

**LAWN TENNIS ASSOCIATION
INDEPENDENT REVIEW**

REPORT OF THE REVIEW PANEL

January 2019

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I. EXECUTIVE SUMMARY

1. On 30 June 2017 at Mold Crown Court a Lawn Tennis Association ('LTA') licensed tennis coach Daniel Sanders ('DS') pleaded guilty to a number of sexual offences committed against a young tennis player whom he coached while Head Coach at Wrexham Tennis Centre ('WTC'). On 26 July 2017 he was sentenced to a total of 6 years' imprisonment.
2. In December 2017 the LTA Board commissioned this independent review ('the Review') into events at WTC, principally regarding the activities of that former Head Coach. In doing so, the LTA Board determined that it was necessary to conduct this Review into the events leading from the time concerns were first raised about DS in 2012 up to his conviction.
3. Paragraph 9 of our ToR required us to *"ensure that any failings by the LTA [and WTC and Tennis Wales] at the relevant time are brought to light and to ensure that lessons are learned and similar failings are not repeated"*. We have identified those findings¹. In doing so, we have been careful not to judge with the benefit of hindsight. By way of example, we know that DS committed serious sexual offences against a child. That has not distorted our assessment of the evidence or of his conduct of that or other individuals at the time; nor has it influenced our findings.
4. The Review has been concerned principally with events in the environment of elite sport. All parents place a degree of trust in those they permit to coach their children. The investment of trust is obvious. It goes beyond the mere physical; it is also emotional. In elite or high performance sport it goes further. Potential careers, hopes, ambitions and dreams are put in the hands of coaches. Those may be realistic or illusory.
5. Players involved in the WTC High Performance Programme ('HPP') were not playing pastime tennis. It was elite sport. It was (and is) intense, as can be

¹ Designated by the capital letter 'F' and the appropriate number. For example, F1.

the pressure upon participants. The demands on the players are significant. It is very competitive. The pressure for success is greater. The time spent together by players and coaches is considerable. The relationships necessarily become close. Coach and player invest considerably in each other. Trust is - or should be - at the heart of it. The balance of power lies very obviously with the coaches. As Baroness Grey-Thompson observed:

"it was often difficult to challenge the programmes that they were in, and hard to know where to go if they want to make a complaint about behaviour. It was also clear that people did not want to be seen to be causing trouble or jeopardise their sporting career, and felt they had little power to bring about change. Many reported that bullying behaviour could at least sometimes be the 'norm' in sport, and that they felt that they just had to 'get on with it'..."².

6. Just as there is trust, so there are responsibilities. There are pressures and demands on coaches. It is not easy to deal with such demands, including any unrealistic, unfulfilled and unfulfillable ambitions of players and/or parents. Difficult messages have to be delivered.
7. In that elite environment the safeguarding risks are more pronounced. It was in this environment that DS offended, repeatedly. It is in such environments that we must all be alert to the risk of abuse. Not just sexual but of all kinds of abuse, including emotional. WTC, TW and the LTA all missed opportunities to tackle safeguarding concerns brought to their attention. As one insightful contributor observed:

"If I was asked to make recommendations I would say that steps should be taken with the culture of performance tennis to ensure safeguarding is the first priority and performance tennis is second."

8. We have not set out in unnecessary detail the significant volume of documents and evidence gathered from witnesses by investigators. It would not be helpful to rehearse the thousands of pages of evidence we have considered. This Report is the product of our careful analysis and consideration of it all.

² *Duty of Care in Sport*, April 2017, pp20-21

9. In broad summary, we have concluded that in 2012 WTC failed properly to address a number of complaints about the behaviour of coaches at the Centre, including DS. In large measure that was because it embarked upon an investigation when it should not have done; that internal investigation was fundamentally defective; and it was undertaken by people with insufficient safeguarding experience and skills for the task. The resulting report ('2012 WTC Report') and the analysis thereof were also seriously flawed. In 2012, and during the subsequent years covered by this Review, there is further evidence of repeated failures at WTC to act and deal appropriately with additional complaints about the behaviour of coaches, including DS.
10. Further, and again in broad summary, we have concluded that Tennis Wales ('TW') failed to recognise the safeguarding concerns that should have been evident in the 2012 WTC report. Thereafter, and over subsequent years, TW failed properly to oversee WTC.
11. The LTA also failed to investigate the risks that should have been evident to them both from the 2012 WTC Report and from other information; and to initiate appropriate proceedings against DS. In the subsequent years there were further failures to react sufficiently to further complaints and disclosures emanating from, or relating to, WTC and to manage properly the LTA's 2012 Action Plan.
12. We cannot now say whether the subsequent serious sexual assaults carried out by DS in 2016 and 2017 would have been prevented by more detailed and thorough investigations in 2012, 2013 and/or 2014. Our firm conclusion is that there was sufficient evidence available before 2016 to merit stronger action being taken against DS. Once more, we cannot say that action would have removed DS from the sport before he offended.
13. We should make this point clear. DS did not contribute to the Review. Some of what we record in this Report is what people allege against him. We do not know what DS says about such allegations. Save where the contrary is indicated, such alleged behaviour has not been admitted by, nor proved against, him. We have made no factual determination as to the truth of such allegations.

14. Paragraph 3 of the Review's Terms of Reference ('ToR') states that the *"emphasis of the Review is to learn from the facts surrounding this incident to ensure that any failings are not repeated and that safeguarding arrangements in tennis are strengthened as a result"*. Before the Review, the LTA sought advice from leading counsels and commissioned a safeguarding audit of WTC by Gill Camina, Universal Safeguarding Solutions ('the Camina Review'). The LTA has acted expeditiously and commendably in response to each.
15. Following these recent safeguarding changes implemented by the LTA, we are confident that if DS's 2012 case arose today, it would be handled differently and more effectively by the LTA Safeguarding Team. With its new processes (including a new case management system), policies and resources the LTA Safeguarding Team is – in our judgement - much better placed to deal with such cases. In consequence our recommendations³ are, necessarily, few.
16. We acknowledged and express our gratitude to the contributors who cooperated in this Review and to the LTA, particularly the Commissioning Team and the present LTA Head of Safeguarding.
17. In more detail, and in the Chapters in which they appear hereafter, we have reached the following findings and make these recommendations.

FINDINGS

Chapter 2012

WTC

F1: The WTC Board should have referred the former coaches' complaints to the LTA immediately.

F2: The 2012 WTC Investigation into the former coaches' complaints should have been carried out independently of WTC.

³ Designated by the capital letter 'R' and the appropriate number. For example, R1.

F3: The WTC directors appointed by the WTC Board to carry out the 2012 Investigation into the former coaches' complaints did not possess the necessary skills and experience.

F4: The 2012 WTC investigation into the former coaches' complaints lacked appropriate focus and direction.

F5: The 2012 WTC investigation into the former coaches' complaints failed to consult sufficiently widely.

F6: The methodology employed in the 2012 WTC investigation into the former coaches' complaints was flawed.

F7: The 2012 WTC investigation into the former coaches' complaints failed to discover and/or act upon information which was disclosed, or should have been discovered, at the time.

F8: WTC failed to address serious issues raised during its 2012 investigation and thereafter.

F9: The 2012 WTC Report and the analysis thereof were seriously defective.

F10: The 2012 WTC Board failed to take sufficient action in respect of the findings in the 2012 WTC Report and the other available information.

TW

F11: TW acquiesced in the decision of the WTC directors to conduct an internal investigation when it should not have done.

F12: The WTC 2012 Report should have been made available to all TW Board members.

F13: There was no clarity as to TW's responsibility to superintend WTC and to monitor the LTA Action Plan.

LTA

F14: The LTA's decision not to pursue safeguarding proceedings against DS was erroneous.

F15: The LTA's decision not to pursue Misconduct proceedings against DS was incorrect.

F16: There were failures by the LTA in the handling and processing of FP2's disclosures.

F17: The LTA failed sufficiently to monitor its 2012 Action Plan.

F18: The LTA reacted inadequately to VB's July and September 2012 letters.

Chapter 2013/14

LTA

F19: The LTA's response to the anonymous letter dated 7 May 2013 was insufficient.

F20: The LTA's response to Dr Carwyn Jones's referral was inadequate.

F21: The LTA's response to the 12 March 2014 letter was deficient.

F22: There was a failure by the LTA Safeguarding Team to see the cumulative picture at WTC during 2012-2014 and act accordingly and appropriately.

WTC

F23: WTC directors failed to react appropriately to continuing

complaints about the conduct of coaches and the 'coaching culture' at the Centre.

TW

F24: TW failed to follow up the Dr Carwyn Jones referral with the LTA.

F25: TW failed adequately to superintend WTC after the 2012 WTC Report.

F26: There was a failure properly to share safeguarding information about WTC across the whole TW Board.

2015-17

WTC

F27: WTC failed to do more to ensure the tournament visits involving DS and the player were conducted in accordance with LTA Guidance on Supervising, Travelling and Overnight Trips.

F28: WTC failed to notify the LTA about the fact a convicted (child) sex offender was using the facilities at WTC.

F29: WTC failed to record what steps were taken in relation to the use of facilities at WTC by that convicted (child) sex offender and the risk assessment that underpinned that decision.

F30: WTC failed to engage with other agencies such as the police in relation to the use of facilities at WTC by that convicted (child) sex offender

RECOMMENDATIONS

Chapter 2012

R1: In future, safeguarding matters of this nature should be referred immediately over to the LTA.

R2: The biannual LTA audits of HPCs should be multi-departmental including reviews of both performance and safeguarding.

Chapter 2015-2017

R3: WTC, TW and the LTA should work together to ensure that all children who were coached in the high performance/elite programme at WTC during 2012-2017 are contacted and offered such specialised support and assistance (such as counselling) as they reasonably require.

R4: So far as its high performance programmes are concerned, the LTA should reflect on its present policies and ensure that they are consistent with the 'Theme 5 Safeguarding Recommendations' in the *Duty of Care in Sport Report, 2017*.

R5: Tennis clubs, counties (including TW) and the LTA should monitor and ensure that all activities, tournaments and trips to events are conducted in accordance with the LTA's 2018 Safeguarding at Events and Competitions Policy.

Chapter 2017-2018 Developments

LTA

R6: The LTA should devise and make mandatory a form of online or in-person safeguarding training at a level suitable for all persons at tennis clubs who either work with children or are responsible for persons who work with children. For the avoidance of doubt that

would include board members.

R7: The LTA should consider the Safeguarding Policy's content with a view to making it more accessible and easy to engage with for children and young people or to issue a policy entirely for that constituency.

R8: The LTA should review whether it has sufficient 'child friendly' resources designed to encourage children/young people to disclose and report concerns. Such a review would include consideration of its website and social media.

R9: The LTA should review and ensure that the present and future provision for training and development of the members of its Safeguarding Team and Safeguarding and Protection Committee is sufficient.

R10: LTA and TW continue to work to achieve clarity as to TW's precise safeguarding duties and responsibilities.

R11: The LTA should review how it records the low-level concerns that do not meet the threshold for 'MyConcern'.

TW

R12: TW should forthwith consider making the Safeguarding Officer role a full-time position.

R13: TW should forthwith review and update as appropriate its safeguarding policies in light of the LTA's 2018 safeguarding policies and the content of the safeguarding page of its website more generally.

R14: TW should have a clearly identified link to the LTA safeguarding page on the page of its website.

WTC

R15: All accredited tennis clubs including WTC should adopt the LTA's Safeguarding at Events, Activities and Competitions 2018 policy immediately.

R16: Individuals at WTC (and all accredited clubs) with designated safeguarding responsibilities should complete successfully both online and face-to-face safeguarding training.

LTA/TW/WTC

R17: Children and parents upon obtaining British Tennis membership, should receive an information sheet which includes details of (1) where they can find online the LTA and local (i.e. club county and TW or TS) safeguarding policies, (2) the identity and contact details of the LTA regional safeguarding officer and (3) the identity and contact details of their club welfare/safeguarding officer.

II. TERMS OF REFERENCE

Terms of Reference relating to Independent Inquiry into events at Wrexham Tennis Centre

General

1. The Board of the Lawn Tennis Association (LTA) is commissioning an independent review (the Review) into events at Wrexham Tennis Centre (WTC) between approximately 2012 and April 2017 regarding the activities of the former Head Coach of WTC, Daniel Sanders (DS). DS, an LTA accredited coach, was sentenced to six years in prison in July 2017 for the sexual abuse of a child he was coaching. Warning signs regarding the behaviour of DS appear not to have been acted upon and, as a result, the LTA issued an apology.
2. The LTA is committed to adopting best practice in safeguarding within sport and continually reviews its approach. Over the last 12 months this has included commissioning an independent review by Adam Lewis QC (October 2016) into the operation of the disciplinary, licensing and safeguarding processes and an independent review by Gemma White QC (February 2017) into its safeguarding processes and procedures based on specific case reviews. Specifically regarding WTC, the LTA commissioned an independent audit of the centre by Gill Camina, Director Universal Safeguarding Solutions Ltd in response to the arrest of DS (march 2017). In June 2017, the LTA appointed a new Head of Safeguarding with significant experience in child protection. In July the NSPCC confirmed its green rating of the LTA safeguarding arrangements.
3. The LTA Board has determined that it is necessary to conduct a further independent review into the events leading up to the conviction of DS from the time concerns were first raised in 2012. The emphasis of the Review is to learn from the facts surrounding this incident to ensure that any failings are not repeated and that safeguarding arrangements in tennis are

strengthened as a result.

Background

4. Wrexham Tennis Centre (WTC) is a community indoor tennis centre (CITC) based in Wrexham, North Wales. It is run by Wrexham Tennis Centre Ltd, a charitable company limited by guarantee, which leases the building from Wrexham County Borough Council supported by a management agreement between the two organisations. With seven full size and two mini indoor and seven outdoor courts, it is a significant tennis facility in the region. Tennis Wales, and other external organisations rent office space at the centre.
5. WTC currently receives no direct financial support from the LTA. Between 2009 and 2014 it received some funding from the LTA towards the costs of running an LTA High Performance Centre at the venue. From January 2015 until mid-2017, WTC received a smaller level of funding as an LTA grant funded centre, with the purpose of that funding being to support the development of performance tennis and players at the venue. Since mid-2017, this funding has been given directly to Tennis Wales to manage the performance funding relationship with WTC. This arrangement ends on 31 December 2017.
6. As a CITC, WTC also receives a range of support available to CITCs across the country. This includes business development training, attendance at national conferences and promotional initiatives co-ordinated centrally by the Tennis Foundation, a separate tennis charity.
7. Tennis Wales is the national governing body of tennis in Wales and works to grow the game and support talented players. It has three main funding partners in Sport Wales, the LTA and the Tennis Foundation. Tennis Wales has its own Safeguarding Lead but is supported by the central LTA safeguarding team.
8. There are 15 self employed coaches at WTC. DS was a Level 5 Master Performance Coach and held the position of Head of Coaching. All coaches at WTC are accredited by, and subject to the jurisdiction of the LTA. Accreditation requires coaches to complete a DBS.

Purpose / Objectives

9. The overriding objective of the Review is to ensure that any failings by the LTA at the relevant time are brought to light and to ensure that lessons are learned and similar failings are not repeated. In particular the Review will:
 - a. Consider and identify what steps the LTA, and where relevant Tennis Wales and WTC took to address safeguarding/child protection issues at the Centre between 2012 and the conviction of DS in June 2017, and to consider any failure to act appropriately in relation to allegations made (at any level).
 - b. Consider and identify what lessons can be learned by the LTA, and as appropriate Tennis Wales and WTC arising out of the investigations
 - c. In light of 9(a) and 9(b) provide recommendations for improvements that should be made to safeguarding procedures within the LTA and, as appropriate, across the sport.

Agreed Principles

10. The Review, whilst commissioned by the LTA will be completely independent and its conclusions and recommendations will be theirs alone.
11. The Review should have access to all the materials it seeks, including copies of the previously commissioned reviews and audits. Where any material is not in the possession of the LTA , the LTA will take all reasonable steps to try and obtain such material in support of the Review.
12. The Review recognises that WTC is an operational tennis centre and it will seek to minimise unnecessary disruption as it conducts its investigations.
13. The Review will endeavour not to cause further distress or publicity to the victim involved in this case.

14. The Review will not cover any areas where the LTA, Tennis Wales or WTC does not have jurisdiction but in the event information comes to light of further offences or safeguarding concerns such information will be passed on to the local authority and, where appropriate, the Police.
15. The Review will refer any potential regulatory breaches relating to accredited coaches or matters within the jurisdiction of the LTA or Tennis Wales to the LTA or Tennis Wales who will take appropriate action.
16. These Terms of Reference may be amended by mutual agreement between the Review Panel and the LTA Commissioning Team.
17. The Review will be conducted in such a way as to be as transparent as is possible within the scope of these terms of reference whilst having regard to all the relevant duties of confidentiality, security and data protection protocol. The LTA will make the final report publicly available. The Review will decide what should be published and will liaise with the LTA Commissioning Team on timing and content, along with other appropriate authorities, bodies and enforcement agencies.
18. The Review is keen to talk to individuals who have been directly or indirectly involved with, or affected by, the events at WTC. The existence of the Review, and its terms of reference will be available on both the LTA and the Sport Resolutions UK website which will detail how contact with the Investigating team can be made. All LTA employees and directors will be required to assist the Review if requested to do so, and the LTA will support the Review to encourage other individuals not employed by the LTA to do the same.

Responsibility for the Inquiry

19. **Sport Resolutions UK:** Sport Resolutions UK will select and appoint the Review Chair, two further members of the Panel as well as independent investigators to conduct the Review and produce a report based on the agreed Terms of Reference. Sport Resolutions UK will also provide the administrative support to the Panel and the independent investigators.

20. **Commissioning team:** The LTA has appointed a Commissioning Team of two LTA non-executive board directors (one independent and one Council-elected) to:
- a. Agree the Terms of Reference;
 - b. Ensure that there are no conflicts of interest on the Panel or the Investigators;
 - c. Meet with the Chair monthly or as agreed;
 - d. Answer specific questions regarding the structure and operation of tennis and the LTA, and
 - e. Comment on the final draft report for points of factual accuracy or potential misunderstanding.
21. **LTA Board:** The LTA Board will fund the Review, receive the final report and take appropriate actions regarding the findings and recommendations of the Review. The final report will be shared with Sport England, Tennis Wales and WTC, before publication.
22. **Review Panel:** The Panel is to consist of three members including the Chair and will:
- a. Work to the Terms of Reference;
 - b. Provide monthly updates to the Commissioning Team; an
 - c. Produce a final report detailing their findings and recommendations for the LTA Board.
23. **Independent Investigator(s):** The independent investigator(s) will:
- a. Work to the Terms of Reference;
 - b. Gather evidence in relation to this matter (including, but not limited to, conducting interviews with relevant individuals);
 - c. Produce such evidence, together with a report of the same, for the

consideration of the Panel.

24. **Timetable:** The Review will commence immediately. It is accepted that no final date can be agreed at this stage given the time it will take to recall files for review and to locate and interview all those relevant people to the Review some of whom no longer work at WTC.
25. **Confidentiality:** The LTA, Tennis Wales, WTC, the Review Panel, the Independent Investigators and Sport Resolutions UK procure to keep confidential all confidential information disclosed as a result of this investigation and shall not use or disclose the same save as provided in these Terms of Reference or as required by law. The parties shall only disclose such confidential information to those of their respective employees, consultants or agents who need to know it for the purposes of these Terms of Reference provided that the recipient of such information is bound by obligations of confidentiality no less onerous than provided herein and each party shall be responsible to the other in respect of any disclose to such a person. The obligations of confidentiality shall not extend to any matter which is in, or becomes part of the public domain.

December 2017

III. METHODOLOGY

A. The Review Team

1. Pursuant to paragraph 19 of the ToR, Sport Resolutions UK ('SRUK') an expert, independent, not-for-profit, dispute resolution service for sport in the UK, selected and appointed the Review Chair, the Review Panel ('the Panel'), and the Independent Investigators to conduct the Review and produce this Report. SRUK also provided the administrative support, both to the Panel and to the Independent Investigators.
2. The original composition of the Panel included Lisa Wilkins. In light of her knowledge of a former employee of the LTA who contributed to the Review, we decided that she should stand down. She did, and for the substantive part of our work was replaced by Ian Wilson.
3. Therefore, for the vast majority of the time the Panel comprised (in alphabetic order after the Chair):
 - a. Christopher Quinlan QC, Chair
 - b. Jane Aldred
 - c. Ian Wilson
4. The Review Panel was supported by Independent Investigators Keith Eldridge and Peter Keen.

B. Evidence Gathering Process

5. The Review process comprised essentially two elements. First, consideration of documentary materials. A complete list of all the many and voluminous documents considered is set out in Appendix 4. The documents ran to in excess of 3000 pages. In summary, they included:
 - a. Contemporaneous material and documentation concerning the 2012

WTC investigations.

- b. WTC procedures, policies and codes of conduct, including those relating to safeguarding and to coaches.
- c. LTA polices, including safeguarding procedures 2011-2018 and disciplinary codes.
- d. WTC Board meeting minutes, including from 2012.
- e. TW Board meeting minutes, including from 2012.
- f. Relevant correspondence including during the period 2012-2017.
- g. The Camina Safeguarding Review of WTC, 31 May 2017 ('the Camina Review').
- h. Training documentation.
- i. Previous reviews of LTA safeguarding procedures.

6. The second element involved gathering contributions from individuals, including those directly involved with or affected by the events at WTC during 2012-2017. Paragraph 18 of the ToR states:

"The Review is keen to talk to individuals who have been directly or indirectly involved with, or affected by, the events at WTC. The existence of the Review, and its terms of reference will be available on both the LTA and the Sport Resolutions UK website which will detail how contact with the Investigating team can be made. All LTA employees and directors will be required to assist the Review if requested to do so, and the LTA will support the Review to encourage other individuals not employed by the LTA to do the same."

7. The Review followed that method. Potential contributors were identified in the following ways:
 - a. From the LTA's initial list of 39 individuals associated with WTC, TW and the LTA who might be able to assist.
 - b. From an analysis of relevant documentation provided by the LTA and

other bodies.

c. As a result of articles on the LTA and SRUK websites, inviting people to come forward to assist the Review if they wished to do so.

8. A total of 143 potential contributors were thereby identified. They were classified as follows:

a. Current coaches, present and former staff at and directors of WTC.

b. Service users of WTC, including current and former players and their parents.

c. Present and former TW Board members and staff.

d. Present and former LTA staff and committee members.

e. Those who came forward as a result of the website invitations.

9. Of the 143 identified persons, it was impossible to trace only 5. All 138 were contacted. Of that number, 101 replied. Of the 101, 77 made contributions in the form of interviews and/or statements. Of the remainder, 14 completed a questionnaire and 10 declined to contribute. DS is a serving prisoner. Attempts were made to contact DS using HMP Prisoner Location Service, but no response was received.

10. Contributions were received either through direct interview, by telephone or by video conference call. A questionnaire was utilised to make contact with the potential contributors whose role or position was already identified. These contributors were invited to provide any additional information they wished to. They were offered an interview, if they wished. The Panel did not interview any of the contributors, save that the Chair interviewed David Humphrey, the present LTA Head of Safeguarding ('HoS').

11. Some of the contributors are listed as consultees in Appendix 3, either by name or by position they occupied at the relevant time. A total of 77 interviews were conducted and statements produced. Some contributors were interviewed on a second occasion, either by request or because the investigators considered they may be able to provide further assistance in

respect of information gathered during the inquiry.

12. Interviews with contributors were conducted by appointment, and always in a private setting. Each contributor was told in advance the ToR and the matters which would be discussed. Those interviews were recorded audibly (where possible) and otherwise in writing. The interviews were bespoke, chronologically based and not formulaic in content or approach.
13. The notes or recordings were reduced to statements, which were provided to the consultees for agreement or correction and subsequent approval. Once approved the statements were signed by the contributor. They have been preserved, together with recordings and notes.
14. From that process, the Panel produced this report to the LTA in accordance with paragraph 9 of the ToR, namely:

"The overriding objective of the Review is to ensure that any failings by the LTA at the relevant time are brought to light and to ensure that lessons are learned and similar failings are not repeated. In particular the Review will:

- a. Consider and identify what steps the LTA, and where relevant Tennis Wales and WTC took to address safeguarding/child protection issues at the Centre between 2012 and the conviction of DS in June 2017, and to consider any failure to act appropriately in relation to allegations made (at any level).*
- b. Consider and identify what lessons can be learned by the LTA, and as appropriate Tennis Wales and WTC arising out of the investigations*
- c. In light of 9(a) and 9(b) provide recommendations for improvements that should be made to safeguarding procedures within the LTA and, as appropriate, across the sport."*

15. Paragraph 17 of the ToR provides:

"The Review will be conducted in such a way as to be as transparent as is possible within the scope of these terms of reference whilst having regard to all the relevant duties of confidentiality, security and data protection protocol. The LTA will make the final report publicly available. The Review will decide what should be published and will liaise with the LTA

Commissioning Team on timing and content, along with other appropriate authorities, bodies and enforcement agencies.”

