concerns or if they did, they had not been reporting them. He felt that BG staff, Club Welfare Officers and senior coaches, in some instances, perhaps didn't have sufficient knowledge about identifying welfare concerns, especially low-level ones. Yet these are the very people overseeing the development of elite gymnasts.

660. Elite gymnasts divide their training time between their individual club, Lilleshall and training camps or squads which are arranged internationally. I asked Jane Allen, the former CEO, where safeguarding responsibility lay for elite gymnasts and she considered that the personal coach was the person most likely to detect or receive welfare concerns and the coach in turn could readily contact the World Class Programme to get help via coaches in Lilleshall, the Performance Director or through the sports science team. As far as I am aware there was no welfare lead or dedicated Safeguarding Officer at Lilleshall for the gymnasts training there during almost all of the period of Review until the commencement of the long overdue Pastoral Care Policy at the end of the period. This is as surprising as it is unacceptable.

661. When I asked BG's Safeguarding Manager about the safeguarding of elite gymnasts, he appeared to draw significant comfort from this Policy which now applies to national squad gymnasts attending Lilleshall and other events. Whilst welcome, this was only finally published in 2021 and has no application to the period of Review. It defines the responsibilities of key personnel and identifies a Pastoral Care Lead role at Lilleshall. This means that a person will be appointed for each event or squad and will be on call throughout the period of attendance. The Policy contains a copy of the codes of conduct to which gymnasts, staff and volunteers are required to adhere. It also contains a flowchart which explains step by step how to register concerns relating to the welfare of gymnasts or to the behaviour of coaches or other personnel.

BG accesses safeguarding expertise and advice from the CPSU and the Ann Craft Trust. Surprisingly, before 2016, the CPSU was not assessing BG's safeguarding of elite gymnasts. It is not clear how the CPSU was assessing it after 2016, given the limitations of their processes and the suggestion from the Unit that it did not really have access to the elite programmes. It was also not obvious from an analysis of the CPSU annual reviews after 2016. Therefore it seems to me that the safeguarding of elite gymnasts specifically, cannot have been demonstrably taken into account when the annual review process was being conducted between the CPSU and BG.

662. Gymnasts entering the World Class Programme (and their personal coach) are required to receive an induction from BG. This is a UK Sport requirement. Baroness Tanni Grey-Thompson also made specific

recommendations about this in her 2017 report, including suggestions of what such inductions should consist of. Inductions are an opportunity to engage with elite gymnasts and their coaches on welfare issues, including those specific to high performance athletes.

663. UK Sport (and BG) agree that the induction should entail a clear explanation of how the performance system works, the culture and behaviours that the World Class Programme operates in, and the implications of being an elite athlete. This process also requires the development of an Individual Athlete Plan and Exit Plan, explanation of selection and deselection (including appeals), whistleblowing, grievance and complaint procedures, anti-doping, competition and training schedules, health management (including mental health), injury management. Each sport is required to ensure that such processes and procedures are published, communicated and understood.
664. UK Sport indicated in one of its meetings with me that it felt that there could be more focus on inductions into World Class Programmes and that it was proposing to restructure the induction process into stages, with itself and the EIS more involved than previously. It wanted more of an emphasis on including parents with early specialisation sports such as gymnastics, on refreshing the process for athletes who are part the World Class Programme for more than one Olympic cycle and on transitioning away from the sport after retirement.
665. Parents have, historically, been excluded from the induction process. Communications with the parents of elite gymnasts by senior coaches, including those based at Lilleshall, has been inadequate historically and has lacked any consistent structure. Insufficient thought has been given to the need to keep parents informed about the entire process of high-performance training and of the supportive role that parents can play in this, should they wish to.
666. BG accepted that for part of the period of Review, the parents of elite gymnasts had not been as involved in their children's development on the Performance Pathways and World Class Programme as they could have been. One employee, closely connected to the programme said that there was some resistance from coaches to involving the parents too much because they wanted to discourage parents from interfering. In the last couple of years, this has improved and there is far more structure around the induction process for parents. BG is aware of the need to include parents in inductions and has implemented a far more structured approach to the process which is still evolving and which now includes even the youngest members on the Performance Pathway. BG is developing separate induction meetings for parents as part of this. This is a welcome development which will, hopefully, increase parental involvement for those on the World Class Programme and enhance levels of understanding and communication.
667. In summary, the sport has given insufficient thought, historically, to institutional safeguarding of elite gymnasts and how this should be assured. There has also been insufficient recognition, until recently, of how to manage the heightened vulnerabilities that accompany high-performance, particularly in relation

to welfare. This is despite the fact that BG was aware of the additional pressures and risks facing such athletes. It should not have taken until 2021 for a bespoke Care Policy to be implemented. Overall during the period of Review, there has been a lack of policy in place and a lack of consideration for who within BG is responsible for the welfare of elite gymnasts. My impression is that there was an associated lack of understanding amongst the elite gymnasts as to who they should or could turn to within BG if they had any welfare concerns. All of this reinforces my conclusion that gymnast welfare has not been at the centre of the culture of the sport.

Recommendation: BG must revise and improve welfare provision for high performance gymnasts, and their parents, including:

- **a more thorough induction process;**
- **access to an independent disclosure service; and**
- **access to a dedicated Welfare Officer from outside a gymnast's club.**

Failures in Collaboration

Engagement with Sports Science/Sports Medicine Professionals

668. Some coaches appear to have had misguided preconceptions, no doubt in many cases acquired in earlier life through their own experiences as gymnasts, about issues such as training loads, managing injuries and weight management. These have been exacerbated by an unfortunate resistance at times from national and personal coaches to the available expertise from sports science practitioners about these matters.
669. The coaches of elite gymnasts needed clear educational guidance about these sorts of issues and about collaboration with their practitioner colleagues. This was a task for the leadership of the performance programme and it was especially lacking between 2013 and 2017. This lack of leadership is something I deal with elsewhere in the report.
670. Instead of welcoming and respecting the knowledge and support of enthusiastic sports science and sports medicine professionals, some coaches felt threatened by it and rejected it. They were allowed to reject it because they were not being adequately managed or encouraged by BG in this respect. A 'them and us' culture was allowed to develop in parts of the Lilleshall (and Cardiff) machinery between coaches and sports science/sports medicine staff and the resulting imperviousness was allowed to spread to some influential personal coaches as well.
671. In 2018, after gaining insight from gymnasts, a senior member of the sport science/sport medicine team expressed concerns to BG and to UK Sport about the culture within the sport and especially within the WAG Programme. This coincided chronologically with Culture Health Check processes which would

ultimately lead to a Walk the Floor examination of the culture in the sport in 2019, which I describe in further detail below. Since 2018, with some notable exceptions, there has been much progress in integrating a more multi-disciplinary approach and I also note that from 2018 BG funded a PhD student to assist with research and delivery of expertise about growth and maturation.

672. Some of the difficulties which EIS practitioners told me they had encountered with establishing their credentials and sharing their expertise were mirrored in the equivalent Welsh programme, especially in WAG. I spoke with individuals connected with Sport Wales and Welsh Gymnastics about this. I understand that things came to a head in 2019, when there was, essentially a short-lived proposal by Sport Wales to withdraw sports science and medical support due to perceived concerns about the culture of the WAG Programme. Fortunately, both Sport Wales and Welsh Gymnastics worked constructively to repair the relationship. A Performance Strategy and Plan was formulated and the support services were maintained. It took these differences of opinion for the formulation of a proper agreement for the delivery of support services to be drawn up and for there to be an agreed strategy that would permit open communication and a proper opportunity for the Sport Wales staff to contribute formally at meetings concerning elite athletes. A Performance Committee was created to ensure safe and effective delivery of the national performance plan.
673. The lack of integration of the sports science/sports medicine experts particularly impacted upon the management of gymnast welfare and wellbeing in relation to training loads, injury management and weight management, as outlined in the relevant sections above (see [paragraphs 131 to 140](#), [141 to 150](#), [194 to 266](#)). In these areas, the expertise available from the sports science/sports medicine practitioners to support and assist the gymnasts was not always properly utilised initially, and only more recently has this improved.
674. The sport, through BG, did not 'professionalise' nutrition and weight management until relatively recently despite the availability of expertise from EIS. I do not agree that BG could safely satisfy itself that weighing practices and control were appropriate simply because there was a part time EIS nutritionist at Lilleshall, as the former CEO suggested in one of my meetings with her. Even when advice was available, there is sufficient anecdotal evidence to conclude that some coaches continued to ignore it. Some of these coaches were and are very influential which made the practices around weight control difficult to challenge. This has negatively affected athlete welfare.
675. In addition to the above, the Safeguarding Team was not as 'joined up' with other sections of the organisation as it should have been and this was another area where collaboration or information sharing levels were less than ideal. This was accepted by the Safeguarding Manager. He was unaware for example of the results of surveys about the culture of the sport completed by gymnasts, which would impact upon his work. He was unaware of the 2019 Walk the Floor exercise and agreed that it would have been very useful to know about it when the 2020 complaints about the high-performance programme landed on his desk. As noted previously, it was unclear as to whether safeguarding or education had

responsibility for dealing with policy dissemination to parts of the coaching community. The education team was not always adequately connected with other parts of the organisation, as reflected in the fact that the Coach Education Development Manager did not know about the 2020 Weight Position Statement until it was uploaded onto the BG website. Individuals with experience of BG felt that there was a lack of integration between teams within the organisation and also across the disciplines of the sport. I note that there is now a cross-discipline coaching group, which was established recently in order to assist with co-ordination and shared learning across the disciplines.

Athlete Representation within BG

676. In the Rio 2016 and Tokyo 2020 Olympic funding cycles, UK Sport required funded NGBs to put in place a formal structure for athlete representation. I had the impression from my meeting with the former CEO that BG felt that these structures had amplified the athlete 'voice' and demonstrated an organisational recognition of its elite gymnasts.
677. A subjective review of Athlete Representation / Athlete Voice work is carried out annually. This was carried out initially by UK Sport in February 2019 then again in May 2020 where the second iteration involved the subjective opinions of the BAC Athlete Engagement Manager. BG in both 2019 and 2020 was rated as Amber. The BG Athlete Representation structure has an Athlete Representative per discipline who engage frequently with Athlete Ambassadors (x2). It is understood that these Athlete Ambassadors then engage directly with the Performance Director and the leadership team of the World Class Programme.
678. The Athlete Ambassador is a role paid for by BG and their job is to be a communication bridge between the athletes and the senior leadership, to offer support and advice to gymnasts, to be a spokesperson on behalf of gymnasts and to help the athlete representatives. The Athlete Representatives are members of the current national squad. Although BG plainly sees the use of ambassadors and representatives as a truly progressive step, I was unable to gauge their impact. I understand it has been difficult at times to fill all of the Athlete Representative roles for gymnastics, perhaps partly reflecting the younger age of elite gymnasts compared to other sports.
679. More generally, the BAC's experience of trying to engage with the World Class Programme in gymnastics had not been particularly successful. Previous offers it had made to meet and brief gymnasts about its services had not been taken up. The BAC finds, unsurprisingly, that where a programme makes the effort to promote the BAC, awareness and athlete uptake increases. With gymnastics, the BAC felt as though BG staff had acted as 'gatekeepers' and that this had reduced opportunities to engage with gymnasts, although it was able to meet with the BG Performance Director in early 2020. I was informed that before 6 July 2020, it had never been contacted by a single World Class Programme gymnast.

680. The BAC has noted, that with a change of guard in certain key posts at BG in the last year, the organisation is now in some ways more receptive to the BAC. This accords with the BAC's general experience that the tone set by the leadership within a sport has the power to filter positive change and really does matter. The information available to the Review did not confirm one way or another whether the use of athlete ambassadors and representatives had made a demonstrable difference to the welfare of elite gymnasts or the development of the gymnast 'voice'. BG knows that it needs to do more to ensure that gymnasts are represented at Board level. Once this gap is plugged, it is quite possible that the ambassador and representative roles will achieve greater prominence and development.

Failures in Governance and Oversight

External Oversight from the CPSU

681. As is set out above the CPSU conducted an annual review with BG each year to review its Safeguarding Implementation Plan, after which it would rate BG. This provided the opportunity for a degree of external oversight of the safeguarding procedures that BG had in place and the chance to flag areas where improvements were required. The CPSU was clear with the Review that it was not a regulator and it was not involved in individual complaints, although it encouraged sports to recognise and properly deal with concerns and complaints.

682. When the media storm of July 2020 arose, I note that BG's CEO, Jane Allen relied more than once on the fact that BG's safeguarding processes and systems had been audited, accredited and 'championed' by leading experts in the field and by this, she was referring to the CPSU annual reviews referred to above. The Integrity Director told me: *'I very much see the CPSU as the external benchmarking exercise around safeguarding'* and *'it tells me as somebody who isn't a safeguarding expert what the experts are saying our safeguarding service is'*. It became apparent in other meetings with members of the Board and the safeguarding manager that BG similarly took very real comfort and reassurance from these annual reviews.

683. As the BG Integrity Unit accepted, it is very difficult to reconcile the consistently positive ratings that BG received from the CPSU with what I heard about the culture and behaviours in the sport, the lack of connection between BG and its clubs and the lack of monitoring by BG about safeguarding policy implementation. Sport England recognised in my meeting with them that the previous CPSU review system had failed to identify the extent of the safeguarding problems within gymnastics. I asked the CPSU, Sport England, and as many BG personnel as possible, including past and present Board members about this. There was a recognition from all three organisations that the ratings and reality bore no resemblance to each other but I detected a real organisational lack of insight from both BG and the CPSU about how this could have happened year on year. Given the wholesale reliance on volunteers to act as Welfare Officers, this organisational incomprehension is of very real concern and suggests that the annual review process is not working, however well-intentioned its purpose.

684. From an analysis of the CPSU Implementation Plans, Annual Reviews and Reports for BG, some notable and relevant issues and areas for improvement emerged as having been recorded. What follows is not remotely exhaustive:

Child's Voice
2013: The need to communicate with children in order to develop their 'voice' and involve them in club initiatives was identified. Over the following two years, there was no further mention of this or of steps taken to implement it. It was noted again in 2016 as a key priority, especially as gymnastics is an early specialisation sport. The development of active listening skills was required both in the clubs and with children performing at an elite level. By 2017 these actions remained incomplete and identified as key priorities. Insight surveys were conducted in 2018 which included the views of children and young people. By 2020 these surveys had still not been analysed. I was candidly informed by a member of the CPSU that neglect of the children's voice is a common theme across various sports and that the recurring failure to address this should have been picked up by the CPSU.
Education
2015 – there was a need to provide training and guidance to BG staff to enable them to respond to lower-level breaches of codes of conduct. I note that by 2018 this had not been completed.
2016- there was an intention to develop a safeguarding toolkit for Welfare Officers to include impact assessments, policy templates, a resources library etc. This featured again in 2017-2018 and had not been completed by 2019-2020.
Case Management and Case Recording
2015 - BG was set actions of monitoring reporting rates across the country and identifying the root cause of low complaints disclosure rates in order to address low reporting. As this action was set repeatedly year on year afterwards, BG would know that low reporting rates was an issue that required explanation. Low complaints rates in an organisation the size of BG could point significantly towards a lack of awareness or willingness to use available complaints procedures.

2015 - BG was required to introduce an effective case tracking system that manages key stages in a case and identifies where there is slippage from timescales on individual cases and general bottle necks across in the case pathway. This was repeated as a required action in 2017-2018.

2015 – BG was required to identify patterns of conduct (geographical/type/category/discipline) and trends in order to inform learning, to highlight conduct concerns and to target training. This was repeated as a required action in 2017-2018.

Elite Squad Members

2017 – BG was required to deliver safeguarding training for elite squad members and coaching staff.

685. This shows that the reviews are capable of identifying issues and actions that will improve the delivery of welfare and safeguarding but failures in subsequent delivery did not affect BG's ratings (or funding), which would suggest a lack of rigour in the entire process. None of these reviews refers to how BG monitors club compliance with safeguarding and complaints handling. The CPSU acknowledged that it did not have the capacity to conduct any sort of audit, rigorous or otherwise into how safeguarding was actually working inside an NGB. The CPSU, Sport England and UK Sport²⁰ did not receive any analytical data, high-level or otherwise, from NGBs about nature and volume of complaints received by funded NGBs.
686. There is a risk that form filling for funding takes priority over genuine annual organisational reflection about safeguarding processes. The CPSU review process is essentially led by the NGB with the former being utterly dependent on the information provided by the latter. There is something inherently problematic about a NGB marking its own safeguarding homework. The CPSU does not have the resources to verify what a sport is saying in its safeguarding self-assessment document or to monitor what is happening 'on the ground' in a sport. Under the current system, it must take it on trust. As one member of the unit put it if a body is good at presenting itself and good at paperwork, it can appear polished and effective, even when it isn't. The CPSU does not conduct an audit and despite the requirements of the Standards for Safeguarding Children in Sport, it is not a 'portfolio process' and it is 'surface' rather than a 'deep dive' and 'relying very much on them telling us what they are doing'. As one

²⁰ It is a condition of the Grant Funding Agreement that NGBs have to report and update UK Sport on any fact finding investigation or conduct issues involving any athletes or Athlete Support Personnel. This data would only be applicable to the World Class Programme and so would not cover any complaints outside of that.

individual from the unit observed *'I think people look at our website or see us written into documents I think they have this idea that we might be bigger than we are'*.

687. I think that there is a real disconnect between this review process and the actual clubs where the safeguarding issues arise. There is also a disconnect between the review process and the elite programmes which did not feature in the annual process documents that I saw, though apparently this is changing. The CPSU recognised that several key priorities in the BG Implementation Plans remained incomplete and yet it did not affect BG's overall rating. One of these was the failure to develop the children's voice in the sport which the CPSU acknowledged should have been centre stage, but, again, did not affect BG's ratings. The BG Integrity team (and the Board) informed me that it had taken real comfort from the positive ratings. Unfortunately, therefore, the way in which the CPSU rated BG, gave BG a false sense of security and moreover enabled BG to offer an inaccurate organisational response later to what were, in fact, justified criticisms.
688. The Implementation Plans and annual ratings would be explained to the Board. I was able to speak with various Board members about this. It was clear that some did not understand the nature of the annual process. For example, there was some ignorance of the fact that reviews were based on BG assessing itself, rather than the CPSU conducting some sort of external audit. One queried how BG could have received continuous green ratings from the CPSU and yet find itself confronting a wholesale safeguarding crisis. He wondered whether this meant that the Board had not been asking the right questions.
689. In 2017 Baroness Tanni Grey-Thompson reported that the CPSU should be provided with the appropriate resources to work with sports (both funded and non-funded) to provide clear guidance on safeguarding processes and responsibilities and help make those processes as effective as possible. She also thought that the CPSU's role should be highlighted to the wider public. As far as I can tell, those recommendations have not yet been implemented, five years on.
690. I discussed with Sport England the disconnect between BG's current safeguarding predicament and the annual positive CPSU assessments. One executive commented in this context:

'I think that we are taking away that our interest in athlete experience has not taken us far enough to enable us to know how bad it was and to enable them to tell us. We think we need to review our standards and approach in safeguarding – and we need our level of interest in behaviour of coaches to develop into more rigorous professional coaches - accept that we haven't seen it'.

Sport England informed me that it will continue to refresh the current Standards for Safeguarding Children in Sport. There was an appreciation that it is not enough for the CPSU to check that a NGB has a policy or a plan. Rather it needs to be able to assess the implementation of policy. It was not clear at the time of writing how this was to be achieved. I note that the House of Lords Select Committee Report: A National Plan for Sport, Health and Wellbeing called on Sport England (and UK Sport) for greater monitoring and robust enforcement of duty of care and safeguarding standards.

Oversight from UK Sport

691. UK Sport supports World Class Programmes using an investment process which takes place every four years (commonly referred to as an Olympic/Paralympic 'cycle'). As part of the investment process, each NGB will apply for funding by submitting various information and documentation, including a business case and performance strategy. UK Sport invests in the strategy, which will detail how the NGB proposes to achieve success at a future Olympic or Paralympic Games. Progress against this strategy is then monitored at an *'annual investment review'* whereby a range of indicators, targets and insights are considered. This review is co-ordinated by UK Sport's Performance Investment Team but it is sport led, it is not an inspection. The investment is invariably future focussed, i.e. investment decisions are made based on potential at forthcoming Olympic/Paralympic Games. Should an NGB be successful in their application for investment, UK Sport and the NGB will enter into a Grant Funding Agreement, the aim of which is to ensure that public funding is being properly used to help deliver a successful World Class Programme. I note that in July 2020, UK Sport modified the way it referred to this process, stating that although four year awards would continue, these would be in the context of a *'twelve year horizon'* reflecting *'the ambition to develop a more sustainable, healthy and efficient sporting ecosystem, and ...that this will take time.'* Leaving aside the somewhat baffling way in which language is used to signpost elite sporting strategy, this is a welcome development, if it is put into practice.
692. At my request, UK Sport conducted an analysis of payments to the World Class Programme for the period of the Review and the breakdown of the overall funding to BG was:
- a. £11.7million Exchequer; and
 - b. £25.7million Lottery funding.
693. It was a requirement of the funding award that BG adopt various athlete policies and procedures including those for selection, grievances and disputes, and disciplinary matters. BG was also required to have in place an appropriate system of athlete representation and consultation including some element of election. Because of the joint funding awarded to BG from Sport England and UK Sport, it was Sport England which took responsibility, through the work of the CPSU, for monitoring safeguarding within the sport. UK Sport sought to understand how individual NGBs maintained the welfare and safeguarding of elite gymnasts and did so using its different teams, including Integrity and Athlete Investment and through its individual Performance Advisers.
694. UK Sport's success metrics have historically included the number of Olympic and Paralympic medals won. UK Sport told me that each sport *'proposes and agrees'* a medal target range with UK Sport (and annual milestone performance targets) as a measure of success in return for significant public investment. BG's former CEO, Jane Allen, told me that it is UK Sport which sets the actual target. There were other

key performance indicators too, including athlete satisfaction with the quality and delivery of high-performance services to their sport.

695. In any event, the medal target has received a lot of attention in the last two years, with headlines about 'Cash For Medals'²¹ The language previously deployed by UK Sport around the quest for success has been recently criticised in the wake of public concern about the cultures in some World Class Programmes. The 'No Compromise' slogan used before and after the London 2012 Olympics is an obvious and longstanding example. It has attracted scrutiny because it could imply a 'Win at all Cost' philosophy that relegates athlete welfare and wellbeing below performance and success. It is possible that as a slogan, it could be understood as an incentive to push everyone to their limits and so to place tacit pressure on NGBs, coaches and gymnasts to feel an unacceptable amount of pressure. I discussed this issue with UK Sport. Whilst acknowledging the perceptions that had formed as result of this use of language, it reiterated that this was an investment process rather than a performance philosophy and that such language had been aimed internally at the sport rather than in any sort of public facing way²². I also discussed this issue with the current Chair of BG. He said that it was important not to attribute any adverse pressure about funding to UK Sport because it was up to the relevant NGB to manage the pressure on its athletes.
696. The official guidance provided by UK Sport for each of the cycles that I am concerned with, focused, unsurprisingly, on a definition of success which included the number of medals won, the number of medallists developed and the quality of the systems and processes in place to find and support the nation's most promising future champions. This last issue required UK Sport to scrutinise the governance and leadership of all sports. Receipt of funding was accompanied by a requirement that each NGB achieved the highest standards of corporate governance and financial management with systemic excellence at all levels. It also required each NGB to evidence that equality, safeguarding and ethical standards were visibly integrated.
697. I asked UK Sport whether it had undertaken any research into the impact of medal targets on athlete welfare across sport. It had not. I was informed that more recently, athletes have been 'consulted' about the impact of medal targets but I was not informed of the results. Questions about this are not raised in the Culture Health Check process that UK Sport uses to assess culture in the World Class Programmes that it funds (see below). I was told that this is because 'the survey is designed to highlight the indirect

²¹ By 2012, the medal target for gymnastics had increased from the Beijing target of 2 medals, to 3 to 7 medals. By 2017 in the Tokyo High Performance Strategy the target was a minimum of 4 with a range of 4 to 7.

²² The concept was described in the Mission process as: 'At the heart of this approach is our philosophy of No Compromise – a commitment to channel the resources needed towards athletes and sports with the greatest chance of succeeding on the world stage, both in the immediate future and in the longer term. No Compromise demands we reinforce excellence, support talent, challenge under-performance and reject mediocrity. Put simply, we strive to invest the right resources, in the right athletes, for the right reasons.'

consequences of a performance system in which medal targets are a key driver of investment'. This did not seem to me, to answer the point.

698. At the start of the Tokyo 2020 Cycle (2016/17), UK Sport and Sport England significantly enhanced its expectations of the governance standards in funded bodies. Meeting the 58 requirements of the new Code for Sport Governance became a mandatory part of receiving funding. On a continuing basis throughout the term of a cycle, an assessment of compliance was undertaken by the UK Sport Governance team/the dedicated Governance Manager of the relevant NGB.
699. I do not propose to summarise in detail all the requirements made of BG and reviewed by UK Sport as part of the funding cycles that I have investigated. I am concerned, for present purposes with assessing whether athlete welfare and wellbeing has been prioritised in gymnastics and if it has not been, why that is. I received voluminous documentation from UK Sport, Sport England, the CPSU and BG about the funding infrastructures, the annual review process, the self-assurance processes, and the external audits of BG's assurance statements conducted every cycle. All this documentation has been considered when reporting on the links between funding from Sport England and UK Sport and athlete welfare.

The Mission Process

700. Mission 2012 was the evaluation and monitoring process used by UK Sport for assessing the progress of all funded World Class Programmes in the run up to the London 2012 Olympics. It was introduced in 2007. It contained three "Dimensions".
- a. The Athletes – their performance, development, health and well-being;
 - b. The System – the staff, structures, processes, facilities and expertise that deliver the programmed;
 - c. The Climate – the feel, functionality, and day to day function experienced by athletes and staff.
701. Each sport was responsible for providing its own assessments of their performance and progress throughout each year and they would suggest whether they should be rated gold ('Excelling'), green ('Performing'), amber ('working on it...action plans under way') or red ('need help... not working, solutions to challenges not agreed or planned or activated'). In BG, the person signing off on this type of assessment was Jane Allen, the former CEO. The assessments were done with reference, initially, to various 'elements' spread across the three dimensions. These were fed back to a UK Sport Mission Panel which consisted of UK Sport Executives, relevant UK Sport staff and independent members. This panel would consider the NGB's assessments and confirm the relevant traffic light status, providing a major review of the entire Mission process each year.
702. This would be accompanied by an explanation and an action plan. The action plan would incorporate activities designed to address any gaps. UK Sport informed me that its approach was not so much 'carrot

and stick' or punishment as open dialogue, sharing best practice and encouraging improvement. If there were significant issues to be resolved, UK Sport would invite the sport to attend a Mission panel or would directly intervene. This did not occur with BG during the period of Review.

703. In addition to information derived directly from the relevant NGB, UK Sport would use the services of facilitators including independent external people with relevant sports science experience and the relevant UK Sport Performance Adviser. A Performance Adviser is allocated by UK Sport to each funded sport. He/she has traditionally had a portfolio of six to eight sports though UK Sport is looking to reduce this individual workload so that the Adviser can concentrate more closely on fewer sports. The Adviser is a central point of contact linking UK Sport with the relevant World Class Programme and staff at the NGB. This person also oversees the investment of UK Sport's award and therefore plays a key part in the annual award review process. They should have day to day oversight of the relevant World Class Programme's delivery of the performance strategy.
704. The Mission process was also followed for the Rio 2016 and Tokyo 2020 Olympic Games. The format gradually changed. The number of elements to be tracked was reduced and the subjective assessment from the funded sport gave way to a more evidence-based structure. The 'Climate' dimension was re-named 'Culture'. The NGB's progress fed into the annual review process. I was provided with some basic data for the sport of gymnastics for 2008 to 2015, which included just the traffic light colour for the three dimensions rather than any more detail. I note from this data that the 'Climate' dimension which should have embraced the culture of the World Class Programme was amber for BG from mid-2008 until 2012. Thereafter it was solidly green. The sport overall fluctuated between amber and green but was basically green from 2010 until 2015 with a brief exception for about six months between 2013 and 2014. There was no equivalent data available thereafter.
705. One of the elements of the 'Climate' dimension involved an assessment of the 'Mood in the Camp'. According to an available profiling tool used in the Mission 2012 cycle, this should have meant that there was positive leadership in the World Class Programme with offers of support through mentoring and coaching, that athletes and staff were empowered, that dialogue was open and honest, that issues and concerns were discussed in a supportive and respectful way. There should also have been a range of methods by which perceptions could be expressed, including surveys, event de-briefs, open meetings and the uptake of Performance Lifestyle advice should have been valued and encouraged. As events will show, this was not the case, especially in WAG and at times in MAG and Trampoline to various extents.
706. The Mission Process should, if working effectively, have identified any adverse or worrying cultural issues in a sport in the run up to the last three Olympic Games. However, it is quite clear that for all its packaging and aspirational language, the Mission Process did not accurately reflect, with any consistency, the state of the gymnastics World Class Programme so far as athlete welfare and culture was concerned. This was the case even though athlete wellbeing and culture were apparently yardsticks of success that BG had to demonstrate in order to justify its UK Sport funding. The ungenerous interpretation, is that

the Mission Process was window dressing for those sports, like gymnastics, where medals were realistically anticipated and that the medals mattered more than amber ratings and more than athlete welfare. Another interpretation is that athlete health and welfare was not on the radar before the creation of the UK Sport Culture and Integrity Teams in 2017 as much as it was after, and was not being assessed in a holistic and meaningful way. I note that, as with the CPSU annual review, the Mission Process was led by the NGB and there was an element of it marking its own homework.