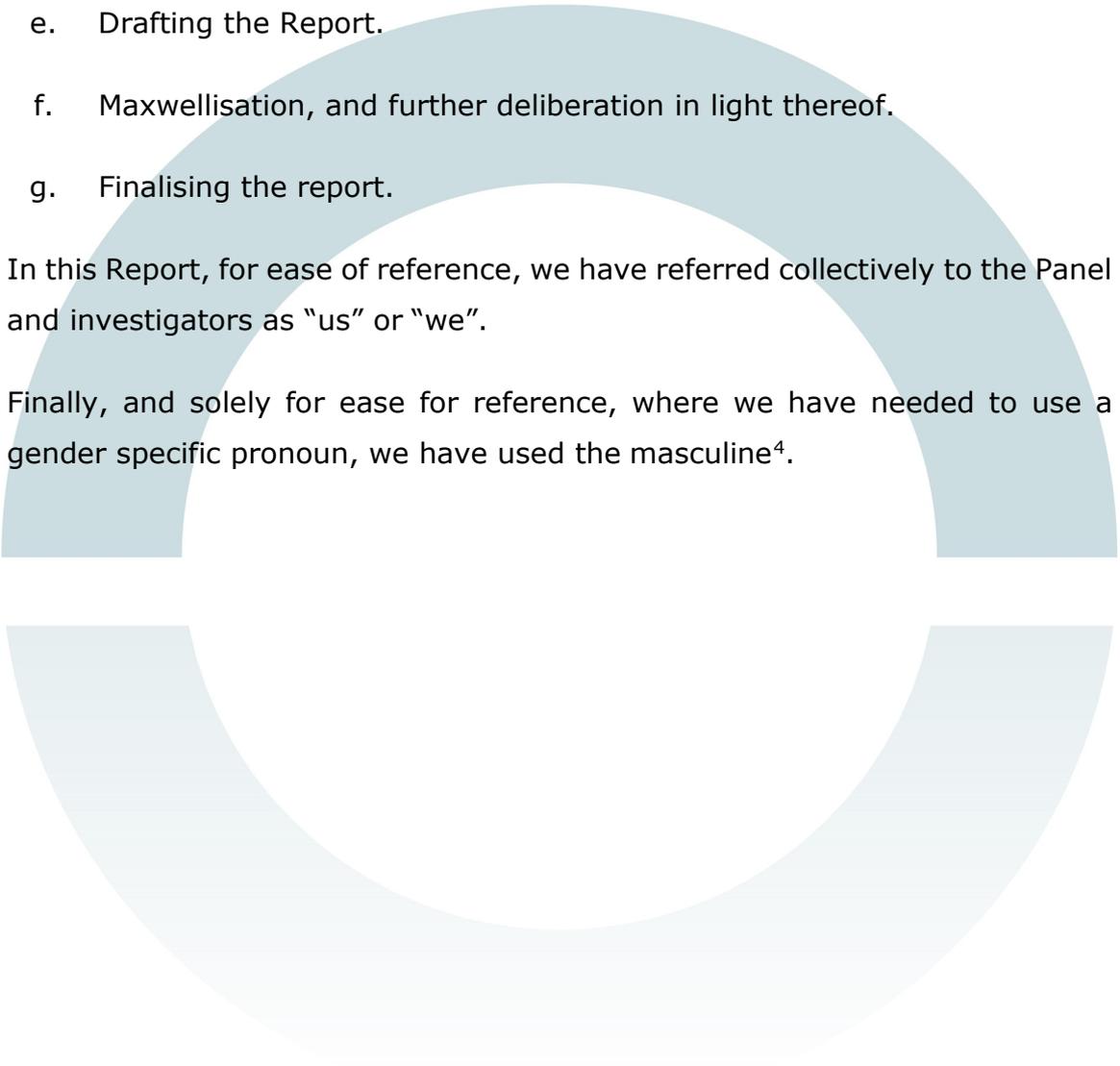
16. Consistent with that, the Panel has acceded to requests for, or otherwise decided upon, anonymity, where we have deemed it necessary or appropriate. For those reasons not all of the contributors are listed by name in Appendix 3. The LTA's intention is to publish this Report. We have not identified by name those we have criticised. We see no need to name them publicly. The relevant institutions and those affected know who they are. In those circumstances we have referred to them by the position they held at the relevant time. In such circumstances we have used letters (not initials) and numbers. The methodology is further explained in the text as and when it arises. We have adopted the same approach where we have deemed it inappropriate or undesirable to name a person publicly, such as an actual or alleged victim of inappropriate conduct. For similar reasons we have redacted (in the published version) parts of Appendix 4.
17. Prior to its finalisation and publication, the draft Report underwent a confidential process known as 'Maxwellisation'. It is a confidential procedure whereby certain persons and parties ('the relevant parties') were provided with a draft Report for their comments prior to its finalisation. Those comments were limited to points of alleged factual inaccuracy or, as applicable, draft criticisms about which those relevant parties had not already been given a reasonable opportunity to address.
18. The Panel in consultation with SRUK considered the practical process to be adopted for Maxwellisation. There is an obvious need to balance, on the one hand, a fair opportunity to respond and, on the other hand, adopt reasonable safeguards to ensure that the draft Report could not be disseminated, copied or saved and, therefore, increase the likelihood of confidentiality breaches. The Panel and SRUK adopted this approach:
 - a. All relevant parties for the purposes of Maxwellisation would be required to sign a written non-disclosure agreement as a pre-condition to receiving the draft Report.
 - b. Upon doing so, each relevant party was entitled to choose at their liberty

a convenient 4-hour time-slot (during a defined 2-week window) to read the draft Report in electronic form.

- c. That draft Report was water-marked with the relevant recipient's name on each page and was labelled " private and confidential" diagonally across each page.
- d. The nature of the computer package used to serve that draft Report on relevant parties prevented the draft Report from being forwarded, copied, or saved.
- e. After the 4-hour period elapsed, the electronic draft Report would no longer be accessible.
- f. A hard-copy of the whole draft Report was available for supervised reading at all times during a defined 2-week window at the offices of SRUK.
- g. All relevant parties were entitled to read the draft Report, in either electronic and/or hard-copy form. All relevant parties were asked to provide any responses in writing to SRUK, for forwarding onto the Panel, within that defined 2-week window that the draft Report was ready for review.
- h. The Panel read and considered carefully all the responses received as part of the 'Maxwellisation' process and where accepted, reflected those in the final Report.

19. Paragraph 24 of the ToR correctly recognised that *"given the time it will take to recall files for review and to locate and interview all those relevant people to the Review some of whom no longer work at WTC" that "no final date can be agreed"* by which the final report would be published. That proved wise. Indeed, those were not the only factors which contributed to the time necessarily taken in gathering the evidence, drafting and finalising this Report. In no particular order, those included:

- a. The number of individuals who contributed to the Review.

- 
- b. Interviewing the contributors.
 - c. Reading and considering the relevant documentation.
 - d. Deliberations, including assimilating, digesting and considering the material, including conflicting evidence.
 - e. Drafting the Report.
 - f. Maxwellisation, and further deliberation in light thereof.
 - g. Finalising the report.
20. In this Report, for ease of reference, we have referred collectively to the Panel and investigators as “us” or “we”.
21. Finally, and solely for ease for reference, where we have needed to use a gender specific pronoun, we have used the masculine⁴.

⁴ Unless the present occupant is female.

IV. BACKGROUND

A. LTA

1. The LTA is the National Governing Body for tennis in Great Britain, Channel Islands and the Isle of Man. It is not a public body but does receive some public funding. Its constitution is set out in its Articles of Association.
2. It is responsible for developing and promoting the sport while safeguarding the integrity of tennis. According to its website, it aims to do so through:
 - a. Building partnerships in the community;
 - b. Supporting tennis clubs and venues; and
 - c. Growing participation among children and young people.
3. The LTA's mission is to "*get more people playing tennis, more often*"⁵.
4. There are three relevant aspects to its governance structures: (i) the Council (ii) the Board and (iii) the LTA's Executive Team. The LTA Council is made up of a representative from each English county, from Tennis Scotland ('TS') and from TW, as well as other organisations involved in tennis.
5. The LTA exercises disciplinary, licensing and safeguarding functions. The relevant, current rules and regulations governing the disciplinary, licensing and safeguarding procedures are contained in:
 - a. the Articles of Associations;
 - b. the May 2018 Rules; and
 - c. Its Disciplinary Code ('the Code')⁶.
6. It exercises those functions through, *inter alia*, its Disciplinary Panel, the Safeguarding & Protection Committee ('SPC'), and the Licensing and

⁵ LTA website

⁶ Effective 21 May 2018

Registration Committee ('LRC').

(1) Safeguarding

7. The LTA safeguarding procedures are set out in Appendix 2 to the Code ('Appendix 2'). As is clear from Appendix 2, the LTA retains jurisdiction for dealing with safeguarding matters in the sport. It exercises that jurisdiction and complies with its responsibilities through its Strategy⁷ and relevant policies and procedures.

8. The introduction to Appendix 2 starts with this observation: "*The LTA has a duty of care to ensure the safety and welfare of children, young people and adults at risk. This is recognised in the LTA Safeguarding Policies*". It continues thus:

"The LTA's duty towards children, young people and adults at risk has moral, ethical, contractual and statutory elements. The LTA adheres to current legislation including but not limited to: the Children Act 1989 and 2004, the Protection of Freedoms Act 2012, the Safeguarding Vulnerable Groups Act 2006, the Mental Capacity Act 2005, the Care Act 2014 and the Equality Act 2010.

In particular, for children and young people, the statutory guidance Working Together to Safeguard Children (HM Government, 2015) places clear requirements on sports' organisations to deliver high quality work with children, and to have in place rigorous safeguarding procedures and guidelines."

9. By Section A of Appendix 2, a safeguarding case is defined as "*a matter which is deemed by the [HoS] to raise concerns about a child, young person or adult at risk, which decision is not overruled by the SPC*". The SPC is the Safeguarding and Protection Committee. It did not exist in 2012.

10. The 2018 Code defines "*Child Protection*" thus: "*any matter or circumstance that triggers the LTA's duty to protect against any act, statement, conduct,*

⁷ LTA Safeguarding Strategy 2018-2020.

omission or other matter by a person under the LTA's jurisdiction which harms a child or poses or may pose a risk of harm to the child". The 2012 Code used the same definition. Harm is not defined in either 2012 or 2018 codes. For the purposes of the Codes a child is a person under 18 years of age. We have adopted that definition.

11. As the present LTA Safeguarding Policy makes clear, harm is not limited to just physical injury or sexual abuse. It includes emotional and mental harm, as well as neglect. That derives from the NSPCC Child Protection in Sport Unit ('CPSU') advice, namely that there are 4 main types of abuse: neglect, physical abuse, sexual abuse and emotional abuse. Children and young people can also be harmed through poor practice and bullying within a sport setting. When we use the term 'safeguarding and child protection' ('SGCP') issue/s in this Report, we mean conduct which does or may cause harm within this wider meaning.
12. By way of example, emotional abuse in sport may occur if a child is subjected to constant criticism, name-calling, sarcasm, bullying, racism or pressure to perform to unrealistically high expectations; or when their value or worth is dependent on sporting success or achievement. It is noteworthy in the context of the evidence we have considered, that of poor practice, the CPSU says this: *"poor practice is potentially damaging to the individual, the organisation and to children who experience it. For example, coaching with alcohol on the breath, smoking, swearing in front of children, or not paying due care and attention to participants all constitute poor practice"*.
13. An emerging theme from our analysis of the evidence is a poor understanding of risk and of what does or may amount to a SGCP issue; and the wider meaning and true ambit of the meaning of harm. In our view, this limited appreciation was not an insignificant factor in the limited and erroneous conclusions following the investigations in 2012.
14. The LTA has a duty to deal with all complaints and concerns about persons within its jurisdiction which raise protection issues about children, young people or adults at risk. All such safeguarding cases shall be dealt with in accordance with the procedure in Appendix 2 ('the Procedure').

15. The Procedure under the 2018 Code is materially different from the one provided by the 2012 Code. Common to each is that the procedures provide for different levels of cases. In 2012 the LTA Child Protection Team had responsibility for supervising its safeguarding procedures, dealing with general safeguarding queries and low level ('Level One') cases. The Safeguarding Manager⁸ ('SM') was responsible for, *inter alia*, identifying and taking forward more serious cases ('Level Two' and 'Level Three' cases) and presenting them to the other more senior decision-making bodies. The SM also carried out internal investigations, alongside the Safeguarding Team. Under the 2018 Code, the SM has been replaced by the HoS.
16. Level Two cases were referred to the Case Management Group ('CMG'). The CMG was appointed by the Board to act as "*final arbiter of whether or not a particular matter is to be treated as a Safeguarding Case*"⁹. It comprised a minimum of eight individuals, all employees of the LTA, with specialist skills and expertise, although not necessarily safeguarding. Schedule 1 to Appendix 2 of the 2012 Code set out the terms of reference for the CMG, including membership. We have looked at the membership, which includes senior executives with responsibility for registration and licensing, officiating and education. With respect, we question whether this broad spectrum of knowledge, expertise and skills was sufficiently specialist for the particular nature of safeguarding. It is noteworthy that under the 2018 Code, the CMG has gone; such cases now fall under the remit of the HoS and the SPC. Indeed, we were told that from about 2013 the LTA no longer convened the CMG, cases instead being considered by the SPC.
17. The CMG had the power to do any of the following in Level Two cases:
- a. Instruct the SM to apply for an interim suspension of the coach/ coaching assistant/official's licence, registration, or accreditation or impose an interim suspension from Tennis Activities in accordance with Schedule 3;
 - b. Instruct the SM to carry out an investigation into the case;

⁸ Now HoS

⁹ 2012 Code, Section C, §3.2

- c. Require the SM to appoint an external investigator to carry out an investigation into the case;
 - d. Refer the case directly to the Child Protection Committee ('CPC'), for determination;
 - e. Require the SM to seek advice in relation to the case from external advisers, such as the Child Protection in Sport Unit of the NSPCC; or
 - f. Where a case was considered by the CMG not to be a safeguarding case, refer the case to the relevant LTA Committee or Panel; or
 - g. Declare that no further action is necessary¹⁰.
18. Level 3 cases were those which could lead to sanctions being imposed on the individual. The CPC considered Level Three cases. Its composition, proceedings and powers were set out in Schedule 2 to Appendix 2 of the 2012 Code. The CPC comprises a suitably qualified individual to act as Chair and a minimum of five further persons to serve as members of a Committee established to consider safeguarding cases. The CPC Chair has the power to invite a lawyer independent of the LTA to act as adviser to the CPC. Its procedure was usually based on written submissions and documentation although it could invite an individual to attend a meeting¹¹. There was a right of appeal from its decisions, governed by the procedure in Schedule 4 to Appendix 2.
19. The 2018 Code simplifies the Procedure. It summarises the procedure thus:
- "There are two levels through which a Safeguarding case may progress. These Procedures allow the LTA (either through the Safeguarding Team (via the HoS), or the SPC) to take the view that a case has been satisfactorily resolved at Level One or Level Two. All Safeguarding cases which could lead to sanctions being imposed on the individual concerned shall progress to Level Two. The HoS may escalate a case to Level Two should s/he deem the information so serious that s/he reasonably considers only a sanction can be imposed on the individual."*

¹⁰ Ibid, §3.6

¹¹ Ibid, §4.8

20. Level Two cases are now dealt with as follows:

"Upon receipt of notification of a concern relating to a child, young person or adult at risk which the HoS deems to be a Level Two case or upon a determination by the HoS that a Level One case has now become a Level Two case, s/he shall do the following:

2.10.1 decide whether or not the police or Social Care should be involved and, if necessary, contact them;

2.10.2 support an adult at risk who has reported a criminal offence, that is not tennis related, to contact the police or Social Care;

2.10.3 consider requesting an interim suspension of the coach accreditation, coaching assistant accreditation, official's licence or official's accreditation of the individual concerned or an interim suspension from Tennis Activities in accordance with Schedule 2 to these Procedures and, if appropriate, apply for one;

2.10.4 consider requesting an interim suspension of a venue's registration in accordance with Schedule 2 to these Procedures and, if appropriate, apply for one;

2.10.5 carry out any necessary preliminary investigation into the matter (in accordance with the procedure set out below in 3.1 to 3.4 inclusive);

2.10.6 inform the individual or venue concerned that a Safeguarding issue has been raised (provided that this will not place the individual at risk of harm or hinder any police investigation). If necessary, telephone contact should first be made with the individual concerned to ascertain the appropriate address to which sensitive material should be sent;

2.10.7 convene a meeting of the SPC which shall meet within 28 days of the notification or determination under 2.10 above or as soon as reasonably practicable thereafter; and

2.10.8 consider whether or not it is necessary to seek advice in relation to the case from external advisers, such as the CPSU or other professionals who are deemed experts in the protection of children and adults and, if so, contact them to obtain such advice.

2.11 The HoS may, if s/he deems it necessary, instruct an external

investigator to commence an investigation into a Safeguarding case; any such investigator appointed shall follow the investigatory process set out below in 3.1 to 3.4 inclusive.

2.10 The HoS shall present a report of his preliminary investigations (together with any advice received) and any correspondence with the individual concerned to the SPC together with a recommendation for the next stage of action.

2.12 Upon consideration of the facts already ascertained and the recommendation of the HoS, the SPC may:

2.12.1 instruct the HoS to apply for an interim suspension of the coach accreditation, coaching assistant's accreditation, official's licence or official's accreditation of the individual concerned or an interim suspension from Tennis Activities in accordance with Schedule 2 to these Procedures;

2.12.2 instruct the HoS to carry out an investigation into the case in accordance with the procedure set out at paragraphs 3.1 to 3.4 below;

2.12.3 require the HoS to appoint an external investigator to carry out an investigation into the case in accordance with the procedure set out at paragraphs 3.1 to 3.4 below;

2.12.4 where a case is considered by the SPC not to be a Safeguarding case, refer the case to the relevant LTA Committee or Panel;

2.12.5 instruct the HoS to propose a course of action to the individual concerned and seek his agreement to this;

2.12.6 require the HoS to seek advice in relation to the case from external advisers, such as the CPSU; or

2.12.7 declare that no further action is necessary."¹²

21. It is necessary to know something of the 2012 Procedure to understand the regulatory context in which the LTA considered the 2012 WTC Report and DS at that time. If the 2012 WTC Report and DS's case came to the LTA now,

¹² 2018 Code

we are confident the HoS would:

- a. Consider an interim suspension;
- b. Refer the case to the SPC; and
- c. An investigatory process would be undertaken.

(2) Disciplinary and the Licensing Functions

22. We need to touch on these, but only briefly and as they were in 2012. The LRC is (and remains) responsible for "*all matters relating to the interpretation, implementation and enforcement*" of the LTA's accreditation and licensing Rules for officials and for coaches¹³. It comprises seven persons, with a legal qualified Chair¹⁴. In 2012 it was known as the Coach Licensing and Registration Committee ('CLRC').
23. As events in 2012 demonstrated, the LRC may instruct the LTA Disciplinary Officer ('DO') to investigate any disciplinary matters which come to its attention. If there are sufficient grounds for doing so, the matter may then be referred on to the LTA's DO¹⁵. If an accreditation or an application for a licence is refused, an appeal procedure was provided for by the Rules¹⁶.
24. The LTA's disciplinary process was set out in paragraphs 1-5 of the 2012 Code. Its jurisdiction includes members, associates, players and coaches. As a result of a complaint to, or a decision by the LTA's DO, that such a person's conduct may constitute "Misconduct", the matter was referred to a Disciplinary Tribunal drawn from the Disciplinary Panel ('DP'). The Rules provided for a "Summary Procedure" for less serious matters; and a hearing before a three-person Disciplinary Tribunal for more serious cases¹⁷. There was a right of appeal from its decisions.
25. The DP Chair must be "*independent of the LTA*", and a current or former

¹³ 2012 Code, Appendix 6, §3.3

¹⁴ Ibid., §3.2

¹⁵ 2012 Code, Appendix 6, §9.1-9.4

¹⁶ Ibid., Schedule 2 to Appendix 4

¹⁷ Ibid, §5

member of the judiciary, Queen's Counsel or junior barrister or solicitor of more than 10 years standing¹⁸. We received a contribution from the LTA DP (and CLRC) 2012 Chair.

B. Tennis Wales

26. TW is the national governing body of tennis in Wales. It was incorporated in 2006. Its Articles of Association provide:

"Objects

The objects of the Company are:-

(a) to be directly affiliated to the LTA, and to comply with and uphold the Rules and the rules and regulations of the LTA and any body to which the LTA is affiliated or to which the LTA may become affiliated in the development, furtherance and advancement of the game of tennis;

(b) to act as the national association for tennis in all its forms in Wales and to be responsible for the administration of all matters relating to the game of tennis in Wales apart from those matters in respect of which the LTA has exclusive jurisdiction;

(c) to foster encourage and develop tennis in Wales;

(d) through the LTA and/or by itself (as appropriate), to make and enforce rules and regulations and to formulate and issue codes of ethics and conduct for participants in tennis at all levels and to make appropriate regulations to ensure that the carrying into effect of codes of conduct, disciplinary procedures, measures for the proper protection of children and young persons, anti- discriminatory procedures and rules of the Company are properly observed; and to promote the observance of the said codes procedures measures and rules by its members and others;

(e) to promote international and national championships and competitions and to regulate, arrange and manage all matters in connection therewith including the selection of players to represent Wales; and

¹⁸ Ibid., Schedule 2, §3.1

(f) to do all other things necessary or desirable for the promotion of the interests of tennis in Wales."

27. TW's mission statement is consistent with its Articles of Association:
- "To grow the game of tennis in Wales in all respects, making it accessible to everyone in the community, and creating a pathway that can support talented players to reach their full potential."*
28. TW is a member of the LTA and, as such, is entitled to one representative on the LTA Council. The LTA has a funding agreement with TW. It provides a set amount of financial support to deliver against the LTA's strategy in Wales, working closely with the LTA team. Responsibility for core functions such as safeguarding in British tennis lie with the LTA.
29. According to the TW section of the LTA website, there are 90 clubs registered to TW. Annually those clubs elect 8 members of a total Board of 11; the remaining Board members are independent. The Board is responsible for running tennis in Wales. The Board meets 5 times a year to agree strategic direction and discuss other matters of business. The Board delegates the day-to-day running of the sport to a team of staff, headed by a Chief Executive Officer ('CEO').
30. The TW CEO during the period 2012-2017 contributed to this Review. He has since left that post. He was in post at all relevant times. For ease of reference we refer to him throughout as the 'TW CEO'. It is not a reference to the present CEO.
31. TW CEO observed that "*safeguarding developed over time*". In 2012 he said the LTA led on Safeguarding. It was, as he described it, "*centrally driven by the LTA*". TW adopted the LTA policies; but he said, "*our team in Wales helped to ensure policy was being adhered to*". He said TW, "*worked to ensure that centres had welfare officers and that coaching teams were checked and trained.*" In 2012 TW had a designated officer who led on Safeguarding, who also had other responsibilities.
32. The TW CEO's understanding is consistent with documents we have been provided with. Ref 11.1 of an 'Assurance Statement' for TW provides that (as

at 8 August 2011) the “*Child Protection policy was reviewed by the Board during 2007. It is communicated to all staff and volunteers and follows LTA procedures*”.

33. TW’s Safeguarding Lead contributed to the Review. She too has other responsibilities, as we touch upon in the 2015-2017 Chapter. She is supported by the LTA safeguarding team. TW adopts the ‘All Wales Child Protection Procedures’ and implement its policies. In addition, TW has an obligation to Sport Wales to have in post a safeguarding lead to be responsible for safeguarding matters. In practice, as we understand it, safeguarding matters in Wales are referred to the central LTA team, not least because TW lacks the resources and specialist expertise to manage safeguarding cases.

C. Wrexham Tennis Centre

(1) Introduction

34. WTC is a community indoor tennis centre (‘CITC’) based in Wrexham, North Wales. It is unnecessary to set out at any length its history. In summary it grew out of the Garden Village Tennis Club (‘GVTC’) located at Egerton Walk, Wrexham. It was established in September 1990 following the sale of land belonging to that club. Agreements were reached between the GVTC directors and Wrexham Council to create a new indoor and outdoor tennis centre at Plas Coch Road in Wrexham, close to a new retail site and the local university.
35. WTC is run by (and separate from) Wrexham Tennis Centre Ltd, a charitable company limited by guarantee. Wrexham Tennis Centre Ltd wholly owns two subsidiaries: Wrexham Tennis Centre Retail Ltd. and Wrexham Tennis Centre Energy Ltd. The former runs the bar and catering and other retail services including merchandising and racket stringing services. The latter owns the PV panels which have been installed on the Centre roof to provide energy for the building as well as supplying to the grid. In both cases all profits are

donated to the main charitable company.

36. It was and remains a significant tennis facility in the region. It has 7 full size, 2 mini indoor and 7 outdoor courts. TW, and other external organisations rent office space at the centre. The WTC briefing prepared for the Camina Review stated that there were 15 self-employed coaches. The coaching team consisted of: 5 level 4 coaches (three Performance and two Club); 5 level 3; 3 level 2 and 2 Level 1 coaches who worked occasionally. Further, there were fourteen employed staff which included 5 Duty Managers, Centre Assistants, Catering staff and a General Manager who was also a Level 4 coach. All of the operational staff were multi-functional.
37. In May 2017 (the most recent figures we have), there were over 200 juniors on the coaching and social tennis programmes and over 3000 registered Centre users. There were approximately 300 players/course participants/parents signed up as regular users or course attendees and many other users who pay on a 'pay and play' basis, which does not require them to become members. The Centre does not have a membership system. Any user who registers with WTC without charge can become a member of British Tennis for free and thereby receives all the relevant benefits including access to the Wimbledon tickets ballot. There were then 2227 registered British Tennis members.
38. In 2012 WTC was one of a relatively small number of LTA High Performance Centres ('HPC') in Great Britain. It therefore received significant funding from the LTA towards the costs of running the HPC at that venue. On the material gathered during the Review there is little doubt that LTA funding was a significant factor for WTC. The level of that funding derived from it being an HPC. It was not, though, the only relevant factor. By way of just one example from a contemporaneous director (D2):

"At the time [2006/07] the Lawn Tennis Association was prioritising performance rather than participation and at the time they offered funding opportunities, designating Wrexham as one of the LTA High Performance Centres. The funding was important if we wished to continue to give performance a high profile, which we did, but this was only part of our business strategy, which also gave emphasis to participation, which was in

line with our objectives as a Centre for the community open to all. The Centre's long-term viability depended as much on this element of the programme than on performance."

39. From January 2015 until mid-2017, WTC received a smaller level of funding as an LTA grant funded centre, with the purpose of that funding being to support the development of performance tennis and players at the venue. Since mid-2017, this funding has been given directly to TW to manage the performance funding relationship with WTC. That arrangement ended on 31 December 2017. WTC currently receives no direct financial support from the LTA.
40. As a CITC, WTC receives a range of support from the LTA. This support includes business development training, attendance at national conferences and promotional initiatives co-ordinated centrally by the Tennis Foundation, a separate tennis charity.
41. TW was a "*minor funder*" of the WTC compared to the LTA. It removed its financial support in 2011; it maintained other support on programmes, partnership, network development and business advice. TW did not run the WTC; that responsibility lay with the WTC Board and its staff.

(2) Safeguarding

42. The 2012 WTC welfare officer, with responsibility for safeguarding, contributed to the Review. We have referred to him throughout as D1¹⁹. He was one of two directors who undertook the 2012 investigation. As one would expect, in 2012 WTC had its own safeguarding policies.
43. The Camina Review considered the following WTC policies in place in 2017:
 - a. Disciplinary Policy and Procedure.

¹⁹ 'D' denotes director; 1 denotes that he is the first director referred to in the Report. Other WTC directors are designated using D and numbered sequentially. There is no significance in the numbering.

- b. Grievance Policy and Procedure.
 - c. Whistleblowing Policy.
 - d. Coaches Code of Conduct.
 - e. Safeguarding Policy, in which the WTC states that the directors and trustees have "*adopted the LTA safeguarding policies and have overall accountability for this policy and its implementation*".
44. We have read and considered them. We examine the present safeguarding position, including policies in the final Chapter. Policies are only the first building block in effective safeguarding. However, they are only as effective as those implementing and applying them.

D. Daniel Sanders

45. Daniel Sanders ('DS') was born on 29 July 1974. He is 44 years of age. He appears to have started coaching at WTC in 2006. He was a national level junior tennis player. He was Captain of the Great Britain U16 team. He was a professional player for 6 years and achieved a decent world ranking.
46. He enjoyed a respectable coaching career before arriving at WTC. He joined WTC from Loughborough University, where he was working for the LTA as a coach. He was a Level 5, master performance coach. He was engaged as the WTC Head Coach. He was responsible for the high performance programme.
47. As Head Coach, DS was pivotal to ensuring continuation of funding and maintaining the performance programme at, and the profile of, WTC. The significance of his role is not irrelevant when considering the context in which decisions relating to him were taken. While many contributors spoke of their concerns regarding his conduct, there were others who attested to his success and abilities as a performance coach. His career and successes, and the important and prominent role he played at WTC, helped make him a formidable presence.
48. He remained coaching at the WTC until his arrest on 30 January 2017.

Another director whom we shall refer to as D2, was informed the same day. DS was subsequently charged with sexual allegations and released on conditional bail. He was made the subject of an interim suspension by the LTA, which it promulgated in a letter dated 6 February 2017. By letter dated 20 February 2017 he was dismissed for gross misconduct by the WTC.



V. 2012

A. INTRODUCTION

1. Paragraph 9 of the ToR required us to:
 - a. *"Consider and identify what steps the LTA, and where relevant Tennis Wales and WTC took to address safeguarding/child protection issues at the Centre between 2012 and the conviction of DS in June 2017, and to consider any failure to act appropriately in relation to allegations made (at any level).*
 - b. *Consider and identify what lessons can be learned by the LTA, and as appropriate Tennis Wales and WTC arising out of the investigations.*
 - c. *In light of 9(a) and 9(b) provide recommendations for improvements that should be made to safeguarding procedures within the LTA and, as appropriate, across the sport."*
2. In order to do so, it was necessary for us to consider and to analyse the documentary and other material relating to what happened at the relevant time; what was done in light of that material; whether that which was done was adequate or sufficient; what failures arise from such action or inaction; and what lessons can be learned.
3. Inevitably there are conflicts between contributors' accounts. That is entirely predictable and understandable. We have done our best to analyse the material placed before us. However, we have not heard live from contributors and have questioned them in any adversarial sense. We are not in a position to resolve many of those evidential or factual conflicts. Therefore, we have often been unable to conclude whether alleged conduct did or did not occur. In other circumstances, it has not been possible for us to attribute to any particular individual a motive or motives for why action and/or decisions were, or were not, taken.
4. We have kept firmly at the forefront of our collective mind that we must not judge or assess events or people by what is known now. That DS was subsequently convicted of serious sexual offences against a child is well-known. That fact must not distort or influence our assessment of what

individuals and organisations did in 2012. That would be unfair to them. Our assessment and our judgements are based on what was known then, without using the distorting prism of hindsight.

5. Further, we have encountered a degree of parental resentment about, or criticisms of, coaching standards, suggestions of favouritism and complaints about selection (or non-selection). We understand this was a very competitive environment for the young players at a formative time of their careers. We appreciate that it is not uncommon for parents in such environments (and otherwise) to be competitive about their child. They are not always blessed with objectivity when it comes to assessing the merits of their own children's abilities. We have done our best to have regard to such feelings when assessing what we have been told about what is germane to this Review, namely issues of SGCP.
6. SGCP referrals, complaints or disclosures should be judged objectively and on their merits. A proper investigation should reveal whether such complaints have any substance; they should not be ignored, written off or prejudged as being the product of disgruntlement or malice without first being properly considered. There was more than an element of that approach at WTC and by TW. We have discovered evidence of disclosures being prejudged and dismissed (or not followed through properly) because they have been adjudged to be the product of embittered parents or disputes between coaches, rather than being assessed on their objective merits.
7. Historical context is helpful. That comes from understanding the basis for selecting 2012 as the starting date. To understand that, one must look at the catalyst for the investigation at WTC in 2012 and the subsequent referral to the LTA.

B. COMPLAINTS FROM FORMER COACHES

8. In 2012 WTC received complaints initially from two former coaches. We shall refer to them as FC1 and FC2²⁰ respectively and their complaints collectively

²⁰ 'FC' denotes 'former coach' and they are numbered sequentially. There is no significance in the numbering.

as 'former coaches' complaints'. Both contributed to the Review.

(a) FC1

9. FC1 first played at WTC in 1996 aged 12 years. He was a fine player achieving a respectable world ATP ranking. An injury ended his competitive professional career in 2008, when DS invited him to become a coach. He knew DS from his playing days. In common with other coaches, FC1 was self-employed while engaged at WTC. He first undertook safeguarding training in 2009. He was a coach at WTC until he left shortly before he made his complaint.
10. His complaint was submitted in writing on 6 February 2012. It was sent by email to a number of people in WTC and TW. He made many criticisms of what was happening at WTC; he also criticised DS. Some of those complaints related to DS's integrity.
11. So far as is relevant to the Review, he alleged:
 - a. DS sought and was sent explicit photographs from a teenage female player (whom we shall refer to as FP1²¹) who was aged 17 years when she joined WTC.
 - b. DS developing an inappropriate sexual relationship with that player.
 - c. DS bullying and ridiculing another coach, FC2.
 - d. DS having what he called "*very strange relationships with the older female players*".
 - e. DS delivering "*at least one racial slur a day*".

²¹ 'FP' denotes 'former player' and they are numbered sequentially. There is no significance in the numbering.

(b) FC2

12. FC2 was a coach at WTC from 2007. He left WTC in September 2011. On 9 February 2012 he too made a complaint in writing, which he emailed to the TW CEO. He told the Review he did so after raising his concerns privately with another, Vicki Broadbent ('VB'); he also sent her a copy of his complaint.
13. We have read his complaint. So far as is relevant to this Review, he alleged that DS's conduct was "*unprofessional*":
 - a. He undermined, belittled and bullied some coaches in front of other coaches and parents/players.
 - b. He regularly used inappropriate foul language.
 - c. He was often "*sexually explicit*" with coaches and players.
 - d. He described:
 - i. a coaches' meeting at which DS showed pornographic images; and
 - ii. An occasion when he asked for "*sexual favours*" in return for stringing a racket for a female player, whom we refer to as FP3.
 - e. DS would "*openly rate female senior players in order of their attractiveness*".
14. He ended the statement by indicating his preparedness to expand on any of those matters.

C. WTC

(1) Safeguarding Policies

15. An integral part of dealing properly with SGCP issues is to have in place relevant and effective policies. We spoke to a number of the 2012 WTC

directors. D2, who conducted the subsequent investigations and who cooperated with this review told us that “before 2013” WTC had relevant policies in place. She disagreed with the Camina Review which “stated that policies only went up on the wall after Daniel was arrested”. She said WTC made sure it had proper written policies in place in 2008, when it started going through the LTA Clubmark accreditation scheme.

16. That is supported by Minutes from a WTC Board meeting held on 10 March 2008 at which a revised Child Protection Policy - said to be in line with LTA guidance - was approved. The Minutes also record that the Board agreed to adopt the LTA Code of Conduct for People Working with Children and Tennis Clubmark Guidelines for Child Protection.
17. We have also read Minutes from a WTC Board meeting held on 9 June 2008 at which the LTA Code of Conduct for People Working with Children was adopted. The Minutes record that it would be made available to all WTC users on request. D1 is referred to in those Minutes as the “*Child Protection Officer*”.
18. D2 told us that WTC used LTA and, in some cases, Sport Wales templates. She said the policies were on the wall at the entrance to the tennis centre with D1’s photograph and contact details. There was also a notice referring people to the full policies, which were kept in a folder at reception. In the case of safeguarding, she said, they tended to rely on the LTA policies, which they believed covered their needs.
19. We have seen copies of the policies entitled ‘Child Protection Policy’ and ‘Child Welfare Policy’. In the former, D1 is named as the person responsible for children, young people and child protection. His telephone number is set out in the policy. The policies are fairly typical policies of that time. They are relatively short, functional and largely followed LTA policies.
20. D2 also said that another inaccuracy in the Camina Review was the timing of the creation of a whistleblowing policy. She said WTC did that work after the 2012 matters came to light. It was revised in 2016, having also been reviewed in 2014. She also disagreed with the Camina Review definition of whistleblowing. D2’s view was that whistleblowing was something done by

staff; if customers, including players raise issues, then these should be handled as complaints.

(2) Investigation into the Former Coaches' Complaints

21. On our analysis, each of the former coaches' complaints contained SGCP issues. Further, any investigation of those complaints had the potential to unearth more such issues. Further, the complaints merited a full SGCP investigation.
22. In summary, we have concluded that the **WTC investigation into the 2012 complaints was flawed from inception; it was defective in execution; and the report prepared in consequence ('the 2012 WTC Report') was seriously deficient.** We look at those findings – and the basis of them – in more detail below. In doing so, we have not added to the length of this Report by repeating every single piece of evidence which supports those conclusions.

(a) Not referring the matter to the LTA

23. Paragraph 2 of the 2012 WTC Report recognised that *"some of the allegations being made were that there had been contraventions of the LTA guidelines on child protection"*, which it observed were *"potentially reportable to the LTA"*. It was agreed that the resulting report would be sent to TW. It would then be for TW to *"determine whether any further action by an independent body was required"*.
24. It is also to be noted that in an email from TW CEO to D1 and D2, sent at 11.16 on 22 February he stated that a Safeguarding Officer at the LTA had advised him that if they discovered any *"tangible evidence with regards Child Protection Issues...then the LTA needs to be informed immediately"*.
25. Therefore, it is clear from this very early stage that D1 and D2 knew there were *"child protection"* issues, which must be investigated properly. The LTA had jurisdiction over SGCP issues. We are clear in our conclusion that the

matter should have been referred immediately to the LTA. The email from TW CEO on 22 February 2012 made it clear that if there was “*tangible evidence*” of any SGCP issues then it should be referred immediately to the LTA. There was such tangible evidence and that referral should have been made immediately. Referral to the LTA would also have been consistent with its own safeguarding policy.

26. It follows: **F1: The WTC Board should have referred the former coaches’ complaints to the LTA immediately.**

(b) Role of WTC D1 and D2

27. The above error was compounded by WTC’s decision to carry out an internal investigation. **F2: The 2012 WTC investigation into the former coaches’ complaints should have been carried out independently of WTC.**

28. The investigation was conducted by the two directors, D1 and D2. Paragraph 2 of the 2012 WTC Report explains that decision thus:

“After discussion between Centre Directors and [TW CEO], it was agreed that in the first instance the matter should be investigated internally by [D1], the Centre’s Child Protection Officer, and [D2], the Vice-Chair.”

29. Therefore, the investigation was not independent of WTC. It should have been. We have reached that conclusion for reasons, which appear to us, to be obvious, and which should have been evident to the directors and others (including the TW CEO) *at the time*. The potential for, and in any event appearance of conflicts of interest, arises from a number of factors, including financial.

30. Firstly, the perception of a conflict of interest arose from the very fact of directors of an HPC investigating its own Head Coach. The directors had engaged DS’s services. He was, to use a convenient shorthand, ‘their man’. He was also their Head Coach, with a considerable presence at and influence

over the centre.

31. Secondly, the HPC element of WTC was dependant on LTA funding. That in turn depended upon DS, as a level 5 coach. We have been told that Level 5 coaches were not in plentiful supply. DS could not have been employed on the salary he was without LTA funding. They needed a Level 5 coach for the HPC. The appearance that commercial imperatives did or may have had an influence undue or otherwise, conscious or subconscious, on decisions taken was, we are bound to observe, as obvious as it was inevitable.
32. Thirdly, each of those two directors had not insignificant financial interests in the WTC, having loaned it money. Once more, and in this context, the appearance that such financial interest may influence or otherwise impact on decisions and findings was both obvious and inevitable. The roots of potential or apparent conflict ran deep.
33. We are in no proper position to decide now why this was done. We cannot decide what motive(s) led the Board to keep the investigation 'in-house'. It is not for us to speculate. TW CEO remains of the view that the directors acted with the best of intentions but – he observes *now* (but did not at the time) - were insufficiently skilled and equipped to perform the task. However, one of the (frankly) obvious consequences of so doing, was that it led people to question their motive(s) and, we are bound to say, undermined their conclusions. By conducting their own investigation, they opened themselves and the WTC Board up to such criticism.

(c) Qualification of D1 and D2

34. The Review spoke to D1 and D2. They cooperated fully and provided us with a good deal of documentation, which proved helpful to us. D1 was a director of WTC in 2012 and until he resigned in March 2017. He was a deputy head teacher and the WTC welfare officer. He had undertaken safeguarding training. He believed that he and D2 were "sufficiently independent" to carry out the investigation. The flawed thinking is clear: they believed independence was necessary (it was) but that they were independent (they

were not independent of WTC at all).

35. Like D1, D2 was a founding member and director of WTC. She had worked for the Crown Prosecution Service ('CPS') as an area business manager. She had no direct experience of undertaking an investigation. She had been interviewed as a witness before and had been part of a disciplinary panel on a couple of cases. She had received no direct safeguarding training during her career. She said they agreed with TW CEO that they would deal with the matter first; she believed he had consulted the LTA which – she also believed – approved that approach.
36. With respect to them, neither D1 nor D2 had the appropriate skills and necessary experience to carry out this investigation. Neither had any investigative or legal background. We venture to suggest that had they possessed such knowledge, they would never have embarked on the investigation. As we have observed, TW CEO expressed the same view about their lack of experience; he appears not to have appreciated it at the relevant time. **F3: The WTC directors appointed by the WTC Board to carry out the 2012 Investigation into the former coaches' complaints did not possess the necessary skills and experience**
37. That error was compounded by their failure – having decided to undertake the task themselves – to obtain the necessary assistance and advice, from those qualified to give it. They did not seek any.
38. Further, and F4: The 2012 WTC Investigation into the former coaches' complaints lacked appropriate focus and direction.
39. Fundamentally, there were no Terms of Reference put in place by the WTC Board. It is therefore perhaps no surprise that it lacked direction and the resulting report lacked focus.
40. D2 told us that the matter was dealt with "*firstly as a complaint rather than a disciplinary matter*". Insofar as we understand D2's distinction, they are not necessarily mutually exclusive. In any event, the former coaches' complaints gave rise to obvious disciplinary issues. It should have been treated as such. The decision to treat them as complaints, may explain why

DS was not suspended during their investigation. The fact that he was not, may also have undermined the efficacy of their process.

41. Related to this was D1 and D2's failure to appreciate the true nature of what they were dealing with. D2 said she understood that it was not initially about his behaviour towards children. We disagree: there were obvious SGCP issues. By way of example, FC1's disclosure about explicit photographs involving a 17 year old player.
42. Of course, there is an alternative interpretation, namely that they knew there were SGCP issues and chose deliberately not to inform the LTA, hoping instead to keep matters in-house. The evidence does not lead us to that interpretation or conclusion. We are far more inclined to view that there was simply a collective failure (by WTC and TW CEO) to appreciate the true nature of what they were dealing with; and then to act appropriately.

(d) Scope of the investigation

43. Paragraph 3 of the 2012 WTC Report asserts that during the investigation they interviewed "*all interested parties, including the coaches who had initially raised the issues, those from Tennis Wales and elsewhere who had received copies of their emails, and others whose names came to attention during the process*". In short, they did not.
44. The single Appendix to the WTC 2012 Report records the 18 people spoken to. The list includes coaches, FP1, FP3, DS and his wife, FC1 and FC2.
45. D1 told investigators that notes were made at every meeting. D2 provided us with notes of 13 of those meetings. We were given the notes of the meeting with DS and his wife by D1. The interviews were conducted by either D1 and/or D2. On occasions other directors were also present.
46. In our view D1 and D2 did not speak to people who should have been interviewed. By way of example, more coaches, former coaches, players and parents of young players should have been consulted. We note that very few young players were spoken to; more should have been spoken to. This was

a fundamental error and we think it illustrative of and/or caused by their lack of knowledge of, and experience in, conducting an effective investigation.

47. Of course, no one can now know what would have been disclosed or revealed. We cannot predict the outcome of a fuller investigation; nor whether action would have been taken against DS or the nature of it. However, as this Review has revealed, a number of people, not spoken to at the time, have since told us damning things about DS and other coaches; and about the environment at WTC more generally.

48. Therefore, **F5: The 2012 WTC investigation into the former coaches' complaints failed to consult sufficiently widely.**

(e) Methodology

49. **F6: The methodology employed in the 2012 WTC investigation into the former coaches' complaints was flawed.**

50. We can deal with this shortly:

a. Interviewing by way of *pro forma* set questions and a single open question was not appropriate. By way of example, asking the closed questions (along these lines), "*do you have any safeguarding concerns*" is limited and apt to miss important information. It is much better simply to ask a person open questions what they have seen, heard and know; rather than ask a closed question which requires them first to define what they are being asked about and thereby select what they do or do not disclose.

b. Interviews should have been audibly recorded where possible.

c. The note taking was – in at least one example – deficient and failed to record an important aspect of the interview.

d. Interviews were conducted in inappropriate locations, for example in a pub and café. Those are not appropriate places for discussing sensitive

and confidential issues. They are not conducive to the sharing of such information.

(f) Efficacy of the investigation

51. Our overall conclusion is this: **F7: The 2012 WTC investigation into the former coaches' complaints failed to discover and/or act upon information which was disclosed, or should have been discovered, at the time.**

52. To understand our critique of the efficacy of the investigation and the 2012 WTC Report, it is necessary to understand what interviewees told D1 and D2. We cannot know for certain as they were not audibly recorded. The obvious starting point is the contemporaneous interview notes disclosed to us. The investigators saw all bar 3 of the 18 people listed.

53. What follows is, necessarily, a summary. If there is no entry for the Review, then that person did not contribute to our process:

a. FC1:

i. 2012 - was taken through his written complaint; asked if he had any child protection issues, he said no, but also said he was "*de-sensitised to such*".

ii. Review – he confirmed that account; he was interviewed in a pub; and told us of another incident where DS filmed a 16 year old playing tennis, concentrating the camera on her backside; he said he did not disclose that in 2012 as it was not "*at the forefront of [his] mind*". He said D1 did not ask him about naked images, but he recalled DS showing one such image of a naked female at a meeting.

iii. FC1 was himself the subject of allegations (which he refuted). The LTA investigated those in both 2012 and in 2018. The LTA decided there was no basis to proceed against him.

b. FC2:

- i. 2012 – his account was in line with his written complaint: DS belittling coaches; offensive nicknames for players; small group of coaches who swore in presence of and at players; at coaches meeting DS showed on a screen 2 still pornographic images which he said were his “*favourites*”; he was present when DS invited a female player “*out the back*” when she asked him to string her racquet. He thought she was 16 or 17 at the time; in fact – on her own account - she was older.
 - ii. Review – he repeated the above; he was interviewed in a supermarket café; it was short, and he was left with the firm impression that D1 and D2 thought he and FC1 were working together as “*disgruntled employees*” and had made up their minds against them.
- c. VB:
- i. 2012 – we have seen notes of her meeting with D1 on 13 February 2012. She said she was present at a meeting of coaches where DS would refer to girls and boys as “*chicks and dicks*”. There is this note: “*VB was asked if she’d seen anything at [WTC] regarding child protection that she was concerned about. She said that she had not*”. Other than swearing she said she had not seen anything to breach the LTA Code of Conduct for Coaches. She said that about 5 years ago a female aged 18/20 had quote “*unofficially confided*” in her that she had received explicit text messages from DS.
 - ii. Review - She had been a tennis coach at WTC and in 2012 was a member of the TW Board. She took TW regional squad coaching sessions at WTC in 2012. Her impression was that a group of coaches – including DS – ran WTC. DS was quite arrogant, but she observed that “*lots of performance based coaches can be inappropriate*”; a boys’ culture was not uncommon in such an environment and WTC was not different. In 2012 she felt the environment at WTC was unprofessional with a bullying culture. She heard from different sources that DS showed a pornographic film at the start of a coaches

meeting. She was worried about child protection, but it did not “*jump out at [her] that children were in immediate danger*”.

- iii. She told us that when interviewed by D1 she was asked if she had seen child protection issues and she replied in the negative. She did tell D2 that a young female player (whom we shall refer to as FP2) had confided in her about DS’s conduct. We deal with that below at paragraph 73.

d. Deborah (‘DJ’) and Adam Jones (‘AJ’, then a young player):

- i. 2012 – they made complaints relating to FC1 whom they alleged used inappropriate language, including swearing in AJ’s presence; they had no issues with other coaches.

- ii. Review:

1. Both repeated what they had alleged against FC1 in 2012. AJ was positive about his experience of being coached by DS. He remained at WTC until 2014; he occasionally visited WTC in 2015.

2. She provided us with two letters from the 2012 LTA Safeguarding Manager:

- 2.1 The first, dated 28 June 2012 informed her that the allegation against FC1 had been considered by the CMG. Its decision was this matter was “*not a disciplinary issue warranting further investigation or action by the LTA*”.

- 2.2 In the second, dated 20 November 2012, the LTA informed her that the complaint had been upheld in part and she was told what action would be taken.

e. Alan Bevan:

- i. 2012 - a ‘lads’ culture; had not witnessed any inappropriate conduct by coaches; not seen any inappropriate images at a coaches meeting.

f. A coach we shall refer to as Coach 1:

- i. 2012 - very similar to Alan Bevan.
- ii. Review – he was a coach at WTC and said he could not recall much about 2012.

g. Martyn Lewis:

- i. 2012 - no direct knowledge of anything that had been reported.
- ii. Review – he was a member of the TW Board. He told us that he did not meet the directors; he never saw the Report and was told it was confidential.

h. A coach we shall call Coach 2:

- i. 2012 - at coaches meeting DS showed image of man wearing a rugby shirt with four pictures on the back, which were cartoons not photographs but showed the figures in sexual positions and were crude. He did not see anything else inappropriate.
- ii. Review – a coach at WTC, he said DS was a bit “*flirty*” with some female players, was often “*inappropriate in his comments but...it was in a banter sort of way*”.

i. A coach we shall call Coach 3:

- i. 2012 – another coach at WTC; something of a lads’ culture, but not in presence of children; FC1 swore but in front of older players; did not remember DS showing any pictures at start of coaches meeting.
- ii. Review – it did not add to his 012 account.

j. A coach we shall call Coach 4:

- i. 2012 – not witnessed any conduct which gave rise to child protection concerns.

- ii. Review – she was employed as the TW National Coach. She started in 2012 and left in 2017. She was involved in talent spotting, working with young players, their coaches and parents. She was a frequent visitor to WTC. Her recollection is that she was not interviewed as part of the 2012 investigation, despite the notes purporting to record what she said. In 2012 she did not – and had not before that time – witness any conduct which gave rise to child protection concerns. After the 2012 WTC Report, her recollection was that she was told WTC had been advised that “*certain procedures*” be put in place. However, they were not told what those were, for what were described as reasons of “*confidentiality*”. All she was told was that the coaches were to attend a “*workshop*”. We look at this later in the context of failings by TW at Section D below.
 - iii. We have seen an email she received on 9 September 2012 from a concerned father. It related to DS’s alleged treatment of his daughter. It concerned reference to his daughter’s weight and coach-related matters. She characterised the father as someone who “*tends to get emotional*”. That is another example of a failure to appreciate the true nature and import of a disclosure. We look at this below at paragraph 78 *et seq.*
54. We have seen notes of a meeting between D1 and D2 with DS and his wife. He said he was “*unaware that anything shown was pornographic*” and it might have been a t-shirt with “*inappropriate jokey language on it but he could not recall*”. DS said he might have made a comment about “*sexual favours for stringing a racket*” but in a “*jokey way*”. He said, he had “*never been told ‘blokeism’ was not acceptable behaviour in this environment*”.
55. The Review spoke with some of the others.
- a. Jo Trataris:
 - i. She was a coach at WTC when DS arrived. She was the only female coach when it became a HPC. She felt excluded and raised her concerns with D3 and D2.

- ii. DS was arrogant, a "*law unto himself*" who could do no wrong in the eyes of the Board. She had no concerns about how young people were coached. She left in 2013.
 - b. The WTC Tennis manager up to February 2012 said that DS seemed like a family man. He saw nothing to cause him concern. Nor did other 2012 WTC staff who spoke to the Review.
 - c. The WTC manager in post-February 2012 saw nothing to cause her concern.
56. Coach 5 is a level 5 coach. He has worked as coach for the LTA and the TW National Coach. He was involved with players training at WTC. He contributed to the Review and told us:
- a. He was never asked to contribute to the 2012 WTC investigation.
 - b. He said that he has known DS as a player and coach for many years. He described his coaching style as aggressive; he would swear and "*make throwaway comments that were innuendos*". He was also an excellent coach but one who could be "*quite bullying*" in his approach. He never witnessed any aggressive behaviour by DS towards players under 16 years.
 - c. He remembered an occasion when DS filmed a young female player. He was pointing the video camera up-and-down her lower body which at the time he felt wasn't right, but it could be easily explained from a coaching perspective in terms of recording the player's leg and hip movements. He mentioned it to a director (D3) and a sport psychologist (whom he named), both said they were quite "aware". Nothing was done; Coach 5 thought there was a plausible explanation for DS's conduct. That sport psychologist, who spoke to investigators, had no recollection of such an event. He did recall DS making an in appropriate and sexually offensive remark about a female player.
 - d. Coach 5 also remembered a meeting of male coaches sometime before 2012. When he walked in with Coach 2, he saw a film playing on the screen in which a man and women were having sexual intercourse. Other

coaches, whom he identified, were present. He locked the office door.

- e. He also expressed the view that he was shocked when he heard of DS's convictions in 2017: he never thought he was "*motivated to sexually abuse children*". No young person ever complained to him.
- f. He said he was spoken to by D1 after the 2012 WTC Report was complete. He told us that D1 told him that he would be managing DS and would monitor him closely.