707. I discussed with UK Sport the extent to which it was able to assess the entire wellbeing of funded gymnasts. UK Sport recognised that up until 2017, athlete welfare had not been 'front seat' and it suggested that whilst it was satisfied that its assurance process around governance and finance had been thorough, there had been less rigour around welfare assurance. I was able to access some additional Mission documentation as a result of responses to the Call for Evidence. From the combined material, it would appear as though from 2010, athlete health and wellbeing was really being judged by BG via the Mission Process by whether or not the athletes were physically injured. In other words, health was not being considered in any other way by the NGB and emotional wellbeing was not obviously monitored.
708. I have no accurate way of assessing whether perceptions around 'Cash for medals' adversely affected the welfare of gymnasts. When discussing this issue with the current Chair of BG, he accepted BG's own responsibility for managing the pressures on gymnasts that may derive from funding issues. He said '*We thought we were on top of that and we were wrong. There were things going on that we didn't appreciate or hadn't really understood*'. Sport England reflected in its meeting with me that its own historic performance related targets had probably driven the wrong sort of behaviour in sport although it had no way of knowing whether it had caused abusive behaviour. Medals will always be a metric for sporting success, and the tension between public funding of elite sport and the imperative to succeed is never going to be eliminated. What can change is the culture of a given sport. This will only occur when the leadership of NGBs along with the leadership of funding bodies find ways of reassuring athletes (and coaches) and the public that the definition of success is squarely on a demonstration of excellence across all aspects of a World Class Programme and not primarily on medal hauls.
709. As I have noted above, the House of Lords Select Committee in its report: A National Plan for Sport, Health and Wellbeing (November 2021) called on UK Sport (and Sport England) for '*greater monitoring and robust enforcement of duty of care and safeguarding standards*'. The same Select Committee also observed that the credibility of Sport England and UK Sport is undermined if non-compliance with required safeguarding standards are not met with funding sanctions. I was informed by UK Sport that in December 2020 the investment strategy was changed and that the importance of medal targets had been significantly reduced. Instead, there is more focus on the number of athletes in a sport mapped against both performance and developmental markers.
710. In June 2021, UK Sport launched its new Integrity Priorities. This tilted the emphasis onto winning in the '*right way*' which is a welcome use of plain language. UK Sport promised to consider conduct-related

issues, including safeguarding, and to influence and lead positive change. It aimed to do this by consulting with relevant partners and stakeholders to improve performance across four areas in funded sports. (1) Enhancing Independent Disclosure and Complaints, (2) Defining integrity standards for sport (3) Supporting the work of the BAC and promoting the creation of an independent body to support high-performance coaches (4) Helping to resource increased Integrity capacity within NGBs. Sport England will need to be on Board with these principles for any of this to translate to club level beyond the elite end of the sport. The Integrity Priorities were complemented by UK Sport's 2021-2031 Strategic Plan which identifies three core ambitions, one of which 'Keep winning and win well' emphasises the importance of integrity.

Culture Health Checks and Walk the Floor Process

711. As part of UK Sport's assessment of the culture of each World Class Programme during the period of Review, assessments of the training environment occurred through surveys, including the Culture Health Checks, and subsequent Walk the Floor programmes which I discuss in this section.

Surveys

712. By 2010 UK Sport had a system in place for annual surveys of World Class Programme athletes and staff, which would focus on the three Mission dimensions of 'Athlete', 'System' and 'Climate'. These commenced in Gymnastics in about 2013. They were anonymous and administered by contracted research agencies. The standard questions did not really focus on welfare as such, rather on more motivational issues. Sports were allowed to add their own bespoke questions. The majority of questions were framed as a positive statement using aspirational language with the contributor having the option of a range of agreement or disagreement: *Strongly agree/Agree/Disagree/Strongly disagree/Don't know*. Examples include:
- a. There is effective leadership in the World Class Programme;
 - b. I feel proud to be part of/associated with my World Class Programme;
 - c. I have confidence in the future direction of the World Class Programme;
 - d. It feels like the people in my World Class Programme have good intentions;
 - e. I feel empowered to take ownership of my programme/role/people are empowered to take ownership of their role in the World Class Programme;
 - f. My World Class Programme encourages (and supports me) to be the best that I can be.
713. I have no doubt that these exercises were conducted in good faith and after obtaining expert advice in the field. I am doubtful about the utility of responses given to questions framed in such a leading and

aspirational way. BG added some more positively worded questions but again they were not really centred in any way around specific aspects of welfare. There was a free text section for athletes to add comments if they wished to do so.

714. UK Sport reported to me that the Artistic Gymnastics responses were very positive although the response rate was sometimes too low for this to be taken at face value. A low rate of response is a red flag for possible dissatisfaction. BG staff response rates waned notably and I was informed that by 2015 the survey revealed that only 32% of staff/personal coaches thought that the sport was good at gauging what athletes and staff thought and felt about the World Class Programme.
715. After the Rio 2016 Olympic and Paralympic Games, more work was commissioned to find a way of measuring culture in the World Class Programmes being funded by UK Sport. In 2017 the Culture Health Check Survey tool was developed, in conjunction with various external specialists, as the primary tool for gathering insights into the culture of those World Class Programmes funded by UK Sport. I gather that the BAC has not been not involved in devising the contents of these surveys. By virtue of its role, the BAC might have valuable insight about the type of welfare issues arising in individual World Class Programmes and what that might say about culture in any given sport. It should be possible to try and test the prevalence of any concerns that have come to the BAC's attention in a Culture Health Check without a breach of athlete confidentiality should UK Sport find that useful.
716. The online surveys that were part of the Culture Health Check were administered by an external independent company to ensure anonymity of respondents, which included staff, funded athletes, and stakeholders. The survey explicitly asks whether people have experienced and/or witnessed 'Unacceptable Behaviours' in their World Class Programme. Respondents who have experienced/witnessed 'Unacceptable Behaviours' are offered an opportunity to follow up with UK Sport Integrity Team, or the independent survey company. UK Sport review the anonymous results and hold feedback meetings with the respective sports. I was informed that the sport's culture, development vision, strategy and associated actions would be discussed at this meeting and, if appropriate a Culture Development Action Plan would be drawn up. I did note that the questions asked do not reflect the fact that gymnastics is an early specialisation sport and they do not ask about the impact of medal targets.
717. Before 2019 two such Culture Health Checks had occurred within the gymnastics World Class Programme. The results of the 2017 Culture Health Check were mixed, though in part positive. UK Sport gave the World Class Programme a score of three (with one being least concern and four being most concern). The 2018 Culture Health Check saw positive responses in some important areas, in particular some technical areas, but there were also significant dips especially in MAG and WAG and amongst staff. Some of these would or should have raised cultural concerns. In fact UK Sport informed me that ordinarily, the outcomes or recommendations of any culture health check were left to the relevant NGB to implement and it was up to the NGB to report any resulting actions to UK Sport if they chose to in the annual review process. The 2018 Culture Health Check saw a poor athlete response

rate amongst those involved in the WAG Programme, which caused uncertainty about the reliability of the available data. Follow up focus groups failed to extract more insight and it was felt that the group was quiet and relatively non-responsive. As a result, a Walk the Floor process was initiated with BG's agreement.

Walk the Floor 2019

718. The Walk the Floor approach was developed in 2018 as a more immersive assessment tool, in which a panel of experts, independent from a sport, spend time observing that sport's World Class Programme. They would conduct interviews, run focus groups, observe coaching, team meetings etc. If a Walk the Floor has been run, rather than a Culture Health Check survey, the feedback to UK Sport and the NGB will take the form of verbal feedback together with a written report outlining observations, key strengths and opportunities for enhancement, along with key recommendations.
719. In the years prior to the commencement of the 2019 Walk the Floor process for gymnastics, the World Class Programme at BG had been disrupted by the departure of two head coaches, the sudden mid-cycle departure of the Performance Director in 2013, and from 2014 to 2017 the quick fix of an Interim Performance Director who had alternative duties as Executive Director of Sport.
720. The Walk the Floor report is dated October 2019 but is based in part upon a sequence of visits to Lilleshall in May 2019. In between those dates UK Sport received, in confidence, informed concerns about certain practices within the WAG Programme and on the part of the Head National Coach. These related to physical and emotional abuse, excessive weighing and not reporting injuries.
721. As part of the Walk the Floor process a panel (including a UK Sport Performance Adviser, a former Olympic athlete and a former Olympic gymnast) observed and appraised the current state of affairs in the World Class Programme. 32 out of 37 World Class gymnasts were interviewed, as were Head National Coaches and two national coaches. The panel met with the Performance Director, the CEO and key personnel from the EIS. They also conducted an assortment of focus group sessions. Over the course of three weeks, they observed multiple training sessions at Lilleshall.
722. Their findings were contained within a 24-page report and confirmed the reality that a low response rate in a Culture Health Check can be an index of profound dissatisfaction. Whilst the authors were keen to emphasise some positive developments and the sense that some cultural progress was being made, they identified some significant risk factors and areas for improvement. At a high level they found:

What Were the Issues with these Systems/Structures?

Question	BG Generally	WAG	MAG	Trampoline
How would you rate the culture in the sport?	Challenged	Compromised	Challenged	Delivering
To what extent has the sport made progress in developing culture since the 2017 Culture Health Check?	Regressed	Stayed	Marginal Improvement	Marginal Improvement
How adequate is the culture action plan or the culture plans in general?	Good	Adequate	Good	Good
How engaged/receptive is the sport to developing culture?	Good	Adequate	Good	Good

723. The key problematic findings in the report were as follows:

- a. The conflict of interest arising from the Performance Director line managing his own manager's spouse not only created a sub-optimal working environment for the Performance Director but invited difficult perceptions across the entire World Class Programme and represented a '*serious risk*' to BG;
- b. The three disciplines had very different cultures and values and were not joined up. Support from EIS services was not as well aligned as it could be;
- c. There was a lack of cultural blueprint across BG and this was compromising standards and award winning performances. Lilleshall itself, as a training environment was physically uninspiring and needed renovation, as BG itself recognised;
- d. The observed culture in WAG represented a '*serious reputational risk*' to BG and required urgent remedial action. There was no clear strategy around how gymnasts, coaches and sports science/sports medicine staff should all interact. In such a vacuum of understanding about behavioural norms, the personality of those in power was determining the culture. The WAG Head National Coach, whilst highly respected as a technical coach was presiding over a training environment characterised by excessive control. Staff and athletes did not feel part of decision making and did not feel able to voice their true feelings and opinions for fear of negative consequences and this extended to hiding injuries and deliberately declining to seek psychological support. This put athletes at possible risk of physical and psychological harm. The personal

coaches felt disenfranchised. Staff and others described having to rehearse conversations prior to speaking up out of fear. Culture appeared to be measured by 'doing the numbers' which mirrored the personality of the Head National Coach rather than any wider sense of shared ownership and collaboration;

- e. The training environment in MAG was more positive though some gymnasts felt that they were treated like commodities. There was a sense that more could be done to integrate the expertise of EIS personnel and to integrate personal coaches and to build a collective vision whilst recognising the efforts being made by the Head National Coach on this front;
- f. The Head National Coach of Trampoline was very highly praised and there was a strong sense of identity and improvement in the programme. Care would be required to ensure that gymnasts did not become too dependent on the Head National Coach;
- g. There was an implication that the Performance Director and EIS personnel had not always been as welcome in the gym at Lilleshall as was desirable for the performance of their duties and that the training environment ought to be more open in that sense, especially in WAG and MAG.

724. The key overarching recommendations included using an external expert to work with the WAG Head National Coach to develop her coaching and leadership philosophy and style and to put in place a performance review and clear management oversight for her. It is difficult to obtain any sense from the available information about how comprehensively the WAG Head National Coach was ever line managed. I have certainly seen no evidence of probing line management. Tim Jones left BG less than a year after the coach's appointment. He was briefly replaced by a successor who left in 2014. Martin Reddin stepped in and then in 2017 James Thomas took over responsibility but was caught in the middle of an obvious and visible reporting conflict. I note that it was or should have been the Performance Director's job to ensure that the Head National Coach and national coaches were communicating and collaborating with the personal coaches. Jane Allen agreed that whilst Martin Reddin was acting up as Performance Director, this became her responsibility in relation to WAG. The interrupted line management of the WAG Head National Coach, the fact that for over two years she was ostensibly managed by a CEO who had significant alternative duties of her own and the fact that the WAG Programme was ultimately managed by the Head National Coach's husband might explain why, by 2019, gymnasts, staff and personal coaches were feeling as though things were not working as they should, however successful the technical development of some WAG gymnasts and the number of medals won. The inference, if one were minded to draw it, is that deficits in the WAG Programme and its leadership had gone unchecked and unremedied for several years because those required to manage and address such issues, lacked the objectivity, inclination or time to do so.

725. The panel also advised the development and embedding of a cultural blueprint across the three disciplines and an improved alignment of sport science and sport medicine. The panel identified recommendations

for each of the disciplines individually including the formation of a culture in WAG where gymnasts were given more autonomy. It also recommended improving the atmosphere at Lilleshall and making it a warmer and more dynamic environment for gymnasts. UK Sport took the contents of the report very seriously. It held a panel meeting with BG to discuss an action plan and how BG should go about implementing such a plan. BG formulated a responsible series of actions to align with the recommendations in the report.

726. UK Sport provided support to BG in the development of their 'Cultural Value Blueprint' using an outside agency to assist with this aspect as well as calling on the support of a member of its own culture team. UK Sport also arranged mentoring for the WAG Head National Coach with a view to addressing some of the issues identified in the panel's report. I asked Jane Allen about the lack of a cultural blueprint within the World Class Programme. She felt that more work and support was needed to assist NGBs to develop the culture of high performance sport. At the time of writing, work on the embedding of the blueprint was continuing. When speaking with her about the Walk the Floor results, Jane Allen actually said that although she was alarmed about the severity of some of the observations about the WAG Programme, the rest of the report did not surprise her.
727. If Jane Allen was not surprised to learn that EIS staff were not properly integrated and that there was a lack of cultural blueprint across BG and in particular the World Class Programme, one wonders why it took an outside agency to point it out to BG. Many of the observations in the Walk the Floor report are consistent with a significant number of submissions received by the Review. Without the Walk the Floor process, I saw no evidence that BG would have taken proactive steps to investigate culture in the World Class Programme and to effect any necessary change.
728. The use of the Walk the Floor and its results show the UK Sport system of cultural assurance to be working in one sense. UK Sport was right not to trust the 2018 Culture Health Check because of the low response rate.

BG Board Engagement with Safeguarding

729. The BG Board consists of Executive and Non-Executive Directors, the latter of which are tasked with providing independent scrutiny and oversight of the organisation. As part of my work I looked at the nature and extent of BG Board engagement on safeguarding issues during the period of Review. I was able to explore this issue with various BG personnel, including Board members past and present.
730. From 2012, Compliance and Safeguarding reported into the Executive Director of Community Services. This Director was responsible for updating the Board about safeguarding within the sport. Before that time, the responsibility lay with the Director of Technical and Education. Performance of this responsibility was usually in the form of presenting an Ethics and Welfare or Integrity report to the

Board. Before 2010, there had been a Non-Executive Director of Ethics and Welfare on the Board but this position ceased to exist in 2010.

731. I note that in April 2017, in her Duty of Care Report, Baroness Tanni Grey-Thompson had recommended that all NGB Boards have a named Duty of Care Guardian. The Guardian should have an explicit responsibility and leadership role to engage with participants across the talent pathways and in community sport, and to provide assurance at Board level. This assurance, she said, should be evidenced in a public statement from the Duty of Care Guardian in the NGB's annual report.
732. When I met with BG Board members for the purposes of this Review, this had still not occurred. The Code for Sports Governance issued by UK Sport and Sport England was then revised in 2021 and it is now a mandatory requirement that sports organisations appoint a director with responsibility for welfare, health and people. BG informed me that it was in the process of recruiting a relevant director to fill this role and I understand that an appointment was made in January 2022. I do note that BG's action in this regard has only occurred in the wake of a funding body requiring it.
733. I discussed the skills and backgrounds of Non-Executive Directors in the meetings that I had with current Board members. The previous Chairman (from 2013 to 2019) conceded that BG had not prioritised safeguarding expertise when recruiting Non-Executive Directors. He thought that this was partly because the data received by the Board had not raised alarm bells and that the Board was aware that an Executive Director had direct responsibility for compliance and safeguarding. His successor agreed that there had been no safeguarding expertise on the Board and in that sense safeguarding '*had not been on the list*'. His perception was that BG had been somewhat reliant on the gradings received from the CPSU and had felt reassured that it was on the right track because of its successful annual CPSU reviews. I have no way of assessing whether this is correct but I do consider that the conscious focus of the BG Board and of the former CEO, Jane Allen, appears to have been on participation and finance.
734. The sport itself (both recreational and elite) was also un-represented. Whilst business development and financial growth were clear focus areas at Board level, it would appear as though culture was not. BG has been recruiting new independent Board members with safeguarding, integrity and/or diversity and inclusion expertise and now recognises that the 'athlete voice' needs to be represented at Board level. There was a slight tension in BG's representations to me about this. BG relied on the skill sets of its Non-Executive Directors, past and intended when explaining how it recruited relevant expertise to the Board. More recently, BG observed that these directors are limited in terms what they can achieve practicably as their commitment is limited to six days per year.
735. The Review was provided with examples of Integrity (or earlier Ethics and Welfare) Board reports for 2011 to 2020 (and one report from 2010) and I have described these in some detail in section [4\(a\)\(ii\) of the report](#) even though their contents overlap, in terms of relevance, with this section of the report. These reports were provided to the Board on a quarterly basis. The decision to confine useful complaints

and safeguarding data to the most serious cases meant that the Board did not receive regular reports about the prevalence and nature and outcome of less serious but still very significant behaviours at club level. Poor case management systems, record keeping and the tendency of BG to divert lower level cases away from its own case management structures and sometimes back to clubs, meant that in any event, the Safeguarding Team/Integrity Unit did not have a reliable handle on the number, nature and outcome of the less serious cases. This had a knock on effect on the type of data being provided to the Board.

736. Overall, it could be said that the quarterly reports provided headline news only about safeguarding developments, usually after some sort of departmental re-structuring, or when a new member of staff had been recruited, a CPSU review had occurred, or some sort of training package rolled out. The reports did not identify any steps taken to comply with BG's own duties to monitor safeguarding in a proactive way, despite assertions that this was happening²³ (beyond CRB/DBS and mandatory training issues). I did not obtain any sense from my meetings that the Board queried the contents of these reports in any meaningful way.
737. In 2017, an independent review of historic safeguarding cases found that improvements were required to the way in which safeguarding cases were managed and resourced, with particular attention required in the high-performance programme. The Board was aware of these recommendations. Likewise the Board was on clear notice that increasing membership meant that more regional welfare capacity was required and that inertia could risk negative press and reputation damage. Despite this none of the recommendations in the 2017 independent review was implemented (this issue is discussed in more detail at [paragraphs 1009-1016](#)).
738. There was a sense from several of the Board members that I spoke with that the sport itself was not reflected at Board level. I note that clubs as an entity were also not represented on the Board in any discrete way. The acting interim CEO in 2021 had reflected, understandably, on the previous 18 months and agreed that the Board had not been sufficiently sighted on welfare issues and the development of the high-performance athletes. The Board had been in receipt of data about safeguarding and complaints, but he wondered whether the data had been used well enough and whether more attention should have been paid to low-level concerns.
739. Although a former skeleton athlete was appointed as a Non-Executive Director in 2018, there was no one on the Board with dedicated responsibility for the 'athletes' voice', as BG now acknowledges. According to the current President of BG, until publication of Baroness Tanni Grey-Thompson's Report in 2017, the duty of care to athletes was not the focus of Boardroom discussions. I note that after reflecting upon her third meeting with me, Jane Allen considered that after the Rio 2016 Olympic Games,

²³ E.g. in December 2019, the Integrity Board Report stated; '*The Integrity Unit continue to ensure and monitor compliance with internal and external standards for sports integrity and our duty of care*'.

BG had failed to seek the voice of the gymnasts and the staff on the World Class Programme and to enquire whether the success of those Games had created any additional risks for the athletes.

740. BG has recognised now that it did not take steps to ensure that the following areas of focus were adequately represented at Board level: duty of care to athletes, the athlete voice, the actual sport, clubs, the World Class Programme and safeguarding. It also accepts that it failed to connect with 'the community voice' within its own clubs. It is telling that these aspects of the sport and the disconnect with clubs have featured heavily and negatively in submissions. This does not point to an organisation putting athletes or their welfare at the centre of its culture. It also suggests that the organisation failed to appreciate just how important individual gymnast participants are to its existence. The gymnasts are members every bit as much as the clubs. As most of the gymnasts are children or young people, the absence of Board level representation to safeguard their interests is as out of date as it is out of touch. BG only really acknowledged this in August 2021 when it said in an open letter:

'The Board has taken stock over recent months. It is evident that the executive team and the Board have failed to be close enough to the gymnastics community to understand your concerns, and our engagement with those raising concerns has not been good enough. We have let you down, and we are deeply sorry for that'.

Recommendation: BG must introduce effective governance pathways to ensure that the views and interests of athletes and parents are known to the Board and are taken into account in relevant decision making.

Recommendation: BG must appoint independent Board members with relevant professional expertise in safeguarding and athlete welfare.

The Performance Director Role

741. The role of Performance Director is important because this is the person in charge of overseeing and delivering the World Class Programme and acting as the conduit between the elite gymnasts and BG. As a result, the manner in which this role is fulfilled has the potential to significantly impact upon the wellbeing and welfare of those gymnasts.
742. The Review received information about the role of Performance Director from several sources. The collective material enables me to suggest with confidence the following:
- a. Tim Jones was not only the first Performance Director for BG but came from a non-gymnastics background. I was informed by those close to the World Class Programme that both factors

affected the reception he found at BG and at times appeared to impede his ability to perform his duties as he wished to. I was also informed that he had encountered elements of coach resistance and a surprisingly high degree of involvement from the former CEO, Jane Allen, in the World Class Programme. Jane Allen, in turn, felt that when she arrived, the World Class Programme needed to be more integrated into BG;

- b. Tim Jones left in 2013. BG struggled to find a replacement. The post remained vacant for several months. Mr Jones was briefly replaced but his successor left in November 2014. Martin Reddin stepped in as interim Performance Director in 2015 and this appointment would have been apparent to UK Sport. I have addressed elsewhere the disadvantages of this interim 'fix' and the conflicts of interest that arose. The collective information available to me, mainly from my meetings with BG personnel, suggested that Martin Reddin had not been a particularly hands on or present Performance Director and I note that during his interim tenure he was regularly abroad undertaking international duties with the FIG and European Gymnastics Executive Committees. I saw and heard very little evidence of the national and head national coaches being line managed in a co-ordinated way or of any coherent management over the three funded disciplines, despite the ongoing medal success. It was during this period that some EIS practitioners continued to struggle to find their voice with key coaches, something that should have been monitored and addressed by the person leading the programme;
- c. James Thomas was appointed in early 2017 and again, came from a non-gymnastics background. My impression is that he inherited something of a void and had to work hard to re-galvanise the role. This caused low level tensions which decelerated the positive impact that Mr Thomas was able to have on an already beleaguered programme. Nevertheless, over time, these have been overcome and Mr Thomas succeeded in progressing the World Class Programme in many aspects.

743. I asked UK Sport about the Performance Director role at BG. As UK Sport funds this role, it has some influence over appointments and very real interest in the way in which the role is carried out. UK Sport was unable to tell me what organisational view it had of BG's decision to deploy Martin Reddin as an Interim Performance Director.

744. The Performance Director role has lacked continuity and coherence from around 2013/2014. This should have been apparent to BG, its CEO and to UK Sport, yet this does not appear to have been the case. From 2012 onwards, particularly between 2015 and 2017, it involved a conflict of interest that required formal mitigation and transparency, both of which were lacking. The interrupted leadership of the World Class Programme has impacted adversely upon the appropriate management of coaches, the optimum involvement of EIS support, the encouragement of athlete autonomy and on the development of a positive and healthy culture.

Failure to Recognise Red Flags

745. I have set out at various places in my report, occasions when BG was, or should have been, aware of issues relating to gymnast welfare that had been identified. If these issues had been appropriately managed they would have afforded BG important opportunities to assess culture and patterns of behaviour within the sport. These include:
- a. The ESRC report provided to BG in 2012 and setting out findings and recommendations in relation to attitudes towards diet in elite gymnastics (see [paragraphs 248 to 254](#) above);
 - b. The CPSU action points from annual reviews, including in 2013 for BG to communicate with children in order to develop their 'voice' and involve them in club initiatives, which remained incomplete and as a key priority in 2017. (See [paragraphs 684 to 690](#) above);
 - c. The recommendations for improvement made by an independent safeguarding expert in 2017 (see [paragraph 1015](#) below);
 - d. The Culture Health Checks and the resulting Walk the Floor report provided to BG in 2019 raising cultural concerns (see [paragraphs 711 to 728](#) above).
746. In addition, in 2017 and 2018 a number of media reports were published in the Guardian that raised concerns about athlete welfare in gymnastics. These included:
- a. An article in 2017 which was critical of the way in which BG had handled serious complaints against an unidentified coach. The coach was alleged, amongst other things, to have made highly inappropriate comments about the weight of child gymnasts. The report alleged that abusive practices were occurring at un-named clubs where high-performance female gymnasts trained. It suggested that others, including staff, were too frightened to speak out;
 - b. Articles in November 2017 about the alleged culture of fear within BG. There were overt references to a culture of fear, fostered from the top down, that prevented people from speaking up about athlete welfare failings. There was also reference to BG being an organisation ruled by favouritism where medals took priority over athletes and over coach welfare;
 - c. An article in April 2018 about the exclusion of a gymnast from the Team England squad for the Commonwealth Games, in which the gymnast claimed that there was an unhealthy focus on weight loss which had negative lasting effects.
747. At around the same time, I am aware that following an investigation into complaints raised against a coach working in the World Class Programme, an independent report was commissioned by BG in relation to the case. I have read recommendations that were made by the author of the report which were not specific to the case in question but applied to the World Class Programme in general. The

author recommended that substantial effort be made to rebuild relationships between the gymnasts and the coaching staff. He also recommended that a detailed review be carried out by BG with a view to significantly improving:

- a. The measures in place to educate coaches and gymnasts alike as to what is, and is not, acceptable behaviour by adults in a coaching environment;
- b. The measures in place to safeguard coaches and gymnasts from bullying, to include the circumstances in which inappropriate, or perceived inappropriate, behaviour is reported;
- c. The pathways available to coaches, gymnasts or any other concerned party, to report such concerns as there may be.

748. BG was therefore on specific notice that in at least one of its disciplines, there were identified and important areas of concern. This report was provided to UK Sport. The measures recommended in the report, if acted upon, would have addressed precisely the sort of issues that UK Sport and Sport England would ask me to investigate three years on.

749. I requested further information from BG, UK Sport and relevant individuals about the steps taken to address these particular recommendations. In short, despite receiving 14 pages of responses on this issue, I was not able to discern that anything tangible had resulted other than:

- a. Recruiting staff to the relevant programme which was successful in rebuilding the relationships between coaching staff and gymnasts;
- b. The continuing efforts of the newly appointed Performance Director to familiarise himself with the personalities and landscape of the World Class Programme (which I am confident would have happened in any event);
- c. An appropriate 'lessons learned' exercise conducted by the Integrity Unit about the way in which the case had been procedurally managed. Whilst this exercise led to amendments to BG's complaints procedures, I was not pointed to anything which would have obviously altered or improved the pathways for participants to raise concerns within the World Class Programme.

750. UK Sport informed me that that it had noted the situation and understood that BG was implementing the recommendations but, as an organisation, was unable to assist with the steps taken to do so. It could not confirm how the recommendations had informed, if at all, any further cultural assessment of BG's World Class Programme. BG, likewise did not know whether the recommendations were passed to the departments best placed to help implement them and thought it unlikely that BG coaching staff would have been informed. I received conflicting accounts of whether the BG Board or the gymnasts were informed of them, there is certainly no record of this having occurred or of the CPSU being informed. I also received inconsistent accounts of the actions taken in response to the recommendations. Reliance

was placed at times on developments (such as the Positive Coaching course, annual Culture Health Checks and the appointment of a Performance Coach Developer), which, according to other sources, were not the result of this particular report and recommendations at all.

751. Whilst the rebuilding of relationships between coaching staff and gymnasts was a positive development, this should have occurred in any event and was not the obvious result of the recommendations. The inability of BG to identify discernible actions arising from these recommendations was unsatisfactory. The issues that these recommendations were intended to address featured again in the 2019 Walk the Floor report and they have featured prominently in my Review. There was certainly no evidence that anyone had sat down to consider how they should be implemented within the affected (or any other) discipline of gymnastics and I saw no evidence that the apparent failure to address these recommendations featured in any safeguarding or cultural review, whether by BG or UK Sport. This was yet another missed opportunity by BG to effect the type of positive cultural change that it was on notice was required.
752. Another source of information which should have acted as a warning sign to BG was the results of surveys conducted between 2018 and 2020 in order to obtain the anonymous views of various members of the gymnastics community. The different types of surveys conducted are set out in the section regarding [Surveys](#) above. I was informed by the Safeguarding Manager that there was very little time available to analyse the results of these surveys or effect any necessary policy changes on the back of such surveys. For example, the results of an Athlete Insight Survey that took place in 2018 were not analysed until 2020.
753. When I reviewed the responses to these surveys I found that there were positive and negative comments about the experiences of individuals. They also included concerns about the following issues: a fear culture and oppressive environments in the sport; excessive weight control; lack of respect for gymnast voice and negative coaching behaviours such as shouting, bullying and belittling language; lack of viewing facilities; excessive training loads; the bewildering suite of BG policies. Clearly, these chime with the submissions sent into my Review. I saw no evidence that the results had been brought to the attention of the Board, let alone shared between departments, and there is nothing to suggest that any department analysed them. The surveys were one of the few ways in which some individuals felt able to raise concerns with BG, yet when they did so there was insufficient recognition of what they had reported.
754. Given the above, BG should have recognised that there were issues that needed to be properly investigated and addressed, before the crisis of 2020 which resulted in my Review. Instead, the responses to some of these issues were defensive and less than rigorous, as I set out in the following section.