57. The Review has spoken to others who do not appear in the Appendix to the 2012 WTC Report. Those others include WTC directors and D1 and D2. Insofar as they added to what was known, in summary they told us as follows.

a. D3:

- i. He was a director on the Board in 2012. D1 and D2 volunteered to carry out the investigation and he said he had faith in them. He claims not to have been given, read, nor to have had the Report read to him. We find that difficult to understand. Any interested and competent director would have wanted to read the Report and, we think, would have done so.
- ii. If he did not read it, he must have known a good deal about its contents. Further, we have seen an email he sent to the LTA DO at 12.30 on 30 May 2012 in which he purports to correct details of the LTA 'Statement of Case' (in respect of DS). In doing so he stated "...[the] *investigation report acknowledges that there were management fallings and that I and other Directors should have been aware sooner of the poor culture within the coaching team*". One might reasonably infer from that passage that he had read it or knew of its contents (or part thereof).
- iii. It was discussed at a Board meeting on 27 February at which he was present. As he acknowledged in his statement to us, "*the content of the report would have been discussed at [that meeting]*". He also concedes that he was aware it made recommendations, which "*were*

accepted by myself and the other directors". As we have shown, he was able to summarise accurately one of its many findings in his email to the LTA DO sent on 30 May 2012.

- iv. We have also seen an email sent at 10.08 the following day (28 February) from his LTA account in which he, *inter alia*, thanked D1 and D2 for all the work they had done; its subject title is "Last night's meeting". As we have noted in the preceding sub-paragraph, the draft report was discussed at that meeting. Indeed, D1 told us the final version was approved by the whole WTC Board.
 - v. With hindsight he observed that post-2012 events, DS "*should have been more closely monitored*". He apologised "*unreservedly...for anything we as Directors may have missed*".
 - vi. In a further statement, he said he never warned DS. He also added that D1 did not raise any serious concerns with him.
 - vii. D3 also told the Review that he could recall nothing of the Action Plan nor its implementation; he did recall training being carried out by the LTA 2012 Safeguarding Manager and staff. FC2 raised concerns with him about DS which he, D3, put down to what he described as a "*clash of personalities*".
- b. D4:
- i. The Companies House register records that he has resigned as a director. He told investigators that he remains a member of the WTC Board. He was a WTC director in 2012. He cannot recall being present at any of the interviews conducted during the investigation. In paragraph 9 of his statement he said he had no "recollection of ever seeing the report". He subsequently informed us that he saw it after it was sent to TW.
- c. D5:
- i. She was a player at WTC. She left in 2010. The culture was "*laddish*"; but the Board was part of it. She was aware of DS using sexist and

inappropriate language. She recalled DS making remarks about what she was wearing. She was about sixteen years of age. She became a WTC director in 2017. When she saw for the first time the 2012 WTC Report she said she was deeply unimpressed by its contents.

d. Coach 6 - He has been a coach at WTC since 2010/11. He never witnessed any inappropriate conduct by DS nor received any reports of such behaviour.

58. We cannot recreate the picture in 2012. We cannot now find where the truth lies. We cannot discern what was, would or might have been revealed had we conducted this exercise in 2012. It is also right to note that many of those spoken to in 2012 said in terms that they did not have SGCP concerns.

59. However, what is clear to us is that the investigation in 2012 revealed conduct and behaviour which gave rise to SGCP issues or concerns. Our Review has confirmed that; and in places added to that picture. That appears not to have been appreciated at the time and in consequence not addressed properly in the WTC report. We need to consider three separate and discrete disclosures, which in our judgment, reveal a further failure to act appropriately on disclosures about DS.

Richard Hughes

60. Richard Hughes ("RH") is the father of a player coached by DS. We have seen a note of a meeting on 5 March 2012 between RH and D1 and D2²². This is after the Board meeting on 27 February and 2 days before the Report is dated (7 March 2012). The 2012 WTC Report is silent as to the contribution he made.

61. RH's daughter shares the same first name as another player. The notes of the 5 March 2012 meeting with D1 are confusing for they refer simply to that first name without identifying whether it is his daughter or the other player. They do not disclose any concerns of inappropriate conduct towards any of the players. His concerns – as noted – were of the difficulty his daughter had

²² The Minutes for 21 March 2012 WTC Board meeting record this meeting as being on 9 March 2012.

experienced transferring from FC1; issues with management of the club; and the lack of the transparency in the structure. He complains about DS whom he described as naïve, unprofessional and arrogant; he'd heard from others that he used bad language in front of younger players. He is recorded as being happy with the quality of coaching.

62. Investigators spoke to RH, and his wife. They gave the investigators documents, and very detailed information about their concerns about WTC. RH has had those concerns for many years; he has reported them frequently, he said. In summary, he was unhappy when FC1 left, who had coached his daughter. He said he made numerous complaints about bullying at WTC; he said he had many meetings with D1.
63. He recalled telling D1 (at a meeting at the Grosvenor Garden Centre) about DS's behaviour, including towards another young female player. He said that at that meeting he raised his serious concerns about DS's behaviour and that he described him as "*showing many of the characteristics of a sexual predator*". He heard from another about a 15/16 year old female player emerging from DS's locked office. He said D1 assured him that "*Dan Sanders is not a paedophile*".
64. D1 was asked about these meetings. He said he had extensive dealings with RH and his wife. They met many times during 2012. He described the relationship between DS and RH as fraught. He said that DS did not welcome criticism of his coaching methods. RH told D1 that DS played, "*mind games with the girls*". D1 did not recall RH ever telling him about a young female player leaving DS's office, after it had been locked.
65. D1 disclosed his file to us. It is a full lever-arch file. Within it was a manuscript note dated 7 October 2012. D1 said this is the note of his meeting with RH at the said garden centre. This note appears in it: "*DS is playing mind games with the kids, especially girls – mums + daughters are frightened of him*". There is reference to DS being a "*bully*" and this: "*I may still go formal*". There is no note of the following: characteristics of a sexual predator; 15/16-year-old female player emerging from DS's locked office; or paedophile. D1 was adamant that RH did not at any stage say he believed DS was a sexual

predator or made any other disclosures of that nature. D1 was asked by the investigators to reflect on whether RH raised with him “*concerns which was [sic] flagged as safeguarding issues*”. For him, RH believed DS was unduly controlling over his daughter. D1 said “[it] *amounted to emotional abuse although it wasn’t the term he used*”.

66. We have also seen other documentation which concerns RH’s daughter’s education. It is plain from those that the feeling at the time was that she was seen as having been ‘loyal to’ or ‘in the camp’ of FC1. His departure and the subsequent complaint about DS, appears to have caused resentment, which led to her being bullied by others, including players. We note that D1 said so in terms in in an undated letter of support he wrote for her.
67. She was not given the same level of coaching by DS. That had a deleterious effect on her. It also is very good contemporaneous evidence of just how difficult it can be for young players and their parents/guardians in such an environment to complain about or even to disclose such sensitive matters. They are dependent upon the coaches, for training, for coaching, selection and advancement. There may be a kind of sporting *omertà* familiar to those who have played or been involved in sport, especially team or squad-based ones. We were told by one parent who spoke out about something, of their daughter being relegated to hit with younger children.
68. All the more reason that they should be assisted in so doing and then properly protected. They can also be acutely vulnerable, in a sporting sense, intensely dependent upon their coaches, especially in a highly competitive, elite environment. That is just one reason why safeguarding is not the field for an amateur, even a well-meaning one.
69. We cannot resolve the factual differences in the recollections of D1 and RH. The notes do not record verbatim what was said. Our ToR do not require us to resolve such disputes. The fact RH was in 2012 complaining about DS and his methods is supported by note of 5 March meeting, the 7 October meeting (and the note thereof) and by D1’s recollections. Such complaints came during and after the investigation into the former coaches’ complaints. We emphasise: we are not in a position to comment on the truth of what was

being said about DS and are not doing so. What is important is the fact that disclosures of that nature were made. They should have been actioned appropriately. We cannot see that they were.

70. Of further note, investigators spoke to his daughter. She was not spoken to in 2012; had she been and disclosed what she told us, events may have proved very different. That is not a criticism of her and should not be read as one. For all manner of well-known and good reasons, it can be very difficult to disclose. In any event she was not even approached. If there is fault, it does not lie with her.
71. She started at WTC in about 2002, aged approximately 7 years. In those days she recalled that lots of coaches behaved inappropriately. DS coached her when she was a young teenager. She alleged that he told her to "*stick her boobs out*" when she played. She recalled a bullying environment at WTC. DS was a big presence and could be intimidating, she alleged. She believed everyone could see what was going on at WTC.
72. Police spoke to his daughter as part of their investigation into DS in 2017. The police report given to us records her as not disclosing any "*specific sexual activity*". She told them of inappropriate comments he made to "*child student*" and of his "*tactile nature*" while coaching. She said she left WTC because of a "*bullying incident*" involving DS.

FP2

73. On the 16 February 2012, FP2 was interviewed by D2 as part of the WTC Investigation. We have seen notes of that meeting. This was well before DS was convicted of sexual crime. During that meeting (in 2012) she disclosed two matters of a sexual nature against DS:
 - a. When FP2 was aged about 18 or 19 (she can't remember - it was 4 or 5 years ago), she was coaching at WTC when she received texts from DS in which he asked her to take pictures of herself and send them to him. He asked for pictures of her breasts. She did not report it to anyone and did not respond to the requests ('FP2 text messages').

- b. In November 2008 FP2 attended a conference in a British city. DS was also present. Late in the evening she received a text from DS asking her to go to his hotel room. When she arrived, he was wearing just a T-shirt and boxer shorts. He was aroused. He touched her chest and tried to kiss her, at which point she said no and left. On the following day and subsequently DS acted as if nothing had happened; save for one oblique reference to it. She was very upset by it ('FP2 hotel room incident').
- c. FP2 also said she had confided in VB.
- d. However, she wished these disclosures to be confidential, save that they could be shared with D1. D2 told the Review that she found the alleged conduct "*unsavoury*" and "*unprofessional*" but did not feel able to do anything about it, given FP2's request that she didn't want to take it further.
- e. Therefore, they did not feature in the 2012 WTC Report.

74. This was a missed opportunity. This was a disclosure of inappropriate behaviour. It is reasonably capable of being treated as a disclosure of an alleged sexual assault. It is not at all clear to us what support she received in terms of help to follow through with this disclosure, if she wished to. We appreciate that her wish for it to be "confidential" may have caused difficulties with onward disclosure. There is an obvious tension between complying with the wishes of the confidant and one's wider duty or responsibilities. But, in our judgement, this was sufficiently grave to warrant referral to the LTA.

75. It should also have been viewed in context of what else was being disclosed about DS. It was part of a pattern of allegedly boorish and sexually inappropriate behaviour. FP2 was a teenager when DS allegedly sent her the text messages, albeit no longer a child. However, the nature of the conduct directed towards someone who is on the cusp of adulthood is highly relevant when considering whether he did or may have represented a risk to children, particularly older teenage girls. We are driven to conclude the significance of that was not appreciated at WTC.

76. The FP2 disclosures emerged again after the 2012 WTC Report was referred to the LTA. We consider them further in that context at paragraphs 178-180, 192 – 194 and 208 – 214.
77. A contributor whom we shall call FP4²³ told us that they had been playing at WTC from a very young age. They heard DS use the expression “*chicks and dicks*”. DS had a low opinion of women. He commented on the tightness of their tops or shortness of skirts. She was aware of the nature of the texts DS was allegedly sending FP2.

Other concerned parents

78. We have already mentioned RH. There is another set of concerned parents to consider at this stage. They contributed to the Review and we shall call them Concerned Parent A and B. Their daughter was a player at WTC. She started there in 2008. She was a very talented player. Before DS was suspended, and at a time when she was 11 or 12 years of age, he – and 2 other coaches – made unflattering and unpleasant references to her weight. They complained about this and other more coaching-related matters – to Coach 4 by email on 9 September 2012. We have already referred to her reaction, when she forwarded it to D1; it perhaps betrayed a lack of appreciation as to the true nature of the conduct. They told the Review that they complained to D1 about DS and other male coaches during 2012 and beyond.
79. Their daughter was spoken to by police following DS’s arrest in January 2017. We have seen a police report which summarises what she apparently told them. She said he was unpleasant to her and made unkind references to her weight: he called her an “*elephant on court*” and said she was “*fat*” and “*boys won’t like you*”. Unlike other coaches, he routinely repositioned her stance by physically moving her body position, touching her arms and hips. She left WTC because of his conduct.

²³ She did not contribute to the 2012 WTC Report.

80. In his contribution to the Review, D1 recalled there being issues with DS's failure to acknowledge the achievements of this player. He said there were also issues over her "fitness". He said this: "I think, on reflection, [DS] said things about [her] which were not appropriate". He also said that it was "on the edge of safeguarding". He accepted meeting the said parents a few times and said that eventually they moved her to be coached elsewhere.
81. The said parents also complained about another coach, whom they named. They said that on a trip without parents, he made young female players walk back unaccompanied to their hotel as a punishment. When investigators spoke to that coach, he agreed that he had made them walk back to the hotel; he did it because they were misbehaving and being disrespectful. He said the walk was in daylight, it was a straight road and he risk-assessed it. In response to that complaint he was spoken to by D1 and another, on a bench outside WTC. It did not feel very formal to him, but it was supposed to be. He told us that D1 and another coach supported him.
82. D1 recalled something of the incident and the meeting with that coach. He thought the players had walked back to the hotel of their own volition. He reproached the coach for describing a player's performance as "rubbish".
83. This is yet another worrying aspect. It did not involve DS. We are not in a position to assess the 'right and wrongs' of it. To do so would require an assessment of evidence and making factual conclusions as to what happened and in what circumstances. However, it occurred against the background of complaints about bullying. To address it by way of an informal discussion, is illustrative of a poor cultural approach to safeguarding at WTC.
84. That was not the end of their discontent. We return to them in the next Chapter.
85. These three contemporaneous disclosures, together with what was revealed during the WTC 2012 investigation lead us to conclude: **F8: WTC failed to address serious issues raised during its 2012 investigation and thereafter.**

(3) The 2012 WTC Report

86. **F9: The 2012 WTC Report and the analysis thereof were seriously defective.** We need to set out the 2012 WTC report in some detail, so our criticisms can be properly understood.

2012 Report

87. D1 told the Review that he was shocked by what they uncovered. He would not have tolerated such a culture at a school. He and D2 produced a draft report, circulated it amongst directors and discussed it at an extraordinary directors meeting on 27 February 2012. They wanted it to be “owned” by the whole Board. He thought no minutes were kept; we have seen none.
88. The 2012 WTC Report is dated 7 March 2012. The investigation was completed in less than a month. Expedition is invariably a virtue, but not if it results in the job being done improperly. It runs to only 6 pages, 31 paragraphs and has a single appendix.
89. It is more a discursive document than a report which presents the evidence, analyses it and reaches clear factual conclusions. Paragraph 6 thereof is incorrectly entitled ‘Findings’. It is incorrect for that it does not record any findings. Instead it sets out the two main categories or “themes” as they called them, into which the issues could be divided. The first paragraph is called “*child protection issues*”. The second issue is identified thus: “*management of the Centre and Academy...*”. At that stage of the document they make no findings in respect of either.
90. There is a section of the Report dedicated to SGCP issues. It is entitled “*Child protection*” [sic]. Under this title and in relation to DS, the authors appear to have concluded that he did not have an inappropriate relationship with a young player FP1 (which we shall call ‘finding 1’).
91. Further, D1 and D2 found – by virtue of his admission²⁴- that he made a

²⁴ Which DS later denied to the LTA ever making.

remark to an adult female player that amounted to a request for what are described as “*sexual favours*” in return for stringing her racket²⁵ (our ‘finding 2’).

92. This part concludes with the following (our ‘finding 3’):

“We found that on occasion players have been exposed to the use of bad language during training sessions. In respect of one individual, who no longer works at the Centre, the matter has been reported to the Safeguarding Team at the LTA²⁶.”

93. The coach referred to appears to be FC1. He was referred to the LTA for swearing. We note that WTC did not refer to the LTA DS for swearing. We could find no explanation for the apparent inequality of treatment as between a former coach and their present head coach.

94. The next part is entitled “*Management and cultural issues within the coaching team*”. What follows in that section of the 2012 WTC Report – in our judgment – goes beyond management or cultural issues and into SGCP issues. That betrays – for us - an absence of clear thinking and proper analysis and understanding of some of the material they were dealing with.

95. Paragraph 9 appears to contain allegations, it reads:

“We investigated a number of examples of inappropriate behaviour, including:

- An obscene picture being shown in a presentation at the start of a coaches meeting*
- Use of the Academy’s e-mail system to send abusive messages*
- Derogatory nicknames being given to young players*
- Coaches swearing within earshot of young players*
- Belittling and undermining of coaches by the Head Coach, Dan Sanders”.*

²⁵ Ibid., §7

²⁶ We infer that to be a reference to FC1.

96. Paragraph 10 concludes:

"Our conclusion in summary was that in a male dominated coach environment a 'laddish' culture has become commonplace. This culture has been allowed to thrive to the extent that the behaviour has spilled out of private interaction into situations where children and young players are present. Pornography, nicknames, swearing are all part of this culture and those indulging in it have not been given the appropriate guidance or training to enable them to realise that this is not acceptable."

97. On our reading they appear to have accepted as fact the matters stated therein.

98. Under that same heading and in relation to DS, they concluded that DS had shown a pornographic image at the start of a meeting of coaches:

*"At the start of an all-male coaches meeting an image was shown which FC2 described as 'pornographic'. He was shocked and embarrassed by the picture. Other coaches have confirmed that a picture was shown. Dan Sanders showed us this picture. He now accepts that it was inappropriate to include this in a business presentation in this environment."*²⁷ (our 'finding 4')

99. More generally, they also found (on our analysis):

- a. The phrase 'chicks and dicks' was used to refer to girls and boys in a coaches meeting attended by coaches from outside the Centre (our 'finding 5'²⁸).
- b. Other names referring in a derogatory manner to the physical appearance of young players were used in everyday conversation between coaches (e.g. "stroke boy" and "twitcher")²⁹ (our 'finding 6').
- c. It described that the giving of feedback to coaches about their performance and the development of their players was not always constructive and helpful. It is to be noted that the example cited involved

²⁷ Ibid., §11

²⁸ Ibid

²⁹ 2012 WTC Report, §13

DS's treatment of FC2, about which the latter complained³⁰ (our 'finding 7').

d. There had been a failure to take "*firm action*" in respect of those matters³¹.

100. It also found that the directors' policy on Child Protection was not effectively communicated to coaches and parents³² (our 'finding 8'). It identified a number of further "*management issues*" around the departure of FC1 and FC2.

(a) The 2012 WTC Report factual findings

101. Finding 1 – FP1:

- a. We have read the notes of the 2012 interview of FP1. She left WTC in June 2011, having trained there for about a year and a half; was aware that there were some rumours about her and DS; not aware of any inappropriate relationship between any player and any coach; she had not sent any pictures of herself to DS and he had not asked her to do so.
- b. We note that police spoke to her as part of their investigation into DS in 2017. The report we have seen states that she had "*no disclosures which would assist this investigation and still regarded herself as a friend of*" DS.
- c. Other witnesses did not support it.
- d. DS denied it.
- e. On the basis of the material before them this was entirely understandable and reasonable. They could hardly have reached any other proper conclusion.

³⁰ Ibid., §14

³¹ Ibid., §15

³² Ibid., §20

102. Finding 2 – restringing the racket:

- a. The 2012 WTC Report states that DS characterised that as a joke. The subject of that exchange was FP3. The Report records her as having not recalled it; the notes of that meeting record her as saying that she “*was not aware of any inappropriate conduct on the part of any coach toward any player*”.
- b. The notes of that 2012 interview disclose that she was then aged 20 years. She had no recollection of the re-stringing/sexual favours conversation, but the note records her as saying that she was “*was not aware of any inappropriate conduct on the part of any coach toward any player*”.
- c. FP3 cooperated with the Review - she joined WTC aged 18. She could not recall being interviewed by anyone during the WTC investigation. She said DS was an “*amazing coach*”. The culture at WTC was “*laddish*”. She heard DS making sexual comments about female players when they were skipping; he made to her a comment “*about doing restrings for blowjobs*” in the presence of other coaches which was said in a “*jokey way*’.
- d. Her account to the Review is inconsistent with the note of her account in 2012. However, D1 and D2 found that a sexually inappropriate comment was made to a young female player. It is right that at that time she was aged at least 18 years; but it was inappropriate, and action should have been taken. The fact FP3 did not take offence is not dispositive.
- e. Further, it demonstrated an absence of a proper regard for sexual boundaries. It was also directed towards a young female player. We note, it was alleged conduct not dissimilar to the texts he was alleged to have sent to FP2. WTC’s assessment of, and reaction to this conduct were inadequate.

103. Finding 3:

- a. Did not relate to DS. It does not name the coach, but it appears to be a reference to FC1, as it states the matter was referred to the LTA. If it was FC1, the LTA subsequently took no further action.

104. Further, findings 6 and 8 (and potentially 5 - subject to ages) give rise to SGCP issues, especially when viewed cumulatively. They also should have been looked at in the context of inappropriate sexual conduct by DS (findings 2 and 4). This is also the proper context in which the disclosures by FP2 should have been assessed, considered and (in our judgement) acted upon. Considered in that way, the SGCP concerns should have been apparent to the WTC directors and to others who read the WTC 2012 Report. There was, in our judgement, a failure to 'join the dots'; a failure to examine and to assess adequately the overall evidential picture.
105. As we have observed the investigation was defective and poorly executed, as was the delivery of its outcomes and recommendations. In our opinion they failed to appreciate the SGCP issues which arose from his inappropriate behaviour towards 18-21-year-old female players. Further, there was no formal risk assessment of DS. There is no evidence that anyone with specialist SGCP expertise was instructed to provide advice or carry out an assessment as to the risk he may have posed.
106. We make this comment about swearing by coaches in the presence of children. It is not appropriate, especially when viewed in the light of the other conduct. Does it amount to abuse? As the CPSU advice makes clear, there are 4 main types of abuse: neglect, physical abuse, sexual abuse and emotional abuse. This type of conduct is capable, we think, of being threatening and/or of creating a hostile and/or threatening environment to young people.
107. D2 insisted to the Review that at no point during their investigation did anybody give them information that suggested DS had done anything inappropriate physically or sexually towards children. That is a fair observation; but it is a limited one. SGCP issues go beyond the physical and sexual. We are bound to observe (again) that this response does reveal – we think - a failure to appreciate the wider ambit of conduct which goes beyond poor practice and amounts to abuse. This failure of appreciation was not D2's alone. It compromised their investigation, findings and recommendations.
108. D2 said they were aware of derogatory remarks and name-calling towards

children; such as DS using the phrase “chicks and dicks” and having derogatory names for players. She said this:

“with hindsight I accept that perhaps they should have been seen as a safeguarding matter. At the time these were made about children between coaches not directly to children. It doesn’t make it acceptable but it was not quite as bad as if these things were said to children. Issues around calling a young female player fat did not happen at the time of this investigation.”

109. She also observed:

“From the information we gathered we took the view that we hadn’t uncovered serious issues relating to child protection although there was evidence in hindsight we were probably wrong. There were aspects of [DS’s] behaviour that were unacceptable but we didn’t conclude that children or any people were at risk at the time. With hindsight perhaps we should have done. We felt reassured that the LTA investigation didn’t uncover such issues either.”

110. D1 said this:

“The spirit of our report was that child protection was clearly in our minds. Although the line hadn’t been crossed in relation to the two specific allegations the culture was dangerous and wrong and there was a need for us to do something about it. I would not have tolerated that behaviour in a teaching environment. What we had done is formally identify that it couldn’t go on and things had to change.”

111. With respect and for the reasons we have set out, we disagree with their analysis and with their conclusions in 2012. With hindsight they appreciate they made erroneous judgement calls. They were not alone. The 2012 WTC Report was shared at Board level. It was approved and adopted by the Board. Therefore, responsibility should be shared more equally. It rests with the whole of the Board and not the two directors alone.

(b) The WTC 2012 Report recommendations

112. The Report made a number of recommendations. In relation to management

of the WTC it recommended³³:

- a. The directors must accept responsibility for their failure to put in place sufficiently robust policies and procedures for the effective oversight of the HPC.
 - b. The running of the Academy should be overseen by a group of directors.
 - c. Engagement of new coaches will follow an agreed process which will include involvement of the directors.
 - d. Newly engaged coaches should go through a structured induction programme which will include learning about the ethos of the WTC.
 - e. Regular structured coaches' meetings should take place with a director present.
 - f. The job description of the Head Coach should be reviewed, particularly in relation to his management and reporting responsibilities.
 - g. The Head Coach should be given a letter of admonishment setting out the seriousness of its concerns and how he is expected to operate in future.
 - h. The Head Coach should be provided with training and support to help him to improve his communication and management skills.
113. In respect of the policies and procedures at WTC, the Report recommended that new policies should be agreed by the directors as a matter of urgency and adopted by all, including:
- a. A tailored code of conduct for coaches, setting out clearly and in detail, the types of behaviour that are expected in the Centre. This should include references to centre policies as below, and a process will be devised to ensure that all coaches read, understand and abide by it.
 - b. A code of conduct for players in the Academy.
 - c. An IT policy which sets out how the official IT network should be used and

³³ Ibid., §§22-29

is clear about private use and what may or may not be sent on it.

- d. A published complaints procedure for use by parents and other customers, to include guidance on what constitutes a complaint, who to complain to and any escalation procedures.
- e. A 'Whistleblowing Procedure' to enable anyone working within WTC to report concerns without fear of victimisation.
- f. A protocol for giving feedback to players, parents and coaches.

114. Those recommendations are, with respect, basic and reflect a collective failure properly to understand the totality of the issues. They are formulaic. They do not address at all the root cause of the problems, namely DS and a small number of identified coaches and did not indicate that they had breached any WTC policies or should be sanctioned in any way. It simply recommended that an Action Plan will be put in place to implement its recommendations³⁴. As we understand it, those recommendations were adopted and implemented by WTC.

(4) WTC Board

115. Our broad conclusion is **F10: The WTC Board failed to take sufficient action in respect of the findings in the 2012 WTC Report and the other available information.**

(a) Daniel Sanders

116. By letter dated 13 March 2012, D3 informed DS of the outcome of the WTC investigation into "*complaints from 4 people about issues that concerned them in the Centre and the Academy*". He was told:

"The investigation found that there a were number of occasions when your actions and behaviour did not meet the standards that the directors expect.

³⁴ Ibid., §31

These include:

- *Making jokes in a public area which could be misinterpreted as having sexual connotation in relation to a female player*
- *Showing an obscene picture at the start of a serious presentation to the team coaches*
- *Using or allowing the use by others in the team of derogatory language and nicknames for players*
- *Belittling and undermining a coach in the way feedback was given to him"*

117. The letter did not admonish him. It did not inform him that any disciplinary proceedings would be implemented, nor that any other action would be taken. He was simply informed that he would, "*be given clearer guidelines on the expected standards of behaviour and supported in developing [his] personal skills as a manager and team member*". This was inadequate.
118. The findings in respect of DS and as spelt out in the letter to him dated 13 March 2012 were serious. Swearing in the presence of young players and using derogatory names for children/young players gives rise, in our view, to SGCP issues. The alleged sexual behaviour should have been deeply concerning. On the face of what we have read, there was sufficient material to implement disciplinary proceedings. If in doubt, legal advice could have been taken. There is no evidence that it was.
119. A properly conducted investigation at the time would have been much better placed to assess the evidence and decide what did and did not happen at WTC. A disciplinary procedure would also have looked more closely at the evidence than we are able (or indeed mandated) to.
120. The actual findings WTC did reach against DS were not properly addressed. They should, in our judgement, have led to an immediate referral to the LTA, in addition to disciplinary action. D1 rightly makes the point that the LTA did not discipline him after its enquiry in 2012. However, that did not remove from WTC their responsibility to regulate matters within their own tennis centre and act appropriately, including according to its own policies.

(b) WTC more generally

121. The behaviour of other coaches was criticised. To characterise it as a “laddish culture” (whatever that actually means or was meant to mean) was a misstatement of the issues the 2012 investigation revealed. The 2012 WTC Report and its authors and the WTC Board failed, in our judgment properly to appreciate and reflect the seriousness of the issues at WTC. In consequence, they were not addressed. Those matters went beyond DS.

122. D1 and D2 both told us that the 2012 WTC Report was debated at the WTC Board meeting on 21 March, Minutes of which we have seen. There was a further WTC Board meeting on 16 April 2012. Both D1 and D2 told us that an Action Plan was agreed at the 16 April 2012 meeting. The Minutes record this:

"3. ACADEMY

[D3, D1 and D2] had met Dan & Sue and discussed a way forward for putting together necessary policies and procedures.

There was a discussion about future line management and it was agreed that [D3] should not continue as Dan's line manager, although e[sic] expressed a desire to retain an involvement in running the Academy. There would be further debate on the mechanism for managing Dan and for the time being a small group would take it on.

All policy decisions and staffing matters would come to the full meeting.

It would be necessary to repair relationships. [D4] had arranged to speak to Pam Griffiths to get an 'honest broker' opinion on the issues, and D1 would talk to Vicki Broadbent and Martyn Lewis about their concerns. Feedback would be given at the next meeting..."

123. We agree with the conclusion the LTA Safeguarding Manager expressed in her report dated 9 May 2012: at WTC at that time there was an “*endemic culture of poor conduct and practice...under the management of Head Coach [DS] and Chairperson [D3]*”. She also, correctly, in our view, concluded: “*the investigation fails to convey the seriousness of the poor conduct and*

behaviour displayed by [DS] and other coaches. Even more concerning is that when issues have occurred WTC has failed to adequately address the poor behaviour and conduct therefore allowing them to continue". This demonstrates that in 2012 the LTA appreciated the seriousness of the conduct and behaviour. It also shows that the gravity of the conduct was both capable of being, and was appreciated, (certainly by the LTA) at the time. What we do not know is why it was not by those in charge at WTC.

124. The 2012 WTC Report did seek to address that culture. The recommendations it made were inadequate and based on its flawed conclusions. It failed to address important issues raised by the evidence we have identified. What is clear beyond peradventure is that it was an opportunity to investigate properly DS's conduct and the behaviour of others. That did not happen.
125. We repeat, it is easy to lay the blame for this at the doors of D1 and D2 alone. That would be wrong and unfair. Other directors should have ensured the matter was referred to the LTA. They could also have instituted or at least suggested that disciplinary action should be taken. Further, if D1 is right and they all saw a draft and agreed the final version, they did indeed "own" it. Thereby they are all responsible for it.

(5) Developments

126. The final paragraph of the 2012 WTC Report states that a copy of it should be sent to the TW CEO. It states further that letters should also be sent to named individuals, informing them that an investigation has been carried out and that the directors will be making changes to address issues raised. Those letters were sent, dated 12 March 2012. A copy of the 2012 WTC Report was emailed to TW CEO on 9 March 2012.
127. The 2012 WTC Report was discussed at a meeting of the WTC Board on 21 March 2012. We have seen Minutes of that meeting. The Minutes record, *inter alia*, an observation that D1 and D2 were "*too hard on themselves and [DS]*". They note that WTC sent a letter to DS, which he signed and returned.

Thereby he is recorded as having accepted he had "*done wrong*". We have seen a copy of the letter dated 13 March, referred to above at paragraphs 116-117. D3 appears to have signed it. There is another signature which we presume to be that of DS. By that signature, one infers acknowledgment of receipt of the letter; agrees he has read it; and to "*accept its contents*".

128. Notes at the end of the said Minutes appear to record something of the material gathered during the course of interviews and the investigation more generally. There are details of the allegations made against FC1. While it is difficult to get the sense of a meeting from Minutes alone, doing the best we can, we discern from those Minutes a general view the Report was "*harsh*" on the Board but that they should accept it.
129. As a postscript, matters did not rest with the 2012 WTC Report. As we have seen, complaints from concerned parents continued in 2012 and, as this Review records, beyond. The legitimate disquiet felt by some remained.

D. Tennis Wales

(1) TW Reaction to the Former Coaches' Complaints

130. As with WTC, we have concluded that there were failures by some at TW and there are lessons to be learned.
131. The 2012 TW Board Chair told the Review that so far as he was concerned, WTC was an "*independent concern*". He said they asked the TW CEO to "*ensure the investigation was happening and in accordance with LTA procedures*". The procedure was that if a safeguarding concern came from a club it "*would normally be sent*" to the LTA. He believed the general consensus of the Board was that it was content for WTC to conduct an internal investigation.
132. VB told investigators that she and other directors told TW CEO that the WTC investigation should be independent and not conducted by D1 and D2. Contemporaneous email traffic between some of them and TW CEO supports her. The TW President from 2009-2012 recalled suggesting to D2 that any

investigation of DS should be "*independent*". As VB observed in an email sent in early February 2012 to TW CEO:

"I understand completely that Wrexham Tennis Centre Directors need to investigate what has been happening in their own centre BUT I also feel very strongly that this should not be instead of a Tennis Wales/LTA investigation; this is not a tennis centre issue it is a 'Tennis' issue and there are people not just economics to consider here."

133. They were all correct to do so. However, TW CEO did not impress that upon the WTC directors nor did he insist that such a course should be followed. In his contribution to the Review TW CEO paid tribute to the highly successful HPC the directors had built at WTC. D2 had been his line manager for the previous two years, and he had confidence and trust in her judgment and ability. That may have been the case, but the issues in the 2012 WTC Report were completely different from building a successful tennis centre.
134. He also observed to the Review that, "*I thought that the preferred internal approach by the Wrexham Tennis Centre was motivated by the fact that they didn't want to jeopardise their [HPC]*". If that was what he thought at the time, then it begs the question as to why they thought that. It should also have raised questions about independence and to have caused or led him to (at the very least) advise or – more appropriately - insist that the investigation was conducted independently of WTC. The failure to do so was compounded by the fact he told the Review that at the time he believed D3 to be close to DS and protective of him. Others have expressed similar sentiments to us. The risk of conflict or at least the appearance of conflict was obvious.
135. Therefore, we struggled to understand why he did not insist that the investigation was conducted independently of the WTC. During the Maxwellisation process he explained to us that he took that decision (and not to pass the matter immediately to the LTA) because of the "*circumstances of the two complaints*". He explained that because of circumstances in which those two coaches left WTC, it "*created the potential for the complaints to be a smear campaign against DS*". It may have done, but in our view, that was not a sufficient reason not to insist on an independent investigation and

referral to the LTA. He also volunteered that the decision was "*an error of judgement*" and he would "*definitely do it differently now*".

136. That this was an error is almost acknowledged. In a document the TW CEO provided to us entitled "[WTC] Safeguarding Case Timeline of Events 2011-2017" the following appears:

"Tennis Wales could have potentially shifted the 2012 investigation over to the LTA right from the start, however the case was eventually passed over to the LTA when it became clear there were some significant issues involved. Recommended Action: in future this type of situation probably should be passed over to the LTA immediately where further recommendations for best course of action can be discussed and considered as appropriate. In this particular case, the clear conflict between the coaches involved in making the initial complaints muddied the waters."

137. The words "*could have potentially*" inject – in our judgement – an unnecessary qualification. They should be replaced by "*should have been*".
F11: TW acquiesced in the decision of the WTC directors to conduct an internal investigation when it should not have done.

138. That error was compounded by the fact TW CEO failed to follow contemporaneous advice given to him by the LTA. He consulted the LTA in early February 2012 via an LTA Safeguarding Officer. We have seen her email in which she advised him that any safeguarding matter should be referred immediately.

139. It was not appropriate for the WTC directors/Board to conduct the investigation into the former coaches' complaints. In our view, TW, through its CEO, should have impressed that point upon WTC and made the referral to the LTA if WTC declined to do so. As the TW CEO acknowledged to the Review - correctly in our view - : "*I should have insisted that the matter was passed immediately to the LTA*".

140. It follows that we recommend - **R1: In future, safeguarding matters of this nature should be referred immediately to the LTA.**

(2) Treatment of the 2012 WTC Report

141. D2 emailed the 2012 WTC Report to TW CEO on 9 March 2012. Only he and another director were given a copy. That other director declined to contribute to this Review. The email informed TW CEO that the WTC directors agreed with its content. In that email D2 said that the Report “*is marked confidential for obvious reasons and [I] leave it to you to determine the next steps for [TW]*”. She also told him that FC1 had been reported to the LTA and he was “*now in their hands*”.
142. TW CEO appears to have accepted at face value the assertion that the report was “confidential”. He did not, by way of example, take legal or other advice as to whether it was “confidential” and , if it was to what extent. He considered himself bound by the (confidential) terms on which he received it. We have seen many emails in which he sought to explain and justify that position. With respect, we are unconvinced by the reasons he gave then or has given to us since. He maintains that he acted correctly. With respect, we disagree.
143. There is a balance to be struck between maintaining confidentiality of all those involved in safeguarding matters and the Board ensuring that it is meeting its corporate, statutory and regulatory responsibilities. However, in our view, reports of this nature should not be withheld from the whole Board. To share it would, we think, have also been consistent with the contemporaneous LTA Safeguarding Policy and the information sharing flowchart (HM Government, 2008). We emphasise that we are not saying it is necessary for TW Board members to be involved in the management of safeguarding matters. We are not saying it should have been involved operationally in the safeguarding investigation.
144. The TW directors spoken to by the Review told us they wanted to read the 2012 WTC Report at the time. We have seen contemporaneous email traffic which supports what they told us. They asked for it, sometimes in robust terms. It was the subject of debate at the 21 March 2012 TW Board meeting, the Minutes of which we have read.
145. They were not given it. TW CEO told the Review that – on his reading of it -

the Report did not give rise to any child safeguarding issues. He told the TW directors the same thing. In an email, sent to him on 13 March 2102 a fellow Board member made these valid points:

"Your assertion that there were no child protection issues discovered during the investigation is, I assume, based on the internal investigation carried out by those at the centre. What we need to decide as a board, is whether we are satisfied that this internal investigation was thorough and impartial, particularly in respect of any child protection issues if the management of the centre was alerted to problems some considerable time ago, and the same people who dealt with those alerts will also be involved in conducting a recent investigation, can we be satisfied the investigation was impartial?"

146. Therefore, we conclude - **F12: The WTC 2012 Report should have been made available to all TW Board members.**
147. As we have observed, an effect of the decision not to share the 2012 WTC Report with the directors was that they were removed from the decision-making process and so could not comply with their own responsibilities. Further, the more directors who saw it, the greater the chance that someone would appreciate – as they should have – that it did give rise to SGCP issues.
148. The decision not to share the 2012 WTC Report is also surprising, given the TW CEO's immediate reaction to the 2012 WTC Report. After receiving it, he emailed D2 on 9 March 2012 observing that DS staying at the Centre may face a "challenge" in terms of its "image and reputation". He raised a suggestion (from another) of a 12-month secondment to Bolton so that DS "can better understand the working and culture of a professional HPC working environment". The obvious inference is that he believed DS did not understand that; and would not by remaining at WTC. In any event, we have found nothing to explain why this option to address his behaviour was not taken.
149. The TW CEO was obviously concerned by the content of the Report. He told his fellow directors that much. On 15 March 2012 he informed an LTA Safeguarding Officer (LTA Employee B) of his concerns about the situation at WTC. In an email he sent to her at 07.51 that morning he said this:

"I am under significant pressure from the Tennis Wales board to circulate the internal report from Wrexham because they are concerned about potential child protection issues and an inappropriate environment. I have informed the board that I have not been given authorisation from Wrexham to do this. However I feel in an uncomfortable position here being in between the Wrexham board and Tennis Wales board and having sensitive and important information that I am not able to share. Therefore I am forwarding the report to you for your comment as to whether you feel that any immediate action needs to be taken.

150. He also said this:

"My summary of key findings is as follows:

- 1. No evidence of child protection issues.*
- 2. No evidence of inappropriate texting.*
- 3. Admission of the Head Coach making a sexual comment in public to a young female aged over 16.*
- 4. Evidence of bullying and inappropriate management style that probably led to one of the coaches leaving his job.*
- 5. Evidence and admission of showing an inappropriate sexual image on the large screen at a coaches meeting.*
- 6. Evidence of bad language being used by some coaches on court in front of players*
- 7. Inappropriate sexual language used in meetings with external coaches.*
- 8. Inappropriate language used by a coach on a work e-mail.*

To me these are serious outcomes [...]

My personal opinion here is that the process of the investigation has been very thorough and complete, however I have major concerns with the outcomes. I am concerned that stronger action is not being taken with the Head Coach and the Chair of Wrexham who has allowed this culture to blossom. I believe that the Head Coach should have been suspended early on in the investigation, if not immediately on receipt of the complaints, and

I believe that the ongoing involvement of the Head Coach at the centre is probably not appropriate. The sexual image shown at the coaches meeting is enough to warrant gross misconduct. But I guess this is a decision that the Wrexham board have to make. But what I am pretty sure of is that the Tennis Wales board will not be happy to accept that situation and therefore this will have major repercussions for the tennis environment in the area because the Tennis Wales board will want to remove themselves from involvement with what they will no doubt consider is an inappropriate environment. "

151. The TW CEO stated to us that he was recording in that email the 2012 WTC Report's conclusions rather than his own. We disagree. The 2012 WTC Report does not list its findings in that way. Nor is there any express conclusion that "no evidence of child protection issues" or "no evidence of inappropriate texting". Our interpretation is that his email represents his own summary of the report.
152. There are a number of points which arise from this. As we have commented, in our view the process was neither thorough nor was it complete. As we have made clear for reasons set out earlier in this Chapter, we profoundly disagree with the assessment that it did not disclose SGPC issues. Further, the reference to the age of 16 years is (potentially) concerning. Sixteen is not the cut-off age for a child; it is 18 years. We do wonder whether there was a conflation of the age of consent with the definition of a child.
153. In addition, the assertion that the 2012 WTC Report did not give rise to SGCP issues appears at odds with an email he sent to D1 and D2, 3 days earlier on 12 March 2012. Therein he said, *inter alia*:

"Having given this some thought I think from a [TW] point of view to cover all bases, until such time as the investigation is complete, outcomes circulated and actions implemented that [TW] needs to be saying that we will not engage the services of Wrexham coaches to work for us as part of [TW] events. I hope you can understand this point of view that we need to be seen to be taking a precautionary approach until such time as processes have been undertaken and completed to an extent that [TW] can feel comfortable with the environment that we are putting juniors into this part of [TW] activity."

154. On our reading the email demonstrates that he and TW had SGCP concerns about WTC coaches working with *juniors*. That concern appears inconsistent with the 15 March email to the LTA in which he summarised the report as not giving rise to any "*child protection issues*".
155. The understandable discontent within the TW Board rumbled on. In May 2012 VB was still asking TW CEO whether she and other members of the Board would see the Report. In an email sent on 26 July 2012 she observed: "*...this investigation has been anything but transparent.*"
156. After TW CEO sent the 2012 WTC Report to the LTA on 15 March, he told the Review that D2 shared with him the information she had received from FP2. TW CEO had an email exchange with FP2 about it. They exchanged emails about it on 12 March 2012.
157. In his email on 12 March the TW CEO told FP2 that he knew about her disclosures. He also said:
- "Because you were 18 or 19 years old at the time, then this incident that you describe is not an issue of Child Protection, however it could potentially be an issue of sexual harassment. Therefore, if you wish that this matter be considered as such then I would ask your permission to seek advice on this from the Safety Team at the LTA by forwarding your statement to them. This will of course be kept totally confidential by the LTA team if you agree for me to do this."*
158. FP2 replied to him by email sent on 12 March 2012 (at 15.16) that she did not wish to take the matter further with the LTA. However, she said she disclosed the information to D2 because:
- "I feel that the information was relevant as I was a young player/coach and received inappropriate text messages and the end result was the incident explained in the minutes. I did not respond to the text messages and the incident that happened at the Welsh coaches conference left me feeling very uncomfortable particularly as Dan was a lead coach on my court the next day. Also the minutes do not reflect how uncomfortable I felt about the whole thing."*
159. The "*minutes*" referred to is (we understand) a reference to the note of her

meeting with D2, which D2 emailed to her at 08.41 on 18 February.

160. We agree with FP2's assessment in her 15.16 email. Frankly, she is right. It follows that we disagree with the assessment of TW CEO that because she was aged 18/19 it did not give rise to SGCP issues. We note that the TW CEO did email D2's note of her meeting with FP2 on 16 February 2012 to LTA Safeguarding Manager A on 16 March.
161. The TW CEO has also reflected on his own decision making at – what must have been for him (and others) a difficult - time. He acknowledged to us that:
- a. *"I do agree with hindsight I should have acted differently";*
 - b. *"In hindsight...we should have adhered to the correct process and passed the report to the LTA safeguarding team as soon as I had seen the report"; and*
 - c. *"In hindsight...I should immediately have sought legal/expert advice and then subsequently passed the report to the LTA (which is what I did, but not straight away)"."*

(3) TW Overseeing WTC

162. We were presented with little evidence that TW did much, if anything, by way of superintending WTC after the 2012 WTC Report and the LTA's involvement. The issue barely gets any mention in Minutes for July, September and December 2012 TW Board meetings. In fact, the only mention is in the July Minutes is when an action is noted in these terms: *"Wrexham- [CEO] to seek written clarification from the LTA about the process of the investigation and what the outcome was from the point of view coach code of conduct"*.
163. Pam Alford, a TW Board member, told us she was concerned that the LTA decided to take no action, as she described it. We will look at what action LTA did recommend. She expressed to us surprise that those recommendations were considered proportionate to the complaints. For

reasons we shall explain, we agree. She said her unhappiness was shared by other TW directors.

164. It appears to us that the LTA Action Plan was not sent to TW. TW CEO told the Review that he was aware of the Action Plan, but it was "*not something that TW had responsibility for or was invited to be involved in overseeing*". He observed that there should have been a more coordinated and clear approach to this. We did find it surprising that TW did not involve itself in the Action Plan and provide some superintending of WTC to ensure that it was being implemented and being adhered to.

165. There may be some explanation for this in an email the 2012 LTA Head of Performance Support shared with us. It is from the LTA SM A to TW CEO which was sent on 27 July 2012. It reads:

"Dear [TW CEO],

Thank you for your email. As per my email on the 24 May 2012, the LTA Safeguarding Team has investigated the matters raised by Tennis Wales in accordance with the LTA Disciplinary Code, both when matters were deemed to be of a child protection concern and when we were dealing with matters of poor practice and poor conduct. The overall outcome, is that Dan Sanders is allowed to continue coaching, with no restrictions imposed on his Licence. At this stage there are no further issues the LTA need to raise or discuss with Tennis Wales and there are no immediate actions for Tennis Wales. Whilst a number of areas have been identified for Wrexham Tennis Academy to address in partnership with the Performance Network Team, there are no immediate concerns for the safety and well-being of children, young people or adults deemed at risk.

Kind regards,

[...]

Safeguarding Manager"

166. We have made clear we do not agree with the conclusions in that email. However, it would not be unreasonable for the TW CEO to point to it to explain the stance adopted by TW. On the other hand, he knew of the fact

of the Action Plan and he had read the 2012 WTC Report.

167. There was also confusion on the ground as to who was monitoring the Action Plan. A former national coach (Coach 4), who was employed by TW in 2012 told us that only a few at TW, including the TW CEO knew the outcome of the 2012 investigation. She did not know the detail. Nor did she know, because she was not told, the detail of what “*new procedures*’ (as she described them to us) were being put in place. It was said to be “*confidential*”.

168. That there was confusion on the ground is supported by the contribution of the LTA Head of Performance Support at paragraph 226. He confirmed that no steps were put in place within his team to oversee the Action Plan. He said he liaised with TW about monitoring WTC; but did not say what actual steps were put in place. The inference is that he understood TW and the National Coach were undertaking it.

169. In this context, the Camina Review observed:

“It would not be unreasonable for the LTA to have expected Tennis Wales to have taken lead responsibility but safeguarding leadership for Wales is based at its Cardiff headquarters not in the regional offices in Wrexham and the LTA had led the case management process. Equally, in a context where reportedly less than six per cent of Tennis Clubs in Wales had a Welfare Officer who was DBS checked and trained prior to June 2016, the fact that WTC had appointed a designated safeguarding lead may have given a false sense of confidence and security³⁵.”

170. The LTA Performance Network Programmes Manager told us that HPCs were subject to twice annual reviews. He thought the National Coach was tasked with monitoring progress on the Plan. He said there was a feeling that TW “*undertook visits function and that was done by the [National Coach] who would feed into the review process*”. Yet that National Coach told us she had not know, because she was not told, the detail of those “*new procedures*’.

³⁵ Para. 3.1.12

171. Further it highlights two further issue for us, namely (1) an absence of clarity as to TW's responsibilities in relation to WTC and (2) TW's analysis of the 2012 WTC Report. The latter is no great surprise since it was not shared with the Board. The lack of any real action by TW in relation to the Action Plan is symptomatic of this confusion as to where responsibility lay and what its actual role was. The safeguarding aspects should have been separated from the behavioural /cultural issues. The safeguarding aspect should then have been dealt with by the LTA. TW had a role to play in the wider cultural/behaviour issues and to manage matters in that regard. TW seems not to have done so.
172. It is also to be noted that a member of the Board, VB, continued to complain to the LTA about events at WTC, both after the WTC investigation in 2012 and in 2014. She was also involved with meetings with concerned parents A and B in 2012 and 2014. It is concerning and puzzling why more was not done by the TW Board.
173. Ultimately, we share the TW CEO's conclusion that there should have been a coordinated and clear approach between the LTA and TW in relation to overseeing the Action plan.
174. In our judgment, **F13: There was no clarity as to TW's responsibility to superintend WTC and monitor the LTA Action Plan.**

E. LTA

(1) Action in respect of DS

(a) Narrative

175. TW CEO sent the 2012 WTC Report to the LTA by email on 15 March 2012. It acted immediately. By letter dated 16 March 2012 the LTA imposed an interim suspension on DS. That letter refers to two of the allegations being "*substantiated*" a clear reference to the two found 'proved' in the 2012 WTC Report. It is to be noted that the letter informed DS that he was being suspended because of the "*the seriousness of the matters and the potential*

risk he posed to children and adults". The interim suspension was imposed pursuant to a decision made by the LTA SM in post at the time ('LTA SM A') and the Chair of the Child Protection Committee. The LTA then launched its own investigation.

176. D1 recalled that LTA SM A visited WTC with the LTA Equality and Diversity Manager on 21 March 2012. He handed over the WTC file. D1 also told us that during the LTA investigation there were some internal discussions about terminating DS's role at WTC. They resolved to await the outcome of the LTA investigation.
177. By a letter dated 23 March 2012 DS was invited to provide his comments in relation to the allegations. We have seen his detailed written response dated 25 March 2012. In summary he said the following:
- a. DS denied the allegations. He denied there was a "*laddish* culture" at WTC.
 - b. He described FC1 and FC2's assertions as "*defamatory and libellous*", threatening to take legal action against them both. He made counter allegations against them both.
 - c. He claimed that the WTC directors had promised him their support. If true, that is an interesting assertion, given that two of them purported to investigate him.
 - d. He raised issues with the content of the 2012 WTC Report in important respects:
 - i. He said he had no recollection of making a request for "*sexual favours*" in return for restringing a racket. He said that the WTC directors had misunderstood his reaction to that allegation; he told them that it *could* have happened, not that it *did* happen. In any event the player in question could not remember and was aged 20 years.
 - ii. As for the alleged showing of an "*obscene picture*" in May 2011, he claimed his recollection was not "*clear*" but that it was not pornographic; it was shown as a joke, which he had got from his mother; and it was treated as such by the other coaches who all

laughed.

- e. He criticised the conduct of other coaches and of the TW CEO.
178. FP2 was interviewed on 26 March 2012 by LTA SM A. She was no longer at WTC but had been a coach at the centre. She spoke to D1 during the WTC investigation (16 February) and had been contacted by TW CEO in consequence. Her name was supplied to LTA SM A who then spoke to her.
179. We have seen what we understand to be a contemporaneous report of that discussion. She disclosed the same two specific allegations against DS that she had confided in D2 about. Those disclosures were essentially consistent. The text messages were sent when she was aged 19; she was 20 years old when the hotel room incident occurred.
180. FP2 also disclosed the following (more general) matters about WTC and also about DS's 'influence' there:
- a. There was a *"very weird atmosphere at Wrexham"*, that *"feels tense"* and you *"feel like you can't be yourself, everyone's whispering in corners"* and *"you don't feel comfortable"*.
 - b. Male coaches are like a *"boy's club, they stick together, they probably know a lot more [than they would say]"*. *"Dan would influence and keep them quiet", "they're frightened of him"*.
181. By letter dated 4 April 2012 from LTA SM A, DS was informed of the nature and detail of FP2's allegations. In his written response to the LTA SM dated 4 April he categorically denied them. In support of that denial he asserted. *"I would NEVER jeopardise my wife and children for anything in this world!!"*.
182. His wife sent an email in support, timed at 23.19 on 4 April 2012. On 8 April DS's wife sent FP2 a Facebook message in which she accused her of telling *"disgusting"* lies and asking whether she had thought through the consequences for herself.
183. By letter dated 10 April 2012 the Chair of the LTA CPC informed DS that the interim suspension was lifted with immediate effect. The letter states that

the interim suspension had been imposed on the basis that it was understood that one of the allegations concerned a young person aged under 18 years. When the CPC met on 30 March it was appreciated that such was erroneous and accordingly the interim suspension was lifted. We have seen the Minutes of that meeting.