BG Responses to Red Flags

755. I include this as a separate section because the way in which an organisation responds to concerns and criticism, especially legitimate criticism, can be a litmus test of leadership and of culture. It can also be a test of how decisions are made within an organisation and whether these decisions are appropriate and effective. In this section I have considered BG's public responses to criticism or concern and its response to UK Sport's Walk the Floor report.
756. In response to the press articles in 2017 and 2018, BG issued statements suggesting that it had followed its normal procedures in managing concerns that had been raised to it, denying the culture of fear which had been alleged and, in response to the allegation of an unhealthy focus on weight in the sport, suggesting that it provided its British squad gymnasts with world-class specialist sports science advice and support.
757. A former Chair had been aware of such media reports in 2017 about a culture of fear and felt that such issues would probably have been discussed at Board level. However he said that without a formal complaint there would not have been any further investigation arising. Leaving aside the fact that even under BG's own policies, it does not require a formal complaint for an investigation to take place, the organisational response, for which Jane Allen was partly responsible as CEO, seemed to me to be less than rigorous, if not complacent, given the reputational risk engaged and the importance of the issues that had been raised.
758. In the Directors Annual Report for the year ending 2019, (a public document containing statutory accounts), a reference was made to the 2018 Culture Health Check process. It was summarised in this way: *'The UK Sport Culture Health Check in 2018 saw a pleasing improvement in the culture of the [high-performance] program with more positive feedback from athletes, coaches and staff. This progress is monitored closely by the Board'*.
759. I have referred to this health check at [paragraph 711](#) of the Report. Whilst some improvements were noted, there were also significant areas of real concern, including cultural ones. Furthermore, the response rate was sufficiently low to cause UK Sport to require a Walk the Floor process. I asked Jane Allen about the way in which the results of the 2018 Culture Health Check had been presented in the Directors' Report and whether she considered it to have been balanced. Ms Allen said she had framed the summary, which had been approved by the Board, in that way to demonstrate that the Check had revealed a positive response from the athletes about leadership of the programme (James Thomas having arrived as Performance Director). It was pointed out to Ms Allen that this was not apparent from her summary and upon this, she conceded that the summary ought to have been clearer and ought to have included a reference to the areas where more work was required. Regrettably, I am left in little doubt that this summary lacked transparency.

760. In 2019, the BG Board was required to respond, privately, to the UK Sport Walk the Floor report about MAG, WAG and Trampoline. I have described the findings from the report in some detail at above. In summary, it revealed serious problems with the culture of the World Class Programme, especially in WAG, some of which required urgent remedial action. The report came at a critical time given the proximity of the anticipated Tokyo Olympics scheduled for summer 2020 (though subsequently delayed by Covid until 2021).
761. The Walk the Floor report exposed real organisational and cultural issues that needed honest scrutiny and a mature response from BG. BG was keen to reinforce that the Board was seriously concerned about the Walk the Floor report and anxious to work with UK Sport to address its findings. I was also informed that it was a '*major topic of conversation around the Board table*'. I do not doubt this and I have set out above a number of steps that BG took in response to the report, including the formulation of an action plan.
762. However I saw no compelling evidence that either the CEO at the time or as far as I am aware any other senior individual in the organisation really looked into how the problematic cultures identified in the Walk the Floor report had been created and maintained and why it had taken outside intervention to identify something that should have been apparent to personnel such as the Executive Director of Sport, Performance Staff and coaches. In addition, no-one appeared to ask whether the issues identified in the report were also affecting the non-funded disciplines or the sport at grass root level. BG states that it was focussed on what should be done as a result of the report rather than looking backwards.
763. This may be the case, but BG should still have been more probing about these issues. In its final written submissions to the Review, BG acknowledged that it should have done more to understand the concerns of gymnasts on the WAG Programme and the extent to which they might be reflective of a wider culture outside the World Class Programme. My impression is that the Walk the Floor report did not get beyond the Board. I saw no convincing evidence that the athletes affected were informed about it or that performance staff and EIS practitioners were formally briefed about the findings. Jane Allen conceded that, upon reflection, she had missed making these important communications and that the gymnasts and staff should have been informed.
764. The Executive Director of Sport had had both executive responsibility for the programme and for two key years, immediate control over it. The CEO's seeming failure to hold him, or anyone else, to account for the issues raised in the Walk the Floor report smacks of the very complacency and favouritism identified in submissions.
765. The written response to this report that went to UK Sport was drafted in large part by the former CEO, Jane Allen. She informed me that she obtained written feedback from other senior staff and the Chair of the Board. The Performance Director in post at the time, assisted with the construction of an action plan and Jane Allen told me that the executive approved the draft of the response before it went to UK

Sport. The Chair discussed this with me and disputed that there had been any formal written response, as such, on behalf of the Board to the Walk the Floor report. He said that he provided some limited feedback to the former CEO about the written response and said that the Board knew that Jane Allen's written response would go to UK Sport. However the Board was more focussed, he said, on determining the actions that should follow the report and in that sense the Board had paid little attention to Ms Allen's document.

766. Whilst that written response to the Walk the Floor report accepted that some of the report's findings were fair, the tone and content of the response is surprisingly defensive. This is particularly apparent in relation to the WAG World Class Programme and the obvious conflict of interest caused by the WAG Head National Coach being line managed by someone who was, in turn, line managed by their spouse. The immediate focus in the response appeared to be on mitigating for the WAG Head National Coach and ensuring that she was able to stay in post, as BG now accepts. In my discussions with Jane Allen about her response to the report, she suggested that any reference by her to the WAG Head National Coach needing more support was a reference to the fact that she struggled with certain administrative tasks and as such benefitted from the support of a dedicated WAG pathway manager. This latter post had been more recently merged with MAG, thereby reducing the administrative support available. Whilst this might be the case, I do not consider that the findings in the report about the WAG Head National Coach can be explained by this.
767. In one of its meetings with me, UK Sport discussed the contact that it had had with BG following the Walk the Floor report. UK Sport agreed that the tone of the CEO's response to the Walk the Floor report had been defensive and more focused on supporting those who were criticised than on expressing concern about the athletes. UK Sport also detected what it described as *'the closeness of the executive team in the response'*.
768. UK Sport went on to explain that despite the defensive tone coming from BG, there was real engagement from BG about *'moving forwards'*. This may be so but I had no sense from either UK Sport or from the BG Board that anyone had questioned the content and tone of Ms Allen's response to the Report at the time, despite the fact that it had apparently been seen by the Board. No-one appears to have pressed Ms Allen on how the Walk the Floor report might be said to reflect, by implication, on the Executive Director of Sport and the Performance team. I asked various senior BG personnel about both the report and the former CEO's response to it. There was some measure of agreement that the response was defensive and could be interpreted as reflecting more concern about the WAG Head National Coach than about the gymnasts. The interim CEO in 2021 accepted on behalf of BG that looking at it all in the cold light of day, it revealed a response which was unbalanced and over-protective of the coach. I understand that instead of challenging the CEO's proposed response, the BG Board effectively decided to take its own independent approach and arrange a meeting directly with UK Sport without the involvement of the then CEO.

769. There was therefore a formal meeting between members of the BG Board and UK Sport in January 2020 in order to discuss the best way forward after the report had been considered. I consider that I received inconsistent information from the organisations as to exactly what was said and who was ultimately responsible for the decisions made in the meeting. However, an outcome of the meeting was that the WAG Head National Coach would stay in post.
770. The Directors' Annual Report 2020 (a public document drafted by the former CEO and approved by the Board) was published later in 2020. Despite Jane Allen's earlier assertion that BG had worked hard to be transparent about the gymnast/coach culture, she described the Walk the Floor process in the following way:

'In 2019 the World Class Programme went through the "Walk the Floor" culture program established by UK Sport which involved extensive face to face interviews with coaches and athletes by an independent panel. The outcome of the report saw an action plan drawn up and actioned by the Performance Team. The progress of this plan is monitored closely by the Board'

771. On any reading, this is not transparent. BG subsequently stated to me that as the report post-dated the commencement of this Review, it would not have been able to state publicly anything that might prejudice the Review, which was not an explanation relied upon by Ms Allen.

BG Response to 2020 Media Reports

772. When the post 'Athlete A' publicity storm occurred, one of the accusations levelled at BG, was that the leadership, particularly, the CEO, had reacted over-defensively to allegations and observations of those gymnasts who had made public statements about the culture within the sport. BG did acknowledge that gymnasts had not felt able to complain, that reported coaching behaviours were, if true, contrary to BG's safe standards and that the organisation was determined to get to the bottom of the issues and change gymnastics for the better. BG did, in mid-July, assert that it had worked particularly hard in recent years to ensure that athletes' interests and concerns were addressed and that the athlete and coaching culture was transparent and inclusive. However I note that the way in which this media storm was referred to in the 2020 Directors' Annual Board Report was as follows:

'Safeguarding Crisis: In July 2020, British Gymnastics became embroiled in a media storm over safeguarding issues that have engulfed the sport. The ferocity and relentlessness of the media attacks on British Gymnastics have seen many gymnasts come forward with allegations of abuse within the sport. An independent review has been established to review the safeguarding practices within British Gymnastics and it is anticipated that the recommendations from the review will be known by early 2021. Consideration of the potential impact on the financial position of the company is considered in note 24 of the financial statements.'

773. One senior executive referred to this later (though I note not at the time), after Jane Allen's departure in December 2020, as '*gloriously understated*' and acknowledged that the suggestion that the press was to blame conjoined with an emphasis on financial consequences, was, in the circumstances, unfortunate. I asked Ms Allen about this wording, and she did not particularly resile from it, continuing to view the press coverage as an attack on BG and a spur for athletes to speak out. Ms Allen's response remained, in my view, inappropriately defensive and overprotective as well as out of touch. The Board does not appear to have challenged this at the time.
774. On 9 October 2020, Ms Allen issued an open letter which used a more conciliatory tone. On 13 October 2020 she was interviewed by the BBC and during the interview she was asked about an email that she had sent thanking the former Trampoline Head National Coach for their commitment to the sport. This individual's employment with BG had come to an end in 2017 following concerns being expressed about them. The details of the settlement that they reached with BG are subject to a confidentiality agreement. Upon their departure, Ms Allen wrote an email which was distributed throughout the organisation thanking the coach for their commitment to the sport. When challenged in the interview about the appropriateness of such thanks in the circumstances, (which had filtered through to the gymnasts affected by their tenure as coach), Ms Allen essentially declined to respond meaningfully, citing the settlement agreement. That agreement would not prevent Ms Allen responding to the question. Ms Allen did tell the BBC that she could understand why athletes were upset by it but she deliberately chose not to answer whether she regretted the email. I too raised this with Ms Allen in one of my meetings with her. She stated that she did now regret the email and agreed that it was insensitive and should not have been sent. Ms Allen's original email and her response to a reasonable media question tends to support the perception of a tendency towards defensive and less than transparent responses to criticism.
775. The internal lack of enquiry about press reports from 2017 and 2018, the lack of transparency and balance in the response to the Walk the Floor report and the contents of the Director's Reports (which were written on behalf of the whole Board) and the 2020 response to more recent press scrutiny, reflect negatively on the Board and on the former CEO, Ms Allen. Taken in combination, they suggest a lack of leadership and an organisational failure, until recently, to appreciate the central importance of athlete welfare. BG has acknowledged in its final written submissions that more should have been done to understand the 2017 press reports about a '*climate of fear*'. It now realises that it was '*too focused on pushing back against what were seen as hostile media stories rather than understanding the athletes' perspective*'.
776. The leadership style of the former CEO of BG had its part to play here. I have met with numerous individuals well placed to observe Ms Allen's interaction with others and her response when faced with opinions and approaches that differed from her own or when faced with issues which had the capacity to impact adversely on the organisation's reputation. These contributing individuals include past and present Board members, operational staff within BG, coaches, gymnasts, sports science/sports medicine practitioners and Performance Pathway personnel.

Conclusions on 4(a)(i)

777. Despite the many positive and passionate contributions made by Jane Allen during her long tenure as CEO, which are recognised in other parts of this report (as well as some positive observations made by BG personnel during my meetings with them about Ms Allen and her contribution), the number of submissions attesting to an inability on her part, to listen with an open mind to information that had the potential to affect the reputation of BG, are too numerous to ignore. The tendency to defensiveness and to a dismissal of those who sought to challenge her, however constructively, were features of her leadership style which were recognised within BG.
778. This appears to have contributed to an environment in which individuals felt it was difficult to raise genuine concerns or to criticise Ms Allen, or those seen as close to her. It may also have resulted in a situation where Board members felt unable, or unwilling, to challenge her. I received mixed reports as to whether this was the reality of the situation, but it may certainly have been the case for some individuals.
779. On 17 August 2021, the Chair issued an [open letter](#) in which he went much further than BG had done previously in acknowledging organisational failings. He apologised unconditionally for those failings. This was over a year after the storm first broke but marked a much more constructive approach by BG which, from what I can tell, has continued to the current time.

Conclusions on 4(a)(i)

780. There were enough warning signs available to BG for it to recognise by the later years of the period of Review, that there were serious cultural problems within the sport, at all levels and particularly at the elite level. Had the 'Athlete A' documentary not encouraged and empowered gymnasts to speak out individually and collectively, thereby prompting this Review, it is difficult to know how or even whether BG would have recognised the realities of the culture within its own organisation and clubs and how this had affected gymnast welfare. The numerous red flags should have indicated to the senior executive and the Board that there might be problems that needed to be properly investigated and addressed. Instead, one senior employee explained that, at the time, it felt as though there was no appetite to drive high level change from the top. Independently, I have concluded that BG did not pay enough attention to the warning signs available to it and to the gymnastics community. BG now acknowledges and accepts as much. As a result the cultural issues were allowed to persist. The potential for coaching techniques to cause physical and emotional harm to gymnasts was not adequately recognised or minimised even though BG was aware of most of the relevant risk factors identified in this report. BG did not have its ears to the ground in its own clubs, especially high-performance clubs. It failed to invest adequately in safeguarding, coach education, policy implementation and as we shall soon see, complaints handling. The policies, systems and structures in place to deal with athlete welfare were not robust enough to deliver the right culture and BG was not monitoring the efficacy of the systems that were in place. BG did not adequately reflect upon what was required to prioritise athlete welfare. Instead, its focus was on increasing revenue. It did this by supporting higher levels of participation and membership, both of which

Conclusions on 4(a)(i)

rose, incidentally, with each medal success of its World Class gymnasts. The financial stewardship of the former CEO and Board during the period of Review, was effective in terms of growth. The cultural leadership was not.

4(a)(ii): HAVE SAFEGUARDING COMPLAINTS BEEN DEALT WITH APPROPRIATELY AND IF NOT WHY NOT?

Introduction to 4(a)(ii)

781. I have been asked to determine whether safeguarding concerns and complaints have been dealt with appropriately in the sport of gymnastics and if not, why not. According to paragraphs 5 (a), (b) and (d) of the Terms of Reference this required me to investigate the:

- a. nature and volume of complaints received by BG, including (but not limited to) allegations of mistreatment, sexual, mental (emotional and neglect) and physical abuse, bullying, harassment and discrimination;
- b. approach taken by BG to resolving complaints;
- c. adoption and application by BG of safeguarding and complaints procedures, including how compliance with safeguarding standards by clubs and member coaches was monitored and assessed.

782. In investigating this term of reference, for the period of Review:

- a. I analysed the written submissions received from gymnasts and parents in response to the Call for Evidence which detailed experiences of raising concerns and complaints (including safeguarding concerns and complaints) at both club level and with BG;
- b. Both I and members of my team held meetings with many of those individuals and asked them about their experiences, in particular taking note of the nature of their complaint, who they complained to and what the outcome was;
- c. I analysed written submissions received from coaches, clubs and other individuals who had either received or been the subject of complaints. I also met with a number of these individuals to discuss their experiences in more detail;
- d. I considered the Safeguarding and the Complaints and Disciplinary Procedures in use at BG from 2008-2020 and the Standards of Conduct for BG members, as well as any BG policies or guidance designed to support clubs or BG staff with complaints handling at club level;
- e. I examined the available minutes of the case management groups and teams tasked with complaints handling under BG's own procedures;

- f. I analysed complaints files held in relation to 26 individual coaches and 7 clubs, as well as a sample of 66 complaint files derived from spreadsheets provided by BG to obtain a rounded view of BG's approach and its adherence to its policies and standards;
- g. I invited BG to answer written questions about its complaints processes, giving specific examples from my analysis of its complaints files;
- h. I invited BG personnel (including senior executive staff and Board members), coaches, club owners and Club Welfare Officers, where possible, to reflect on this issue in my meetings with them;
- i. I met with and gathered information from other paragraph 13 organisations to obtain further perspectives on these issues.

783. While the Terms of Reference ask me to determine whether safeguarding concerns within the 'sport of gymnastics' have been dealt with appropriately, they also specifically required investigation in relation to the complaint handling within BG rather than the sport as a whole. It was neither realistic nor proportionate to try and investigate how individual clubs (whether members of BG or not) had handled individual complaints. However from the investigations I have undertaken and submissions I have received, I have obtained a broad understanding of the ways in which complaints are expected to be dealt with at club level and the experiences, in reality, of those people involved in complaints handling within clubs. I was also informed by BG that it required its member clubs to report all safeguarding concerns to BG. In theory therefore, all safeguarding concerns which arise within BG clubs should be raised with the NGB.

784. The way in which an NGB and its clubs handle complaints relating to the welfare of its members is plainly linked to the culture of the organisation and the sport it purports to govern. This is particularly so in an early specialisation sport such as gymnastics, where the overwhelming majority of participants are children and where its elite athletes face the additional vulnerabilities discussed in previous sections of this report. If an NGB and its clubs take welfare and safeguarding complaints seriously and are seen to take such complaints seriously, this will have the associated benefits of driving up professional standards and maintaining appropriate training environments. It will also instil confidence in the gymnastics community about the positive common values of welfare and wellbeing.

785. BG defined a complaint during the period of Review as:

'any communication to British Gymnastics from which it appears that there has or may have been a breach of the Articles of Association, Membership Rules, Standards of Conduct or British Gymnastics Policies, whether expressed as a complaint, disclosure, grievance, allegation, query or expression of concern or identification of an issue.'

The definition was therefore wide and I have adopted it for the purposes of this report. The definition of safeguarding that I have adopted is set out in [paragraph 414](#) of the report and includes unintended behaviours and poor practices that fall outside of the definition of child protection.

The Nature and Volume of Complaints Received by BG

786. The Terms of Reference required me to investigate the nature and volume of complaints received by BG, including (but not limited to) allegations of mistreatment, sexual, mental (emotional and neglect) and physical abuse, bullying, harassment and discrimination. I have set out in this section the information I received from BG about the complaints it received between 2008-2020, my analysis of this information and my findings.
787. BG provided me with a broad indication of the volume of complaints it has received during the period of Review. These are to be distinguished from complaints which were made directly to BG's member clubs. BG told me that in the period July 2015 to July 2020, it received an average of around 300 complaints per year. Although not part of the original written submissions, BG also indicated in meetings with me that the volume of complaints received annually increased year on year. The organisation estimated that there were up to 3,500 closed complaints in total in the period 2008 – 2020.
788. BG explained to me that over the period of Review it had used a number of paper and electronic record keeping systems which I set out in more detail in [paragraph 875](#). The core software BG utilised was a system called Customer Relationship Management ("CRM") which was used to record the details of members, including their membership number, contact details, club, qualifications and/or training. From 2011 to 2020, BG recorded varying categories of information relevant to safeguarding complaints in the CRM system. This system was gradually customised but, by BG's own admission, had limited functionality. It was not possible to save documents into CRM and it had limited search functions.
789. I asked BG to provide me with a spreadsheet setting out all complaints received during the period 2008-2020 that were now closed, with basic information about the nature of the complaint, the outcome (and reason for that outcome) and the time taken for the complaint to be resolved. I also requested the same information regarding any complaints that were currently open. The intention was that this would inform me broadly about the nature and volume of complaints received during the period of Review.
790. BG was able to provide spreadsheets containing details of all open cases as at September 2020. BG also provided me with anonymised information which suggested that there were 327 open cases at the time of my request in February 2021. The vast majority (280) of these cases were notified to BG in early July 2020. The Safeguarding Manager of BG informed me that in the summer of 2020 BG received in two months the volume of complaints it might expect to receive in a year. I could not therefore assume that the current volume of open cases could be used to inform with accuracy the likely volume throughout the period of Review.

791. The breakdown as to the nature of the open complaints given in the spreadsheet was broad and was as follows:

Nature of complaint	Number of cases
Emotional abuse	123
Poor Practice	66
General Welfare Concern	47
Physical abuse	46
Other (please detail in comments)	22
Sexual abuse: contact	16
Sexual abuse: non-contact	4
Bullying by peers	2
Neglect	1
Grand Total	327

792. These categories do generally mirror the pattern of complaints that the Review received via the Call for Evidence, with emotional abuse the most prevalent broad category of complaint followed by physical and then sexual abuse. BG provided spreadsheets containing details of all cases which had been closed between October 2017 and September 2020. None of the systems BG chose to use for the period of Review was able to generate reports containing all the information requested by the Review. BG had used a combination of report generation, other sources of information and manual review of case files to collate the 2017-2020 spreadsheets. In order to provide the information for some categories of closed cases, a manual review of over 1,000 cases was required which took more than 60 hours. BG informed me that in order to provide a list and the requested information regarding all complaints received by BG from 2008 to 2017, they would have to manually review an estimated 2,500 case files to collate the requested information. BG estimated that it would take them three months to provide the Review with this basic information for all of those cases. I explored with BG various options for obtaining this information more efficiently but without success.

793. In the view of the timescales and obstacles described above, I determined that it was not proportionate to pursue my request for basic information in relation to each complaint received between 2008-2017. It would have diverted extensive resources from BG's team and taken an unsatisfactory amount of time for me to receive. I had also already been given estimated figures by BG of the number of complaints received over the period of Review, which have informed my report. Furthermore, for the reasons identified below, there are limitations to the conclusions that could, reliably, be drawn from spreadsheets created in this way. I was not confident that such an exercise would generate sufficient additional or

meaningful data to justify the onerous request. Therefore I decided to analyse the spreadsheets about closed files received between 2017 and 2020 and use other routes to obtain information about cases from earlier in the period of Review, as detailed later in my report.

794. Real caution must be applied to any analysis of this data. The data only covers a quarter of the period of the review. It identifies the volume and category of cases being handled by BG at this time, but BG's categorisation system is such that a wide range of behaviours can fall within each category. The categories alone with these closed cases cannot indicate whether the nature of case was sexual, physical, abusive, poor practice, health and safety related, whether the conduct was inside or outside of gymnastics. Therefore, the analysis that can be undertaken from the spreadsheets alone is limited.
795. Notwithstanding these limitations, there are some conclusions that I can draw. These spreadsheets showed that of the 661 cases closed by BG during this period, 117 cases had been categorised by BG as A-C (these are serious cases which had police involvement for suspected/potential criminal offences or met threshold for LADO referral) and 544 had been categorised at the lower levels of D-F. These categories are explored in more detail later in my report. By far the greatest number of cases being dealt with by BG during the 2017-2020 period were categorised as level F cases (52% of all cases closed), which are low level conduct issues that BG considers should be handled by the relevant BG department or the affiliated association/club.
796. This replicates the findings of an independent review conducted by an independent safeguarding expert in 2017. In that review of 356 cases which were closed between 2004 and 2015, the expert found that 49.4% of cases were category F cases. It lends some support to the conclusion that category F, low level cases, have therefore consistently made up the most significant category of complaints in terms of volume. Given the negative cultural factors that I have identified as prevalent within gymnastics, I was particularly interested to understand how lower level poor practice had been handled for the obvious reason that if low level misconduct is not checked, it has the potential to mushroom into something more serious and also to be normalised.

Conclusions in relation to the Nature and Volume of Cases

797. It was telling that BG was unable to pull together the basic information that I requested without many months of time and resource intensive work. As it accepted, *'there is no complete overall record of complaints made between 2008 – 2016 available'*. This is a point that I examine in more detail later in this section of the report. BG conceded that *'the limited functionality of the CRM Complaints Module...together with the requirement for associated documents to be stored separately first on a shared drive and later on SharePoint, made the process administratively cumbersome and the extraction of holistic case records and statistical data difficult'*. Overall, the case management systems diminished the Review's access to accurate statistical data. Whilst I have been able to assess information from the later years of the period of Review, I have been unable to scrutinise with accuracy the nature and volume of complaints received by BG over

the entire period due to limitations in the case management systems and record keeping practices of BG for these earlier years.

The Approach taken by BG to Resolving Complaints

798. In this section I have set out BG's approach to resolving complaints, which has been considered via consideration of the following areas:

- a. BG processes for complaints handling;
- b. Themes identified from BG complaints files and anecdotal submissions to the Review;
- c. Complaints about BG employees;
- d. Complaint handling at club level;
- e. How did BG audit its own complaint handling.

BG Processes for Complaint Handling

Introduction to Policies and Standards

799. As I have stated earlier in my report, when a person or a club becomes a member of BG, they become subject to membership rules and conditions. It is a requirement that all members, registered clubs (and their members) and all affiliated organisations (and their members) comply with BG regulations and conduct themselves in accordance with the Standards of Conduct, Membership Rules and any other relevant policy. These documents are the foundation for maintaining members' conduct. For the purposes of this section the relevant BG documents are as follows:

- a. The Standards of Conduct; ('the standards')²⁴
- b. The Membership Rules (between 2008 – 2012 known as Membership Regulations) ('the membership rules');
- c. The Safeguarding and Protecting Children Policies ('the safeguarding policies')²⁵;
- d. The Health, Safety and Welfare Policy;
- e. The Use of Criminal Records Checks and Recruitment of Ex-Offenders Policy;

²⁴ Codes of Conduct are a less formal version of the Standards of Conduct but are essentially the same so are included within this

²⁵ Previously known as the Child Protection Policy which was in operation 2004 – 2009.

- f. The Anti-Bullying Policy and Procedures;
- g. The DBS Policy and Guidelines.

800. All alleged breaches of the standards, rules or policies above, fell to be dealt with in accordance with the Complaints and Disciplinary Procedures²⁶ ("the Complaints Policy"). The Complaints Policy applies to all breaches (including safeguarding) and to all members whether operating at recreational or at any other level. It applies to conduct in a wide variety of settings, including BG's clubs, competitive events, training camps and trips abroad. The Complaints Policy applied whatever the nature of the breach alleged.

801. According to the Complaints Policy certain complaints were excluded and were subject to separate policies and procedures, namely complaints about BG employees (to be considered under HR disciplinary policy) and complaints about 'acts of BG' (to be considered by the CEO as set out in an alternative policy). These policies are in addition to any policies operated by clubs in relation to complaints handled at club level. The Integrity Director did not consider that this would cause confusion because, if in doubt, any complainant would be signposted by BG. He emphasised that BG needed to have separate procedures for employees, for members and for customer complaints about the organisation. Whilst I recognise the need for separating the way in which certain complaints are managed, I did not share the Integrity Director's opinion that the multiplicity of policies would be easily understood by others. The route for raising a complaint or concern should be clear and BG's system of separate but related complaint policies risked confusion for those trying to navigate them.

802. For the purposes of this report, complaints under the Complaints Policy can be split into two categories; those complaints which resulted in a formal disciplinary hearing before a nominated panel (also called formal disciplinary procedure) and those complaints which did not and were managed in an alternative way. These latter cases were still capable of resulting in some form of sanction or outcome. The language around these procedures was not especially user friendly because both procedures are capable of being 'disciplinary' in nature and both involve 'complaints'. I have started by considering the processes and outcomes that were in place for complaints that were not referred for formal disciplinary hearings. I then move on to discuss the process for formal disciplinary hearings later in this section.

Complaints and Disciplinary Procedures 2008-2016

803. BG's Complaints Policy remained essentially the same between 2008 and 2016 and consisted of three distinct phases: consideration and action by a lead officer, consideration and action by the Case Referral Management Group ('CRMG' – a BG panel including independent members tasked with complaints management) and referral of the case to a disciplinary panel (also later known as a Case Panel) for formal

²⁶ Known as the Complaints and Disciplinary Procedure between 2008 – 2016, subsequently known as the Complaints and Disciplinary Policy and Procedure 2008 (effective 15/09/2008), 2013 (effective 01/09/2016), 2016 (effective 01/09/2016), 2017 (effective 05/12/2017) and 2019 (effective 13/03/2019).

disciplinary proceedings. The procedures also allowed for BG and the respondent (not the complainant) to appeal against decisions made by the disciplinary panel and, in some limited circumstances, for an appeal against sanctions imposed by the CRMG.

Lead Officers

804. The lead officer was a BG employee and a member of the Safeguarding Team. They were responsible, upon receipt of a complaint, for conducting initial enquiries and ensuring the case was appropriately triaged. The officer was required to assess the complaint or concern, identify the standards or codes engaged, determine whether the case crossed the threshold for LADO or police intervention and if so refer it on. It often fell to the lead officer to collate information and if the case did not require referral to an outside agency, to decide how it should be processed within BG.
805. After initial enquiries, the lead officer had a number of options. They had the power or to 'dismiss the complaint as unfounded' or 'insufficiently serious to require further action by BG' or they could refer the case back to a club or to another relevant organisation (such as a home country association) or to other BG Departments or refer the case to the CRMG (discussed in further detail below). They also had the option to consult with the CRMG in making any decisions.
806. I asked BG about the language to be used to describe determinations on complaints, noting for example, that policy permitted cases to be closed if they were 'insufficiently serious'. BG told me that it did not use the term 'insufficiently serious' and yet it featured in every single Complaints Policy during the period of Review.
807. In cases where the allegation was admitted, the lead officer could impose a limited range of sanctions or outcomes. These included withdrawal from competition, imposition of a fine, reprimand, advice, requirement to prove competence, to undergo a risk assessment or comply with a period of mentoring/supervision. A lead officer could not impose the more serious outcomes/sanctions of withdrawal of membership or expulsion.
808. In cases where the allegations were not admitted, the lead officer still had the option to 'take action to resolve informally' or 'take action in accordance with guidance issued by the CRMG for complaints of a particular kind' or to require a risk assessment. I asked BG what 'take action to resolve informally' actually meant and whether there was any guidance in relation to when and how such action might be appropriate. BG informed me that it did not provide guidance on this but stated that 'if this refers to situations when BG advised clubs to try to deal with one off, low-level concerns through discussion and conflict resolution before situations escalate, the circumstances of these can be extremely varied'. I asked BG to provide the 'guidance issued by the CRMG' but no details were provided. I was referred back to the CRMG Terms of Reference which did not, in my view, provide any guidance for lead officers. It is unclear whether any written or oral guidance was ever provided to lead officers. If it was, I have not seen it and therefore it has not been possible to assess the appropriateness or impact of any such advice and whether it was followed by lead

officers. Due to the turnover of staff, BG no longer has available the personnel who would have been responsible for implementing these earlier policies. Finally, I asked BG about the guidance and information made available to lead officers who had decided to exercise their power to require a risk assessment. BG informed me that before 2016 a 'Behavioural Awareness Plan' was used but the results rarely recorded, which is of particular concern. There was no formal or written guidance to assist lead officers in the exercise of their power to require a risk assessment in safeguarding complaints where the allegations were not admitted.