184. The said CPC Chair contributed to the Review. The CPC was unhappy with the circumstances of the case and took the unusual step of referring it to the CLRC. The CPC formed the view – which we share – that DS’s behaviour was inappropriate for a person in a position of trust.
185. Pursuant to the referral of the matter to the CLRC, LTA SM A prepared a Statement of Case, dated 2 May 2012 (‘SoC’). We have read that document, in which the background and LTA investigation is set out. It also contains what is described as an assessment of risk and a number of recommendations. The text under the heading ‘Assessment of Risk’, is an analysis of the competing evidence. A number of perceptive points are made including (1) DS’s tendencies to minimise the gravamen of inappropriate sexual behaviour and (2) to claim simultaneously to have no recollection of a specific incident, but also an ability to explain it (away) nonetheless. On our reading it does not contain any assessment of the risk (if any) DS may have posed and to whom at that time.
186. In the same part of the SoC, two further noteworthy observations are made. First, that there was no known or suggested motive or explanation as to why FP2 should or might fabricate her allegations. Second, the response of two WTC directors about which the ST was “*concerned*”. That response was assessed as follows:
 - a. They failed to recognise issues of poor behaviour and poor conduct exhibited by DS.
 - b. When behaviour that was not at the level required of a Licensed Coach was observed of DS, it was “*merely attributed to being part of ‘laddish’ behaviour*”.
 - c. They believed their investigation into the issues raised was ‘*too harsh*’ as

the outcome resulted in a referral to the ST; once again failing to recognise the extent and level of poor behaviour and conduct that has occurred within WTC.

187. The ST recommended "*based on the substantiated behaviour and conduct of [DS] along with the alleged behaviour by three separate complainants*" that DS:
- a. Undergo a period of three months supervision by a licensed coach from the LTA to monitor behaviour and conduct;
 - b. Undertake the LTA's Equality and Diversity training;
 - c. Undertake the LTA's Promoting Safety and Well-Being in Tennis training (Safeguarding training);
 - d. Undertake Professional Standards training or equivalent as directed by the LTA; and
 - e. Attend any other training as recommended by the Committee.
188. The SoC was supplied to DS for his comments and response. We have read his written response. Once more he denied FP2's allegations; he claimed the obscene image was a picture of the back of a man's T-shirt showing four printed stick men in sexual positions, which he showed as a joke; and if he ever made a sexual request in the context of offering to restring a tennis racket, that too was a joke.
189. The LTA SM sent a copy of her 9 May Report and recommendation to three members of the LTA Performance Network Team, including the 2012 Head of Performance Support. We have seen an email sent by the 2012 LTA Head of Performance Support the same day in which he said:
- "We will discuss further how to monitor the Wrexham centre however your 6 recommendations will definitely be used in a bespoke approach to this centre."*
190. The 2012 Head of Performance Support could not recall seeing that 9 May Report (though told us, "*I probably received it*"). In fairness, he had not seen

all the emails we have. We look at what action the LTA Performance Landscape team took in respect of monitoring WTC at paragraph 5 in Chapter VI – 2013/2014.

191. The matter came before the CLRC on 16 May 2012. We have read the Minutes of that meeting. The Chair and others present contributed to this Review. The CLRC referred the matter to the LTA Disciplinary Officer ('DO'). In his contribution to us the CLRC Chair opined that the CLRC concluded that the matters were serious, and DS may have committed disciplinary offence(s). We agree with that assessment; as we do its decision to refer the case to the LTA DO. The CLRC also agreed that the ST's recommendations as set out in the SoC should be considered by the LTA DO. DS was informed of that decision by telephone call on 17 May and by letter dated 29 May 2012.
192. The relevant LTA Safeguarding Log ('the Log') records an entry from LTA SM A on 8 June 2012. In light of what we were told it is necessary to set it out in detail:

"T/C to [FP2]

I informed that the CLRC outcome was to refer to the DO who stated that the evidence available does not amount to charges for misconduct. That if a referral to the DP occurred based on the allegations by [FP2] that she would need to give oral evidence to the panel. [FP2] stated she did not have the text messages sent and no hard evidence that would make the case 'black and white', that it was 'my word and his word'. She stated that things like knowing the hotel and what was on the TV was evidence but did not feel this would be strong enough. [FP2] expressed feeling quite daunted by the prospect of having to give oral evidence but also quite firm about wanting something to be done in relation to the allegations raised. [FP2] was on her way to a tournament today and wanted to take some time to think about things over the weekend. She will contact me on Monday."

193. LTA SM A's entry in the Log for 11 June reads:

"Email to [FP2] requesting return call.

[FP2] contacted me to inform she had thought about things and that due to the balance of probability she did not think the outcome would be

different. [FP2] stated 'I don't want to go through it again and nothing comes of it'. [FP2] stated she had hoped for an outcome from the CLRC and felt [DS] had 'got away with it'. I explained the process of referral to the CLRC and DO was serious and would remain on [DS's] record, however that with some situations the outcome is not always as expected.

DO informed of telephone call. Action:

- 1. DO to write to Mr Sanders.*
- 2. [LTA SM] to forward report & recommendations to Wrexham HPC, for Landscape Network team to follow up with action plan.*
- 3. Close case, send closure letters."*

194. The clear inferences to draw from that entry are:
- a. At the very least FP2 was expressing (understandable) concerns about the process and especially about giving 'evidence'.
 - b. The exchange ended with her apparently saying she would not. That fact (if it be a fact) was reported to the "DO" which we understand to be an abbreviation for the LTA Disciplinary Officer.
 - c. That decision had (at the very least) some causative effect on the termination of the prospective disciplinary proceedings because of (1) the reference to writing to DS and "close case" and (2) nine days later the LTA DO did write to DS in such terms.
195. On the 15 June 2012 the LTA SM emailed an Action Plan for WTC to two members of the LTA Performance Landscape Team, the LTA Head of Performance, the LTA DO and the LTA Equality and Diversity Manager. We have seen it. It contained her 6 recommendations from the 9 May 2012, with a timeline for implementation of the same ('the Action Plan'). She commented in that email that she and the LTA Equality and Diversity Manager were planning to attend WTC to deliver equality, diversity and safeguarding training, in August/September 2012.
196. The LTA DO sent DS a letter dated 20 June 2012. Its purpose was to inform him of the outcome of the LTA's investigation into him. It informed him as

follows:

- a. His conduct *"fell short of the conduct expected of an LTA Licensed coach"*.
- b. He would not be charged with Misconduct because:
 - i. It stated that FP2 would find the experience of giving evidence against him at hearing, *"too distressing"*.
 - ii. The other three allegations - (1) showing a photograph of a person wearing a t-shirt with 'stick men' in sexual positions during a meeting in May 2011 (2) provoking (sic) a 'laddish' culture at WTC and (3) not following proper employment processes including recruiting his wife - amounted to *"poor practice...[but did not] amount to Misconduct in accordance with the LTA's Disciplinary Code"*.
- c. He was informed that in light of his *"poor behaviour and conduct"* he should undertake the following training within the next few months
 - i. LTA equality and diversity training; and
 - ii. LTA promoting safety and well-being in tennis.
- d. He was recommended to undertake the following training
 - i. LTA professional standards online training; and
 - ii. Safe recruitment training.

197. The 2012 LTA DO contributed to this Review. She could not recall making the decision that DS's alleged behaviour did not meet the threshold for a disciplinary hearing. She said she would often discuss such matters with others, including the CLRC Chair and external counsel.

(b) Analysis

198. We understand why the CPC revisited the interim suspension. It was

imposed on an incorrect factual basis, namely that the alleged 'victim' was under 18 years of age. It was therefore right to revisit it on 30 March 2012.

199. However, what did surprise us is that the CPC did not consider the matter warranted further investigation and proceedings within its own remit. The CPC Chair informed us that she (and her committee) had "*limited information*"; did not have "*sight of the Wrexham investigation*"; were told only its the conclusions; and were advised by the LTA SM that "*the concerns related only to adults and were not safeguarding issues*". The Minutes for the 30 March meeting do not disclose to the contrary. If that is right, then it may not be a surprise it did not do more. However, the CPC might have been expected to call for more detail and for sight of the 2012 WTC Report.
200. In any event, as we have observed, there were SGCP issues which needed to be investigated properly. In our judgement the LTA should have gone further - **F14: The LTA decision not to pursue safeguarding proceedings against DS was erroneous.** In our view there was also sufficient material for a safeguarding investigation and proceedings in relation thereto. We also wonder whether there were grounds for the interim suspension to continue.
201. A consequence of such proceedings might well have been the gathering of more evidence, both in relation to DS and other coaches. It may well have been the case – we cannot predict – that others might have felt more able to disclose to the LTA that which was it difficult or impossible to tell D1 and/or D2. It might have had the effect of giving confidence to other people to come forward if the governing body was seen to be acting. Action by the LTA would have been without the inherent limitations of the WTC investigation. The LTA ST at the time was small. But it had the ability to outsource such an investigation to experts.
202. Further, we are confused as to what process the LTA adopted once the DO was seized of matters. In the letter dated 20 June 2012 DS was informed that his conduct "*fell short of the conduct expected of an LTA Licensed coach*". It is not at all clear to us whether he did admit the matters in respect of which LTA proceeded to deal with him. In fact, it seems to us that he did

not admit them all. Doing the best we can in respect of the “*allegations*” (as they were called) –

- a. Showing a photograph of a person wearing a t-shirt with ‘stick men’ in sexual positions during a meeting in May 2011 (which he appears to have admitted);
- b. “*Provoking*” (sic) a ‘laddish’ culture at WTC (which he appears not to have accepted responsibility for); and
- c. Not following proper employment processes including recruiting his wife (we simply do not know his position in relation to this).

203. No disciplinary proceedings were brought against him. There was no formal finding of Misconduct or any express finding of a breach of the Code by him. However, recommendations were made in respect of both him and WTC. Again, we are not sure on what basis or pursuant to what part of the Code they were made.

204. We have reached a different conclusion in respect of the decision taken in 2012 that DS should not be subject to disciplinary proceedings for Misconduct. The 2012 Code defined Misconduct as including, “(i) *any breach of the Association’s rules...*” and/or, *inter alia*, “(v) *any conduct which is detrimental to the interests of the game of lawn tennis*”³⁶.

205. Putting to one side the FP2 disclosures, the LTA concluded that the other three matters in the 20 June 2012 letter amounted to “*poor practice...* [but did not] *amount to Misconduct in accordance with the LTA’s Disciplinary Code*”. With respect, we disagree with that assessment. The letters sent to him by WTC (dated 13 March 2012) and by the LTA dated 20 June 2012, as well as the content of the Report, gave rise, in our view, to a *prima facie* case of Misconduct contrary to §2.2(i) and/or 2.2(v) of the 2012 Code.

206. Further, the decision (not to institute disciplinary proceedings) must be viewed in the context of the LTA SM A’s own conclusion as articulated in her 9 May Report: “*There is a distinct lack of confidentiality and professionalism*

³⁶ §2.2(i)

*amongst those leading both [TW] and [WTC]. Overall, what has become evident is the existence of an endemic culture of poor conduct and practice at WTC, whilst under the management of Head Coach, [DS] and Manager and Chairperson, [D3]". We agree with that. However, we would add that there was, in our view, sufficient evidence justifying proceedings being brought against him for Misconduct. **F15: The LTA decision not to pursue Misconduct proceedings against DS was incorrect.***

207. As we observed in relation to safeguarding proceedings, we do not know what might have come of disciplinary proceedings. The DP's sanctioning powers would have been extensive, including suspension and even removal of licence³⁷. The sanction would, of course, have depended on the nature and seriousness of any proven Misconduct. However, there was, in our judgement a case to answer. It was another missed opportunity.
208. FP2 spoke to the Review. She said she was 17 years old when DS started complimenting her on her appearance and commenting on her clothing. She confirmed that she told D2 about the event in the hotel room and she also told VB. She recalled telling LTA SM A (by telephone) about both of the incidents and that she could be named in the proceedings against DS. Her recollection was that LTA SM A subsequently told her DS denied the allegations and that she asked if she would go "face-to-face" with him. She said she was not comfortable doing so; she expressed to an investigator disappointment in the LTA that she was not given more support.
209. Police took a witness statement from FP2 as part of their investigation into DS in 2017. We have seen it. She told them what she told us (and others) about the text messages and the incident in the hotel room. The requests by texts for explicit photographs came when she was aged 19 years old (or thereabouts). The incident in the hotel room happened when she was 20 years old and in the early winter of 2008.
210. LTA SM A was spoken to by the Review. She said she could not recall speaking to FP2 but said it was likely that she spoke with her on the telephone. She did not understand any reference to FP2 having to "face" or meet DS; she said

³⁷ 2012 Code §9.1

she would not have asked her to do so and would never ask an alleged victim to “face” the person they accused. She also claimed there was “*reluctance and resistance*” from the “*LTA Legal Manager*” to take action against DS as he was a Level 5 coach. We know not to whom that refers, and we have found no other evidence of it.

211. A number of aspects about the 8 and 11 June events and Log entries trouble us. Whatever was actually said to FP2, she was left with the impression that she would have to face DS. That was not right. We do not know what support she was given at that time. It appears to us that she was not visited; she was simply spoken to over the telephone. We do not know the extent to which the nature of the possible proceedings was explained to her. By way of example, we do not know if, and can find no evidence, that, she was advised about the possible provision of special measures to facilitate her giving an account to a disciplinary panel.
212. What FP2 alleged against DS was serious and it was sexual. To us, whether the sending of the sexual text messages started when she was aged 19 is not the most significant point. That conduct, if proved, demonstrates (at the very least) an absence of self-control and a failure to understand or respect proper sexual boundaries. Regardless of her age, there was an imbalance between them, given he was her head coach. That the alleged conduct concerned a teenage female tennis player is all the more concerning; and should have been in 2012. To someone with such a propensity, the ages of 18,17 or 16 are unlikely to be material considerations.
213. Further, those disclosures did not stand alone. She made another serious allegation against him. Further still, they should have been viewed in the wider context of his behaviour at WTC as recorded in the 2012 WTC Report. We understand the difficulties faced by those with safeguarding and disciplinary or licensing responsibilities, where the subject of such alleged conduct is not inclined to ‘formalise’ a complaint. We have seen sufficient material to the effect that FP2 did not wish to ‘take forward’ her grievances. However, in our view that should not have been the end of matters. We are left with real reservations about the way this was handled and the absence of evidence of demonstrable efforts to help her take the matters forward. In

any event, we can find no evidence to demonstrate that consideration was given to other avenues such as:

- a. pursuing safeguarding or disciplinary proceedings on the basis of a hearsay complaint from FP2; and/or
- b. advising FP2 as to the provision of special measures;
- c. seeking to obtain a formal risk assessment of the risk he might pose in light of this disclosure.

214. Therefore we conclude that **F16: There were failures by the LTA in the handling and processing of FP2's disclosures.**

215. Overall, we are left the impression that the LTA struggled to get a proper handle or grip on this case in 2012. It appears to have been passed from one committee to the next, before landing on the LTA DO's desk. It was left to LTA SM A to put an Action Plan in place. Of all those who looked at WTC, she came closest to correctly identifying the issues.

(2) FC1

216. As we have made clear, the events at WTC causing disquiet were not limited to nor revolved solely around DS. As we have already observed, DS made allegations about FC1.

217. On 28 March 2012 the LTA SM met with AJ. The Log records that AJ complained about FC1's conduct.

218. FC1 cooperated with this Review. It is important to state that he always denied those allegations in the complaint. He spoke with the LTA ST on two occasions in 2012. He provided a response to the allegations, which included the observation that AJ's mother never complained about his coaching of her son. He also repeated his concerns about DS and suggested he may have "*orchestrated*" the complaint.

219. On 28 June 2012 LTA SM A wrote to his mother DJ. In that letter she

informed her that “the CMG has decided that this matter is not a disciplinary issue warranting further investigation or action by the LTA”. As we have seen above at paragraph 53(d) the LTA wrote to her in November 2012.

220. Following an article published in a national newspaper in November 2017, DJ contacted the LTA ST. The present HoS met DJ and AJ in December 2017 and re-opened the FC1 matter. They took statements from 5 people, including DJ and AJ. They also spoke to others. They spoke with FC1, who maintained his denials. It is also to be noted that FC1 had undertaken safeguarding training and there had been no such allegations in the interim.
221. In light of thereof, on 15 May 2018 the Chair of the SPC wrote to DJ and AJ informing them that she had decided not to refer the matter to the Safeguarding and Protection Committee. She reached that decision in consultation with the LTA HoS.

(3) WTC

222. LTA SM A prepared a report on WTC dated 9 May 2012 entitled “*North Wales Regional Tennis Centre/Wrexham High Performance Centre (9 May Report)*”. Therein she analysed the evidence gathered and made a number of findings in consequence.
223. She reached these conclusions about WTC:

“There is a distinct lack of confidentiality and professionalism amongst those leading both [TW] and [WTC]. Overall, what has become evident is the existence of an endemic culture of poor conduct and practice at WTC, whilst under the management of Head Coach, [DS] and Manager and Chairperson, [D3]. There is reference to the WTC as a ‘lads culture’, ‘bloke culture’ and ‘old boy’s network’ along with the notion of ‘third party awareness’ which is encouraged and therefore promotes unacceptable behaviour, led by [DS], who admitted trying to instil a ‘third party awareness’ which is overseen by [D3], Chairman and Manager. For such behaviour to be acceptable and remain unchallenged is wholly unacceptable and falls short of expectations of coaches and management of an Independent HPC.

Whilst the outcome of the investigation undertaken by Wrexham concluded there were no child protection matters, the investigation failed to convey the seriousness of the poor conduct and behaviour displayed by [DS] and other coaches. Even more concerning, is that when issues have occurred, WTC has failed to adequately address the poor behaviour and conduct, therefore allowing them to continue.

A number of unsubstantiated allegations have been made in relation to [D3] and [DS's] behaviour, admittedly whilst subjective and unsubstantiated; it appears relevant to the overall consideration of the current situation at WTC."

224. She also made the following recommendations:

"Recommendation 1: The process for reporting any concerns or allegations of abuse is clearly displayed at WTC and Tennis Wales and monitored by the Performance Landscape Team. Alternatively, initial concerns can be raised directly with the LTA Safeguarding Team.

Recommendation 2: The Whistle Blowing policy to be re-distributed to all current employees and distributed to all new employees on induction. With current employees signing a letter to state they have read and understood the contents and kept with the training record and monitored by the Performance Landscape Team.

Recommendation 3: A bespoke session to be organised in consultation with the Performance Landscape Team, about the importance of confidentiality to ensure working relationships can be repaired and be maintained in the future, within the next 6 months.

Recommendation 4: All coaches to undertake the Professionals Standards on-line training within the next 3 months and for their score to be recorded on a central training database to be accessed and monitored by the Performance Landscape Team.

Recommendation 5: [DS] and those staff planning to recruit for WTC to read the Safe Recruitment and Selection Procedures available from the NSPCC Child Protection in Sport Unit, along with the LTA's Safer Recruitment policy. It is also advised that they organise a bespoke session on Safer Recruitment by the NSPCC within the next 3 months, in consultation with the Performance Landscape Team session.

Recommendation 6: All coaches working at WTC to attend: Promoting Safety and Well-being in Tennis training (Safeguarding) and Equality and Diversity training within 6 months of the Committee's decision and record on a central training database to be accessed and monitored by the Performance Landscape Team."

225. As we have observed, LTA SM A prepared an Action Plan which she circulated. It contained her 6 recommendations from the 9 May report with a timeline for implementation of the same. The last action was to have been completed by December 2012. It was shared with the Performance Landscape Team. That Team had responsibility for monitoring WTC as the Action Plan makes clear. That is also clear from the 27 July email from LTA SM A to TW CEO, which we have looked at. It stated, *inter alia*:

"... At this stage there are no further issues the LTA need to raise or discuss with Tennis Wales and there are no immediate actions for Tennis Wales. Whilst a number of areas have been identified for Wrexham Tennis Academy to address in partnership with the Performance Network Team, there are no immediate concerns for the safety and well-being of children, young people or adults deemed at risk." [emphasis added]

226. The 2012 LTA Head of Performance Support told us that had the matter concerned an *"English Regional Centre then my team would have led on oversight"*. He acknowledged in his statement to us that no steps were *"put in place to bring forward any work to check progress against [WTC] action plan"*. He told us that while not making excuses, in 2013 *"significant budget cuts"* were made to his team, he lost a member of that team and he suffered pressure picking up his work in consequence.
227. We spoke to other members of the Performance Network/Landscape Team. None could help us with the steps taken *by that Team* to monitor WTC. The Performance Network Programmes Manager told us that HPCs were subject to twice annual reviews. He thought the National Coach was tasked with monitoring progress on the Plan. He said there was a feeling with Wales that TW *"undertook visits function and that was done by the [National Coach] who would feed into the review process"*.
228. We cannot see what, if anything was done, by the Performance

Network/Landscape Team to monitor the Action Plan and WTC. The 2012 LTA Head of Performance Support said this:

"From what I recall there was some communication between my team and Tennis Wales about what would be done to monitor the improvement because it was acknowledged that [the National Coach for Wales] was the person attending the centre on a regular basis. I believe that [the LTA SM] also delivered some training at Wrexham Tennis Centre. It would have been impossible for [the Performance Network Programmes Manager] to have monitored the Wrexham action plan as he would only visit twice a year. If there had been a major concern my team would have definitely acted. This is all I knew about the situation at Wrexham until issues came out in 2017."

229. He said he made a few visits to the WTC during 2012-2017. However, it is fair to make four observations about the Performance Network/Landscape Team.

230. Firstly, as we have made clear they had not assessed all the material we have. Secondly, as the Camina Review made clear:

"Ultimately it was the Centre's responsibility to instigate the changes required but it was not recognised that they would require significant support to challenge the prevailing culture at that time. The LTA's Performance Network Team was tasked with supporting this challenge but, in a context where concerns focussed upon a performance coach and centre, and in the light of existing knowledge in relation to the increased safeguarding risks and decreased child focus within an elite sport environment this was inappropriate and safeguarding expertise was vital"

231. Thirdly, we have been told by the LTA Head of Performance that the ability of the Performance Network/Landscape Team to monitor the Action Plan was *"severely limited because of diminishing resources"*, a point we have recognised.

232. Finally, we note the content of the email sent by LTA SM A to the TW CEO on 27 July 2012 at paragraph 165 above that *"there were no immediate concerns for the safety and wellbeing of children, young people or adults deemed at risk"*.

233. In light of the above, our second recommendation is as follows. **R2: The biannual LTA audits of HPCs should be multi-departmental including reviews of both performance and safeguarding.**
234. By letter dated 9 January 2014 the then (new) LTA SM ('LTA SM B'), enquired of DS as to the extent to which he and WTC had complied with the Action Plan and his predecessor's May 2012 recommendations. He said it was part of what he called a "*routine process*³⁸".
235. D1 replied to that 9 January letter by letter dated 26 January 2014. Therein, D1 stated that DS had completed that training as follows:
- a. LTA equality and diversity training and LTA promoting safety and well-being in tennis on 4 September 2012;
 - b. LTA professional standards online training, on 30 September 2012; and
 - c. In addition, he completed a safeguarding training session led by the LTA SM and Equality and Diversity Manager on 4 September 2012.
236. In short, he asserted that each element of the Action Plan had been completed and he appears to have included supporting documentation, where it was available.
237. It is far from clear what steps, if any, were taken to monitor implementation of the Action Plan before January 2014 by the ST. It is also surprising that it was thought appropriate to ask DS whether it had been complied with. There was an apparent lack of planning and organisation. There was no evidence of establishing markers by which progress could be measured and reviewed. It seems that completion of it was based upon self-reporting.
238. Therefore, we find - **F17: The LTA failed sufficiently to monitor its 2012 Action Plan.**
239. Finally, we need to return to VB. On 9 July 2012 she emailed the LTA Manager. She said this:

³⁸ In fact, as will become clear from the next Chapter this appears to have been provoked by further complaints about DS and WTC.

"Wrexham is the centre that we are supposed to link to, the required management processes are still not in place to reassure me enough that it is the best place for me to send our children...I understand that after the LTA took over the investigation that no one was re interviewed. This is a concern of mine also..."

240. LTA SM A replied by letter dated 13 July 2012. Therein she said, *inter alia*:

"I note the concerns you raise about the process of investigation by [WTC] following letters of complaint by [FC1] and [FC2]. I also note your concerns about the subsequent investigation carried out by the [LTA's] safeguarding team. You also indicated you want your email content within to remain confidential..."

Finally as you have requested information within your email to remain confidential we cannot attempt to begin work with the [WTC] to address concerns you raise. Should you want the LTA performance network team to look into the concerns you raise about [WTC] you would need to give consent."

241. VB sent another email to LTA SM A on 25 September 2012 in which she said she was still getting complaints from parents about the culture at WTC and bullying aggressive behaviour. She said parents and coaches were afraid to come forward. She said she was speaking in confidence and wanted advice.

242. LTA SM A replied by letter dated 5 October 2012. Therein she said, *inter alia*:

"Whilst your email mentioned you were reporting this in confidence the LTA cannot investigate complaints or concerns without new facts. Therefore, if parents are reporting new concerns to you then I ask that you record these concerns and forward them to the LTA or ask the parents to contact us directly without this information we cannot consider any complaint or concerns that you mention."

243. LTA SM A also said that she was unable to comment on the investigation carried out by WTC.

244. We have some sympathy for the LTA's predicament when told that such was confidential. However, the rather brusque and inflexible response was not designed to encourage further disclosures nor to inspire confidence.

245. However, it goes further than that. The absence of a 'formal complaint' did

not prevent an investigation nor should it necessarily have resulted in that decision. The decision not to act and to investigate later in 2012 was consistent with the approach the LTA adopted vis-à-vis the 2012 WTC report. But there was no virtue in that consistency. The VB disclosures in July and September 2012 should have been assessed in the context of all that was known about the WTC.

246. In light of the 2012 WTC Report and what the LTA knew of events at WTC, its safeguarding antennae should have been acutely sensitive to any further disclosures of a like or similar kind. There was an Action Plan in place. VB's letters showed that the problems did or may have remained. They were coming from a person who happened also to be member of the TW Board. We are surprised that, in effect, nothing further was done later in 2012. In our judgement, the LTA should have investigated what was happening at WTC. It was passive when action was justified and required.
247. Accordingly, we find - **F18: The LTA reacted inadequately to VB's July and September letters.**

VI. 2013-2014

A. INTRODUCTION

1. The next logical period to consider is 2013/2014. Events do not divide with such precision. However, this is a convenient way to study the next collection of events. The reality is that what follows in this Chapter is a continuation of events in 2012.

B. LTA

2. There are a number of matters which call for consideration so far as the LTA is concerned. We address them in chronological order.

(1) Anonymous letter - May 2013

3. On 7 May 2013 the LTA received a letter sent anonymously. It is necessary to set it out:

"Dear Sir,

Please could you assist us at Wrexham Tennis Academy there is something very wrong here and players are leaving because of the way we are being treated by the coaches and there is no one to turn to.

Some of the best players in the country have left because of the abuse and others are leaving to go to other places to train. There is no one to talk to as if you challenge them they will take it out on your children.

One of the best players here had to go to the United States early because of the way she was treated by the coaches so if they did that to her what chance have the rest of us got. Another girl is going to America early this year!!!

No one ever asks the parents what is going on so we just move away. Just send someone up to speak private and you would see what was going on.

The better coaches are even suggesting that we move players away. Please help. Its [sic] not right.

I daren't say who I am as if it got out I would have to leave as my child is still at the Academy and they would more likely take it out on her.

A concerned parent"

4. There is a manuscript endorsement on it "Received 7/5/2013". We believe we have identified the author of that letter. We believe it to be one of the concerned parents, who the preceding year had expressed similar concerns to D1.
5. The letter was received by the LTA ST. The staff member who received it contributed to this Review. She said it was a busy team. Contemporaneous email traffic shows that she received the letter and sent it to a former member of the LTA Performance Landscape Team (who declined to contribute to this Review and is no longer in the employ of the LTA) on 9 May 2013. He replied that morning asking what the "plan" was. Her response copying in an LTA safeguarding officer (LTA Employee B) was in these terms: *"Unfortunately as no names have been used and the sender is anonymous, there is little we can do"*.
6. From the material we have had access to, it seems nothing was done in response to that letter. While we understand the difficulties posed by an anonymous letter, it did not come in isolation. The events of 2012 were not distant history. Further, there was a 'live' Action Plan for both DS and WTC. The content of that letter spoke of "abuse" and other concerns. While the nature of it is not specified, it was *prima facie* concerning and necessitated attention and action. **F19: The LTA's response to the anonymous letter dated 7 May 2013 was insufficient.**
7. The following might reasonably have been expected:
 - a. A visit to the WTC.
 - b. Letters to DS and the directors, copying the anonymous letter and demanding (1) a detailed and urgent response in respect of that and

- (2) an update on the implementation of the Action Plan.
 - c. A further letter to the TW Board, DS and the directors, copying the anonymous letter and inviting (1) a response and (2) detail of their overseeing of WTC.
 - d. Publicity at WTC inviting people to contact the LTA.
 - e. A survey of the centre.
8. This was another example, as we saw in July and September 2012, of the LTA reaction to something it treated as not being a 'formal complaint'. We think the letter should have been seen for what it was: disclosure of serious concerns, including what was described as "abuse". Further we can see no evidence that the LTA ST considered the wider picture of what it knew about WTC. This letter was another 'safeguarding red flag' flying over WTC; and it should have been treated as such.
9. If the LTA was not complacent about WTC, it does seem to have been mistakenly unworried about it. There is sense of inactivity or passivity about the LTA at this time so far as WTC is concerned, which we have struggled to understand. Doing the best we can, the LTA ST might have felt it could not act unless it received a 'formal complaint'. If that was the view, it was mistaken. If the LTA ST felt it did not have sufficient evidence of the necessary nature to take action, it could, and should have, enquired to see if it existed. There was sufficient material to justify the LTA commissioning its own independent investigation into WTC. It had the power to do so. This inertia characterised the LTA reaction to further disclosures from WTC during this period.

(2) Dr Carwyn Jones Referral

10. Dr Carywn Jones ('CJ') contributed to the Review. He was an independent member of the TW Board for 6 years, ending in 2014/15. He had no recollection of being involved in events in 2012.

11. He recalled conversations he had with two fathers. One was Concerned Parent A. Having done so, he concluded that they were concerned about the way DS was treating some of the adolescent players; there were suggestions of favouritism; and the parents were unhappy about the way he was running the squads. His recollection is that there was no suggestions of sexual misconduct.
12. CJ's understanding was that TW did not have "*jurisdiction*" (as he described it) over WTC. WTC was certainly not financially reliant on TW. The safeguarding arrangements were handled by the LTA ST, he believed. He spoke with someone at the LTA ST. He shared the information he had received from the parents. He expected the LTA to take matters forward from that point ('the CJ referral'). He never received a final update from the LTA on how the matter was finalised. He updated the TW Board about this referral.
13. We have seen internal LTA email traffic relating to the CJ referral. He emailed the LTA ST on 28 December 2013. He copied in another TW director. Therein he said, *inter alia*, thus:

"I write to you as a member of the Board of Tennis Wales responsible for Child protection to bring to your attention possible concerns with regard to the programme at Wrexham performance centre. I was asked last week by another Board member to contact 2 parents in Wrexham who express continuing concerns about the programme. I have spoken to 2 fathers who alleged that there had been no change in the attitude of coaches following the last investigation by your team.

[...NAMES AND TELEPHONE NUMBERS FOR EACH FATHER]

They both felt that despite speaking directly to those responsible for running the programme at the centre, their concerns had not been addressed and that inappropriate behaviour is alleged to be continuing.

I told them that they could contact you direct to report their concerns but both felt that it was unlikely that 'anything would ever change at the centre under the present management' Both had removed their daughters from the programme and stated that a number of other players had also left. They did however feel a responsibility to speak out as they maintain that

the coaching culture at Wrexham was still not appropriate for young players.

I am unsure whether any recommendations were made by your department to the management board at Wrexham or whether any follow up has happened to assure that the previous concerns had indeed been fully addressed.

I am in a difficult position in that I have no direct responsibility for investigating or following up their concerns, but my experience as a GP over 25 years in Child protection issues is that any concerns need to be shared with those responsible for assuring the well being of our young children. [...]"

14. The content is troubling, for a number of reasons. First, it refers to conduct of a kind that was alleged and investigated in 2012; if the disclosures were accurate then such behaviour had not stopped. He was plainly troubled by the SGCP issues arising out of what he had been told. Second, those parents had no confidence in the leadership of WTC and/or LTA or that they would be listened to if they disclosed. Third, CJ was a TW Board member, yet did not know the outcome of the LTA investigation in 2012 nor of any recommendations made and/or any action taken in consequence. Of course as we have seen, that was because he was not told.
15. The (new³⁹) LTA SM ('LTA SM B') replied by email to CJ on 30 December 2013. He promised to read up on the case and to reply. He did so on 2 January 2014. In that reply he suggested it would be helpful for the parents to put their concerns in writing to him. CJ said he would ask them to do so.
16. It is to be noted that the original email from CJ contained the names and telephone numbers of the fathers who confided in him. They could have been contacted directly by the LTA. One was the author of the anonymous letter sent to the LTA in May 2013. The other wrote the letter in January/March 2014 to which we turn next.
17. There was an internal LTA email debate about the CJ referral involving, *inter alia*, the DO, SM B and a LTA lawyer. The LTA DO told us that she recalled

³⁹ Not in post in 2012; he told us he had been in post for approximately 8 weeks that this point.

this event. She advised LTA SM B to look at his predecessor's report from 2012. She also recalled LTA SM B telling her that there was "no new evidence". In his contribution to the Review, LTA SM B said this was "unlikely" as "evidence" was not a word he would use. He also said he was managing several other cases. He said there was no case management system; he was not given access to LTA SM A's emails; and knew nothing of the chronology of the case.

18. It is clear to us that LTA SM B looked at the 2012 Action Plan and followed it up. That is what caused his letter to DS dated 9 January 2014. As we have remarked, that in itself is surprising: asking DS whether he and WTC have complied with the LTA's Action Plan. It tends to suggest the LTA did not monitor compliance in any meaningful way. It is also a fair indication as to DS's role at WTC: in essence he was at the very heart of the Centre.

19. DS replied by email on 11 January 2014 stating he had passed it onto D1; he added that he understood that all of the matters had been addressed. We know that D1 wrote to LTA SM B, to that effect, by letter dated 26 January 2014. On 27 January 2014 one of the parents who spoke to CJ, emailed a LTA Safeguarding Officer. That officer replied by email on 30 January and said:

"I have spoken with [...], LTA Safeguarding Manager, in regards to your query. Wrexham HPC have completed all the recommendations set by the LTA and provided evidence of this. [The LTA SM] will also be visiting Wrexham HPC and meeting with the Directors to discuss any future developments."

20. By email, that father responded the next day in these terms ('the 31 January email'):

"Could I just point out that I did not have a specific query. I was asked to contact you by the Safeguarding Officer at Tennis Wales, Caerwyn [sic] Jones who was concerned about the situation at Wrexham and made contact with me to gain more information. I was then asked by Tennis Wales to contact yourselves which I did.

As I said during our conversation there have been a number of what I consider to be worrying incidents over the past 18 months involving girls

who trained at the Academy which have been dealt with locally following complaints from parents. These complaints when viewed collectively suggest to me that lessons have not been learned. People generally do not take the decision to drive to alternative training venues 40 miles away when they were previously attending the HPC on their doorstep in large numbers without good reason. These incidents have been reported to and dealt with by the Directors of the [WTC].

Unfortunately and surprisingly there is no female coach at the Academy or suitable female member of staff for players to turn to other than the wife of the Head Coach.

I am reassured that you will be visiting Wrexham and would urge you to satisfy yourselves that no children are at risk, physically or psychologically whilst at your HPC.

[...] I know only too well the potential consequences of ignoring or excusing a pattern of behaviour until it is too late.

I would be more than happy to assist in any way I can in the future and would be willing to meet up with you whilst you are in Wrexham should you consider it beneficial."

21. That appears – on the basis of what we have seen - to be the last exchange between them. His offer of further assistance was never accepted by the LTA.
22. The LTA did take some action and it was right to do so. It followed up on the Action Plan; though the method employed was, as we have remarked, surprising. However, given the timelines in that document, we are troubled to understand what action, if any, was taken in 2012 and 2013 to ensure compliance with it. Our Review has not established any clear evidence that anything was done to monitor its implementation. Two contributors from the LTA told us they understood TW was monitoring it. One of them named the person he believed was responsible. But, that same person told us she was never asked to monitor it.
23. The CJ referral had echoes of 2012, both in terms of its content and the reaction to it. We have concluded that more could and should have been done by the LTA ST in January 2014. Again, context is important. The CJ

referral came after the May 2013 anonymous letter and the events of 2012. LTA SM B told us that he did not have access to the anonymous letter and – as we have made plain – was not the SM when it was received by the LTA. We do not know why that was. It is a surprise, given that the LTA provided us with the letter. If it was not available to the LTA SM it does raise questions as to the efficiency of the record keeping and system generally. It may therefore be no great surprise that the emerging theme (for us) from these different events is a failure to join the pieces and appreciate the cumulative picture, stretching back to 2012.

24. The following might reasonably have been expected from the LTA in response to the CJ referral:
 - a. Contact the concerned parents directly.
 - b. Offer to visit the concerned parents; and followed up if accepted.
 - c. Letters to DS and the directors, inform them of the content of CJ referral and demanding a detailed and urgent response in respect of that.
 - d. Place publicity at WTC inviting people with concern to contact the LTA.
 - e. Conduct a survey of the Centre, not least to gather information more widely.
25. Accordingly, we find **F20: The LTA's response to Dr Carwyn Jones's referral was inadequate.**
26. If that had been done, and evidence gathered, then it might have been appropriate to have initiated safeguarding and/or disciplinary proceedings against DS (and any others) pursuant to the Code.

(3) Letter 12 March 2014

27. VB told us that her concerns about what was happening at WTC continued. She told us that she wrote to the LTA in 2014 setting out those concerns.

She cannot now find the letter. The LTA cannot locate a copy. We have not seen it, if it still exists. It follows that we are unable to comment on or any alleged failure to act upon it.

28. However, VB told us that she spoke to a set of concerned parents that year. She identified the parents to us and their conversation may well have resulted in the letter the LTA received in March 2014. It was from Concerned Parent A.
29. We have seen two almost identical versions of this letter. The only difference is the date. We received one from the author dated 23 January 2014. The other copy came from the LTA and is dated 12 March 2014. The only explanation the author was able to give was that he sent two editions of the same letter changing only the date. For ease of reference, we have adopted the latter date, namely 12 March 2014.
30. The letter starts: "*once you receive my correspondence I would like to play no further part in your investigations as we have drawn a line under issues*". It continues to set out the concerns. We need to summarise those concerns:
 - a. The two years spent at WTC under DS had "*given us real cause for concern*".
 - b. The author and his wife had had several meetings with directors, whom they said listened to their concerns but had apparently done nothing.
 - c. On many occasions he overheard coaches mock children behind their backs, but in front of other children.
 - d. Coaches used foul language in front of the children and DS had an aggressive manner.
 - e. DS commented adversely about their daughter's weight when she was 12 years old, calling her a "*hefty elephant*"; he reduced her to tears.
 - f. There was a complaint about the coach (not DS) who, on a trip without parents, made young female players walk back unaccompanied to

their hotel as a punishment.

g. They felt disappointed in the reaction of the directors.

h. He said this about WTC: *"I feel Wrexham is a bomb waiting to go off if coaches are allowed to get away with the issues that I had mentioned...."*

31. He ended the letter in this way: *"we have washed our hands of Wrexham and now enjoying ourselves at [the new centre] and request that we don't get embroiled in any matter further matters"*.

32. This letter was addressed to LTA SM B. He replied by letter dated 31 March 2014. The relevant part of that letter reads:

"Many thanks for your letter dated 12 March 2014. Thanks for raising these concerns and please be assured the LTA works to promote the safety and welfare of all children and young people. We will be taking your comments on board and seeing where we can provide support for Wrexham tennis academy in this area network. Furthermore, I acknowledge that you wish to play no further part of any these issues and therefore I will not contact you about this issue."

33. In his initial contribution to the Review, LTA SM B said he did not remember the exchange with the letter's author. He has since told us that he recalls it and at that stage he said all his letters were *"signed off"* by the LTA DO acting as his line manager.

34. We have concluded - **F21: The LTA's response to the 12 March 2014 letter was deficient.**

35. Ellie Lewis, told the present LTA SM about the letter in 2017. He then retrieved a copy from the LTA's WTC digital case records. That copy is the one dated 12 March 2014.

36. From the outside looking in, it seems to us that the LTA reaction to the referrals in 2013/2014 was (at best) passive. It was also insufficient, especially given the mounting material. That material included the 2012 WTC report, the FP2 disclosures, the anonymous letter in 2013, and the CJ referral. When there

was a positive reaction or an attempt to engage by the LTA, it was to invite evidence and then wait for it. In our view, a more proactive or investigative-minded approach was required. We do not know whether it would have produced results. It would, we suspect, at least have had the effect of building confidence in those who wished to disclose. It might also have sent a message to those at WTC, including DS, that the LTA was supervising them.

37. We have been told by a number of former LTA employees that they felt the LTA ST was under resourced. If it was, that may in part explain such an approach. Others who worked for the LTA have been more critical of the role and importance afforded to safeguarding within the LTA at that time. They told us that there was little appetite for safeguarding within the LTA and it was more of a central office function rather than proactive and on the ground. Further, there was no case management system. We are bound to observe that if such criticisms are right, they are reflected by and may in part explain the LTA's inadequate reaction to the 2013/14 events we have examined. Overall, we are driven to conclude - **F22: There was a failure by the LTA Safeguarding Team to see the cumulative picture at WTC during 2012-2014 and act accordingly and appropriately.**

(4) LTA developments for the future

38. The Review was assisted by the LTA HoS and LTA LD. Careful not to criticise the past, the LTA LD informed us of the changes since the LTA's 2017 review of its safeguarding procedure conducted by eminent leading counsel. We consider those changes in more detail in the final Chapter. He said the review made them appreciate that the LTA needed to change its approach. They aimed to recruit a senior person with detailed knowledge of how to investigate and manage cases and the legislative framework. That approach resulted in the newly created position of HoS.
39. A number of contributors welcomed the HoS's appointment and the changes he is overseeing. He is a former senior detective, which we consider to be relevant. He comes from an investigative background, an important attribute for someone occupying his role in safeguarding.

40. In July 2018 the LTA implemented a new case management system. By October 2018 it aims to have introduced a system of minimum standards for clubs. By October 2019 it will become mandatory for clubs to use LTA accredited coaches, DBS checked and trained. In our view, those are significant developments. The changes will make tennis clubs safer places to train and to play at.
41. The LTA has created a network of trained County Welfare Officers; each LTA registered venue is now going to have a trained club welfare officer and they have funded an additional 5 posts in the LTA Safeguarding Team. Those new posts will be regional positions providing support to clubs and also carrying out audits. That will include Wales. It will give the LTA a national safeguarding team of 12; it was 3.5 in October 2014. The LTA LD described this as "*a huge step forward for safeguarding in British tennis*". The HoS impressed this upon us as a significant development. We see the importance of those developments.
42. In the 2017/2018 Chapter we look further at the present position and at the LTA Safeguarding Strategy.

C. WTC

43. In the preceding Chapter we summarised D1's recollection of his dealings with parents, in the context of complaints about DS. He told the Review that he recalled discussions with other directors about their "*management of DS*". He recalled the exchange with the 2014 LTA SM in January 2014. He pointed to his invitation at the end of his 26 January letter which was not accepted. He believed after that exchange in January 2014, they received no further contact from the LTA safeguarding team, except attending local safeguarding courses.
44. VB told the Review that she met D1 and D2 in 2014. They said they were "*monitoring*" DS. She advised them to "*go to the LTA*". D4, another WTC director during this time, told the Review that he was unaware of any further allegations during the period 2012-17.

45. Our primary concern about this period has been trying to understand, what, if anything of substance, the WTC Board did in respect of monitoring the situation at the Centre. It appears to us that once the LTA pronounced on DS in June 2012, WTC took the view that other than complying with the Action Plan (which they appear to have done to the LTA's satisfaction) the matter was closed.
46. What this Review has established is that the concerns about some coaches at WTC continued beyond the WTC 2012 Report, into the following years. The conduct and behaviour alleged against DS (and other coaches) should have been troubling and prompted action. Further, those matters appear not to have been passed on or shared with the Board more generally.
47. We appreciate that not every concern should necessarily be, reported or even acted upon. Concerns can be trivial, groundless or derive from jealousy or malice. They can relate simply to coaching and/or selection and not the method of coaching or their conduct or SGCP issues. However, the context here was very important. The continuing concerns came after the WTC 2012 Report and the allegations which led to it.
48. We have concluded that insufficient was done to address the continuing complaints about the behaviour of some of the coaches, including DS, and the culture more widely at WTC. The concerns raised with them were such that they should have been immediately passed on to the LTA safeguarding team. If the context was ever properly appreciated by the WTC Board, sight was lost of it.
49. In our judgment - **F23: WTC directors failed to react appropriately to continuing complaints about the conduct of some of its coaches and the 'coaching culture' at the Centre.**
50. Further, what also seems to us not to have been understood was that the risk of such conduct was especially acute in high performance or elite programmes such as the one operated at WTC. In her *Duty of Care in Sport Report, 2017* Baroness Grey-Thompson observed the following (in respect of adults):

"In sport, the balance of power lies in the hands of those who run the programmes. They have a responsibility to ensure the safety and wellbeing of participants. Athletes and professional sportspeople often work under intense pressure in close relationships with their personal coaches and support teams, and safeguarding issues can arise. While, rightly, there is a reluctance to say that every adult who competes in sport is vulnerable, when someone is in a team or on a pathway vulnerability inevitably increases, as so much is taken out of their control."

51. The vulnerability inevitably increases when those on the pathway are children. The imbalance of power between coach and child is greater; the sense of dependency more acute; and the disparity in emotional and developmental maturity can be significant. We cannot see any evidence that such factors were ever appreciated, still less considered in relation to the decisions taken in this case.

D. TW

52. A number of TW Board members were spoken to during the Review. Stephen Clarke joined the TW Board in 2013. He does not recall being told of any complaints about WTC or DS until his arrest in 2017.
53. The Board Chair told the Review that in December 2013 the Board received a complaint that TW *"had taken no action regarding Wrexham"*. He said the Board discussed that complaint and *"felt that it had all been dealt with by the LTA and nothing needed to be done by"* TW. He said he was copied in on the CJ referral but did not know what the outcome was.
54. Between 2012 and 2017, the TW CEO could recall only one matter being raised with TW by a parent. That was the CJ referral. At that time CJ was *"one of our former board members who was the board safeguarding lead"*. CJ told TW CEO about it but did not identify the parent or the nature of the complaint. He did say that he was going to refer the matter to the LTA. He considered that then to be *"closure on the matter"*. We could see no evidence that TW followed up the CJ referral. As TW CEO observed: *"In hindsight I could have made follow up with the LTA knowing what had happened in 2012. In effect*

to check and challenge the LTA”.

55. He provided us with a document entitled “[WTC] Safeguarding Case Timeline of Events 2011-2017”. Therein the following appears:

“Tennis Wales received no complaints about Wrexham Tennis Centre during this time except for a parent from Wrexham having a phone conversation in 2013 with Carwyn Jones (Tennis Wales Safeguarding Lead) where he raised some concerns. Carwyn advised the parent to put his issues in writing to the LTA safeguarding department and he also contacted LTA safeguarding to notify them of the phone call.”

56. Further, TW had adopted the LTA’s 2012 Safeguarding Policy. There is a very clear approach to be adopted in such cases. Sections 6 and 7 thereof contain the appropriate response where a person has concerns about a child or has received such an allegation. Referral to the LTA is the first correct step. It should not have been the last one.

57. In our view, **F24: TW failed to follow up the Dr Carwyn Jones referral with the LTA.** We do have an element of sympathy with the position of TW since it was subservient to the LTA on SGCP matters. However, in our view TW cannot absolve itself of all responsibility in that regard. Its responsibilities did not end with a referral to the LTA. It should have followed up the CJ referral with the LTA, Indeed the [WTC] Safeguarding Case Timeline of Events 2011-2017 document got close to acknowledging that with this question it asked itself:

“Potential intervention point – while this parent made no further contact with Tennis Wales following this phone call with Carwyn, there is a question about whether Tennis Wales should have followed up further with the LTA to enquire as to whether any issues had come from this?”

58. However, this ‘safeguarding no-man’s land’ may explain TW’s activity or inactivity so far as safeguarding is concerned. It was between the LTA and WTC. On safeguarding in 2012 we have been shown no procedure or protocol for what its specific role was; what it should do when complaints, disclosures or SGCP issues came to its attention. The default position was that the LTA had jurisdiction over such matters. The 2012 LTA Safeguarding Policy

provides a framework for dealing with such disclosures but how well that lends itself to a body such as TW we are not sure. The absence of clearly delineated or defined safeguarding responsibilities for TW risked confusion and the missing of opportunities for action. The new LTA Management of Safeguarding Case and Reporting Standards (which we look at in the final Chapter) will address this.

59. The lack of clarity as to TW's safeguarding role, was shared by TW personnel who contributed to the Review. The preponderance of those to whom we spoke - with some notable exceptions- were of the view that such matters were for the individual centre or for the LTA. If that was procedurally correct, then we are surprised TW did not exercise a closer superintendence of WTC especially after the events that led to the 2012 WTC Report. It should not have been left to individuals to unilaterally raise concerns.
60. As we have said, VB contributed to the Review. She told us that she met with D1 and D2 after the occasion when young female players were left to walk back to a hotel. She told us that she told them both that DS should not be allowed to travel with players. She also told us that she told them to dismiss him. D1 told her DS was "*a changed man*". Both D1 and D2 told her that they were monitoring him closely. If they said that, and were doing it, we could find no evidence of it.
61. She wrote to the LTA dated 5 September 2017. In that letter she stated that after the LTA completed its investigation, she told D1 and D2 that DS should not be allowed to travel with players and indeed should have been dismissed.
62. It is clear that VB had continuing concerns about DS. She was a member of the TW Board. Those concerns are not reflected in the WTC Safeguarding Case Timeline of Events 2011-2017 document. It was also not something recalled by TW CEO. He may have forgotten it or have never been told of VB's concerns. As we observed at the end of the preceding Chapter, this is both concerning and puzzling. There appears to have been an absence of 'joined- up thinking' and information sharing at TW Board level. It also begs the obvious question as to why the TW Board did not do more to superintend WTC and bring the concerns to the attention of the LTA in a more formal way

than individual referrals.

63. Once more the TW Timeline document raises this as a possible failing:

"Following the completion of the internal investigation and the LTA follow-up, there could potentially have been a more thorough external support/monitoring process implemented between the LTA and Tennis Wales to ensure that appropriate changes were being effectively implemented. However, this must also be considered alongside the fact that Wrexham Directors did not communicate any problems of this nature, and other than one phone call from a parent in 2013, there were no other complaints received by Tennis Wales during those 5 years."

64. The TW CEO has explained that paragraph to us. He told us that it reflects *his* knowledge. At the core of the issues was this failure to share information. The TW CEO has told us that he did not know of (a) the continuing problems D1 was having at WTC with DS (b) the disclosures made to VB or (c) the continuing disclosures parents made about DS. He said the LTA did not share with him the letters it received. He and TW did not receive any direct complaints about DS, he said.

65. Like the TW CEO, we have concluded that there could and should have been a *"more thorough external support/monitoring process implemented between the LTA and Tennis Wales to ensure that appropriate changes were being effectively implemented"*. Such action would have been consistent with its present (website) statement about its safeguarding role:

"Tennis Wales strives to ensure that all children, young people and adults at risk are safeguarded from abuse and have an enjoyable tennis experience."

66. It follows that we find -

- a. F25: TW failed adequately to superintend WTC after the 2012 WTC Report.**
- b. F26: There was a failure properly to share safeguarding information about WTC across the whole TW Board.**

VII. 2015-2017

1. At the risk of unnecessary repetition, events do not divide with the exactitude we have chosen to divide this Review. The next convenient passage of time to consider event is 2015-2017.