809. Outcomes could, on the face of the policy, be imposed in cases where the allegation was neither admitted nor 'substantiated'. Once more, I asked BG about this and was informed that a determination was required to establish whether or not a complaint is upheld. Despite this, the Complaints Policy that I was provided with did not specify what a decision-maker needed to be satisfied about before determining a complaint.
810. It can be seen from the above that prior to 2016, lead officers had considerable discretion in the management and outcome of complaints but surprisingly little written guidance to assist them in how to go about their day to day work. They were not required to record their decision-making processes. It was therefore not possible, despite requests for information, and despite consideration of the information that was available, to find any reliable evidence or organizational guidance about the meaningful exercise of that discretion.
811. The procedures provided no guidance for decision-makers, including lead officers, on the approach to be taken in cases where the respondent (often a coach) disputed the complaint or allegation. For example, there was no reference about how to investigate a complaint. There was no suggested framework for applying any concept of burden or standard of proof or what to do when an allegation appeared to consist of one person's word against another, especially where one was a child or young person. There was little information about the type of steps that could be taken to investigate or seek corroboration or how to decide upon any type of outcome. I asked BG to explain what guidance or training was given to lead officers about such issues. BG confirmed that it could find no details about this before mid-2016 (and that after mid-2016 a lead officer could ask the Safeguarding Manager or the CRMG/CMT). This void in policy and guidance risked an inconsistent approach to complaints handling and may have created doubt in the minds of leads officers as to the correct approach to take in some cases.

Referral to the CRMG

812. A lead officer²⁷ also had the option to refer a case to the CRMG. The CRMG was made up of a number of cross departmental employees, but with the addition of independent members with safeguarding expertise.

813. The CRMG Terms of Reference specified that it had the authority to decide on the direction of cases involving the welfare of children, young people and vulnerable adults. The case route was to be determined by considering if a case reached a certain threshold, i.e. would a case be considered potential poor practice or potential abuse. It was stated that:

'The British Gymnastics Case Manager [also known as lead officer] will be the first point of contact for all Welfare related cases. On receipt of any concerns, allegations or information that may cause British Gymnastics to reasonably believe an individual may pose a risk to young people, the CRMG will be consulted on the referral route.'

'The CRMG will determine the referral route for all cases that deal with the welfare of children, young people and vulnerable adults.'

814. The 2009 Terms of Reference stated that any actions by the CRMG would be reached after '*a fair appraisal of the case and will be in proportion with the severity of the incident*'. Having a case considered by the CRMG had the benefit of collective as opposed to individual scrutiny of the complaint. It also had the benefit of independence and expertise, given the constitution of members.

815. Although this was not reflected in the applicable policy, the Terms of Reference for the CRMG suggested that it would have had authority (and therefore presumably involvement and oversight) in *all* cases involving welfare. BG explained that between 2008 and 2016 *all* safeguarding complaints that were progressed, were routed to the CRMG. One can see why this would be desirable given the independent safeguarding expertise vested in the group and had this occurred it would have enabled members with relevant expertise to assess the safeguarding significance of a particular case. However, after analysing all the available evidence however, I do not find this to have been the reality.

816. A Review of the CRMG minutes and of the complaints files that I received suggested that consultation either did not take place in every welfare related case or if it did, it was not recorded in the minutes. Although it was, at times, quite difficult to understand with any certainty how and when the numerous decision-making groups and individuals knitted together, it was apparent that the CRMG did not deal with every complaint that involved the welfare of vulnerable categories of participants. In addition, in

²⁷ After 2013 referral to the CRMG could also be made by the Case Management Team.

around 2013 BG introduced a case categorisation system which had a significant impact on the cases which were considered by the CRMG.

The Role of Case Categorisation

817. Although there is nothing within BG's policies requiring case categorisation, for much of the period of Review, BG categorised complaints by seriousness using alphabetic grading which worked as a triage system and directed how the case was to be dealt with internally.
818. The process of categorisation appears to have been introduced in 2005, primarily for administrative purposes. At that stage there were 4 categories which were as follows:

A	Schedule I Offenders or suspected criminal offences relating to children
B	Statutory Agency Involvement
C	Disciplinary Issues (not covered by above)
D	CRMG involvement (not covered by above)

819. From approximately 2013 a new case categorisation system was added which amounted to a sliding scale of perceived severity. As I understand it, after 2014, the categorisations were stated within BG documentation to be as follows:

Category	Category Description
A	Cases where there has or is a police led investigations into a Schedule I Offence against children. Includes sexual and physical offences
B	Cases where there is uncertainty around whether the incident is of a criminal nature as it may be borderline between abuse and serious poor practice (e.g. allegations involving physical contact with intimate areas of the body where there may or may not be sexual intent, allegations of physical assault where there may or may not be intention to harm, very concerning behaviour linked to grooming etc.)
C	Cases of serious poor practice or ethical issues that are being considered by the Case Panel (threshold for LADO involvement)
D	BG Case Management Team: Cases of poor practice that are below the Case Review Management Group threshold but still warrant a BG led enquiry

Category	Category Description
E	Department led: Cases that involve breaches of the 'activity code of conduct' where it is deemed that the nature of the misconduct is of a level the sanction would relate to the activity rather than an individual's wider involvement in the sport. These cases may involve misconduct by children (e.g. misbehaviour at squads, consuming alcohol when at a BG representative event)
F	Employment or volunteer misconduct e.g. lateness, parental misconduct, photography issues taking or publication of images without consent (local level in the first instance), bullying (in the first instance).

820. As will be apparent Category A-C were concerned with child protection issues. The boundaries between D, E and F were less obvious. Notwithstanding the reference to bullying in category F, the Safeguarding Manager referred to low level category F cases as '*non-safeguarding*' concerns and cited examples such as fees or parking disputes. The inclusion of bullying, even in the first instance, as an example of the lowest form of complaint category was unhelpful and risked downgrading inappropriate behaviour and poor practice which could affect the welfare and wellbeing of participants. It was liable to lead to confusion, inconsistent application and, as we shall see when I deal with the analysis of the complaints files, a demonstrable minimisation of inappropriate behaviours.
821. This system diverted away from the CRMG cases which fell below the statutory referral threshold. This meant that the most serious child protection (A-C) cases were being referred to the CRMG but that other cases (i.e. D to F cases), which may still have had relevance to the welfare and wellbeing of young and vulnerable gymnasts were not necessarily being considered by the CRMG. In this sense, BG was confining safeguarding and welfare to serious child protection cases and in so doing it was potentially excluding from the CRMG's consideration other highly relevant cases.
822. The information that I received about the operation of the case categorisation system was unclear at times. On the one hand BG informed me that in introducing this system, it was intended that cases categorised as A-C would be referred to the CRMG and that the remaining cases would be dealt with by the lead officer. However, BG also informed me that the F category was intended to be used for cases that did not meet the threshold for BG's Safeguarding Team to manage. Instead, Regional Welfare Officers could assist clubs to help respond to such matters. As BG's Safeguarding Manager accepted, this would also have resulted in some cases being dealt with at club level, in circumstances when they ought either to have come to the attention of the CRMG or at least have been dealt with by the lead officer. It was the understanding of the Integrity Director that, prior to the introduction of the case categorisation system, the CRMG had been handling a disproportionate number of complaints which would have been more appropriately dealt with at club level. It was intended that such cases would be considered '*category F*' cases and diverted to clubs.

823. The case categorisation system also appears to have played a role in the way in which complaints were presented and discussed at Board level and the obligation on clubs and coaches to report cases to BG. This is something which I discuss further below (see [The Role of Case Categorisation](#)).
824. The CRMG had various case management options under the Complaints Policy. These included ordering further investigations, dismissing the case as unfounded or insufficiently serious to require any further action, referring the case to the police or relevant statutory agency, and referring the case to another organisation. The latter option could be exercised via a provision (the 'paragraph 51' provision for ease) that specifically allowed for a case to be referred to another organisation, namely a club or affiliated organisation (such as home country body) where it was reasonably considered that it would be dealt with in some way other than formal disciplinary proceedings. However, this provision was not available in 'matters relating to the protection of children and vulnerable adults' which suggests that BG was aware that such cases should remain within their control, however 'low-level'. The Complaints Policy does not contain any guidance or information on the circumstances in which this would be appropriate and, because of the way in which case outcomes were recorded, it has been impossible for the Review to determine which of the cases, reviewed, if any, had been referred back to an organisation in accordance with this provision. Upon asking BG to identify cases that had been referred in accordance with this provision they indicated that to do so would '*not be an easy task*' that would take time and resources to manually review the files. I decided that this would cause disproportionate delay in the preparation of the report. I have therefore been unable to consider the extent to which this provision was used and whether it was used appropriately.
825. In addition to this provision, lead officers and the CRMG had the option to decide that a complaint was more appropriately dealt with in accordance with paragraph 26 of the Standards of Conduct²⁸ and/or to ask some other person or organisation to resolve the matter in accordance with section 26 of the Standards of Conduct.²⁹ There is no further information or guidance within the policies to explain this option.
826. Paragraph 26 of the Standards of Conduct provided that:
- 'not all breaches will justify the taking of formal disciplinary action by British Gymnastics. Clubs and Affiliated Organisations will be able to resolve, formally or informally, many issues arising from breaches...British Gymnastics encourages all Participants to work together in a collaborative manner to identify and resolve minor breaches'.*
827. It therefore appeared to me that this provision, taken in combination with the Complaints Policy should operate to allow minor breaches to be resolved at club level, but not where they involved child

²⁸ Paragraph 39 (c) Complaints and Disciplinary Procedures 2008, 2013.

²⁹ Paragraph 39 (e) Complaints and Disciplinary Procedures 2008, 2013.

protection or vulnerable adult issues. When I sought clarification from BG, BG explained that it was an extremely difficult question to answer 'as the majority of staff who wrote the policy and practices it are no longer employed by BG'.

828. BG went on to explain that it was not aware of any interaction between the two routes (via the Standards of Conduct and the Complaints Policy). BG's replies about paragraph 51 of the Complaints Policy and paragraph 26 of the Standards of Conduct suggested to me organisational scope for misunderstanding the way in which both paragraphs operated in practice.
829. The CRMG also had power to impose a sanction. Where the allegation was not admitted, but the CRMG considered that there was no reasonable defence to the allegations, they were able to impose more limited sanctions (i.e. any sanction other than the withdrawal of membership and registration). Where the allegation was admitted, the CRMG had greater powers of sanction than a lead officer and could impose a range of various sanctions including: withdrawal of membership, expulsion, suspension from membership or competitions, reprimand, advice as to future conduct, period of mentoring or supervision, undergoing a risk assessment, requirement to prove competence, club corrective action. BG therefore had available to it a diverse range of tools that could be used to assist in improving the standards and conduct of its members.
830. As with lead officers, it was unclear to us what options were available to the CRMG in the event that the allegations were not admitted. The policy was silent on this. The CRMG Terms of Reference stated that:

'in cases of potential poor practice or where conviction information is received on a DBS Certificate, the group may decide on an appropriate course of action... Any actions will be reached after a fair appraisal of the case and will be in proportion with the severity of the incident'.

831. This suggests that action could be taken in the absence of an admission. I have already referred above to the general lack of guidance in BG's policy about the investigative processes to be followed in the course of a complaint and the lack of clarity about when and how a determination is made. It is apparent from the CRMG minutes that there was also inconsistency in the way outcome was approached. For example, in some cases, even though BG decided that the complaint could not be substantiated, it imposed an outcome. Conversely in other cases, the inability to substantiate was used as an explanation for not taking further action or imposing an outcome. It was extremely difficult therefore to obtain clarity from the available policies, files and CRMG minutes about the specific process that was adopted towards cases where there was either no admission or where BG decided the matter was not substantiated.

The Case Management Team

832. In addition to the published policies setting out the procedures to be followed for complaints, in 2013 BG introduced 'a case management team way of working'. According to its Terms of Reference, the Case

Management Team ('CMT') was 'an internal, interdepartmental group whose function is to assess and agree the response to incident, complaints or concerns'. This group was made up entirely of BG employees, unlike the CRMG which had access to independent safeguarding members.

833. From 2013, it was for the CMT collectively, rather than an individual lead officer, to categorise a case and make decisions as to the referral route. BG explained that system was introduced in to order to 'check and challenge' lead officers. This should have alleviated some of the pressures on the lead officers who were working in what I have already assessed to have been a consistently under-resourced team. It also made the earlier stages of decision-making collective rather than individual.

834. According to its Terms of Reference as at 2014 the CMT would:-

- *Nominate a lead officer for each case that will be responsible for the initial referral and day-to-day case management;*
- *Determine whether interim protective measures (e.g. suspension, supervision, restriction from some activity) are necessary;*
- *Consider whether BG support is required and for whom e.g. the child, family, Welfare Officer, suspended member/respondent, club;*
- *Agree the approach and timing of any BG investigations/evidence gathering e.g. who needs to be interviewed, for what purpose, by whom, who else needs to be present;*
- *Agree what case information needs to be shared, to whom and how the information will be shared;*
- *Agree how best to communicate with the complainant and potential witnesses and the frequency of communications;*
- *Where the case involves a child, consider how their wishes and feelings can be ascertained;*
- *Where the police or other agency shares their case file; review the evidence to identify gaps in available information and decide whether it is reasonable to make further enquiries;*
- *Agree who will represent BG at a hearing or present evidence to the Case Referral Management Group (CRMG);*
- *Agree an acceptable resolution with the club/member/complainant for all D – F cases.*

835. This development appears to have been an attempt by BG to improve its processes. However, it was not accompanied by any change in written policy or procedure that was visible externally and so, as I understand it, any member or parent making a complaint would or might be unaware of the CMT or its

role, despite its importance. In addition, it has not been possible for us to ascertain whether the CMT were consulted on each and every case as intended and set out in its Terms of Reference. BG was unable to provide minutes for every meeting and it is not obvious from the complaints filed that I reviewed. Such analysis as the Review was able to conduct about the impact of the CMT on case handling in practice is set out later in my report.

836. In summary, there was some confusion and lack of clarity about the processes to be followed under the complaints policies up until 2016. The policies were not always updated to reflect the actual procedures being followed and there was a lack of clarity in documentation and in practice around responsibility for decisions and outcomes at any one time between 2008 and 2016, compounded by gaps in record keeping and meeting minutes. The Review found the relationship between, and respective roles of, the CRMG, CMT and lead officers to be confusing. In addition, essential complaints handling guidance was absent from written policy and procedure. As we will see later in this section, these issues likely contributed to issues in the handling of complaints by BG during this period.

Complaints and Disciplinary Procedures 2016-2020

837. In the Corporate Services Board Report in December 2015 it is noted that:

'A review of our Discipline and complaints policy is being undertaken aimed at revising our procedure to handle allegations and incidents. The purpose being that we want to minimise the risk of incidents going unreported or insufficient investigations into notified allegations to ensure safeguarding of children, mitigate the risk of counterclaims being made against BG and to improve the turnaround of cases by having a transparent robust process that allows a level of mediation and/or sanction. The first draft has been sent to an independent law firm with expertise of working with sports bodies on their safeguarding policies. Once we have feedback from this process it will go to the Standards Committee for their feedback and finally for Board Approval.'

838. Following this, a new Complaints Policy was published which included new procedures, which were reviewed and revised in 2017. It seems clear that BG was attempting to provide more clarity to the Complaints Policy and to make changes that reflected learning from previous cases. One of the main changes was that it was intended that the CRMG was to be replaced entirely by the CMT.
839. The CMT continued to be made up of an internal group of BG employees and, according to its Terms of Reference, its function was 'to assess and agree the investigation approach and make decisions in relation to all relevant complaints and concerns'. If they considered that cases crossed the threshold for disciplinary action, then the case would be referred to a 'Case Panel' (essentially a disciplinary panel) in accordance with the formal disciplinary proceedings. Additionally, there was an option to refer cases to a case panel for consideration under safeguarding procedures (discussed in more detail below).

840. The 2016 procedure contained some information on case classification and confirmed 'As the Governing Body, BG's approach is to focus on the most serious breaches of standards of conduct and complaints that may give rise to questions about a member or organisation's suitability to participate in the Sport, whilst providing support to registered organisations to manage the lower level breaches.' This system was reiterated in the 2019 Complaints Policy, which was amended so that where BG and a registered club or affiliated association had jurisdiction over a matter 'BG will not usually consider the matter until the organisation's own complaints procedures have been exhausted with the exception of safeguarding cases that meet a statutory reporting threshold'. The 2019 policy also reflected the fact that a Safeguarding Manager was now in place.

841. Finally, in providing further detail as to the impact of case categorisation, BG explained:

'Category E & F cases would usually be referred to a club to determine unless the club requested that British Gymnastics does so, in which case the Safeguarding Manager would refer it to the CMT. All other cases are usually referred to the CMT although the Safeguarding Manager had discretion to close cases exceptionally where there was no need for CMT intervention (e.g. necessary action had already been taken). Generally, the majority of cases categorised A-C were referred to CMT for determination. However, there were occasions dependent on the information obtained, responses and situation of a particular case, and changes in circumstances, in which the original category may have been lowered if this was possible. This would have given the Safeguarding Manager the autonomy to consider outcomes, especially where there was no requirement for a formal disciplinary hearing, resulting in cases being resolved more quickly.'

842. Welfare concerns and complaints short of the statutory threshold could be referred back to club level or, judging by BG's response, closed by the Safeguarding Manager in circumstances that were unclear to the Review. The quality of complaint handling in clubs was almost impossible for the Review to assess and it remained unaudited by BG throughout the period of Review. This meant, in theory and in practice, that BG did not have an accurate measure of the less serious but highly relevant types of misconduct or poor practice being case managed in clubs. This is significant because the Review received a large number of submissions regarding inadequate complaint handling by clubs.

843. I requested and obtained the minutes of CMT meetings for the duration of the period of Review. BG was only able to provide minutes up to 2016, apart from one additional set in 2018. The minutes that were available, were difficult to follow. Categorisation for cases was often not recorded, it was difficult to follow or determine the progress of cases and there were gaps in record keeping. On the basis of the records that I have seen, it is hard to assess whether the CMT considered all relevant cases as it was intended to. I was not satisfied, on the basis of the material provided by BG that this procedure always operated as intended. When I reviewed the case files provided by BG, I saw examples of decisions, case closures and outcomes letters drafted and sent before such decisions, which should have been approved by the CMT, had even been discussed at CMT level.

844. As with previous policies, the CMT had a range of informal actions and outcomes available to it without recourse to a Case Panel for a formal hearing. However, there was no longer a requirement for an admission from the respondent before imposing sanctions.

845. After reviewing the case the CMT could take any one of the following actions:³⁰

- a. Refer the matter to the police or Children's Social Care/Designated Officer or such other organisation(s) as may be appropriate;
- b. Carry out further investigations;
- c. Require protective measures;
- d. Recommend that no further action be taken;
- e. Impose limited sanctions including but not limited to:
 - i. Removal of eligibility to participate in or be selected for competition or other gymnastics-related activity for a specified period of up to 12 months;
 - ii. Suspending or removing from office one or more officials of an organisation;
 - iii. Withdrawal of some or all of a gymnastics-related financial support or membership related benefit;
 - iv. Conditions relating to the respondent's participation in gymnastics-related activities;
 - v. Formal warning;
 - vi. Imposition of a Fine (of an amount to be determined by the CMT) payable to a sports charity to be nominated by BG.
- f. Require the respondent to make improvements which may include but is not limited to:
 - i. A personal development plan;
 - ii. Requirement to complete a period of mentoring and/or supervision and/or mentoring;
 - iii. Requirement to prove competence for any gymnastics-related activity;
 - iv. Advice or directions on future conduct;

³⁰ Complaints and Disciplinary Procedures 2016.

- v. Engaging a relevant official, employee or other service provider;
- vi. Requiring a person or organisation to modify the way in which it operates;
- g. Agree control measures designed to limit the safeguarding risk posed by the respondent or any other individual (subject to the full co-operation of the respondent and/or the registered or affiliated organisation);
- h. Require the respondent (and/or any other relevant individual(s)) to undergo a criminal record check;
- i. Require the respondent to undergo a risk assessment conducted by a person specified by BG;
- j. Any other action the CMT thinks appropriate bearing in mind the case in question.

846. Short of excluding a member, BG's CMT could now impose a very wide range of outcomes in a broad range of circumstances. As before, the CMT was governed by Terms of Reference and by the prevailing Complaints Policy but neither document explained clearly what approach the CMT should take to substantiating a complaint and whether it could or should impose outcomes in cases which had not been substantiated. I have considered this issue further in the section of the report dealing with the Review's analysis of complaints files. Unfortunately, it was not always easy to follow the decision making rationale of the CMT from its minutes. BG informed me that in practice, a determination was required before a complaint could be upheld or dismissed and an outcome imposed.

847. There was a little more reference in the post-2016 complaints policies as to investigations. The Complaints Policy specified that the lead officer could request any BG member (or individual on behalf of an affiliated association) to make oral or written representations. The lead officer would ensure that the details of the complaint and that, ordinarily, any relevant additional material was shared with the person(s) about whom a complaint has been made, and finally that the person(s) complained about would be interviewed or given a full opportunity to provide written representations and evidence in response. Thereafter the lead officer would collate all the evidence and prepare a summary. These were welcome improvements but the Complaints Policy still did not contain proper guidance about the steps required to gather and record information. It failed to signpost officers about how to obtain additional evidence or corroboration. The policy required the lead officer to prepare a summary of the evidence gathered. My review of case files did not enable me to assess the impact of these aspects of the new policy due to incomplete record keeping and due to the absence of evidence of summaries in the files.

848. I considered whether the new procedure had improved decision-making and record-keeping about outcomes. There was still little guidance in the prevailing policy about the application of outcomes. Although I noted some improvement in investigation and proactive outcomes contained in the case files, the decision-making process about outcomes was not consistently recorded in later case files. This meant

that the Review could not identify the factors considered by the CMT and lead officers when determining the appropriate outcome. The continuing poor record keeping in the files has therefore made it difficult for me to draw firm conclusions in this respect.

A Case Panel for Safeguarding Cases

849. Another development with the 2016 Complaints Policy was that it provided for a specific avenue for the identification and management of safeguarding cases by a Case Panel, to which the CMT could refer cases. This included a safeguarding procedure for considering complaints that gave rise to concerns about an individual's suitability to be working or volunteering with children in the sport. The policy stated that the safeguarding procedure should also apply to concerns regarding an individual's work with adults at risk.
850. The policy continued that where, after investigation, the CMT concluded that there was *'reasonable cause to believe that an 'adult at risk' or a child might be at risk'* they could refer the matter to the Case Panel for consideration under the safeguarding procedures. It appeared to me, therefore, that the Case Panel could consider broader aspects of child protection including risk assessment, as well as dealing with formal disciplinary procedures as I describe below. In cases involving safeguarding, the Case Panel could *'consider suitability under the safeguarding procedures and make suspension and revocation decisions or impose control measures where it is deemed that the sport has the capacity to manage a risk presented by a respondent'*.
851. However, once again I note that the word *'safeguarding'* is being used in this context to describe the procedures relating to *'cases of child protection'* and not to the wider aspects of safeguarding. In 2017, the relevant Complaints Policy clarified that the threshold for referral to the Case Panel under safeguarding procedures was aligned with the threshold for referral to a statutory agency. This suggested that any safeguarding or welfare issues short of that would not reach the attention of the Case Panel under these processes.

Formal Disciplinary Proceedings within the Complaints Policies 2008-2020

852. I turn now to the process and outcomes when formal disciplinary proceedings were initiated. Each iteration of the Complaints Policy provided significant detail about the process when a case was referred for formal disciplinary proceedings. Formal disciplinary proceedings would consist of formulating allegations, presenting available evidence to a Panel, fact finding and determining the outcome and any sanction. In cases where there was a dispute, it was envisaged that the proceedings would take place by way of a disciplinary hearing before the Case Panel.
853. Before 2016 there was virtually no guidance about the circumstances in which a case would be managed in this way save that it should occur *'when appropriate'* and the policy explained that informal resolution of complaints was to be encouraged wherever possible. After 2016 the emphasis on informal resolution was removed and the revised policy explained that the formal disciplinary proceedings applied in cases

where the *'standard of conduct of the respondent has fallen seriously below the expected standard'*. In response to requests for information, BG explained that *'the determination of whether a case meets the threshold for disciplinary action is decided by the panel member based on a range of factors such as whether the BG rules or standards have been breached, repeat concerns, the seriousness of concerns, and advice/outcomes from statutory agencies.'* It was apparent that the formal disciplinary proceedings were intended by BG to be used only in the most serious cases, in essence where revocation of membership i.e. expulsion from BG was a possible outcome.

854. In my review of the case file material, I came across very few cases where formal disciplinary procedures had been commenced which again suggested that use of such panels was the exception. It was not possible to identify from the case files any case that had been referred to a 'safeguarding' Case Panel under safeguarding procedures. I asked BG whether it could identify which of the cases, disclosed to the Review, had been referred to the Case Panel dealing with safeguarding matters. BG responded that it would be an onerous task to identify which cases had gone to a Case Panel and that it would take BG at least six weeks to complete. Given that the Case Panel was required to manage outcomes in cases of a sexual nature or involving serious violence, this response was concerning. If BG required that long to identify which, out of a limited number of cases, had been managed at the gravest level, it said very little for record keeping in post 2016 complaints. It means that it is not possible to conclude whether the policy for referring certain cases to the Case Panel was being followed.
855. Given the gravity of the concerns contained within submissions to the Review about complaints handling generally, I tried to establish why formal disciplinary proceedings appeared to have been so infrequently used. I was unable to reach a clear understanding of why disciplinary hearings were not more common, particularly in cases where there were unresolved conflicts of evidence. Therefore it is not possible to substantiate my sense that more cases ought to have been referred to Case Panels.
856. I note that formal disciplinary proceedings are expensive and time-consuming procedures. I understand the attraction of resolving complaints informally. However, Disciplinary panels had available to them the widest range of sanctions as well as the ability to resolve conflicts of evidence, make findings of fact about what had taken place and decide whether any standards or rules had been breached. I am satisfied from the submissions received and from the analysis of the complaints files that some cases were not referred on for further action on the basis or pretext that they could not be 'substantiated' even though a Case Panel was the obvious forum to resolve whether or not a complaint was substantiated. The Integrity Director told me that one technical reason to refer a case to a Case Panel was where the circumstances caused BG to think that expulsion might be the appropriate sanction. As the Review saw little evidence of the operation in practice of Case Panels, it may be that BG decided that in almost all cases, expulsion was not likely to be an option, which would seem surprising.

857. I also note, in this context, that the Complaints Policy provided much more detail about this rarely used procedure than it did about the procedure that BG intended to be adopted in the vast majority of cases (i.e. disposal of cases at CMT/lead officer level), which was both surprising and unsatisfactory.

Interim suspension

858. The various versions of the Complaints Policy provided for the interim suspension of members during the currency of a complaint or concern. This could arise where there was a reasonable belief that:

- a. Children, young people or vulnerable adults may be at risk;
- b. It was necessary for the protection of other participants (until 2016, this also included the respondent);
- c. The allegation would, if established and upheld, amount to gross misconduct/result in revocation;
- d. The reputation of BG, an affiliated association or a registered club could be harmed if the respondent was not suspended;
- e. The continued involvement of the respondent might impede enquiries/investigation;
- f. Risks identified by a risk assessment (if undertaken) are such that suspension is appropriate.

859. Suspension in these circumstances was specifically stated not to be '*a disciplinary sanction*' and BG staff described interim suspension as a '*neutral act*'. Suspension may well be a neutral interim measure but the affected members, usually coaches and their clubs, rarely perceive it this way. For them, it carries an inevitable stigma, it brings uncertainty and insecurity and it has commercial consequences as well as disrupting the provision of services to gymnasts.

860. The Review received submissions from coaches who had been affected by interim suspensions. For the personal coaches of elite gymnasts in particular, suspension was a very traumatic experience. Their lives are often inextricably bound to their profession, they devote significant personal and professional time to the sport and to the gymnasts in their charge. It was clear from my meetings with personal coaches that the impact of suspension was devastating on a professional and personal level.

861. Beyond the personal impact, a suspension could inevitably result in financial hardship for coaches. The availability of financial support and assistance appeared to depend entirely upon the relevant club involved, with some coaches being supported financially by their clubs but others not. The mandatory insurance accompanying BG membership is said on the website to provide insurance cover '*if something goes wrong and the coach is held responsible*'. In fact, on closer inspection, the insurance covers neither loss of earnings in the event of suspension nor does it provide for legal advice and support in responding to complaints and going through a disciplinary procedure. The consequences of alleged abusive conduct

for the coach are specifically excluded from cover and the insurance may be invalidated if the conduct is found to be in breach of the safeguarding policies.

862. I was informed by BG that if a coach has BG insurance, he or she cannot utilise any other insurance unless it covers some sort of additional element not catered for under the BG policy of insurance. UK Coaching recommended to me its own policies of insurance and informed me that coaches may hold both BG and UK Coaching insurance. It was apparent from my meetings that some coaches were unaware of the limitations of cover afforded by their insurance until after their suspension and were not aware that holding UK Coaching insurance was a possible option. This suggested a prevalent lack of awareness, even among senior and experienced coaches about the professional and financial support likely to be available to them in the event of a complaint or suspension.
863. I was able to explore the impact of interim suspension because the Review also received vehement submissions from clubs and parents who felt negatively affected by the suspension of coaches, especially personal coaches of elite gymnasts. There was no financial assistance available to clubs in this situation from BG and often very little practical support. One coach described their club as *'hanging on by a thread'* during their suspension. The impact of suspension was, in some cases, exacerbated by the lack of alternative qualified and experienced coaches.
864. Interim suspension is an important and necessary tool in the disciplinary process. It can protect the welfare of participants and maintain the reputation of the sport, notwithstanding the significant negative impact on coaches, clubs and gymnasts. An organisation such as an NGB, must obviously have a discretion about the way in which interim suspensions are applied and publicised. However, they should be guided by policy to promote a clear and consistent approach.
865. Prior to 2016, the only procedural requirement attached to suspension was that *'where a suspension has been imposed pending a disciplinary hearing, the hearing shall take place as soon as reasonably practicable'*. Improvements to this were made in the 2016 policy where the policy mandated a review of suspension *'at regular intervals'* and a right to the respondent to request a review where an interim suspension has been in place for at least six months. However, this right to request a review sits with the CEO of BG (or person delegated by the CEO) and there is no right of appeal or challenge and no independent route available to challenge that decision despite the significant impact that suspension has. Furthermore, in order to mount a meaningful challenge, the respondent would need to have sufficient information as to the allegations they face and an understanding of the reasons for the delay.
866. I received a number of written submissions from coaches who had been the subject of interim suspension. There was a common theme within these cases, that the respondents were given little if any information about the nature of the allegations at the time of and after their suspension. There may have been good reasons for this, for example, possible impact on an ongoing police investigation. But this

made it impossible for the coaches to challenge the necessity and appropriateness of the suspension and in some cases this continued for a significant period of time.

867. In terms of people being notified about an interim suspension, this is a difficult balancing exercise. Coaches fear the stigma of others knowing and having their privacy rights infringed, whilst the affected other sections of the community have a right to know, up to a point, what action is being taken where concerns have been raised. BG must obviously decide each case on its own particular circumstances. I note that in 2016, the Complaints Policy was amended slightly so that disclosure could be made to *'anyone having a reasonable need to be aware of the circumstances'*.

868. One thing that is clear is that in any case where a member is suspended, any associated investigation and disciplinary process should be conducted as efficiently as possible. I was not satisfied, on the evidence available, that historically cases involving interim suspension had been handled as quickly as reasonably practicable. On the contrary, significant delays were more prevalent in those cases where coaches faced suspension. Some of the delay will have been unavoidably attributable to police and LADO involvement. However, that involvement did not explain the full extent of the delays seen by the Review.

Appeals

869. Where respondents were subject to certain sanctions or formal disciplinary action, they, as well as BG, had the right to an independent appeal. The Complaints Policy provided for no such appeal avenue for the complainant. If complainants were aggrieved by an outcome there was no independent watchdog nor an ombudsman to whom they could refer their concern onto. The Review received a number of submissions about this. BG informed me that where complainants were dissatisfied with the way in which BG had handled their complaint, their relevant concerns were considered and addressed by way of a review, even though this review process was not referenced within the policy. I do not think that complainants would easily understand when they might invoke a review and consider it likely that they would not be aware of the possibility. I note, additionally, that there was no guidance available to determine the procedure. On the few occasions where I saw records within the complaints files which suggested that some sort of review may have occurred, it was impossible to scrutinise the nature and extent of that review or to assess the quality of it as a result of the limited records.

Themes Identified from BG Complaints Files and Anecdotal Submissions to the Review

Background

870. Having considered the policies and procedures in place for complaints handling, I now move on to consider the information that I received during my investigations which enabled me to identify themes

around BG's handling of complaints files and assess whether BG was following its own complaints policies during the period of Review.

871. My analysis was based upon the submissions I received in response to the Call for Evidence, which provided me with useful insight into the experiences of a range of individuals who have had different types and degrees of involvement with complaints handling in relation to welfare issues. I considered them in the context of the BG formal policies. I also corroborated and explored these experiences in more detail in meetings held with individuals. It has been particularly helpful for me to be able to consider the submissions alongside the complaints files received from BG, to develop a rounded understanding from both the written records on files and the experiences of individuals that I received. Where relevant, I have also been able to draw on the information provided to me by BG in meetings and written submissions. Overall, I feel that this has given me a range of perspectives on the handling of complaints relating to welfare and that this has enabled me to reach a balanced view on BG's approach to resolving complaints, its application of safeguarding and complaints procedures and whether complaints were appropriately resolved in a timely manner. This in turn has also contributed to my sense of whether gymnasts' welfare and wellbeing has been at the centre of the culture of the sport.
872. In relation to complaints files, I have set out at [paragraphs 786](#) above the material and records that I requested from BG relating to complaints. This has all informed my analysis in this section of the report. In response to the Call for Evidence, I received submissions about complaints handling from gymnasts, parents, coaches, Welfare Officers and others involved in the sport. In over 100 of these, there was information about those individual's experiences making complaints to BG. The vast majority of individuals did not report a positive experience. I recognise that there will be a natural tendency to report negative experiences more readily than neutral or positive ones (of which there were a small number in the submissions to the Review). I also recognise that satisfaction with complaints handling is to a large extent dictated by satisfaction with the outcome, rather than the process followed or the wider experience. I have borne these factors in mind when considering the submissions in relation to complaints.
873. I analysed the complaints policies in distinct time periods (pre and post 2016) to reflect the changes in the policy and procedures that occurred. However, I did not consider that the themes that I have identified from submissions and an analysis of the complaints files were directly attributable to a certain time frame or policy. I considered it would be unhelpful and unnecessary to split this analysis into the same time periods. Therefore the themes discussed below (unless stated otherwise) occurred across the period of Review. I should acknowledge that I did see some improvements to various aspects of complaint handling over the period which are attributable to the appointment of a Safeguarding Manager and to the increase in safeguarding resources. To the extent that I did note positive aspects I have addressed this separately below.

874. In its final written submission to the Review, BG observed in the context of complaints about unacceptable coaching methods:

'Certain coaches, including some senior coaches, have exhibited unacceptable coaching practices. In some cases, this was allowed to go on for too long, complaints were not acted on quickly or robustly enough, and there was insufficient organisational memory (exacerbated by issues with complaints systems which are discussed elsewhere in this document) to ensure that complaints against individual coaches could be considered together over a long period.' This not only chimed with the submissions received by the Review but as we shall see, it is consistent with the Review's analysis of complaints files.

Case Management Systems

875. The systems that have been used by BG to store and record complaints have changed and developed over the years. I have set out at [paragraph 788](#) above some information about the Customer Relationship Management (CRM) system used by BG. Until 2017, when BG introduced an Office 365 suite, complaints records and documents existed in different formats and locations, some in hard copy, sometimes electronically. Where cases were recorded electronically, the documentation relating to the case was frequently located elsewhere because the systems were not capable of keeping the accompanying records in one place. Even when the CRM system was developed to allow additional information to be recorded within them, the relevant BG staff did not appear to have inputted information in the systems consistently or reliably. In its final written submissions to the Review, BG accepted that:

'the limited functionality of the [CRM system] used for logging the administration of complaints, together with the requirement for associated documents to be stored separately first on a shared drive and later on SharePoint, made the process administratively cumbersome and the extraction of holistic case records and statistical data difficult...'

876. BG has acknowledged from its experience of collating case files for this Review, that their case recording systems were limited. In its final written submissions, BG accepted that its processes for handling complaints had not been strong enough and that it had not kept up, on this front, with the growth and professionalisation of the sport. BG's membership grew dramatically but it did not ensure that its systems and structures could keep up with the actual caseload generated during the period of Review. BG therefore had no meaningful or accurate understanding of trends in poor practice and no reliable way of assessing whether poor or abusive practices were concentrated around particular clubs or coaches. The impact of these failures has been significant for many people in the gymnastics community and for BG whose performance and systems are now under the wrong sort of spotlight.

877. In April 2020 BG introduced a new case management system called Globocol which is software specifically designed for managing safeguarding complaints. This went live in July 2020 and is also now used by Scottish and Welsh Gymnastics.
878. Globocol allows for sophisticated electronic searches using multiple criteria which can easily be exported and analysed. It also allows for all communications, documents and decisions to be located together in one file. This means it should no longer be necessary to locate decisions in minutes or to try and identify process and dates from letters and emails or across management systems. I have not reviewed cases using this system because its introduction coincided with the very end of the period of Review. I have therefore not assessed the impact or effectiveness of Globocol, although I accept the descriptions from multiple sources of its positive properties.
879. However, a significant limitation to this new system is that it does not contain all of the historic cases held by BG on its previously used electronic systems (which includes hard copy cases which were transferred across to electronic systems and thereafter destroyed). Most records that pre-date 2020 are not recorded on the Globocol system and my understanding is that there is currently no intention for BG to retrospectively add them. To do so would divert enormous time and cost. Therefore it remains the case that BG cannot undertake one search on one system to identify any previous concerns it has received about a particular individual or club. The concurrent systems that it currently uses for searching data about complaints is therefore still quite cumbersome for BG to trace the history and patterns of complaints, although BG told me that it was confident that it would be able to do this. BG is developing software that will help enable a search on the CRM from Globocol.

Recommendation: BG must ensure its case management system for complaints is fit for purpose and enables a record to be kept of the nature and number of complaints received in order that complaint handling performance can be (and is) monitored and patterns of behaviour identified.

Themes around Complaints Handling by BG

The Quality of Complaint Files

880. A consistent and significant issue that arose during my review of cases was the poor quantity and quality of the underlying documentation in case files.
881. Historically there appears to have been no (or no consistent or logical) system to allocate references to complaints. On occasion, the same case reference was used despite the addition or investigation of subsequent and different complaints after the closure of the initial concern. Prior to 2016, case references might be based upon the name of the club, the complainant or the respondent, with no consistency

across cases. These factors made it incredibly challenging to understand the history and developments of the complaints and to understand the number of complaints that may have been made about a particular club or coach. The Safeguarding Manager introduced a new case referencing system after his arrival in 2016 (which consisted of the year followed by sequential numbering of complaint received) to remedy this for complaints post 2016, although the issue still remains for earlier files.

882. The case files contained a combination of emails, typed notes, CRM records, meeting minutes, communication logs, reports and letters. Many of these inevitably involved duplicates often with protracted and repeated email threads. Many documents were undated or unsigned, therefore the creator of the notes or records was unknown. This made it very difficult to construct even a basic chronology or to make sense of the approach taken as a whole. The poor case management systems in which some of these notes and decisions may have been recorded has contributed to the poor standard of records and, in any event, a recording system is only as good as the information that is put into it.
883. Whilst more extensive in earlier cases, in almost every case, there were missing records. Documents, records or notes were referred to but then could not be located. It was apparent that meetings had been held but there were no corresponding minutes. Important correspondence was missing. Records held on BG's membership database (CRM) were incomplete. On a number of occasions there was no clear record of the original complaint. More often than not, the substance of the original complaint had to be pieced together from the notes and correspondence. I have, wherever relevant, identified where the quality of the records has had an impact of the work of the Review.
884. In addition to this, decisions taken about the management of the complaints were often not recorded, which is not surprising given the lack of policy or guidance on this topic that I have identified above. Where a decision was recorded, it was not uncommon to find that the rationale for the decision was absent. Where visits and interviews appear to have taken place, these were not always recorded or notes were not as detailed and thorough as they should have been.
885. There was no consistency of language within the files and rarely any references to policies or standards. This made it very difficult to see if a policy had even been considered or complied with. Most worryingly, at times it was particularly challenging to identify with clarity the final outcome of a case.
886. BG's safeguarding policies did contain some guidance for Club Welfare Officers about keeping clear and accurate records but there was less evidence of any separate guidance for employed safeguarding officers working within BG. From the review of files, it would appear as though such limited guidance as did exist was not consistently followed. I have described the size and workload of the Safeguarding Team in [The Work of the Safeguarding Team](#) and I have concluded that this team was under-resourced and unnecessarily tasked until 2018 with the management all types of complaints, not just safeguarding ones. It is likely that the combination of inadequate case management systems, under resourcing and lack of clear guidance about record keeping have contributed to the deficiencies identified above. BG did not

do enough to ensure that its systems (and the resources for operating and populating them) were adequate to maintain a complete and accurate record of cases.

Grouping Complaints

887. In some cases I saw a number of complaints had been grouped together, to be dealt with as one case. Sometimes the allegations were similar in nature and close in time, and I can therefore understand the logic in dealing with them simultaneously. However, there were examples of allegations being grouped together even though they concerned different types of misconduct. This meant that there was no coherence sometimes to the way in which documents had been filed together and was another barrier to understanding the true nature and extent of the complaint history made against individuals. This approach also had an impact on the standards of investigation and communication. In some cases it appeared that some complaints were lost in the amalgamation and not properly taken forward. The approach to grouping complaints together was also inconsistent within the files that I reviewed.

The Receipt of Complaints

888. Complaints could arrive at BG via a number of routes and were effectively triaged by the heads of department and from customer services. Changes in personnel and structures have made it difficult to establish how effective this was, made more difficult by the fact that not all complaints received in these ways were logged and recorded on the relevant system. As I have explained elsewhere, the resources for complaint handling throughout this period were insufficient considering the number of members and clubs and considering the age of participants involved in the sport. As a result of these factors, the risk of concerns and complaints being overlooked or neglected was great. It is impossible to make findings about the prevalence or extent of this although I note for example that BG acknowledges that it was aware in 2013 that its own departments were not always reporting concerns with a safeguarding element to the Safeguarding Team.

889. Where there are multiple routes for disclosing complaints, it is incumbent upon the receiving organisation to log and triage them consistently. Failure to do this has the potential to put and leave participants at risk and to allow inappropriate or abusive coaching practices to remain unchecked. It also diminishes confidence in BG's willingness or ability to take safeguarding concerns seriously. That said, I acknowledge that BG has already increased the size of the Integrity Unit and installed case management systems which are now far more sophisticated and flexible. These systems should go a long way in improving this situation. For example, the current Safeguarding Manager now records all calls and contact made with BG, even if these are classified as 'advice calls'. This is something which he believes did not occur with his predecessors and should help to ensure that BG has a more accurate and thorough record of the concerns that are being brought their attention.

890. There was also some evidence within the complaint files to suggest that not all concerns and complaints were acted upon, even though received by BG and recorded within the case management systems in some format. I have considered carefully what inferences can be drawn from this and whether the lack of any demonstrable action or outcome may reflect poor record keeping and retention rather than a failure to take any action. There was sufficient evidence in the case files to conclude that some cases were received but no action taken or no conclusion reached. They were simply lost in the system. This chimed with some of the submissions received by the Review, where complainants reported concerns to BG but never heard anything back in response to them. The reasons for this are not entirely clear though they may include the use of poor case management systems and the heavy case load confronting BG staff. Whatever the reason, it is unacceptable that this failure occurred.

Problems with Categorisation

891. I have set out above the categorisation system that BG adopted and used as part of their approach to complaint handling. My analysis of the complaints files revealed a number of problems with the practical application of the categorisation system.

892. First, I was not able to identify the allocated category for every case reviewed. It is not possible to conclude whether this was a failure in the process (i.e. BG did not categorise each case as per its intended procedure) or whether this was due to the poor record keeping issues I have already addressed. Given that categorisation could dictate the route of case investigation, this was important information which ought to have been recorded in a prominent place within each file.

893. Second, repeat bullying behaviour by coaches was categorised as 'F' even though that category was supposed to be confined to bullying '*in the first instance*', in other words the lowest category of complaints was being misapplied. In some of these cases where the category was recorded, the category of F had been allocated to behaviours that were in breach of safeguarding standards. These included instances of shouting, aggression, sexual innuendo, control, humiliation and fear. Although such cases may, in isolation, have fallen below the threshold for referral to the statutory agencies, they engaged safeguarding none the less and should not have been treated as the lowest category of complaints. Failures in categorisation had the potential to obscure the prevalence and gravity of bullying and other types of behaviours in BG's clubs and to minimise the sport's perceived response to them.

894. Some case files contained concerns about '*dictatorial and oppressive*' coaching styles. It was evident that the CRMG considered that these cases, which included examples of verbal abuse, should also be dealt with at club level which was contrary to the categorisation system in place.

895. It was not always possible to determine from the complaints which 'F' cases had in fact been referred back to clubs and which had been managed by BG. Confusingly, it was apparent from an analysis of the complaints files that BG did retain control of some category F cases. Whatever the true position, the

remission of category F cases that contained safeguarding elements back to clubs, risked removing problematic behaviours from BG's investigative gaze. The prevailing confusion about the management of category F cases contributed to an avoidable organisational failure to appreciate the severity and prevalence of breaches of standards. BG may therefore have failed to handle some safeguarding concerns appropriately as a result of the use of this categorisation system. It also contributed to the fact that certain types of complaints were not being adequately drawn to the attention of the Board.

896. BG no longer use the same case categorisation system in that it now categorises cases as either level 1 or 2, with level 1 essentially being those cases which would previously have come with in categories D-F and level 2 those which would previously have been categorised as A-C. In explaining the move away from the previous system, the Integrity Director explained that he *'found it quite confusing and unhelpful which is why I have moved away from it'*. I agree with this assessment. It risked demoting in seriousness, highly relevant coaching behaviours which should have been taken more seriously and which have featured so consistently in this Review.

Quality of Investigations

897. The quality of any investigation is obviously key to effective complaint handling. One of the recurring themes identified in submissions to us was the sense that BG did not adequately investigate complaints. Some submissions asserted that the complainant had not been contacted to provide further or full information before a final decision was reached. Some expressed surprise or concern that the gymnast in question (often a child) was not spoken to and there was a strong sense that BG failed to investigate robustly and had not pursued relevant lines of enquiry, including contacting identified witnesses.
898. BG stated in one of its narratives to the Review that the extent of investigation would vary from case to case but that enquiries should always include *'the complaint, any additional information identified to clarify the concerns raised, accounts from key personnel named, others deemed relevant and the complainant'*. Having considered the case files provided and submissions to the Review, I am satisfied that BG failed at times to conduct adequate investigations during the period of Review. This, on occasions, impaired the thoroughness of the process and the quality of decision making.
899. The complaints policies in place from 2008-2016 required 'initial enquiries' and/or 'investigations'. The complaints policies are silent as to the nature and extent of investigatory steps. As I have set out above, there was no formal guidance about how to conduct an investigation or about the useful parameters of such an investigation. Whilst I appreciate that there must be flexibility on a case by case basis, the lack of any guidance would have made it harder for the Safeguarding Team to be consistent in its approach. It also would have left participants in the dark about what to expect from the process and less able to challenge any lack of investigation.

900. As discussed above, in 2016 a new Complaints Policy was introduced which did set out some parameters of an investigation (see [paragraph 847](#) above). These were welcome improvements to the guidance on offer but they did not go far enough and did not include any requirement to contact the complainant as a part of the investigative process. Both prior to and after this policy change, there was no evidence in the case files of any sort of investigation planning.
901. Evidence received in response to the Call for Evidence suggested that BG failed to make any or any adequate contact with the complainant at the outset of an investigation to gather further evidence about the complaint or clarify any of the information provided. The reviewed case files corroborated these accounts and demonstrated that BG would often conduct their enquiries or investigations based on the initial disclosure or concern. There was often no meaningful contact with the complainants in order to give them an opportunity to develop, explain or clarify their complaint and for BG to gather the best evidence upon which to base their investigation. More concerning was that fact that, throughout this period, BG appears to have rarely gone back to the complainant during the process of the complaint in order to obtain their views or responses to developments in the 'investigation'. This often led to an understandable sense of injustice, where complainants felt that they could have provided further relevant evidence or information which would or might have changed the outcome had they been given the opportunity to discuss their complaint again.
902. Complaints typically concerned young gymnasts, usually articulated by parents. Consideration of the complaint material showed that it was incredibly rare for BG to speak with the gymnast involved where they were a child. The current Safeguarding Manager accepted this but explained that this was not a matter of ignoring the child's voice but rather obtaining it through the relevant adults. Notwithstanding BG's commitment in policy to ascertaining and respecting the child and athlete voice, in reality, until recently there was very little evidence of the direct involvement of children or adolescent gymnasts in the sort of enquiries or investigations that underpin complaints handling. I appreciate that engaging with children and adolescents in the context of a complaint is far from straightforward and will often be both unnecessary and undesirable. There is a lack of evidence to suggest that this was even considered on a case by case basis or that alternative methods of obtaining evidence, such as taking an account from other witnesses, actually occurred. There was little guidance available to steer officers through the circumstances that might justify speaking with a child or young person. This is wholly unsatisfactory given the demography of BG's membership.
903. An early step in the investigation process was often BG writing to the club or subject of concern and asking for their response to the allegations. However, there was a lack of consistency or quality as to those initial communications with clubs. For example, they did not always set out the allegations with any clarity, they rarely made reference to the standards or codes engaged by the allegations and they did not always explain what form the investigation would or should take. I saw examples where the concerns had been forwarded to clubs in a haphazard or incomplete way, on occasion with significant elements of

the original complaint missing. Some of the concerns or complaints were lost altogether in the process and therefore never fully investigated.

904. It appeared from the files reviewed, that it was very rare for the subject of concern or club to make full and unequivocal admissions. The responses varied and could involve partial admissions, alternative explanations, complete denials or even counter allegations. There were examples where the response to a complaint failed to answer the allegations in their entirety or left uncertainty as to whether the allegations were accepted. It left BG with two conflicting, or inconsistent, accounts and no other information. I saw very few examples of lead officers grappling with such conflicts of evidence, or carefully weighing up the accounts and coming to an evidence based conclusion. Often BG considered the written response to be determinative of the final outcome. Decisions were concluded as '*unsubstantiated*' on the basis of one written response denying the allegations. BG regularly used this as the rationale for closing the case on the basis that it was not possible to resolve the dispute and it would explain why some cases were closed too readily. The difficulty in resolving conflicts of evidence appears to me to be one of the biggest challenges faced by BG in case management.
905. I could find no guidance in BG policy about the approach investigators or decision makers should take to conflicts of evidence and there was nothing in the case files to suggest how investigators had in fact approached such conflicts. There was likewise no guidance about the circumstances in which the decision maker was required to make findings of facts and resolve conflicts of evidence. It is unclear to me whether allegations required findings of fact or proof given that BG had available to them a number of outcomes where disputes of fact existed.
906. BG could have resolved conflicting or inconsistent evidence by seeking further information from other individuals to obtain a more complete picture. The overall sense from the review of the files was that BG was reluctant to seek further independent evidence. There were examples within the complaints files of BG explaining and justifying the decision not to pursue further evidence. For example, in one of the case files a complainant had provided the names of other people who could substantiate the allegations. Despite this, it was recorded that BG had not pursued this further evidence and had advised the complainant that it was not BG policy to '*go chasing*' other complaints.
907. In view of my concerns relating to the quality of investigations I asked BG what guidance or training was provided to investigators and lead officers to help them determine the appropriate extent of an investigation and how far investigators are expected to pursue lines of enquiry before they can conclude that the complaint cannot be substantiated. In response, BG informed me that they:

'realised that investigations were an issue in 2012, at which point skilled ... investigators started to be recruited as roles arose within the Ethics & Welfare Team... From 2017 onwards, all new members of the Ethics & Welfare/Safeguarding Team, were only employed if they had significant

experience and previous employment in conducting or dealing with investigations, including specialising in Safeguarding.'

I did see some evidence of BG taking a more proactive role in investigations after 2016. However I did not find a commensurate, consistent improvement in the subsequent depth of investigations. However welcome the recruitment of staff with experience of investigating complaints is, such recruitment should have been accompanied by clear written guidance and training on these issues.

908. Resolving conflicting accounts between complainants and respondents has been one of the most significant barriers to effective management of complaints and I am confident that the lack of practical guidance in available policy for decision-makers has hindered effective case management. The absence of useful information about how to approach the assessment of available evidence, how to decide the forum for determining a complaint, the relevance of whether a complaint could be substantiated and how and in what circumstances to identify the appropriate outcome all compromised the application of the policies. It also compromised the appropriate and consistent resolution of some safeguarding complaints.

Recommendation: BG must provide better guidance in its internal policies about how to investigate complaints and concerns. In doing this BG must remedy the gaps and weaknesses in this area specifically identified in this report.

The Role of Welfare Officers in Investigations and Club Visits

909. In 2016, the Complaints Policy specified that investigations could be carried out not only by a BG lead officer, but also by a Welfare Officer or an independent investigator if appointed by the lead officer. Prior to 2016, the policies were more vague and simply stated that further investigations could be carried out by the lead officer or some other person. There was no evidence to suggest the way in which BG decided which cases were appropriate to be investigated by a Club or Regional Welfare Officer or which required involvement from a BG safeguarding officer or an independent investigator. In one case despite the complainant's own expressed concerns about the ability of the club independently to investigate, BG remitted the matter back to the club.
910. From my review of the case files, I found that very often, the initial communication from BG following notification of a complaint, was sent to the Club Welfare Officer, who would be asked to investigate at club level and provide a response to BG. According to BG's own safeguarding policy it was not the role of a Club Welfare Officer, to investigate concerns and complaints and this extension of their role was not appropriate. The Club Welfare Officer is the first point of contact for any issue concerning safeguarding, poor practice or potential/alleged abuse. Their role was to ensure that relevant authorities are notified and to ensure that clubs have policies and procedures in place to allow concerns to be raised. Expecting Club Welfare Officers to investigate concerns that had been sent to BG, is a significant

extension of their role and one for which they were not trained. I was not surprised therefore to read the following from a Club Welfare Officer who explained that if their duties remained as they were, they would not be able to continue to maintain the role; *'I would like to verify what BG expectations are for a Club Welfare Officer. I only ask as I am an extremely conscientious person who will always do this volunteer role to the best of my ability. However, as you are no doubt aware these events of late are taking a massive amount of time.'*

911. BG also placed considerable reliance upon voluntary Regional Welfare Officers to assist in the investigations of some complaints. These Officers often lacked the training, experience and time to undertake such activities. These Officers were thinly spread on the ground in any event. Due to the paucity of record keeping it was simply not possible to assess the degree or quality of the Officer's contribution. As with the Club Welfare Officers, this extension of responsibility was not contained in their role description.
912. It was clear from meetings with BG and from examining case files that it did not usually visit clubs upon receipt of complaints, especially those categorized D to F. Increased visibility of the Safeguarding Team or Regional Welfare Officers in clubs would improve evidence gathering, connectivity with BG and foster the impression that BG was taking safeguarding complaints seriously. It is obviously not feasible for BG staff or volunteers to visit clubs in the wake of every type of complaint but certain circumstances might merit such visits depending upon the severity and complexity of the issues, the track record of the club or coach in question and the nature of enquiries that might be required. Visits, in my view, would have been a significant tool in evidence gathering and assessment by appropriately trained BG lead officers who should have had sufficient skill and experience in complaint handling. Such visits would also have provided BG with the opportunity to assess more accurately, the club and its coaches.
913. It was apparent from some case files that club visits were carried out by BG. However, these were ordinarily conducted by (voluntary) Regional Welfare Officers who reported back to BG. It has been impossible to identify any reliable pattern as to when and how visits were deemed appropriate throughout the period of Review. I was not provided with any material that would enable me to assess reliably what such visits involved. For much of the period of Review, there was no requirement for the Regional Welfare Officer to complete any sort of report. At times I have had to piece together internal notes, emails and minutes in a complaints file just to try and ascertain whether a club visit took place.
914. From the basis of the fragmented and limited notes and records I noted that the club visits that did occur did fluctuate in quality. For example, I found the following examples within the files reviewed:
 - a. A club visit would occur but the subject of concern or relevant coaches had not been present or spoken to;
 - b. There was no evidence that the person visiting on behalf of BG had accessed historical records of concerns or complaints;

- c. On one of the few occasions where the visitor representing BG requested access to the accident reports at the club, this was denied on the basis that the club could not access them and this was not pursued any further according to the records on the file.
915. There was some evidence of an increase in club visits for the purpose of BGs investigation of complaints after 2016 but it was not possible to quantify the extent of this and there was still a noticeable paucity of notes and records arising from such visits.

Historical Complaints

916. A history of concerns or complaints against an individual member or registered club (and the outcomes from any cases) is relevant in a number of ways. Repeated concerns can show that behaviours were not isolated and might affect assessment of the severity of the impugned conduct; multiple examples of poor practice may become abusive if repeated over time; a person's disciplinary history may affect their suitability and skill to work with children; and repeated concerns might suggest a failure by a club to manage incidents of poor practice or a lack of insight by the person complained about. The history of complaints made against a club may be indicative of issues within the training environment and club structure beyond just one individual. Where complaints and concerns of a similar nature are repeatedly raised in one club, it would suggest that intervention and support is more likely to be required.
917. From the review of the case files, I was not satisfied that BG consistently took sufficient steps, upon receipt of complaints, to ask clubs about any relevant previous issues or concerns. The reason why this might be important is because some complaints may have been dealt with by the club and BG would have no awareness or record of these. As a result, BG was not always placed to assess the seriousness of the complaint within its broader context and the club's ability or inclination to act upon it meaningfully. Considering the background of a club or coach might completely change the lens through which a subsequent complaint is viewed. This was illustrated by one BG Board member who told me that *'words failed them'* when it came to seeing the history of concerns that existed against one particular coach. *'It's appalling what happened and how little in the end was done to stop it.'* Although this individual had read snippets of information about this coach at various times, it was not until the full picture was provided to them that they reached the view that they expressed to me.
918. Even if BG had made enquiries of the club as to complaint history, this would have been reliant upon accurate and complete records being (a) made and (b) retained. As far as I am aware clubs were not provided with guidance about the maintenance and retention of accurate complaints data. Even if asked therefore I do not believe that clubs would always be in a position to provide BG with accurate and reliable information about complaint history in any given case.
919. BG informed me that upon receipt of a complaint, it would check its own records for complaint history. I am satisfied from my review of the complaints files that this was either not always done, or if it was, it

was not recorded on the file for others to see and as a written record that any historic concerns had been taken into account.

920. Given the deficiencies of the case management systems and the state of the records that I have already identified, I am doubtful that BG would have been able to access and understand a case history without extensive time and effort. BG advised the Review that the most efficient way of searching across their systems would be by the name of the individual about whom a complaint had been made, and that searches could also be made by club. BG informed me that cases were not consistently filed by year, club or subject of complaint. Some records are in hard copy only (not all of which were successfully transferred) some are electronic but not searchable and others are 'searchable' but the file names were not allocated in a consistent way.
921. BG has not shied away from the fact that record keeping and systems have been poor. BG conceded that *'Record-keeping during the early part of the period of Review was paper-based and the archive is incomplete and difficult to search.'* BG added that the process of scanning and transferring files from one system to another in about 2012 had also resulted in the inadvertent deletion of some files. The current Safeguarding Manager acknowledges that he is regularly faced with reports of previous disclosures which he has been unable to locate.
922. This was evident in some of the cases that I reviewed, where the history of various allegations was incredibly difficult to piece together from the extensive papers on the file. This was illustrated by an internal email in 2018 from a BG employee who was reviewing a previous case file in an effort to understand what steps the club had previously taken to address behaviour. They reported to their manager that they *'did not move from [their] laptop for 6 hours straight and still has much to do and go through.'* If an employee with institutional knowledge of BG's systems requires more than six hours to ascertain the complaints history of a particular coach, it confirms that BG's record keeping systems were not fit for purpose.
923. With this in mind and given the limitations of the searching functions, I had my own concerns about whether BG's searches for files that I requested in relation to certain clubs and coaches resulted in all previous concerns reported to BG about that particular club or coach being found.
924. Even when BG did consider an individual's complaint history, the resulting actions and outcomes did not always take sufficient account of that history. In at least one case file it was noted as a mitigating factor that *'no previous complaint'* could be found in relation to the subject of concern where, in fact, one did exist. This again points to a system that was not working and demonstrates how inefficient or inadequate record keeping can distort appropriate decision making.
925. I saw cases where there were repeated incidents on record involving the same club or coach, yet later complaints were seemingly dealt with in isolation of preceding concerns. This resulted in actions and outcomes judged upon one single allegation, rather than a potential pattern of allegations. This was

supported by submissions received directly to the Review, where I was told on more than one occasion that the individual had made more than one complaint to BG about a coach or knew that others had made complaints about the coach in addition to their own — they could not understand why BG had not taken action, or more action, given that their complaint was not isolated. These submissions invariably concerned elite gymnasts.

926. I am conscious that BG would not always be in a position to notify members about other members' complaints but even allowing for this possible explanation, there was sufficient evidence to conclude that complaint history was not always adequately investigated and considered. There was no guidance to help staff understand the relevance and impact of any previous complaint history to a current case. It was not possible to ascertain why staff failed to consider relevant previous issues, where they existed and it was not always possible to judge whether the outcome in a particular case was adversely affected by the failure to consider previous issues. These failures may be the result of inadequate training and guidance, or overwork or, at worst, an organisational failure to take complaints sufficiently seriously.

Outcomes

927. It was not the role of this Review to reinvestigate individual cases or determine the appropriateness of outcomes in any given case. However I did consider in general terms the types of outcomes resulting and the steps taken by BG to implement those outcomes because that, in turn, informed my understanding of the approach taken by BG to resolving complaints.
928. As I have explained, various complaints policies provided for a variety of possible actions and outcomes following a complaint, but failed to provide any useful guidance about how to select an outcome.
929. As decision making processes were often not properly recorded in the files, it was extremely difficult to understand the rationale behind the various outcomes and therefore to understand how such an outcome sat with the facts of a given case. In their final submissions, BG acknowledged that for certain coaches, and potentially others, concerns should have been '*addressed more robustly*' and that this '*has probably fuelled the mistrust some gymnasts have felt in the complaints processes*'. This coincided with my sense from submissions that BG's approach to complaint handling had created the impression they did not take coach misconduct seriously. This in turn may have contributed to the normalisation of such behaviour in some clubs and environments.
930. It was difficult and on occasions impossible to link outcomes, where they were recorded in case files, to the outcomes provided for in policies. This was primarily because the language used to describe outcomes in formal correspondence did not always reflect the language used in the policies about outcomes. This meant that it was difficult sometimes to know which pathway the complaint had followed. It was also difficult to know whether a particular case outcome was going to be administered and

monitored by the club in question or by someone else. In some cases a case was closed with no action taken but the file contained no explanation for this.

931. Equally, there was little information about what different outcomes might actually entail. For example, the Complaints Policy provided for a lead officer 'taking action to resolve informally' without defining this any further, granting a very wide discretion to the lead officer. As BG did not always record the basis upon which decisions or outcomes were reached, it has not been possible to identify which of the reviewed cases were 'resolved informally', what any informal resolution consisted of or whether there was any consistency with this type of decision.
932. In some cases where a concern or complaint was substantiated, coaches were required to undergo a set period of mentoring or supervision. On occasion this required the coach to return to his/her club and to be mentored or supervised by the head coach there. The head coach/club owner may not be the most appropriate person to undertake a mentoring role. There are likely to be conflicts of interest in the outcome, especially considering the sparsity of coaches. There may well be friendships or relationships which might affect the ability of the person to remain objective. It does not appear that this was considered, at least in some of the cases that I reviewed.

Failure to Monitor and Follow up Outcomes

933. In some cases, coaches were made the subject of monitoring, supervision or a development plan, or it was determined that the club and coach would require a further visit to monitor specific issues. Frequently, particularly in the earlier years of the period of Review, the case files contained neither evidence that any of this had happened nor an explanation as to how such outcomes would be monitored or approved. This not only limited the effectiveness of the sanction or outcome (resulting in a failure to effectively reduce risk or improve standards) but it had the real capacity to destroy confidence in the system generally. Arguably, it sent out a signal that BG was not taking the outcome very seriously. It is quite possible that the failure to monitor an outcome in some cases directly enabled a coach to continue adopting poor practice. This is particularly concerning and is not in anyone's interests, including the coach for whom the actions were meant to result in improvement' in their coaching and/or standards.
934. Prior to 2018, once the outcome had been decided the case was closed and there was no method for BG to monitor whether outcomes that involved follow-up steps had been achieved. The Safeguarding Manager recognised this as an issue when he arrived in the team in 2016. He encountered a significant backlog of cases which had resulted in outcomes that had required monitoring or follow up. In a number of these cases he found that this had not happened. As a result, BG changed the process so that cases were not closed until the outcomes had been completed. This was an important development, and I saw examples in 2018 and 2019 of the Safeguarding Manager keeping cases open until the actions had been completed.

Delay and Slow Resolution of Cases

935. Delay in resolving complaints was a recurring theme in submissions and this had obviously caused frustration and anxiety for complainants, clubs and coaches. I found a significant number of examples within the complaints files in which the complainant and/or respondent had to chase BG for updates and information after waiting a considerable period of time for some form of update from BG.
936. In my meetings with Board members, I tried to ascertain levels of awareness about complaints handling generally and to obtain some sense of the type of issues that the Board were notified of. It was apparent that the Board was aware that delay in complaints management was a recurring problem although more often than not, this was in the context of particularly serious and complex cases involving police and other statutory agencies.
937. I was able to discuss the issue of delay in safeguarding cases with the Integrity Director and the Safeguarding Manager. Both attributed significant delays in complex case management to factors beyond the control of BG, such as police investigations which ordinarily take precedence over internal complaints and disciplinary procedures. It was apparent from the case files that police involvement could be a significant cause of delay and in these instances, BG would be powerless to progress a case until the police investigation or criminal process had concluded.
938. However, the Review received submissions about the occurrence of delay in cases which were less serious and which did not involve the police.
939. My review of case files confirmed the prevalence of delay in complaints handling. Within communications, BG often referred to '*competing priorities*' to explain delays. As I have already concluded, throughout the period of Review, the Safeguarding Team was under resourced and received a high volume and variety of complaints. In my view the under resourcing of the Safeguarding Team was the single biggest explanation for the significant time that it took to progress cases.
940. Linked to this was BG's reliance on clubs and Welfare Officers to investigate allegations and report back. I found evidence of delays in clubs and coaches responding. It was clear that the limited capacity of Welfare Officers also caused delays. This was apparent from emails and communications within the case files referring to cancelled and delayed visits.
941. Delay in the management of complaints is in no-one's interests especially the complainant who is likely to be anxious and the coach who may have been suspended. I spoke to a number of coaches about the impact of complaint handling delay. Without exception it had been a negative and demoralising experience exacerbated in their view by a lack of adequate communication with BG.

Poor Communication

942. Poor communication between BG and the parties involved in complaints was both a significant issue in submissions to the Review and apparent within the complaints files reviewed. The quantity and quality of communications from BG has been a significant contributory factor in the grievances felt by all parties in the process.
943. I received a number of submissions from both complainants and those who had been the subject of concern in a complaint. Some complainants indicated that they had never had any response or outcome to their complaint, or that they had received so little information that they were left with the impression that no action had been taken (even if, in fact, it had). I also received submissions and spoke with coaches the subject of complaints who reported that they were similarly not kept up to date with developments or advised of outcomes.
944. These submissions were supported by the analysis of complaints files, many of which revealed a lack of communication from BG and some that did not contain outcome letters or notifications to the complainant. Given the submissions I received about this issue, I do not believe that this can be explained solely by a failure in record keeping. I found one example in the complaints files I reviewed of a deliberate decision not to inform a complainant regarding an outcome (no reason provided), however when the complainant chased BG for a response, an outcome letter was sent, more than 6 months after the outcome decision had been made. This suggested to me that BG had failed to understand the impact on complainants when they are not informed as to the outcome of their complaints.
945. Although it is not possible to measure the scale of the problem, I have no difficulty in concluding that in some cases, BG simply failed to keep complainants and respondents notified of developments and also failed on occasions to notify complainants about the outcome of their complaint. This lack of communication would have given, and by accounts did in fact give, the unfortunate impression to a number of individuals that BG did not take complaints seriously and left participants in unjustified ignorance.
946. I am not aware that BG possessed or used any guidance about communicating with complainants. However, the BG Complaints Policy in force from 2016 onwards made it an unqualified requirement for BG to notify complainants of the outcome of a case. Since this time, I noted some improvement in the communication with complainants although I am satisfied from submissions made to the review and complaints files reviewed that this requirement was not always met. For example, I found a record in one case of a deliberate decision by BG not to inform the complainant of an outcome '*because it might reignite tension*'.
947. It was clear from my interaction with BG, that, at times, legal issues about privacy and data protection were considered an obstacle to explaining the full outcome of a case to complainants. I sought further

clarification from BG about this. BG explained that outcomes are communicated via letter and/or email, providing an overview of the complaint addressed and who conducted enquiries, what actions were carried out in general terms and what decisions were made. BG told me that it tries to consider on a case by case basis how much information to disclose to the complainant. BG is in the process of reviewing available guidance about this from Sports Resolution in order to continue to develop good practice.

948. This approach appears to me to be a reasonable one to adopt, with some basic principles underlying a case by case assessment as to the level of detail to provide to a complainant. It does not suggest that, generally, there are legal barriers to notifying the complainant that a case has been concluded and broadly what the outcome was. This is something that should be happening with all cases concluded by BG.

949. Where there was correspondence communicating outcomes on the files, the quality of outcome letters that I saw varied. Some did not accurately reflect the decisions reached and actions taken. BG was, on occasion, quick to refer to a '*thorough investigation*' in its correspondence, in cases where the investigation had, in my view, been less than thorough. In other examples, the outcome letter assured the recipient that appropriate action had been taken when, in reality, the case had been closed and no formal action had, in fact, been taken. Again, the overall sense was that BG had failed sometimes to notify participants about an outcome or only provided limited information to complainants at the conclusion of a complaint. I had the impression from submissions that this has, at times, contributed to complainants feeling dissatisfied if not disenfranchised with the complaints process. BG has now appointed a National Welfare Officer whose remit will include monitoring the standards of communications with complainants.

Recommendation: BG must ensure that it notifies complainants and respondents involved in a complaint about actions, developments and outcomes in a consistent and prompt manner.

Council and Local Authority Clubs

950. The Review received submissions expressing concern and dissatisfaction about the way in which complaints had been handled in a couple of clubs operated in premises owned by local authorities.

951. BG's Director of Community Services acknowledged that clubs owned by or rented from local authorities faced more of a challenge in managing complaints and disciplinary issues in that the process for making a complaint might seem '*a little more cloudy*'. Arrangements between clubs and local authorities vary. Some clubs are subsidised by the local authority, some are not. Likewise, some staff working in the clubs, including some coaches, are directly employed by the local authority and others are not although they may sometimes receive payment for running specific municipal sessions. All BG members working in such clubs remain bound by BG's Standards of Conduct and relevant policies.

952. It was evident from material generated by the Review that there could be unnecessary overlap between club and local authority complaints and disciplinary procedures. There could also be confusion by those wanting to bring a complaint about the best route to use and who was ultimately responsible for addressing the complaint. After a complaint had been made there could be confusion between BG, the club and the local authority about who was dealing with it and it was not clear that BG had a consistent approach for notifying connected local authorities about complaints received about the club.
953. In one welfare related complaint, there was no evidence that, having referred the matter to the local authority responsible for the operation of the club, BG had made any enquiry or kept any sort of record of the outcome. In another case, BG failed to conduct its own assessment of whether the conduct identified by the local authority following multiple complaints about a coach, amounted to a breach of BG's Standards. At another club, it was clear that the parents bringing a complaint had not appreciated that they could raise their complaint with the local authority and that both BG and the club had not communicated with the local authority about safeguarding complaints in the way that the local authority might expect. This level of confusion and the blurring of responsibility is not acceptable, particularly in cases that relate to safeguarding issues.
954. Although this was not an issue that arose regularly, it did arise in more than one high-performance context and in relation to complaints which raised legitimate concerns about the way in which experienced personal coaches were coaching. It featured in at least one of the complaints files reviewed. The alleged misconduct was capable of amounting to a breach of the Standards of Conduct, if proved, and might also have attracted disciplinary sanction under BG's policies. Any complaint under the control of a local authority that related to a BG club would still require BG to comply with its own safeguarding obligations and to consider the issues in the context of its own policies after any involvement that it might have with the local authority had ended. There was evidence that this did not occur and that inadequate communications had taken place, at times, between the relevant clubs, local authorities and BG at the expense of an effective examination of the complaints.

Cases Dealing with Sexual Allegations

955. In the case files concerning sexual allegations, I examined the steps taken by BG or the relevant club to contact statutory agencies and/or the police and I examined the approach taken by BG to such cases. In each, BG had appropriately consulted with the police and/or LADO. BG appeared to be competent and confident at identifying the child protection issues arising in such cases and its rules catered for expulsion in the wake of resulting criminal convictions. In the post 2016 examples that I was provided with, following the arrival of the current Safeguarding Manager, BG's responsible engagement with local authorities and the police had continued.
956. However, the situation was not so clear in those cases where no criminal charges were brought or where the LADO had determined that the case did not cross the threshold for referral. Prior to 2016 BG

appeared in some cases to be over-reliant on police and local authority outcomes. For example, if the case was closed without a criminal prosecution, BG might similarly close the case or would fail to follow up with their own detailed investigation. I note that this was not confined to cases of a sexual nature.

957. BG's role in assessing the conduct of its members is different to that of the LADO and the police although there will be issues of overlap. Reliance by BG in the complaints and disciplinary context on decisions by the police or LADOs was not appropriate. There is a wide spectrum of coaching practice and behaviour that would fall foul of the standards and relevant policies, but which may not be criminal in nature and may not place a gymnast at risk of significant harm. The considerations underlying charging decisions by the police or Crown Prosecution Service are not the same as the considerations that apply to BG's disciplinary and conduct procedures.
958. I saw the impact of this in one particular complaint alleging sexual offending. After the case was closed by police, BG failed to conduct a sufficient investigation of its own and similarly closed the case, allowing the coach in question to return to coaching. The complainant tried to reopen the case and BG once again relied upon the earlier police decision and stated that there was insufficient new evidence to reopen the case. New allegations then arose, which led to the coach's eventual removal. The CMT when considering this case went on to conclude that the coach had in fact been a risk for many years.
959. As I set out elsewhere in this report, in some cases, BG failed to provide any or any adequate follow up after the outcome of a case had been decided. In relation to cases of alleged sexual misconduct, the Review found examples in the case files of advice and monitoring being imposed on a coach with no evidence that this occurred or was followed up.
960. Review of case files suggested that after 2017 BG became more proactive in this respect and the Safeguarding Manager also considered that BG had in recent years worked effectively with statutory authorities to make appropriate referrals to the Disclosure and Barring Service and collaborated with police. The Review saw examples where, notwithstanding the decision of 'no further action' was taken by the police or the LADO, BG did investigate and case manage more thoroughly. BG went onto take action to remove three coaches in this way due to concerns that remained with BG about the appropriateness of the alleged behaviours. BG's confidence and competence in tackling such situations has improved over time with a greater willingness and ability to take action in cases where sexual misconduct is alleged. I was reassured to see in recent additional examples provided by the Safeguarding Manager, that, according to BG, they referred one case on to the police for investigation notwithstanding an initial decision by the LADO that the case did not meet the relevant threshold.

Improvements since 2016

961. Whilst some of the more concerning features of complaints handling were present to varying degrees throughout the period of Review (2008-2020), there were clear signs of improvement from 2016 onwards, as I have indicated above.
962. BG's policies and structures evolved and the appointment in 2016 of a dedicated Safeguarding Manager and in 2018 of an Integrity Director (both persons with extensive and relevant experience) were significant developments in the management of safeguarding concerns and complaints, as was the introduction in 2020 of the Globocol case management system. I was able to meet with both employees several times. I am mindful that their ability to speak to practice and procedure before their respective employment is limited and that they had no control over any deficiencies in the handling of complaints predating their employment.
963. The improvements noted since 2016 in certain aspects of record keeping and decision making by those tasked with handling safeguarding complaints, was not, however, without exception and were not seen reliably in every case I reviewed after this date. I was still concerned that delay and under-resourcing of case management continued, despite some enlargement of the Safeguarding Team. As recently as January 2020, there was still evidence within the complaint files that complainants were having to seek information and progress reports. In 2018 and 2019 correspondence within the files referred to delays that had been caused by '*competing safeguarding demands*' and '*conflicting priorities*'. I have covered in [paragraphs 642 to 648](#) my views on the resourcing of the Safeguarding Team during the period of Review and it seems to me that this issue also impacted specifically upon the handling of complaints by BG.

Complaints about BG Employees

964. I turn now to consider the procedures adopted by BG when complaints were made against coaches that it employed (as opposed to coaches employed by its clubs).
965. The Review received a significant number of submissions, in a welfare context, about the conduct of coaches, who had, at the time of the alleged behaviours, been employees of BG. In some of these cases, there were concerns about the way in which complaints made to BG about these coaches had been handled and about the perceived lack of any action. It was therefore important to understand BG's approach to safeguarding concerns or complaints where the subject of the complaint was also an employee.
966. Coaches employed by BG are also members of BG and therefore bound both by BG employee policies and BG's Standards, rules and policies for members. Any breach of the Standards would ordinarily fall to be managed under the Complaints Policy but, for employees, any potential misconduct would also be covered by a separate employee disciplinary policy and governed by employment law.

967. I felt it was important to examine these issues in my meetings with BG personnel. The former CEO relied strongly upon two particular cases as evidence of the fact that, where concerns had been raised about employed coaches, BG had acted to remove them from the sport. She said *'When we were made aware of unacceptable practice in the national program from two of our Head National Coaches, we did something about it. The coaches in question were removed'*. The employment relationship with the two coaches was terminated, but I felt that the former CEO's assertion required a little more scrutiny. My ability to achieve this was compromised because the details and case files relating to the termination of employment of both coaches were covered by separate settlement agreements containing confidentiality clauses.
968. In one case, BG took the decision to avoid formal disciplinary action of any kind. Whilst it is correct that the period of employment with BG was brought to an end in that case, it was not because BG had determined publicly or otherwise that the coach (who denied any wrongdoing) had done anything wrong. Although BG (more specifically the CMT) could also have considered the complaints, which included alleged breaches of safeguarding standards, under the Complaints Policy, BG could find no record that it had done so. The coach in question had simply been removed from employment with BG in circumstances where the question of whether they had breached BG's Standards had not been investigated at all.
969. In the other case, even though the employment relationship was brought to an end, BG was unable to utilise the formal disciplinary proceedings available under the Complaints Policy to determine whether the coach's BG membership should be revoked.
970. I sought information from BG about the interface between the Complaints Policy and BG's internal Human Resources Policy for employee disciplinary matters. In response BG indicated that *'All conduct issues relating to BG employees are dealt with through our employment policies and HR policy'* and *'where issues are raised that potentially contravene membership rules and policies set by BG these are addressed [by the relevant department] using the Complaints and Disciplinary Procedures'*. They further explained that there is scope to undertake a joint investigation, but that had *'proved difficult'* to manage since the HR and Safeguarding Teams were separated, given issues such as employee privacy. This was confirmed by a case involving a senior employed coach who was able to successfully challenge BG's procedures by relying on the ambiguity about having two policies which allowed for determinations to be made about the same conduct. The result was that BG felt unable to follow internal disciplinary proceedings with membership proceedings, resulting in a coach of concern leaving employment but being able to maintain membership and theoretically able to continue coaching. It was clear from submissions that the way in which this coach's case had been handled had caused some individuals to lose confidence in BG's management of complaints.

971. That particular case demonstrated the lack of clarity around the way in which the Complaints Policy would operate alongside the HR disciplinary processes for employees of BG. The policies themselves are silent as to which process should take priority and unclear as to whether and how there should be any cross referral of information between the two processes. Whilst I recognise that employers must deal with employee misconduct within the framework of employment and contract law, that would not, of necessity, require the Integrity Unit to be excluded indefinitely from considering any connected breaches of standards.
972. In 2017, the Complaints Policy was amended with the intention of addressing this issue. According to the language currently adopted by BG, the Complaints Policy will only be invoked for employees where there has been a *'sanction [under the HR Disciplinary Policy] that impacts on their ability to continue with BG membership'*. It was not obvious how this use of language should be interpreted and how the HR department would work with the Integrity Unit to judge the issue. It relies on the HR department to make accurate and robust decisions on their own internal proceedings in cases with safeguarding elements. As we have seen above, the HR proceedings will often not involve any assistance or support from the Safeguarding Team. As I have said, I have concerns that a relevant complaint about an employed coach may never be considered by the Safeguarding Team unless and until the HR outcome is one of significant sanction.
973. This was seen in practice as recently as 2019 where significant safeguarding concerns were raised in relation to an experienced national coach. These concerns were addressed under the HR Disciplinary Procedures. Again, the investigation was dealt with without any input or assistance from the Safeguarding Team and was sparsely documented. There was no evidence that the complainant had been communicated with or engaged with. The Safeguarding Team would have had valuable knowledge and experience to share. Yet the impact of these dual processes was to remove the complaint from the Safeguarding Team's jurisdiction altogether. The handling of this case did nothing to reassure me that BG had responded appropriately to concerns about coaches employed by BG. I am aware from my meetings with BG that it recognises the difficulties created by having dual processes for employed members and is in the process of finding solutions that are 'contractually' clear.
974. Although the number of employed BG coaches is relatively small, the fact that concerns or complaints about the most senior coaches were handled in the way that I have described, has an impact on the complainants. It affects the confidence that the community has in BG's management of complaints against coaches. It also carries serious reputational risk for BG (as events have proved) because it might cause others to conclude that BG does not handle coaching misconduct with enough transparency. BG has a choice about whether or not it uses confidentiality agreements and it has a choice about whether it subjects its coaches to membership proceedings under the Complaints Policy. I received multiple submissions from individuals who did not see the point in complaining about coaches because they felt that nothing was ever done. I can see why confidence in BG was compromised given the way in which it handled complaints about senior coaches. I can also see why there was a sense that such complaints (the

merits of which remain untested and about which this report passes no judgment) were metaphorically swept under the carpet.

975. I have considered in some detail above the issue of poor record keeping and inadequate case management systems in relation to complaints handling and the negative impact that this has had. I have been unable to consider the same for HR complaints records. This is partly because of the lower volume of cases subject to the HR disciplinary process and also due to the operation of confidentiality agreements which restricted my access. However, I do have concerns that the HR records may also contain some of the disarray besetting the complaints files. I recently made enquiries of BG about an important report relating to complaints about a senior coach. These complaints were governed by HR proceedings as opposed to the Complaints Policy. In response, BG indicated that their '*electronic searches did not identify a copy of this report*' and that they were only able to locate the relevant information using the specific filename provided by my team. The report in question had not been saved to the relevant HR file. Whilst I cannot make any firm conclusions in relation to the adequacy of case management systems in HR based on this incident alone, I would repeat my opinion that BG must ensure that it has robust and effective case management systems in place across any and all departments handling material relevant to a safeguarding concern or complaint.

Recommendation: BG must provide better guidance in its internal policies about how to investigate complaints and concerns when a complaint is brought against a coach employed by BG. In doing this BG must remedy the gaps and weaknesses in this area specifically identified in this report.

Recommendation: BG must ensure that all welfare related complaints about its employed coaches are independently investigated and, where relevant, determined by a wholly independent panel.

Complaint Handling at Club Level

976. I have explained the limitations on my ability to investigate safeguarding concerns and complaints in all gymnastics clubs and that the focus of my Review has been on the way in which BG has managed safeguarding concerns and complaints and overseen club handling of complaints. However, it is important to look at club complaint handling as far as I can, as it is inextricably linked to BG's approach to complaint handling and relevant to the determination of whether safeguarding concerns and complaints have been dealt with appropriately in the sport. It also has the capacity to impact on gymnast welfare and wellbeing.

977. I received submissions that described the experience of club complaint handling (including but not limited to safeguarding complaints) negatively. These submissions asserted that there was a distinct lack of quality and consistency in complaints handling at club level. Some key themes emerged from across the submissions:

- a. Some clubs appeared not to follow any specific procedures or policies when complaints were made;
- b. The quality of the club's response appears to have depended significantly on the experience, education and availability of the Welfare Officer;
- c. Some Welfare Officers lacked independence or had a potential conflict of interest in responding to the complaint;
- d. That complaints were ignored or swept under the carpet;
- e. That complaints were not taken seriously, and no action (or insufficient) action was taken;
- f. That once a complaint was made the complainant (or more often their children) suffered adverse treatment and consequences;
- g. That, notwithstanding the complaint, the alleged conduct continued.

978. I therefore wanted to explore what BG expects of its clubs in relation to complaints policies and procedures and the extent to which BG monitored the quality of complaint handling in its member clubs.

Complaints Policies in Clubs

979. Between 2004-2009, the Safeguarding Policy stated that it was good practice to establish a procedure through which complaints or concerns could be voiced and advised that *'a club or organisation should put in place a procedure to deal with complaints. Parents and all members should be aware of the procedures for raising a complaint or concern'*.

980. Regional Welfare Officers were responsible, on paper, for ensuring that clubs *'hold and follow the appropriate Policies and Procedures, including but not limited to, Safeguarding Policy, Anti-Bullying Policy, Equality and Diversity Policy and any other documentation'* but there is no mention of complaints procedures. I reviewed the contents of the relevant BG safeguarding and complaints policies in existence between 2008-2020, with which clubs were expected to comply, to consider what obligations this placed on clubs in relation to handling their own complaints. Although the various policies made clear that having a complaints policy and procedure was good practice, they fell short of making it a clear mandatory requirement.

981. Therefore, whilst there appeared to be an expectation of clubs to have a policy and clubs were given a steer about the type of policy to utilise, this was not clearly expressed to be mandatory, nor were there any minimum requirements as to the content or quality of any policy that clubs chose to implement. If I found it difficult to ascertain with certainty, from past and current policies what, if any, requirements were placed on clubs to operate complaints procedures, then it was quite possibly also difficult for clubs. The answer appears to be that during the period of my Review there were not clear mandatory requirements (minimum or otherwise) placed on clubs in terms of the complaints processes they are required to have and that BG clubs have had a discretion about the type, if any, of complaints policy to adopt.

Recommendation: BG must require its clubs to have a complaints policy for safeguarding concerns and must make this a clear requirement within the relevant policies and standards for clubs.

Monitoring Complaint Handling in Clubs

982. Even if a club could boast a specific complaints policy, that would be no guarantee that the policy was properly implemented when dealing with welfare related issues. I have therefore considered whether BG took any proactive steps to monitor the way in which clubs handled welfare complaints which fell outside those referred to BG. This ties in closely with the earlier section in my report about [Monitoring and enforcement of policy and standards](#).

983. In summary, proactive contact with clubs was limited and where it did occur, it was not for the purpose of monitoring the standards of behaviour and complaints handling in clubs. I explored with the former CEO if she had any knowledge as to the nature and number of complaints being managed at club level. She had seen no data in this regard and had no knowledge of this area. The Director of Community Services said '*I don't perceive that we actively monitor the clubs or deploy any procedures or policies*'. When I explored the viability of monitoring compliance with complaints policies and procedures, he believed that the main difficulty with this would be the '*scale of that requirement*' and that there were inherent resource difficulties. He also stated that '*one of the main challenges was governing a large number of clubs with different business models*'.

984. Instead, BG relied heavily on Club Welfare Officers and Regional Welfare Officers to notify them of certain complaints and concerns. There was no evidence that BG checked or monitored the success of reporting from Club Welfare Officers and Regional Welfare Officers in this respect or that BG took any proactive action to quality assure the standards of complaint handling at club level. Regional Welfare Officers were required to report into BG but this was not always consistently and reliably done.

985. BG may have been deterred from a heavier handed approach to auditing and monitoring club standards of complaints management by a fear that it may reduce membership as well as by the resource implications. Membership was described as the 'heartbeat' of the organisation and critical to the income. BG recognised that too heavy an approach might dissuade clubs from applying for or retaining their membership. *'If you weed out the really bad clubs then that is good but you might affect other clubs that are under resourced and underfunded'*. I recognise that this is a complex issue. It would not be in the gymnasts' interests that clubs and coaches are dissuaded from membership of a governing body as that would remove an important layer of support, education and protection. Nor should the requirements be so onerous as to obstruct the availability of clubs willing and able to offer the sport. That said BG was under a duty to implement policy and to safeguard its members. It should have been monitoring the way in which clubs approach complaints and it was not. I have noted elsewhere that in 2019 BG began a process of contacting clubs proactively. This was a positive step towards improving communication but was put on hold because of the pandemic and a realisation about the scale of the task. I understand BG hopes it will resume this process in due course.

What were Clubs Obligated to Report?

986. BG relied upon clubs to (i) report child protection concerns to the relevant statutory authority (ii) refer certain safeguarding concerns and complaints to BG and (iii) handle certain low level complaints internally without recourse to BG and BG's complaints processes.

987. BG informed me that, *'from 2004, all members were required to report all safeguarding concerns to BG'*, although it was aware that this had not always happened in practice. This is an important issue because if complied with, it would have enabled BG, in theory, to identify conduct of concern at club level. I explored the BG policies I had received to assess how this was reflected. In fact the way in which the obligation on clubs to report safeguarding issues to BG was expressed was far from clear and plainly did not include *'all safeguarding concerns.'*

988. References to reporting obligations are contained in the various iterations of BG's safeguarding policies. The 2004 Child Protection Policy (in force until 2009) detailed the obligations upon clubs and Welfare Officers to notify the relevant authorities (and BG) of cases where there is a risk of significant harm and where there are allegations of abuse i.e. child protection. Where a Welfare Officer referred a concern or matter to the police or statutory authority, then there was a requirement on the club to notify BG and, in various versions of the policies, BG provided a template incident form to assist the club in notifying BG of the relevant information.

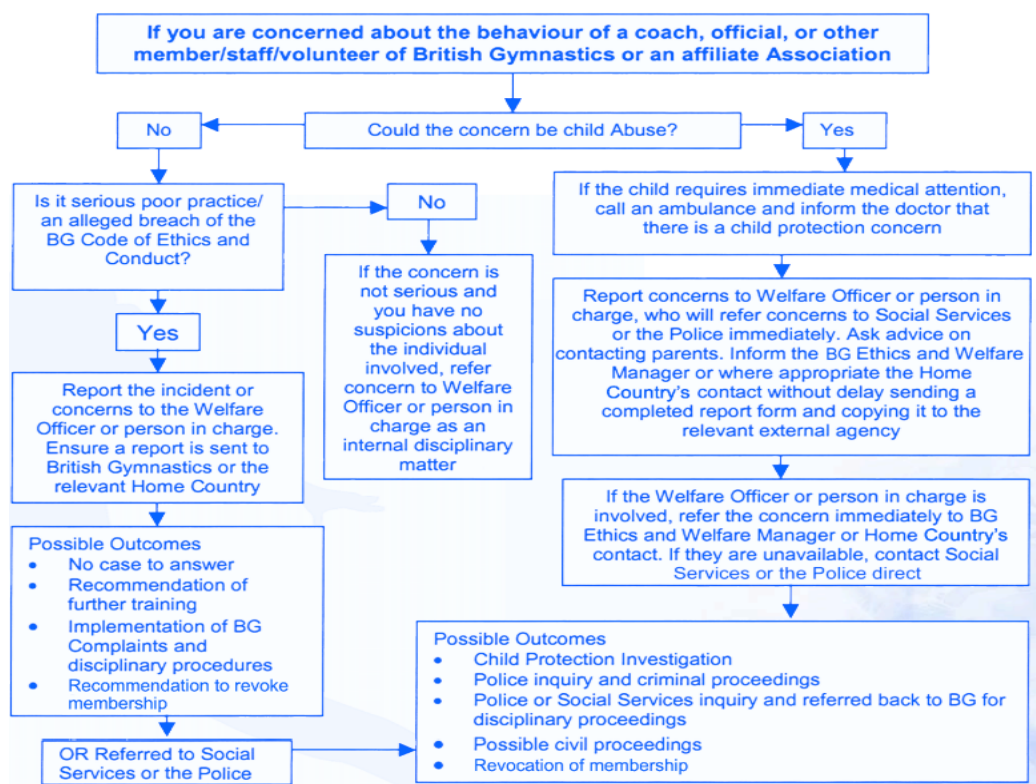
989. The policy recognised that *'It is sometimes difficult to distinguish between what may constitute abuse and what may be poor practice...If following consideration the allegation in clearly poor practice then the club and Welfare Officer can deal with it as a misconduct case'*. According to the main text of the policy only if it *'raises*

suspicions or concerns about abuse' or 'where the poor practice allegation continues to remain a concern' was there a requirement to record and report the incident to BG.

990. The policy purported to provide guidance about this. It defined poor practice very widely as any contravention of:

- a. Best coaching practice as advocated through the BG coach education program or resource materials;
- b. The BG Code of Conduct or Code of Ethics;
- c. The BG Equality Policy;
- d. The accepted roles and responsibilities of a coach;
- e. The BG Child Protection Policy and Health, Safety and Welfare Policy.

991. There was a flow chart in the 2004 Policy as follows:



992. As can be seen, the flowchart introduced the further concept of needing to report the matter to BG if it was 'serious poor practice' or 'an alleged breach of the BG Code of Ethics or Conduct' and so introduced a test which was different to that found in the policy itself, although it certainly did not amount to a need to report 'all safeguarding concerns'. This flowchart was replicated in the 2009 Safeguarding Policy (in

force until 2014) which stated that *'the following procedures outline the responses that should be taken in the event of an allegation or suspicions of abuse or significant harm'*.

993. Slightly at odds with this, the text in the 2009 policy stated that all cases of poor practice should be reported to BG without delay to allow the CRMG to determine the appropriate course of action. In this context, poor practice included bullying, verbal abuse, excessive training or stretching, excessive restriction of diet, poor practice that had previously been addressed by the club but continued to remain a concern or any incident of poor practice that raised a suspicion or concern about abuse. The 2009 policy went on to say that *'if the matter of concern is poor practice, possibly due to the lack of awareness rather than abuse and young people are not at significant risk, a more subtle approach would be appropriate and the Welfare Officer may not need to be involved'*.
994. The 2009 policy provided detailed information about what constituted good and poor practice. Whilst this was more helpful than its predecessor, again there was a lack of clarity about when poor practice could amount to abuse and how to manage and record poor practice or low-level concerns. For example, the reader was informed that practices may be on the fringe of abuse and/or if repeated *'again and again'*, would amount to abuse especially in the context of emotional abuse. This might include name-calling, excessive monitoring of weight, constant criticism, exerting excessive pressure, inappropriate language, breaches of safeguarding policy and procedure. It would also include *'breaches of recognised best practice in coaching'*, and excessive training. It is unfortunate that BG chose to categorise abuse, in important respects, as something that must have been *'repeated again and again'*. There was no guidance about how to deal with poor practice before it was *'repeated again and again'*. I have provided this level of detail because I consider the distinctions between poor practice, serious poor practice, possible abuse and abuse to be unhelpful generally but especially to the volunteer Club Welfare Officer doing his or her best to signpost problematic and complaint worthy behaviours.
995. I also think the guidance was unnecessarily difficult to apply. On the one hand it required a club to report *'all'* cases of poor practice but goes on, arguably, to limit that to specific and far more serious circumstances. Any form of abuse will amount to poor practice but not all poor practice will amount to abuse, though both may jeopardise the welfare of the participants and both may justify complaint and disciplinary proceedings. Certain contraventions of the stated policies or codes may be minor, others might amount to something more serious but the confusing and disparate way in which BG characterised conduct in its policy was unworkable. All participants would need to be operationally familiar with long and detailed policy documents. In addition, BG deployed language which was difficult to apply because it was so generic and subjective and included concepts of *'best coaching practice'* and *'roles and responsibilities of a coach'*. Such terms are not particularly illuminating to the volunteer who has to triage alleged misbehaviour in a safeguarding and welfare context. Although the policies were clear and consistent in requiring clubs and Welfare Officers to report *child protection* complaints and concerns to BG, it cannot be said that the policy was clear that this requirement extended to all safeguarding cases, as BG suggested to me.

996. This position remained essentially the same in the equivalent 2014, 2017 and 2018 Safeguarding Policies with the continuing use of language and definitions. I do note however that BG included this: *'If a Welfare Officer is caused concern then they should consult with BG to agree whether the threshold for referral has been met.'* The default position, sensibly, was: *'if in doubt, consult BG'*.
997. To add to the complexities, as I have already explained, the 2008 Standards of Conduct refer to clubs and affiliated organisations being able to resolve, formally or informally, many issues arising from breaches occurring within their own activities. The Standards (and its subsequent iterations) encouraged all members *'to work together in a collaborative manner to identify and resolve minor breaches'*. They note that members *'should not lodge complaints with BG or pursue allegations in circumstances where it can be reasonably expected that other, less formal, action would be sufficient.'* In 2017 BG created Standards of Conduct for Registered Clubs and these also contained a requirement that registered clubs shall *'report any serious breaches of any BG policies or standards'*. A 2017 Code of Conduct for Coaches contained the same provision about reporting *'serious breaches'*. These requirements conflicted with the requirements in policy to inform BG about all incidents of poor practice. The 2017 Code of Conduct for Coaches did go on to say *'Report promptly any concerns or ...other information concerning any abuse or neglect of a child or adult at risk or other matter within the scope of BG Safeguarding & Protecting Children Policy and provide full particulars of the matter to BG'*. This profusion of guidance was unhelpful because the wording of policy, the Standards and the Codes diverged at times in defining what members, clubs and coaches had to report. Therefore, although the policies were clear and consistent in requiring clubs and Welfare Officers to report child protection complaints and concerns to BG, it cannot be said that the policy was clear that this requirement extended to all safeguarding cases, as BG suggested to me.
998. Given the obligation that BG stated was upon clubs to report all safeguarding concerns to BG and the reliance which BG placed upon this in its narrative to the Review, I tried to gain a sense of how BG monitored the obligation on clubs to report concerns. I received at least one submission expressing significant concern about the protracted failures of a particular club to escalate their safeguarding concerns to BG. I asked BG whether it kept records about concerns which had been notified to them by parents but not by the relevant club because this might have provided BG with some sense of whether clubs were complying with their obligations to notify BG of relevant complaints and concerns. BG was not able to provide me with any evidence that it had done so. If BG considered that it had imposed on its clubs a requirement to notify BG of all safeguarding concerns, it did not take any or any adequate steps to monitor club compliance with this important requirement.

Recommendation: BG must make clear to clubs the circumstances in which they are required to report concerns to BG.

Low Level Concerns

999. Identifying low level problematic conduct which can escalate into something more harmful is, or should be, a key aspect of safeguarding and is plainly relevant to maximising the welfare of participants. As we have seen from the previous section of my report, identifying and assessing the seriousness of such conduct can be difficult. It should be covered in training. It should be recorded and appropriate technology should be implemented to achieve this. Ideally, policy should contain clear guidance to assist everyone, especially BG safeguarding staff, club coaches, staff and Welfare Officers so that they can recognise such conduct and take appropriate steps to address and record it. If such conduct is not recorded, there is no reliable way of knowing whether low level problematic behaviour is escalating and whether it is putting anyone at risk of significant harm.
1000. This could easily have been addressed in policy and in case management guidance for BG staff assessing incoming complaints. In fact, policy did not address it. I am not satisfied that clubs would have reported low level concerns with any consistency. Furthermore, on the occasions when BG were informed of such matters, BG was not always adequately recording the details either. This compromised the process of accurately identifying patterns of low level concerning behaviour and identifying clubs and coaches of concern. Cases that were considered to be 'low level' were often referred back to clubs. In addition, as I have explained, the Board was not informed of the nature or outcomes of category D to F cases, simply of the available numbers of categorised cases. The interim CEO in 2021 told me during my meeting with him that he felt that the Board had not interrogated the category D to F cases as much as it should have done during the period of Review.
1001. The Safeguarding Manager considered that Welfare Officers would be able to distinguish between a low-level concern and overtly abusive behaviour, but that any doubt should always be managed in favour of making a report over a safeguarding concern to BG. In 2018, BG provided some training for Club Welfare Officers on this topic called '*Recognise, Respond, Record and Report*'. The Integrity Director told me that he was concerned about the ability of Club Welfare Officers, BG staff and coaches to identify safeguarding concerns, especially low-level ones. I was informed by the BAC that in their experience, not only are LADOs inexperienced about safeguarding within sport but Club Welfare Officers have difficulty in distinguishing low-level issues from full blown mistreatment. BG has also more recently provided more training on low level concerns to its Regional Welfare Officers.
1002. I appreciate that judgment calls about categorising potentially harmful misconduct are difficult. Professionals steeped in safeguarding find this challenging. BG was entrusting these judgment calls to a large cohort of volunteer Welfare Officers. BG had a duty to ensure that the safeguarding training for such officers was robust around recognising poor practice and abuse and it needed to ensure that such issues were being properly recorded in clubs, escalated and properly recorded by its own safeguarding staff. BG did not do enough to identify in training, policy or culture, the importance of addressing low level misconduct to those tasked with safeguarding either at club level or within BG's Safeguarding Team.

It failed to ensure that such misconduct was properly categorised and recorded. The executive function with responsibility failed to keep the Board adequately informed about such conduct and the Board failed to express sufficient enquiry into this.

1003. The combination of a potential lack of understanding around low level concerns and lack of clarity around what concerns need to be referred to BG will most likely have led to under-reporting to BG of safeguarding concerns which fell below the threshold for referral to the police and LADO. As BG was not monitoring the implementation of its own safeguarding policies at club level, it may have been unaware of what was happening at club level about alleged behaviours and lower level welfare concerns would likely have fallen under its radar.

1004. I discussed with the former CEO the difficulties engaged in the categorisation of misconduct. She acknowledged that issues such as bullying, harassment and excessive control were challenging to define even though their impact on gymnasts, where such conduct occurred was '*devastating*'. The former CEO accepted that this required '*a very big education piece*'.

1005. In January 2020, Farrer & Co published guidance for organisations working with children on developing and implementing a low-levels concern policy.³¹ Some guidance about this already existed in the context of local authorities and schools but as far as I am aware there was nothing specific for the sports sector. The guidance recognised the difficulties of managing concerns which fell below the well-established threshold for referring an allegation to the statutory authorities. It contained guidance for the creation of organisational mechanisms whereby low-level concerns could be shared and managed. It emphasised the critical roles of education and training and the need to have a formal low-level concerns policy. It observed:

'Culture forms the context within which people judge the appropriateness of their behaviour. An organisation's culture will influence human behaviour and human performance at work, and it is vital to recognise the danger of cultural slippage. A Code of Conduct which is understood, accepted and followed by all adults associated with the organisation is integral to this, and strong governance and leadership are vital.'

1006. It is obvious that significant work is already underway to address this within sport and within BG. The CPSU recognises that understanding low level concerns is a key safeguarding area and is working to improve data collection around safeguarding concerns by engaging in a pilot project, in which BG is also involved. The CPSU wants to see clubs and regions actively managing low level concerns and recording them. There is a case-data collection template which has been designed to help NGBs capture case data in a consistent way to provide a sports-wide picture of safeguarding case challenges and emerging themes.

³¹ Available at <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2021.pdf>

How did BG Audit its own Complaint Handling?

The CPSU has worked with academics and several NGBs to develop this tool. It can be used in parallel with, as part, or in place of existing mechanisms to hold case data.

Recommendation: BG must operate a system for the neutral reporting of low-level concerns about adult conduct towards children and vulnerable adults.

Challenging Club Complaints Processes by way of Appeal

1007. I also considered what, if any, processes were available to a complainant who was dissatisfied with the way a club had handled their welfare complaint and, in particular, whether there was an avenue of appeal for alleged poor complaint handling at club level. I found the provisions in BG's policies about this unnecessarily confusing and somewhat contradictory. For much of the period of Review, the Complaints Policy had specifically asserted that BG did *not* act as an avenue of appeal against decisions made by clubs. From 2017 onwards another policy which specifically addressed complaints about the acts and services of BG contained the provision that '*any complaints relating to the management of a club, their fees, rules and requirements should be directed to the club to respond to. Once this process is completed, if the complainant is not satisfied with the response, they can request the Conduct & Disciplinary Manager review the outcome using the Complaints and Disciplinary Policy and Procedures*'. This was the first reference I found in the policies which suggested that there was any right to seek redress from BG where there were concerns about the club complaints process. I do not think that complainants would easily understand that they might invoke a review of club decisions relating to their welfare concerns and, in any event, there was no guidance available to determine the procedure to be followed in the event of a review. I am satisfied that, in welfare cases, there was no clear route by which a complainant could formally appeal the outcome of the club complaint process to BG.

How did BG Audit its own Complaint Handling?

1008. Although BG did not audit complaints being dealt with at club level, during the period of Review there were a limited number of occasions when its own complaints handling was subject to independent, or at least high level, scrutiny. They are set out in this section of the report.

2017 Independent Review into Historic Cases

1009. In 2016 the then Minister of Sport, Tracey Crouch asked all National Governing Bodies for sport to review their safeguarding practices following the sexual abuse scandal involving the Football Association. They were urged to look into:

- a. Whether there were any historic allegations of abuse that would merit investigation or reinvestigation;

- b. Whether they had processes in place for managing allegations of historic sexual abuse;
- c. Whether processes for safeguarding children and young people were as robust as possible.

1010. BG commissioned an independent safeguarding expert to conduct an independent review into historic allegations of abuse. The scope of his review was agreed with BG. He examined 356 cases in files stored electronically across numerous document platforms. Safeguarding/Child Protection cases and other appropriate cases from the Ethics and Welfare Team, between the period of 2004 and 2015, were reviewed according to BG case categories, with the most serious (A-C), being prioritised. It is not possible to ascertain which, if any, of the 356 files seen by the expert were also seen by this Review.

1011. Reassuringly for BG, the expert concluded that there was no evidence that any case needed further investigation or had left any child or children at current risk. He did however refer 12 cases back to the Safeguarding Manager for a further assessment of ongoing or future risk. He stated that the safeguarding process was robust and that there were the necessary policies in place and high practice standards to keep children and young people safe. As is evident from my report, I have not been able to reach the same conclusions. I do not know whether the expert's review went beyond a straightforward read through of various files and policies. I am conscious that my Review has had a very different focus and has permitted a deeper dive into practice and procedure at BG and that this has been supplemented by the material generated by the Call for Evidence, my meetings with BG personnel and the significant amount of related documentation received from BG and other organizations. This difference of assessment may, to some degree, be the result of the expert's focus on the more serious A-C categories which were managed more consistently than the lower level safeguarding complaints.

1012. One can understand why BG drew comfort from the central conclusions of the 2017 report. However, the expert did identify areas where improvement was required, and these mirrored some of the issues that emerged from the Review's analysis of case files. When reviewing the cases, he had attempted to establish whether or not the Welfare Officer either at club or regional level had been involved. In a high number of cases, it was not possible for him to establish this due to the poor level of recording. He commented that some aspects of his review were affected by poor recording of the original complaint, duplication of information on to a number of documents, a limited number of documents in the majority of case papers and a failure to categorise cases. These are all issues which likewise hampered my review of case files. He found that there was limited information on the CRM system as *'it was only in late 2015 that clearer practice policy about adding this information onto the CRM records had been introduced'*. He observed that the recording flaws had improved over time and I would agree that the quality and standard of recording keeping showed some improvement in or around the time after 2017.

1013. The 2017 Review identified several practice issues which required improvement falling under the headings:

- a. Poor recording of referral information;

- b. Delays in investigations of referrals;
- c. Failures to record outcomes of investigations or complaints;
- d. Support for victims; and
- e. Governance of safeguarding across the organisation.

1014. Interestingly, these practice issues have all been areas of concern that I have identified. Presciently, he recommended the introduction of a support system for coaches and other staff subject to allegations of abuse. The expert also observed that *'The CRMG group took a significant role in the case management of individual cases but there is little or no evidence that it looked at practice from within the organisation such as quality of case files and outcome responses'* and that there *'was a serious issue about the governance of the organisation in terms of safeguarding and not identifying poor practices at that time'*. He made a recommendation that the Executive Directors should consider establishing a Strategic Safeguarding Group which would act as a critical friend to the Board in the continual development of a strategic plan for safeguarding and would provide a quality assurance system over practice and training.

1015. The Safeguarding Manager told me that the 2017 Review acted as a *'springboard'* to improved proactive safeguarding and that the author of the Review and the Board had signed off on BG's initial response to the recommendations made. Safeguarding was added as a standing item to the Standards Committee meeting agendas and the recommendations were discussed and explored in a written appendix designed to explain the steps that had been or would be taken as a result. Certain steps were taken around this time as a result of the Football Association historical sex abuse scandal and, I was informed, because of the issues affecting gymnastics in America. These steps included using surveys in clubs and providing information leaflets for children and parents, as I have discussed earlier in my report. I did not share the Safeguarding Manager's view that enough had been done to implement the recommendations made by the expert. A strategic safeguarding group was not created because it was felt, essentially, that the CPSU reviewed BG as part of an annual process and because of the continuing operation of the CRMG, both processes that I have been critical about. I found no real evidence of gymnasts or coaches receiving better or additional support during the complaints process. I saw no adequate evidence of the monitoring or implementation of any recommendations at departmental or executive level. Furthermore, there is no evidence that the contents (as opposed to the fact) of the report were discussed in any appropriate detail with the CPSU in the annual review process.

1016. The 2017 Review is the only wholesale audit around safeguarding case management that I was made aware of and it was part of a government sports wide initiative rather than a BG initiative. One would like to think that had BG conducted its own internal review of complaints handling and safeguarding case handling before 2016, similar issues could have been identified and rectified at an earlier stage. Although the report as a whole was positive, BG failed to take sufficient action in response to the problems identified or to address the expert's specific recommendations. I saw no evidence that the Board

expressed any sense of enquiry about this or appetite to ensure that his recommendations were given serious consideration.

Individual Case Reviews

1017. One further way in which BG informed me that it had audited and reviewed complaints was by commissioning '*general and specific reviews into closed cases where particular issues had been identified.*'
1018. In fact I was provided with only one '*lessons learned*' document, which was produced internally following a specific case review conducted in August 2018 by the Integrity Director. It was clear to me that the case subject to review was one of the more complex and time-consuming complaints that BG had had to deal with in recent years. It was encouraging to see that BG had engaged in formal, organisational self-reflection about this case. I was reassured to see that the Integrity Director identified issues of concern that I also encountered in other cases, such as an '*occasional unclarity on roles, responsibilities and process*', '*occasional lack of clarity about which rule we were working under and we did not consistently record and communicate which rule we were using*' and '*consideration of the relationship between [BG's various] disciplinary processes*'.
1019. Unfortunately, I was not able to assess the quality of the '*lessons learned*' exercise any further or the actual case file because of the operation of a confidentiality agreement existing between the coach in question and BG. Nor was I provided with evidence that the various recommendations made as a result of this internal audit were actioned in any way.
1020. Save for this one specific case review in 2018, I was not provided with any other examples of internal audits, nor was I made aware of the nature or number of these reviews. I was not therefore satisfied that the extremely limited number of internal reviews had led to any positive reform or to improvements in safeguarding complaints handling at BG. I note that BG's new Globocol case management process now requires a manager review of every case closed, which provides a certain level of oversight at a more senior level and should assist with consistency of decision making.

The CPSU

1021. BG also pointed to the annual reviews which took place with the CPSU as evidence of auditing/quality assurance of its safeguarding complaint handling. I have dealt in some detail with the quality and effectiveness of the CPSU reviews in the section of the report regarding [The Child Protection in Sport Unit \(CPSU\)](#) in the context of general safeguarding standards as opposed to complaints. I repeat my conclusion that the comfort drawn from these reviews was sadly, unrealistic, for the reasons already given.
1022. In fact, the CPSU played no part in reviewing or approving the content of the complaints and disciplinary policies and had no involvement in, or oversight of, individual case management or outcomes. It was not

designed for this purpose and does not have the resources to regulate complaints in this way. In that sense, BG's reliance on the CPSU in terms of complaints quality assurance was misplaced. The CPSU explained that 'we ask them about their case management system in terms of how well its working, do they reflect on the cases so they can pick up themes and things but in terms, we wouldn't have access to that and we wouldn't look at cases'. As I have mentioned previously, in 2015, the CPSU required BG on more than one occasion to utilise its existing case management systems to identify rates of complaint reporting, timescales on managing complaints, trends in conduct. This was useful but BG's failure to do so did not affect its overall positive ratings.

1023. The same limitations extended to the CPSU's understanding of how BG engaged with its own clubs about complaints handling. There was a lack of evidence within the annual reviews that the CPSU made meaningful enquiries about the extent to which BG checked club level compliance with complaint procedures in safeguarding cases. The CPSU, did not receive information about the nature and extent of complaints that were being handled at club level (in line with its engagement with other sports) and would not expect to, unless this demonstrated issues that affected the NGB's ability to deliver the Standards for Safeguarding and Protecting Children in Sport.

1024. The CPSU is a small organisation with limited resources and it does not have the capacity to audit the way in which NGB's handle safeguarding complaints or to assess whether the NGB is properly implementing complaints and disciplinary policies itself or at club level.

Governance of Complaint Processes and Procedures

1025. As I explained earlier in my report (see [BG Board Engagement with Safeguarding](#)), during the period of Review there was no safeguarding expertise reflected at Board level. I examined the type of information provided to the Board about complaints during the period of Review. I also tried to establish what, if any, action the Board had taken upon receipt of any such information.

1026. Upon request, BG provided me with Board reports containing information about safeguarding and complaints and with a relevant selection of Board meeting minutes. BG explained that some pre-2016 executive reports to the Board were no longer available but I consider that I have seen enough material to formulate reliable conclusions.

1027. In the early stages of the period of Review, the Head of Support Services reported to the CEO about complaints generally and the CEO in turn reported to the Board. From 2012, the relevant reports to the Board were prepared by the Executive Director of Corporate Services, supplemented with separate ethics and welfare reports on occasions.

1028. In the quarterly executive reports to the Board before June 2014 there was very little, if any, reporting in relation to complaints and to complaints processes. On two occasions, the facts of specific cases were reported (presumably on the basis that they were considered serious and/or complex cases) but there

was a complete absence of data in relation to volume of complaints generally or as to patterns or trends or recurring procedural issues. Commensurately, there is no evidence that the Board at any stage asked for this sort of information. In 2014 something referred to as the 'active case report' was used. This provided the Board with limited information in relation to the number of active cases. Only cases categorised as A-C were reported to the Board in any detail usually with a high level overview provided.

1029. By late 2016, I note that the Board was still receiving mainly (but not exclusively) case related information about concerns of a sexual nature and particularly cases where the police had been informed or a local authority referral made. These tended to be cases categorised as A to C, the cases considered by BG to be most serious. D to F cases were simply grouped in total figures, without any meaningful description of the type of issues justifying complaint. A reader of the reports would have seen that one particular case concerning alleged emotional and physical abuse had been proceeding for over two and a half years by December 2016. That same reader would see, in December 2019, this case was still featuring in Board reports. In another case of alleged sexual assault, the Board was still receiving reports on the BG investigation, over three years after the police investigation had been closed and the coach had been suspended.
1030. I discussed the content of these Board reports with various members of the Board, past and present. Views were mixed. One considered that the reports contained appropriate and rigorous levels of detail. Another thought there was an unhelpful level of detail in relation to the most serious cases - *'I would not have expected the level of details we did. In one level it was overly detailed'*. Conversely, another long-standing Board member felt that the reports had not been detailed enough. In relation to the knowledge and understanding of low level, bullying type cases, they expressed their own concern that *'we have to question why if there were more instances of that (emotional bullying), why not coming to light at Board level'*.
1031. Other BG Board members expressed to me the fact that when they had looked back at the timeline and sequence of events for some of these cases from start to finish, they could not understand the progress of such cases both in terms of delay and outcome. Yet at the time there appears to have been very little questioning or discussion around how individual cases were being dealt with. There was also an absence of questioning (or an absence of any recorded questioning) about, and understanding of, BG's wider approach to safeguarding and whether or not patterns of safeguarding concerns were being monitored by BG (which, in fact, they were not). These issues about complaints handling are covered elsewhere in my report but the key point here is that there has historically been inadequate oversight and understanding by the Board of these important issues.
1032. I have already referred to the independent review into historical cases which BG commissioned in 2017 in response to the government's concerns about non recent abuse in football. The reader will recall that the expert conducting the review did not recommend reinvestigation of any cases and thought that the BG safeguarding processes were robust with the necessary procedures in place. But he identified significant issues with safeguarding complaints record keeping, noted the high level of demand that the

Safeguarding Team faced on a day to day basis and made a series of recommendations, which I have already identified and which were notified to the Board by the Executive Director of Corporate Services. This Director appeared to be fully alive to the reputational risks at play. She observed that it might be necessary to place full time Welfare Officers strategically around the UK because membership continued to grow and with this came the risk of negative press and parental concern. She indicated that more training resources might be needed and that the public profile of the sport needed to be managed in terms of media attention as fallout could be '*extremely damaging*'. She recognised the high-performance training environment needed attention and the high-performance coaches and gymnasts needed more training.

1033. Despite this, none of the above recommendations was implemented and I saw no evidence that they were seriously considered. The only measure that I am aware was taken as a result was the creation in 2017 and 2018 of leaflets to educate parents and gymnasts on safeguarding matters and the insertion of safeguarding as a standing item on Standards Committee agendas. Whilst I understand the priority of the exercise was to ensure that there were no immediate safeguarding concerns emanating from resolved cases, there does not appear to have been any Board curiosity about the wider, systemic issues, which were identified in the report or any follow up from the Board as to whether and how any recommendations had been implemented. The realistic reputational risks identified by the relevant Executive Director appear to have been ignored.
1034. The reports to the Board post 2017 continued in a similar vein, again with an emphasis on reporting back to the Board about specific cases of a sexual nature, with relatively little reporting about cases dealing with emotional or physical abuse. I note that it was not until December 2019 that any explicit reference was made to elite athlete welfare provision.
1035. By 2020, the Integrity Director was responsible for preparing the reports and there was an improvement in the quality and content of the reports. However the category D to F cases were still not reported to the Board or analysed for the Board in any informative way beyond providing total numbers of such cases. This meant that cases involving allegations of bullying, emotional abuse and other frequently occurring behaviours were not being reported to the Board other than as a number. The Board did not ask for any further breakdown or detail about these cases or about general complaints management and none was provided.
1036. Since the 2020 crisis the Board has been provided, at its own request, with a higher level of detail about current cases. One Board member observed that the volume of cases concerning emotional abuse had not previously been conveyed to the Board and nor had trends or hotspot clubs and coaches. He confirmed that the Board had not asked for this type of information and the executive had not been providing it. The current Chair reflected that there might have been an over-emphasis on sexual allegations, to the exclusion of other forms of abuse: '*I was looking but not for the right thing*'.

1037. When I pressed various Board members about what the Board could and should have known of the extent of cultural malaise and the prevalence, in particular of emotional and physical abuse in the sports, I met more than once with the rhetorical response we only know what we know. As the above analysis demonstrates, this is no answer. Gaps in Board room knowledge start and end with the Board and with the CEO. Whilst I have identified failures in complaints handling and recording and in the provision of information from the relevant departments to the Board, there was no demonstrable sense of enquiry about both safeguarding and complaints. There were red flags to which BG now acknowledges it paid insufficient attention. If the Board had wanted to know what was happening in its organisation's clubs, it could have found out. In other words, BG should not have been taken by surprise about the culture laid bare in the 2020 allegations.

Recommendation: BG must introduce effective governance pathways to ensure that any patterns and trends in complaints and BG performance in complaint handling, are known to the Board and are taken into account in relevant decision making.

4(a)(iii): HAVE GYMNASTS OR THEIR PARENTS FELT UNABLE TO RAISE COMPLAINTS AND IF SO, WHY?

Introduction to 4(a)(iii)

1038. The Terms of Reference required the Review to examine whether gymnasts and their parents/carers/guardians had felt unable to raise complaints with appropriate authorities previously and if so, why. Those Terms of Reference also tasked me with investigating the reasons for any delay in complaints being raised. I received information on this issue, across all levels of the sport, from many sources including the following;

- a. Numerous individuals explained in their written submissions whether they had previously raised concerns and if not, why they had not;
- b. Many people who engaged in meetings with the Review were asked whether they had raised concerns previously and, where relevant, why they had not felt able to complain sooner to a person in authority;
- c. In accordance with the Terms of Reference, I reviewed the complaints systems and processes within BG and analysed the way in which complaints had been handled generally. This included scrutinising the effectiveness of the Club Welfare Officer role and the way in which BG had managed complaints about successful (and therefore more visible) personal coaches and national coaches. This work informed me about the likely levels of confidence within the gymnastics community about complaints procedures and about BG and club attitudes to complaints;
- d. I invited BG personnel (including senior executive staff and Board members), coaches, club owners and Club Welfare Officers, where possible, to reflect on this issue in my meetings with them;
- e. I considered all of the above in the context of the culture of the sport, as I have found it to be.

1039. Concerns about welfare or safeguarding issues within clubs can be raised through a number of routes: to the Club Welfare Officer or any member of club staff or volunteer, externally to the Regional Welfare Officer, to the designated Event Welfare Officer present at BG events, directly to BG or to the police or local social services. There was no shortage, therefore, of available routes for disclosure.

1040. A reluctance to complain on one's own behalf or on behalf of another is a common fact of life affecting most places of work and recreation. Potential complainants fear being disbelieved, jeopardising valuable relationships and being perceived as 'troublemakers'. Those complaining risk or fear other forms of retribution including demotion, or in the sporting context, de-selection and, in some cases, consequential loss of funding. BG stated in all of the versions of its Complaints Policy during the period of Review, that

it wished to promote a culture where it was safe and acceptable for participants (or parents) to raise concerns or complaints including those of poor practice, abuse and misconduct and that no individual should be victimized for raising or making a complaint.

1041. It would be unrealistic to assume that any process or environment can completely eradicate complainant reticence. However, this reticence appears to have been particularly pronounced in gymnastics. Out of the individuals who raised concerns with the Review, over 50% of them had not reported these concerns to any other authority or organisation prior to the summer of 2020. There was therefore a demonstrable pattern of failing to raise complaints within the report, including with BG. Although the Terms of Reference confined the determination of this issue to gymnasts and their parents/carers, it was clear from submissions and from meeting individuals that this reticence extended to wider cohorts including other coaches, volunteers and Sport Science and Sports medicine personnel who witnessed certain behaviour.
1042. The reasons for this reticence in the UK, as I have found them, are set out below. There are clear parallels, in this context, with the sport in other jurisdictions, as the reviews into gymnastics in Australia, New Zealand and the Netherlands demonstrate.
1043. It is important to say at the outset that, as with safeguarding, everyone has a part to play in the articulation of concerns and a responsibility to address poor or abusive practice in a way that maintains standards and respect and that instils confidence. Although the careers of gymnasts are longer now than they used to be, many gymnasts are children or young people and therefore unlikely to be confident enough or able to articulate concerns in the same way as adults. The need to identify and address poor practice or abuse should take priority over parental aspirations, the profile and status of a club, fears of disappointing a child or offending a coach. I have concluded already that athlete welfare and wellbeing has not been at the centre of the culture of BG and I have already set out in some detail why various participants in the sport and why some parents may have lacked confidence in the BG complaints handling process. If everyone is to play their part in improving levels of confidence, BG itself needs to do more to set a public example by treating concerns and complaints consistently and transparently and by imposing justified sanctions, regardless of the identity or seniority of the coach in question.
1044. I am particularly grateful to those parents, coaches and other professionals who felt able to speak openly on these issues, even when their replies caused them to reflect on whether they could or should have taken steps to raise their concerns at an earlier time. I endeavoured to remain alert to submissions which whilst critical of others, might veil a feeling of failure (and subsequent guilt) at not doing more to protect their child, or another's child, from known, but potentially unacknowledged, inappropriate coaching behaviours. As one parent described '*...we feel very saddened that we have allowed it to go this far ...we wouldn't put up with this in any other area of our lives...I think, how on earth did I allow that to happen.*'

Gymnasts' & Parents' Anecdotal Reasons for Reticence

Normalisation of Abusive Behaviour and Other Forms of Poor Practice

1045. A significant number of gymnasts and parents confirmed that they had found the confidence and desire to speak openly about their experiences after watching the 'Athlete A' documentary. Most of these related to gymnasts who had competed at a very high level. The documentary prompted a 'public conversation' on the #gymnastalliance Twitter forum and this also saw gymnasts coming forward publicly and sharing their experiences of mistreatment within gymnastics. It would appear that some gymnasts and parents began to realise that what they had assumed was normal and what they had been conditioned to believe was necessary, was neither appropriate nor necessary.³²
1046. On the basis of the material received, I am able to infer that some gymnasts and parents failed to realise that specific practices were abusive or inappropriate and therefore complaint-worthy because they were so habitual in the gymnastics environments that they experienced and because they occurred in plain sight of other adults who did nothing to suggest they considered them inappropriate. This extended to oppressive weight measurement and management, excessive levels of control, overstretching, excessive training hours and loads, training on injury, inappropriate verbal communication and emotional and physical punishment. In some cases, some parents knew that other club personnel and parents were witnessing concerning practices without speaking out and this reduced their own confidence to question the environment in which their child was training. This impression was reinforced by a submission from a head coach and club director who felt that the inappropriate conduct of coaches, in particular negative and belittling language, was so public and unchecked that it must have appeared normal. For some gymnasts and parents, as I have already observed, it was only on seeing 'Athlete A' and/or upon reading the public statements of other gymnasts that they realised that what they had perceived as normal was, in fact, inappropriate and in some instances, abusive.
1047. Both gymnasts and parents referred to feeling that they had been 'conditioned' or 'groomed' to believe the coach knew best and to feeling that they were being over-sensitive if they did have concerns. One former elite gymnast spoke of her immense desire to please her coach. She felt ashamed of her own negative feelings about her training experiences, assuming they must be her fault and therefore not something she could, or should, complain about.

³² Welsh Gymnastics conducted an online safeguarding forum in March 2021. Gymnasts were asked what would stop them from speaking up. Their responses included: Mindset that it is ok; Embarrassed; Seem weak; Own confidence to speak out; Could think that you might be put at a disadvantage if raised.

Fear of Repercussions

1048. Both gymnasts and their parents cited a fear of repercussions as a reason why they did not complain. The most frequent forms of repercussions reported to me (both actual and feared) were negative consequences upon a gymnast's career (deselection, demotion including loss of funding), physical punishment such as extra conditioning or rope climbs and/or emotional punishment including being ostracised, nasty comments or being shunned by the coach.
1049. The fear of de-selection or demotion was cited as a principal reason for not complaining by several current and former elite gymnasts. One gymnast stated *'I feared if I spoke out or stood up to said bully/coach I could be jeopardising my chances of making it to the Olympics'* while another expressed that *'We have always been made to feel like if we speak up we will get removed from the team or even worse...'* and another who said *'The culture has been one where coaches and gymnasts are expected to put up and shut up and never question the management for fear of not being selected for teams...'*
1050. The British Athletes Commission dealt with a high number of complaints from gymnasts in the summer of 2020 and I was informed by the BAC that a fear of losing funding was one of the explanations given for not complaining beforehand. Tellingly, before 2020, the Commission had only been asked by gymnasts for support on one occasion. In their experience, it is not unusual for elite athletes to wait for the end of an Olympic cycle before articulating any sort of concern, sometimes in circumstances where the athlete has committed an account of their concerns to paper but has deferred raising those concerns until the realistic fear of de-selection or lost funding is past.
1051. Delay in articulating a complaint is sometimes assessed as a factor affecting either its credibility or the weight that is attached to it. If an athlete is fearful of the consequences of disclosing concerns or making a complaint, that of itself might create delay as the BAC's experiences have shown. An NGB needs to exercise real care in the way that it approaches this issue because an athlete's delay may be entirely understandable. I am aware of at least one example of a decision-maker dismissing a concern relating to a senior coach in part because they couldn't understand why the athlete had waited until the end of the Olympic cycle before making the complaint. The deliberate decision to wait until the end of the Olympic cycle was entirely consistent with the BAC's experience of dealing with athletes who feared de-selection or loss of funding. The decision maker in this instance had not reverted to the athlete to ask why they had waited until the end of the cycle and I was troubled by the lack of insight demonstrated on this occasion and the way in which it had operated against the gymnast.
1052. I note from the available Technical Regulations that historically and now, the Head National Coach and Performance Director will be responsible for the development of all selection policies, International Competition Calendar, squad/team selection and National Training Camp Programmes. Although more recently, independent observers have also been involved in certain selection processes, it is not difficult to see why talented gymnasts would prefer to keep their concerns to themselves rather than complain

to or about those who have influence over which squad or competition they participate in. They may even wish to avoid raising any concerns about anybody for fear of being wrongly perceived as 'difficult'. This is particularly the case where the process of selection can never be entirely devoid of some subjective assessment, despite the use of objective criteria.

- I053.** BG also determine whether an athlete is selected for the World Class Programme and is therefore eligible for an Athlete Performance Award to cover both living and athlete specific costs. An athlete can be taken off an Athlete Performance Award at any time, at the NGB's discretion, if they believe they are not meeting the expected performance targets. An athlete in receipt of an Athlete Performance Award will be expected to be a 'full time' athlete meaning that this funding is normally their income for all life expenses. The nature of funding can lead athletes to feel constantly under pressure to perform and it can make them very vulnerable to those making performance decisions. This is discussed elsewhere in my report as a factor that increases the vulnerability of elite gymnasts. There is collective anecdotal evidence that gymnasts failed to complain with confidence earlier because they feared a loss of funding.
- I054.** A small number of elite gymnasts and parents spoke of fearing the coach's reaction if they expressed concern. Where this fear was instilled at a young age and once on a Performance Pathway, it is easy to understand why it would persist and set the wrong sort of cultural tone. One elite gymnast said that they did not complain about what they considered to be the abusive practices of their coach because both at the time of training, and now, they remained frightened of the coach in question.
- I055.** I also heard that gymnasts had not confided in their parents, which would explain why some parents had not complained about poor coaching practice. One gymnast said *'I stopped telling them about it. I loved the sport so much and I thought they would take me away from it if they knew what was going on. I just wanted to hide it so I could stay'*. Another confirmed that she did not tell her parents about what she considered were unacceptable training practices, which included training on injury, belittling verbal abuse and excessive weight management because she was frightened that the coach would punish her if she did so. I heard this more than once.
- I056.** I am satisfied that in certain instances, this fear was rational. Several individuals described receiving forms of punishment from their coaches following disclosures to their parents of issues of concern. Some examples of this are set out in the earlier parts of my report. As a result, some gymnasts never confided in their parents again.
- I057.** Parents also expressed a similar fear of repercussions including being ostracised, unpleasant comments and de-selection of their child in the wake of any complaint they might be thinking about making. Some had witnessed first-hand an unfortunate reaction by the coach or club in question to complaints being made. One person told me that they had not raised complaints because they were nervous that the coach would inflict extra conditioning on their child as a form of punishment for confiding in their parent. Other parents told me they had been warned or advised by other parents that certain coaches had

punished gymnasts for reporting concerns to parents. Some said that if they became too engaged in their child's participation in the sport, they were viewed as being too pushy and that they were made to feel unwelcome. In addition, I heard, not infrequently, about the adverse politics flowing in clubs after the expression by a parent of a concern or complaint. The fallout could be tribal and cause irreversible offence and worry. This of itself would deter others from complaining, particularly if the complaint was about the same coach.

1058. One parent told me that they did not want to become unpopular in their community with the club staff and other parents. They felt confused loyalties towards the club and their child. They did not want to get the club into trouble and they did not want their child to experience any repercussions. They had heard the club owner and head coach say previously that they had tried hard not to let a previously expressed concern affect the training of a child, which reinforced their reluctance to utilise a formal complaints policy.

1059. The fear of repercussions in response to raising a concern was also reflected in the Walk the Floor process conducted in 2019, which independently uncovered an environment in WAG where staff, athletes and personal coaches felt unable to give feedback without fear of negative consequences, including being 'frozen out'. This would, of course, inhibit complaints or concerns being raised.

1060. I am satisfied that some parents and gymnasts did not complain due to fear of negative repercussions. This fear was rational given the number of submissions I heard about perceived negative behaviour subsequent to a complaint.

Lack of Trust in Complaints Procedures

1061. At all levels but particularly for those competing at national and international level, there was a discernible lack of trust in BG's ability or willingness to manage complaints about coaches. This was quite closely bound up with a sense that certain coaches were untouchable. This sense persisted for some gymnasts even after they had reached adulthood. Despite their maturity, it seemed clear to me that even these gymnasts were likely to, and did, feel that there would be no point in making any sort of complaint about certain coaches. In this context, it was also felt that BG had accepted and, in many cases, supported coaches who were thought to be technically gifted and capable of instilling strict training regimes, often through somewhat autocratic methods. Gymnasts and parents believed that other coaches and BG staff knew about some of the more negative aspects of this and had done nothing to discourage or eradicate it. This too created a natural impediment to complaint.

1062. Some elite gymnasts, coaches and parents felt that the leadership of BG, particularly in the guise of the former CEO, Jane Allen, lacked the appetite and leadership to discipline and potentially sanction coaching staff who were deemed to be integral to international medal success. I have concluded that, in some instances, the perception about a lack of action was justified and it was compounded at times by the way

in which BG visibly managed complaints about senior coaches. More than one individual with experience of working at BG expressed the view that certain coaches were protected, whilst the transgressions of other coaches were sanctioned more readily. BG also acknowledged in its submissions to me that its failure, at times, to act swiftly and robustly in response to unacceptable coaching practices may have given rise to a loss of faith in complaints handling and that this in turn may have influenced the culture of the sport.

1063. In relation to complaints being raised to clubs, I have noted elsewhere that demand for coaches outstrips supply. The process of disciplining a coach is disruptive and costly for clubs. If the coach in question is involved in training talented gymnasts, then there is the additional difficulty of trying to provide some sort of continuity for those gymnasts whose performance may be adversely affected by the suspension. In this context, club engagement in tackling unacceptable coaching behaviours has inevitably been inconsistent and it has been that way throughout the period of Review. This has a knock-on effect in the confidence that participants or parents will feel when contemplating the use of a club complaints procedure.

Conflicts of Interest

1064. This distrust of BG's appetite to address coaching misconduct was avoidably reinforced by the perceived insularity of the organisation and closeness of individuals within the senior executive. As stated earlier in my report an obvious conflict of interest was created when the Executive Director of Sport's wife was appointed as the WAG Head National Coach. More than one individual questioned why they would ever complain about their experiences in WAG given this relationship. These concerns were no doubt heightened at the time when the Executive Director of Sport was also acting as the Performance Director, during which time he was particularly close to the selection process and to the allocation of athlete funding. In that sense the WAG Head National Coach might have seemed untouchable. The scepticism about the reality of complaining in these circumstances is as understandable, as BG's apparent lack of insight about it at the time, is incomprehensible. I spoke about this issue with a number of individuals from BG. BG acknowledged that this issue had not been formally mitigated and that upon reflection, it could have caused a perceived inability to challenge or complain. Whilst the circumstances were clearly capable of deterring criticism of the WAG Programme, it is not possible to conclude one way or another whether this did actually happen.

1065. At club level, a number of parents said that they were discouraged from complaining because they felt that the Club Welfare Officer lacked independence due to their relationship with the coach or due to having a child at the club, often also being coached by the subject of concern. Parents were concerned that in these circumstances, any concerns raised with the Club Welfare Officer would be disclosed straight to the coach and/or would not be dealt with impartially. A couple of parents felt that the relevant Welfare Officer lacked the confidence, ability or experience to manage the issue at stake. When reviewing complaints files we also saw evidence of a reluctance to raise concerns at club level because

of a lack of faith in the independence or ability of the Welfare Officer to adequately investigate. It is apparent from the information I received that these conflicts, or potential conflicts, and perceptions of the capacity of the Club Welfare Officer to deal with concerns, discouraged complaints from being raised at club level in some cases. This inhibited the making of complaints and left some of those who wanted to make a complaint feeling that there was no point or that it was likely to be more trouble than it was worth.

1066. I spoke with the BAC about this issue. In their experience, born of the last 18 months, Club Welfare Officers regularly lacked independence and responded inconsistently to safeguarding issues. Whilst this might not be surprising given the challenges of safeguarding and the voluntary nature of the role, it did reveal a distinct lack of accountability and use of support.

1067. I asked the BG Safeguarding Manager what BG did to ensure that Club Welfare Officers were not conflicted. Each club, upon registration and renewal must notify BG of the name of its Welfare Officer. Obviously if the surname of a Welfare Officer matches that of a key coach or the club owner, there is an obvious problem but any significant relationship between the two may not be caught by a cursory glance at surnames. In any event, he accepted that in fact, BG would only become aware of a conflict if someone specifically complained about it. This was confirmed by the Integrity Director who acknowledged that it was impossible for BG to police the independence of Club Welfare Officers.

Other Reasons

1068. Although many clubs have modernised their practices over the years and now provide much more information to club users, clubs have not always been as proactive as they could have been in publicising their complaints procedures and making the Club Welfare Officers visible. I do not think that it has always been obvious to gymnasts that they are entitled to raise concerns though this is now improving.

1069. Analysis of submissions revealed that an overwhelming majority of individuals who did pursue a complaint with BG were left dissatisfied with their experience (some 89%). It is not possible, on the evidence available, to state that such negative experiences deterred others in the same community from pursuing their own complaints but it is certainly not something that cannot be excluded as a possibility.

1070. It was a common theme in submissions that parents felt shut out physically and emotionally from their children's training, with complaints that some clubs and coaches deliberately restricted parental viewing facilities. Some clubs struggled to facilitate any such viewing because of the physical limitations of the club premises. The physical distance between parents and the gym environment, coupled in some cases with minimal communications from the coach, would have had a distancing effect on the parents. In my view this closed training environment is likely to have reduced the likelihood of the parents feeling sufficiently confident to raise any concerns.

Other Perspectives on Reasons for Reticence

1071. Although my remit was to investigate whether parents and gymnasts had felt unable to complain, I received submissions from other types of participants about this issue and their experiences have contributed to my general understanding of the ability and willingness of participants to disclose concerns.
1072. I spoke to a number of individuals who were involved in running gymnastics clubs, including high-performance clubs. Invariably they told me that their club encouraged participants to raise concerns, that available Club Welfare Officers were independent and that poor practice would be responsibly addressed. Whilst this may well be correct in some clubs, it did not accord with numerous submissions received by the Review.
1073. Others working or volunteering at gymnastics clubs at times told me about a lack of confidence in the ability of clubs to manage complaints and how this destroyed faith in the integrity of the available complaints process, which echoes the perspective of gymnasts and parents detailed above. One senior club employee said that when staff in their club raised occasional complaints about coaching methods, the coaches would make their lives very difficult, sometimes with the result that the staff would just leave. Despite their seniority, this individual felt unable to complain about one coach because at the time they were line managed by a relative of the coach in question.
1074. An individual who gave an enormous amount of time, voluntarily, to assist with gymnastics competitions said that judges and coaches demonstrating poor behaviour were never dealt with properly at a club level. In her experience this directly led to situations where aggressive and abusive communications from judges and coaches, sometimes in front of young children, were not called out as they were not considered worthy of complaint or concern. It was a metaphorical shrug which implied *'You know what X coach/judge is like'* and *'well you know we are going to have to deal with these people going forward so we don't want to upset them'*.
1075. The reasons why coaches did not complain about other coaches echoed those I heard from gymnasts and parents. Coaches reported to me that they were reluctant to complain due to a fear of repercussions and due to a lack of confidence in BG's management of complaints. Some anticipated a negative impact on their career, loss of BG membership and adverse treatment in the community towards themselves or gymnasts they coached. There were also instances where a line management relationship caused a coach to be reluctant or coaches felt that BG wouldn't be supportive and were unlikely to respond if they raised a complaint. Many of these coaches had themselves been gymnasts so it is not surprising that the same themes appeared in this group.
1076. Some sports science and sports medicine practitioners were nervous of raising concerns, in one instance consulting a psychologist in order to prepare themselves for having a difficult conversation with a senior

coach. In a couple of instances, sports science practitioners felt sufficiently anxious about raising concerns about coaching practices (around weight management and training on injury) with those in the sport, that they referred their concerns to an outside agency. At least one practitioner preferred to move job than to experience the consequences of complaining. I note, at this juncture, that gymnasts sometimes appear to have found it easier to confide in sports science practitioners than in coaches.³³ This is entirely understandable. However if the practitioners are not visibly respected, listened to and integrated, it has the potential to close down another avenue of communication for a troubled gymnast.

1077. If parents, other coaches and professional sports science practitioners, on occasion, felt real anxiety about the consequences of expressing concern about a coach, then it is unsurprising that gymnasts felt the same way.

1078. I understand that the factors for concerned parents, coaches and other professionals to consider before articulating a concern or complaints about another coach are challenging. However I was troubled by the number of adults who must have chosen not to complain or at least query certain issues despite knowing that the training environment was negative and risked having an adverse impact on their child, or another person's child. It is a difficult truth but acquiescence in abusive or otherwise inappropriate practices can cause or expose a greater number of gymnasts to more harm. Although in many cases I can understand the reluctance to raise concerns, such acquiescence serves only to increase the impunity with which a certain number of coaches act and perpetuates the underuse of available procedures, with all too obvious consequences.

Cultural Factors that Inhibited Complaints

1079. These identified reasons for not making complaints tie in closely with the overall culture of the sport as described in section at 4(a)(i). My examination of this culture between 2008 and 2020 enables me to form additional conclusions as to why sections of the community have felt unable to voice their concerns.

1080. A culture of excessive control and of fear and the tendency to deprive gymnasts of autonomy had a foreseeably stifling effect on the ability of gymnasts to articulate concerns or complaints. The fact that this culture also stifled the concerns of parents, other coaches and other professionals demonstrates the extent of the cultural issues in the sport during the period of Review. If adult bystanders, some in a position of trust, do not tackle, or do not feel able to tackle visible poor practice or abusive conduct, there is certainly no reason why a child or young person could feel confident enough to question or report it. The more observers there are of bullying or abuse, the less anyone will feel personal responsibility to act. This normalises abuse as well as implicitly excusing it in ways that inhibit complaint.

³³ The March 2021 Welsh safeguarding online gymnast forum revealed that gymnasts would think of confiding in the medical team.

These issues existed in certain gymnastics environments for too long. Participants in the sports, including parents, need to be educated about it.

1081. This is particularly important in gymnastics, which is an early specialisation sport and for BG, whose membership has a high proportion of young children. It is unrealistic, as I have explained, to expect young children or people to articulate concerns on their own behalf about influential adults who stand in positions of authority. Gymnasts need to operate in a space where they are comfortable about speaking honestly about their experiences. Whilst they need to have safe mechanisms for communicating concerns, the adults watching over them need to call out poor practice and the culpable coaches need to respond to concerns and complaints in a mature and responsible way. When Welsh Gymnastics asked gymnasts in March 2021 during an online safeguarding forum what would help them to speak up, the answers were as follows:

- a. Help to build gymnasts confidence (in themselves);
- b. Have an app to raise concerns;
- c. A way to do it anonymously if uncomfortable;
- d. Regular check ins;
- e. Posters to show who people are and what they do.

1082. Elsewhere in my report I have identified the very low levels of athlete autonomy and very high levels of coach autonomy that have been evident in gymnastics until recently. Gymnastics has not been alone in this historically, but it has been too slow to recognise it and to rebalance the athlete-coach dynamic, at all levels. Regrettably, I have concluded that low athlete autonomy has been maintained by some influential coaches and openly tolerated in the sport and it is a major reason why gymnasts have not felt the confidence to speak up for themselves. The excessive control displayed by some coaches was not necessarily intended to be detrimental to the gymnasts and in some cases, it was undertaken in an attempt to enhance performance. Either way, in some cases it had the effect of reducing confidence and reducing the likelihood of those gymnasts raising concerns with anybody, including their parents. One well-placed BG employee agreed that the lack of gymnast empowerment contributed to the gymnasts' inability to voice concerns about coaching practices.

1083. This lack of confidence is a foreseeable side effect of a sporting environment where gymnasts, and especially girls, commence their training when very young and are discouraged from any role in decision making. The gymnasts forge intense, protracted and quasi-parental relationships of dependence on just one coach who often stays with them right up to international competitions. They have little other life experience that enables them to see beyond the confines of the gym despite being in, albeit disrupted, full time education. This imbalance has been reflected in the tendency of some coaches to 'infantilise' a

gymnast by continuing to treat them like a child during their adolescence and even once they are over 18. All of this can sap the personal confidence of young people, unless their engagement with the sport is carefully managed. It is not surprising that many gymnasts of all ages have not felt comfortable with the idea of challenging or disagreeing with their coach. These are cultural factors that have also inhibited complaints being raised about the culture.

- 1084.** The personal style of some coaches has also been a direct barrier to the ability of gymnasts and parents to complain. This reflects the coach-led culture which has held that the coach is always right and knows best and, especially in WAG, that the gymnast is bound to do as told. Such a coaching philosophy stifles independence of thought and the confidence to speak one's mind in the training and competitive environment. This philosophy has been allowed to flourish within BG not only through a misplaced belief that it was acceptable and was required to achieve results but because the leadership within the organisation and in the performance programme did not do enough before 2020 to question and address it both with national and personal coaches. It is the task of a club and of BG to recruit suitably balanced, experienced and qualified coaches but regrettably this has not occurred as consistently as one would expect. This has been compounded by a failure, as described elsewhere, to challenge inappropriate coaching behaviour with the predictable consequence of deterring complaints about particular coaches. This failure in recruitment and failure to curb excessive coaching practices is probably due, in part, to insufficient competition. There are not enough senior gymnastics coaches with the necessary track records but it is also, probably, because the success of the gymnasts who were being coached, took priority over tackling poor practice.
- 1085.** It is also my view that the willingness of individuals to raise concerns and criticisms was probably impacted by the ways in which BG responded to criticism and concerns raised over the years. This is covered in [paragraphs 755 to 771](#) above. This defensive, non-transparent approach, together with the insular reputation of the organisation, was unlikely to provide reassurance that concerns would be openly received and considered, especially complaints about more senior coaches.
- 1086.** It is also worth observing at this point, that many clubs have long waiting lists and that this can make changing gym difficult. It seems to me that a gymnast or parent is much less likely to raise a complaint if there is no realistic alternative establishment to attend in the event that their complaint meets with a negative response or is not resolved to the satisfaction of all involved. They may be more inclined not to jeopardise their place at the gym by raising a concern. The Review received numerous submissions about the difficulties entailed in trying to move club. The high demand for coaches and places in clubs not only increases the power imbalance between gymnast and coach or club, but is also likely to discourage complaints about those coaches or clubs.

BG Perspective

1087. Several senior BG personnel that I spoke with, including Board members, past and present expressed bewilderment at the realisation that so many people had not thought to, or had chosen not to, complain at the time of the relevant conduct. Since 2020, the organisation has had time to reflect upon this. I am grateful to those individuals who, it seemed to me, had chosen to confront this issue head on in order to analyse it with a view to rectifying it.
1088. In terms of elite gymnasts, there was a general recognition that gymnast fears about of de-selection or non-selection overrode the ability or willingness to articulate concerns. The former CEO acknowledged that BG could have worked harder to ensure that appropriate steps were taken to make gymnasts feel comfortable about raising complaints or concerns without fear of retribution. She agreed that communications within the performance program could have been improved so as to enable gymnasts to voice concerns more readily and she felt that the Performance Director appointed in 2017 had been working to ensure that such communications did improve.
1089. BG now accepts in the light of the apparent reluctance of gymnasts to complain, that it should have asked itself wider cultural questions in this respect and there was recognition that a perception had existed that BG would not act effectively on complaints. There was also a recognition by BG that some abusive coaching behaviours had potentially become so prevalent and normal that participants did not recognise them as inappropriate or abusive. The Safeguarding Manager agreed that some gymnasts and parents were fearful of upsetting coaches. More generally there was some acknowledgement that inadequacies in the voluntary Welfare Officer system and in the complaints system meant that nothing happened when people broke the rules and that this would have inhibited complaints and reinforced coach behaviour. Importantly, there was an organisational recognition from those leading the organisation during this Review, that excessive disciplinarian coaching from a non-trivial number of coaches had occurred and had not been 'called out'.

Conclusions on 4(a)(iii)

1090. It can therefore be seen that the demonstrable reluctance of individuals to express concern or raise complaints is complex and bound up with specific characteristics of the sport, the power imbalance between coaches and gymnasts, compromised independence at club and executive level and inconsistent and ineffective complaints handling by BG. The historic culture of minimising the gymnasts' autonomy and in some cases, discouraging parental engagement, has played a significant role too. Each individual will have their own reasons for deciding to voice their concerns when they did and not sooner. In understanding some of the reasons why individuals felt unable to raise issues sooner, the sport now has an opportunity to start to address these and break down the barriers to reporting welfare concerns.

1091. On that note, in April 2022 UK Sport announced a new independent and complaints service pilot. Named 'Sport Integrity', the service is intended to create a safe space for concerns to be raised by athletes, coaches and support personnel within the Olympic and Paralympic high-performance community. It also provides an independent investigation process to deal with relevant allegations of bullying, harassment, discrimination, or abuse. Whilst this is obviously a progressive and welcome step, it remains at the time of drafting a pilot and its impact is unknown. I have therefore independently recommended that BG ensure that high-performance athletes have access to an appropriate independent disclosure service to enable them to raise concerns and complaints with confidence.
1092. I hope that this recommendation, together with the others made in this report, will be acted upon swiftly and that BG will continue its progress towards a more athlete-focussed culture.

Recommendation: The BG Board must assume responsibility for implementing these recommendations and publish at 6, 12 and 24 months the progress it has made to comply with the report's recommendations, by which time these recommendations should have been implemented.