A. DANIEL SANDERS

(1) 2017 Police Investigation

2. On 30 June 2017 at Mold Crown Court DS pleaded guilty to eight sexual offences committed against a young tennis player whom he coached at WTC. On the 26 July 2017 he was sentenced to a total of 6 years' imprisonment and other ancillary orders were made.
3. We were not provided with the police papers. The officer-in-the-case DS Bowyer-Jones gave us a statement providing us with a helpful overview of the investigation.
4. DS was three days short of his 43rd birthday when he was imprisoned. He coached the player at WTC from a young age. He took advantage of his coaching position to commit the offences.
5. We have seen the indictment. The eight offences reflected both specific offending and courses of sexual conduct committed when the player was aged under 16 years.
6. It is neither necessary nor appropriate to set out the details of his offending. The offending covered the period 2016 to January 2017. Three points of relevant detail are important: he sent sexually explicit messages; some of the offending occurred during tennis activity away from Wrexham; and some occurred at WTC.
7. The player was spoken to by police. In light of what they disclosed, DS was arrested later the same day. DS replied "no comment" to all questions put to him by police when interviewed.

8. As one might expect, the police spoke to those who had been coached by or witnessed DS's coaching. We have referred to some of them in the 2012 Chapter. According to DS Bowyer-Jones, police spoke to about 12 players he had coached. We were given a summary of what they said. We need not set out the detail in this document. No further charges were laid against him. What we can say though was that some of the (we emphasise) *alleged* behaviour was not dissimilar to that which we have heard before.
9. It is important to make clear that DS has not contributed to the Review. We do not know what he would say about any of the alleged conduct, other than that which he admitted by his guilty pleas. We note that what others told the police is not conduct which he has admitted, or which has been proved against him nor which we are stating he has committed.
10. Further, the material gathered by the police did not all go in one direction. The police report discloses that one female player coached by him described DS as the "*best tennis coach*" she ever had. He was strict but caring, she said. She left WTC about 5 years ago.

(2) WTC

11. DS was released on bail by police on 1 February 2017. His coaching licence was immediately suspended by the LTA. A multi-agency meeting was held that day, including representatives from the police, WTC, as well as the LTA SM and TW safeguarding officer.
12. WTC initiated disciplinary proceedings against him. He was suspended with immediate effect. By letter dated 20 February 2017 he was informed that he had been dismissed for gross misconduct, following a disciplinary hearing on 7 February 2017.
13. As one might expect, thereafter a series of meetings were held between the WTC Board, TW Board and also parents/users of the centre. All bar one of the directors resigned following the arrest and prosecution of DS. However, we were told that most of them continue to visit the centre. As we understand it, their financial ties have not been severed. It is beyond the remit of this

Review to offer any opinion on that.

14. In his contribution to the Review, D1 said that the tournaments away from Wrexham attended by DS and the player were in breach of the LTA guidance on 'Supervising, Travelling and Overnight Trips'. The evidence we have gathered is more nuanced than that. We understand the player told police that they made a number of trips accompanied by DS. We know the location of each. They told police that at least one tournament trip was taken alone (that is to say, just the two of them). We have seen LTA guidance on 'Supervising, Travelling and Overnight Trips' which the LTA told us was created in 2012. Section 5 of that guidance requires "*adult supervisors to match the gender of the players attending*". Based on what we have been told, and as D1 acknowledged, at least one tournament trip was therefore in clear breach of that Guidance.
15. D1 told us they were "private arrangements", not financed by WTC. He said that once these arrangements started, he felt WTC "*had not got control over it internally*" and they could have "*educated the parents more*". Another said one of those trips may have been organised by WTC. D2 told us that it was not uncommon for DS to travel to tournaments with young people he coached. She knew he was making such trips with the player. She said that sometimes they were part of a TW group. Otherwise, she said they (WTC) assumed arrangements had been made with parents and also assumed that at least one parent had travelled as well.
16. The fact of 'private' trips is not wrong *per se*. At least two appear to have been in breach of the said Guidance. As an LTA licenced coach, DS was clearly responsible for his own breaches. We do not have clear evidence that the Guidance was breached on any trip WTC was responsible for. However, we have concluded – as D1 volunteered – that more could have been done by WTC to ensure the player's parents were aware of the said LTA Guidance. To do so would (1) have informed them as to the correct procedure and (2) might have caused them to question DS and the probity of such trips. That is especially so, given the knowledge of DS D1 and D2 had gained in 2012 and subsequently.

17. Accordingly - **F27: WTC failed to do more to ensure the tournament visits involving DS and the player were conducted in accordance with the LTA Guidance on Supervising, Travelling and Overnight trips.**

(3) TW

18. TW CEO told us that TW financed DS to attend a TW-organised tournament trip, also attended by the player he abused. TW also provided funding retrospectively for a privately-arranged tournament trip by DS and the same player. Of course, the TW CEO had no idea about DS's conduct. He also told us that after DS's arrest he reviewed TW's "*overall policies and procedures for our tournament trips*". He told us he did so as such trips were an "*important and substantial part of TW's player support systems*". Having done so, he decided "*more checks and balances were needed*" and he explained that he decided TW should develop a "*more comprehensive policy on group trips*".
19. We have seen the LTA Guidance on 'Supervising, Travelling and Overnight Trips' referred to in the preceding paragraphs. We have not seen any bespoke TW policy covering such matters in 2016. We have seen a TW policy entitled 'Trips' which Ellie Lewis told us came into force on 1 September 2017.
20. The TW CEO said he "*made a decision to allow trips to continue*". There was an issue on the next trip to Europe: a female coach was not present when she should have been. That led to a suspension of future trips and disciplinary action.
21. The WTC Safeguarding Case Timeline of Events 2011-2017 document records that following DS's arrest the TW CEO and Ellie Lewis attended a WTC Board meeting and asked if there had been any indications of "*child protection red flags between 2012-2017*". The TW CEO said they were told that there had not been any such indications.
22. Ellie Lewis is employed by TW as the Workforce Manager and in 2016 became the safeguarding lead for TW. She contributed to the Review. She has worked for TW since 2006. She undertook a safeguarding audit for TW in 2016. WTC

was one of the few centres with safeguarding arrangements in place. She was at that meeting, which took place on 7 March 2017. She confirmed that not one of the directors disclosed any other concerns raised with them. The directors present included D1 and D2. If this is right, it is contradicted by the evidence we have seen.

23. That timeline document also states that it was now clear that there “was a *significant and on-going culture of bullying and other inappropriate behaviour at the centre which had impacted many players and parents...*”. It also states that this was news to the TW Board. It also records that in consequence the TW CEO had asked the WTC Board to resign.
24. As we have made clear, the TW CEO told us that the only matter which came to his attention during 2012-2017 was the CJ referral. Information-sharing was a real issue across and between WTC, TW and the LTA.
25. The said document also records that following DS’s arrest, TW did the following:
 - a. The TW CEO and Ellie Lewis held several group meetings and individual meetings with parents to listen to them and to apologise to parents on behalf of “*all parties involved in them being let down so badly*”.
 - b. Ellie Lewis completed a comprehensive set of safeguarding processes and procedures for TW activities involving groups of juniors being taken away, including county cup teams. The document records that this was signed off by key people, including the NSPCC, and tournament trips restarted.
26. Ellie Lewis confirmed the accuracy of what the Timeline document records about the steps taken by TW following DS’s arrest. In a letter VB wrote to the present LTA SM in September 2017 she commended the work of Ellie Lewis and the present WTC manager.

(4) LTA

27. The Review spoke with the LTA SM (January 2015-April 2017, 'LTA SM C'). She complained of limited support from within that organisation during her time with the LTA. Her sense was that the LTA did not prioritise safeguarding. She said there was insufficient support for her substantial workload. Such factors made life difficult for individuals in the LTA ST. We heard similar views from other members of the LTA ST at that time.
28. If those views accurately reflected the position within the LTA ST at that time, things appear to have changed with recent improvements. Those improvements relate both to the LTA policies and the provision of additional resources to the LTA safeguarding team. Martin Weston, the current Tennis National & Regional Pathway Manager for British Tennis, told us that his sense is that "*safeguarding and wellbeing are of paramount importance*". In the next Chapter we comment (favourably) on changes the LTA has made in respect of safeguarding. It might also be observed that The LTA's ultimate reaction is this Review.

B. CONTRIBUTORS TO THE REVIEW

29. The investigators spoke to a former player who played at the club from 2009-2012 ('FP5'). She returned in 2014. DS was, of course still there. He had not changed, but she had. He still made "*inappropriate comments*" but now that she was older (in her mid-20s) she was more confident and less intimidated by them. She observed that such comments were aimed at older players but occasionally said in the presence of young players. She never felt the "*need*" to report him for anything she witnessed.
30. They also spoke to parents of players who were at the WTC when DS was arrested; and who played there before. The effects, emotional and otherwise, upon some has been profound. That can arise in a number of ways. That can be direct, such as witnessing aspects of the offending behaviour. It can be indirect, such as learning of DS's conduct. That can cause a general

undermining of trust between child player and coach. Further, there were adverse consequences for their high performance coaching during the police investigation and beyond.

31. One set of parents were especially critical of WTC, LTA and TW and the treatment of their child who was in the high performance programme. DS was his coach. Their child was a national level player. He had trained at WTC but they did not know the name of the safeguarding officer. They spoke of a lack of pastoral support for him from WTC, TW or the LTA. They told us that no direct contact was made with him or them for over a month after DS was arrested. There was a sense of isolation and abandonment. TW CEO told us that TW was not allowed to meet parents during the police investigation; but thereafter he said he met several sets of the parents affected by events.
32. They initiated contact with the Welsh national coach, who met with them in early March. Their child was offered counselling by TW on 16 March. The national coach undertook coaching until she left her post later that year. They estimated that by 20 October 2017 their child had lost 360 hours of level 5 coaching.
33. On the topic of high performance coaching it is fair to note that the 2017 Camina Review advised:

*"Given the current period of transition in leadership and expressed commitment to cultural challenge and change at WTC in the aftermath of the recent high profile former lead coach's prosecution, it would appear to be wholly inappropriate to push for a return to a performance focus at WTC until a more robust safeguarding framework has been established."*⁴⁰
34. We do not criticise WTC or TW for following that advice.
35. When the same parents spoke to investigators they made the point that was 380 days after DS's arrest and no one had asked to speak to their child to see how and to what extent they had suffered at the hands of DS. In the high performance programme at WTC since 2012 (and aged 16 in February 2018)

⁴⁰ §3.1.13

we were told that that young player experiences included:

- a. DS frequently using homophobic and sexist language.
- b. DS frequently humiliating young players.
- c. DS used sexual, lewd and critical comments about players' body shapes and encouraged him to participate in the use of such language.
- d. DS using excessive conditioning as a punishment.

36. We repeat: we do not know what DS would say about such allegations. It is not behaviour which he has admitted, or which has been proved against him. We are in no position to make any finding adverse to him in respect of it; and plainly we do not do so. However, what we do say is this: that young player was involved in the programme since 2012 and the allegations are entirely consistent with other concerns raised about DS's behaviour. Our investigators discovered what he had to disclose; a proper investigation earlier in time might well have been expected to do the same.

37. That observation is subject to this important caveat: as we have observed before, the culture of high performance sport militates against disclosures of this kind about coaches and others in authority. All the more reason for independent investigators to carry out such work. In any event safeguarding officers should both ensure and reassure young players that they can confide in absolute confidence and without risk to themselves or their careers.

38. The investigators also discovered evidence through a parent of another young player of an unwillingness to disclose suspicions about DS's conduct. The young player did not disclose their suspicions because they were concerned about the effect doing so might have on their own tennis career. Sadly, that is not uncommon in elite (and other) sporting environments. In this context, it is also noteworthy that when matters did come to light, they were not revealed through or to those running WTC. Instead, disclosure was made from child to parents and subsequently to the police. They bypassed the WTC authorities completely.

39. We have considered with care these contributions. We have also reflected

upon the wider impact sexual offending has, particularly upon a small community like this high performance programme. There are the obvious and direct victims of sexual offending. The emotional effects and other consequences often flow more widely. There are also those who have or may have suffered abuse in different forms. Individuals are affected (or not) in different ways and to different degrees. Where support is reasonably required, it should be available and be supplied. **R3: WTC, TW and the LTA should work together to ensure that all children who were coached in the high performance/elite programme at WTC during 2012-2017 are contacted and offered such specialised support and assistance (such as counselling) as they reasonably require.**

40. On the subject of high performance programmes, we have already made the observation that the safeguarding risks are more acute. What we have recommended in this Report, applies across all aspects of the sport of tennis. We have, though, considered the safeguarding recommendations "Theme 5" made in the Duty of Care Review, 2017. Looking at those, there is possibly only one which might apply to the tennis and which the sport has not already have addressed: "*Where talent pathway sports remove young people from the club structure (where safeguarding officers exist), signposting to safeguarding processes must be included in the induction process*". We would simply recommend that **R4: So far as its high performance programmes are concerned, the LTA should reflect on its present policies and ensure that they are consistent with the 'Theme 5 Safeguarding Recommendations' in the Duty of Care in Sport Report, 2017.**
41. We further recommend– **R4: Tennis clubs, counties (including TW) and the LTA should monitor and ensure that all activities, tournaments and trips to events are conducted in accordance with the LTA's 2018 Safeguarding at Events and Competitions Policy.**

C. RPM FITNESS CENTRE

42. This is a discrete issue but the way it was dealt with is worryingly similar to

other SGCP matters we have looked at in this Review. The solution settled upon was arrived at informally, not recorded and the LTA was not informed, when it should have been.

43. The RPM Fitness Suite ('the Suite') was established in 2004 and is located on the WTC site. It is not owned by WTC. It rented premises at the Centre. It seems that in or about June 2015 it came to the attention of the WTC manager (who did not contribute to the Review) that the Suite was being used by a male who was convicted of a sexual offence in September 2010 involving a 14-year-old boy.
44. A Review investigator spoke to D1 about this matter. He was the WTC welfare officer at the relevant time. He recalled being told about it. He met the co-owner of the Suite. According to D1 they agreed that the man would (1) not use the changing rooms and (2) his personal training sessions would not take place between 16.00 and 19.00, when the junior squads met at WTC. D1 told us that the male complied with those stipulations. No complaint was ever made about the male's conduct at the Suite or at all.
45. D1 provided us with a large file of document. Therein we could find none therein which related to this particular event. We have also been shown none. We are driven to conclude that there are none.
46. A fitness coach working at the Suite, Nick McCormick contributed to the Review. He provided the fitness sessions for the man in question. When a tennis coach told him about the man's criminal past, he disclosed it to an owner of the Suite. They discussed it with the WTC manager, who said he would refer it to D1. He recalled they took the decision to ensure the male was always under his supervision while at the Suite.
47. Two WTC tennis coaches recalled the matter. They had some recollection that the male used Facebook to contact a young male player who used WTC. The player confirmed to us that he received a few messages from that man.
48. We have been told that in August 2018, and in light of information said to have come to light during this Review, the LTA ensured that the man was stopped from accessing WTC and the Suite.

49. This matter plainly gave rise to potential SGCP issues. That fact must have been appreciated by D1. To that end, he put in place some measures, including the fact that male was not permitted to use the Suite between 16.00 and 19.00. However, he also failed to take steps we consider he should have done.
50. We find this to be another (recent) example of limited understanding and ability to assess and manage risk. We identified the follow failures on the part of the WTC:
- a. **F28: WTC failed to notify the LTA about the fact a convicted (child) sex offender was using the facilities at WTC.**
 - b. **F29: WTC failed to record what steps were taken in relation to the use of facilities at WTC by that convicted (child) sex offender and the risk assessment that underpinned that decision.**
 - c. **F30: WTC failed to engage with other agencies such as the police in in relation to the use of facilities at WTC by that convicted (child) sex offender.**

VIII. 2017/18 DEVELOPMENTS

A. INTRODUCTION

1. This Review was commissioned sometime after the prosecution of DS. In the interim the LTA, TW and WTC did not stand still. There have been significant changes and improvements in their safeguarding procedures and policies. We have seen an impressively detailed LTA Safeguarding Implementation/Action Plan 2018-2019 to bring into effect those changes. There are also a notable array of resources publicly available.
2. Many of those developments reflect suggestions made by our contributors. Common themes emerging from them included:
 - a. The LTA ST should be expanded and better resourced.
 - b. The LTA should put in place systems that piece together information received from different sources and at different times.
 - c. There should be better information sharing between LTA and TW.
 - d. Case management systems should be improved.
 - e. There should be better information for parents and child players about what they should expect from a safeguarding perspective.
3. During the currency of this Review the LTA underwent an NSPCC CPSU assessment. It received a green rating. The LTA LD told us that the LTA also received positive feedback from the Department of Culture, Media and Sport when it shared its safeguarding plans with it.
4. We look at these developments in this Chapter.

B. LTA

(1) Safeguarding Strategy

5. The current LTA Safeguarding Strategy ('the Strategy') implemented by the new HoS following his taking up the post in July 2017, covers 2018-2020. The stated vision is that by 2020, "*British Tennis is at the forefront of safeguarding in sport*". The focus of the Strategy is those aged below 18 years of age and adults at risk. It is an admirable document.
6. The Strategy is built on the following four "*pillars*":
 - a. Places to play;
 - b. People, including coaches and players;
 - c. Awareness, including improving safeguarding awareness and ensuring concerns are effectively identified; and
 - d. Case management, which includes the management of cases and disciplining those who harm the sport and those involved in it.
7. It sets out strategies for each of the four pillars. Consistent with implementing the Strategy the LTA has made substantial changes to its ST and procedures. One can see the individual strategies are reflected in the procedural changes and amendments. The former informs and drives the latter. By way of example in respect of "*Places to Play*" a stated aim is to "*ensure that tennis venues are safe spaces to play our sport, with safeguarding at the heart of what tennis venues do*". The procedural changes implemented by the LTA include:
 - a. From October 2018 each LTA registered tennis club and tennis venue (there about are 2800 of them) shall be required to meet an approved set of safeguarding guidelines, including a requirement for every club to have a properly trained Welfare Officer; and
 - b. From October 2019 all coaching activity at registered venues will be required to be undertaken by LTA Accredited coaches.

8. The LTA has presented the Strategy to a Sports England Survivors Panel. It is – we are told – one of the first sport to do so. It meets quarterly to appraise the Strategy.

(2) Safeguarding Team and Procedures

9. There have been recent significant and impressive developments of the LTA ST. We commented in the 2013/14 Chapter on the expansion of the LTA ST numerically. They have also spread regionally. In the last year, the LTA has recruited and trained a safeguarding officer for every County in England, to match their counterparts in Scotland and Wales.
10. Further, the LTA is now mandated to share details of a case with the relevant county/venue, unless otherwise justified by the 'HoS'. Should a case arise, an information sharing meeting will now be held between all those with a relevant interest including representatives from the county, venue, relevant LTA departments and the national team. Each case will follow a clear, auditable supervisory plan.
11. The present position, as we understand it, is that only the 500 or so tennis clubs to which the LTA has granted 'Tennismark' accreditation have requirements relating to safeguarding imposed upon them by the LTA. In order to gain 'Tennismark' accreditation a club must, *inter alia*, have a safeguarding policy; an equality and diversity policy; a code of practice for working with children; and a recording and publishing images policy. The club must have a welfare officer and its coaches must be LTA accredited.
12. The LTA has addressed this with further steps being taken to strengthen its safeguarding processes. As commented upon in the 2013/14 Chapter, each LTA registered tennis club and tennis venue (there about are 2800 of them) shall - from October 2018 – be required to meet an approved set of safeguarding guidelines, including a requirement for every club to have a properly trained Welfare Officer. Further, from October 2019 all coaching activity at registered venues will be required to be undertaken by LTA accredited coaches.

13. Those venues will be audited. That will start from January 2019 through the 5 Regional Safeguarding Officers. Their remit will include Wales and they will be funded by the LTA. The LTA - we were told – committed to auditing 30% of those venues per year. That is important: it will help verify that those clubs have complied with their safeguarding obligations. That in turn ensures the policies and procedures are as effective as possible.
14. We were told that the safeguarding training programme for coaches is being redesigned and updated, and every official in tennis will require a licence from October 2019. That will require them to complete safeguarding training. In addition, all LTA and TW staff involved in grassroots tennis have been trained to Level 2 safeguarding standards and every single employee will have received a minimum of Level 1 safeguarding training by the end of this year.
15. Level 1 safeguarding training may be unnecessary for all who directly or indirectly work with children. However, in our view some level of safeguarding training is both appropriate and necessary. There are many good online training facilities. Such training could be delivered by a regional safeguarding officer. **R6: The LTA should devise and make mandatory a form of online or in-person safeguarding training at a level suitable for all persons at tennis clubs who either work with children or are responsible for persons who work with children. For the avoidance of doubt that would include board members.**
16. Further, the LTA launched a new case management system on 10 September 2018, which will permit the LTA to report regionally and by County on types of concerns to better focus its safeguarding effort. The LTA has also streamlined its disciplinary procedures to allow quick time action in cases that come to notice, including the ability to put suspensions in place more quickly.
17. The LTA is appointing a panel of experts to oversee its plans and actions. They will be recruited externally (i.e. outside the LTA). Those experts will be drawn from appropriate bodies as well as the police and safeguarding charities.
18. Furthermore, the LTA plans to launch a new, independent whistleblowing hotline for its staff, as well as for players, parents, coaches, venues and

volunteers across the tennis community. That will enable them to raise any concerns they have, including SGCP issues. It was introduced for LTA staff in October 2018; and rolled out to the broader tennis community from January 2019.

19. The LTA has also undertaken a significant review of a large number of historic allegations since June 2017. We need say no more about that, other than to commend that action.
20. If the 2012 WTC Report came to the LTA now it would, we are confident, be dealt with differently. The LTA approach is now more investigative-minded; it is, to adopt the word we used in the 2013/14 Chapter, less passive. We are confident the case would now be referred to the SPC. Further an investigation would be undertaken. The fact FP2 was not inclined (if that is a fact) to attend a hearing or to give 'evidence' would not be a bar to an investigation.
21. However, it would or should never get to the point of there being a 2012 WTC Report. Even if directors of a tennis club were minded to embark on such an exercise, the welfare officer should prevent it. If it reached TW, the Information Sharing Protocol ('ISP') should result in the LTA being informed; and thereafter taking over.

(3) LTA Safeguarding Policy

22. We have looked at the current British Tennis Safeguarding Policy available at: <https://www.lta.org.uk/globalassets/about-lta/safeguarding/british-tennis-safeguarding-policy.pdf>
23. It is current, and we found its content clear, accessible and informative. It contains a strong statement of the LTA's Policy; outlines its scope; contains helpful contact details; and robustly (and correctly) identifies that safeguarding is everyone's responsibility. There is a practical guide to the LTA's safeguarding procedures and it signposts other related policies. Consistent with the amended procedures, it introduces five 'Standards' aimed at setting a minimum level of practice to promote and support safeguarding,

diversity and inclusion in tennis. As the Policy states: "*Implementing the Safe and Inclusive Tennis Standards is intended to be used alongside this Policy, Code of Conduct and Reporting Procedure; and the Diversity and Inclusion Policy*".

24. The Policy also contains a 'Safe and Inclusive Code of Conduct' and ends with a valuable appendix which gives sensible advice on what to do upon receipt of a disclosure from a child or adult at risk. It is signed by the LTA CEO, as well as the CEOs of TS, TW and the Tennis Foundation Executive Director. Indeed it starts thus:

"The British Tennis Safeguarding Policy, Standards, Code of Conduct and Reporting Procedure are applicable to:

- *The Lawn Tennis Association (LTA)*
- *Tennis Scotland*
- *Tennis Wales*
- *The Tennis Foundation.*

The primary aim of all four organisations is to enable more people to play tennis more often, growing and sustaining the sport so that it is safe and inclusive."

25. However, we do make the following observations about it: it is (not entirely surprisingly) corporate in appearance and content. It is not 'child friendly'. **R7: The LTA should consider the Safeguarding Policy's content with a view to making it more accessible and easy to engage with for children and young people or to issue a policy entirely for that constituency.** Such a policy might be 'softer' in content, with engaging photographs.
26. By extension of that point **R8: The LTA should review whether it has sufficient 'child friendly' resources designed to encourage children/young people to disclose and report concerns. Such a review would include consideration of its website and social media.**

(4) Safeguarding Resources

27. We have looked at the Safeguarding section of the LTA website. It is an informative and (we suspect) very useful section. The '*Reporting a Concern Flowcharts*' within and without tennis appear especially helpful.
28. One particular aspect of the 'within tennis flowchart' is the facility whereby the LTA may, where appropriate, report a matter of concern to the Local Authority Designated Officer ('LADO') or police. This may be especially beneficial in cases where no 'complaint' (as such) or disclosure direct from the alleged victim, has been made to the LTA. The LADO or police can assist and provide directions to the LTA in such a difficult situation; police may investigate the matter in a way not open to the LTA.
29. The LTA has also created a 'What's the Score' Toolkit ('the Toolkit'). The stated aim of the Toolkit is that "*everyone should be able to enjoy tennis in a safe and inclusive environment. What's the Score enables tennis venues, coaches, officials, volunteers, players and parents to achieve this*". It contains:
- a. Checklists on and for:
 - i. safe and inclusive venues;
 - ii. safeguarding policies;
 - iii. diversity and inclusion policies;
 - iv. complaints and appeals processes; and
 - v. welfare officers.
 - b. Guidance on such matters as:
 - i. Anti-bullying;
 - ii. Event and activity planning;
 - iii. Protecting confidential information; and
 - iv. Trips.

- c. Checklists for monitoring progress in respect of the same.

(5) Safeguarding Advice

30. As the ToR make clear in 2017 the LTA commissioned separate reviews by different leading counsel. We have considered them, including recommendations made following a selective case review. The LTA has acted in consequence and we can summarise the improvements taken in respect thereof, so far as it is appropriate to do so:
- a. All SPC decision letters are released with the Chair's approval and contain reasons explaining the decisions reached.
 - b. Minutes are taken of each SPC meeting, which record consideration given to the material presented to them.
 - c. As of October 2018 the LTA has a network of trained welfare officers and Regional Safeguarding Officers who may be better placed to assist with the provision of references for the SPC.
 - d. Where conditions have been imposed on a coach's continued accreditation, the LTA is now able to monitor such through its online system and, by the time this is published, its new case management system. Further, actions are set at committee for the matter to be returned (to the committee) once the conditions have been complied with.
31. We considered with care those recommendations and the substantial changes the LTA has made since that advice was received. It is encouraging that the LTA's Safeguarding Regulations have been updated this year to improve its ability to deal with allegations where no formal complaint has been made. The key to success in this area lies with the implementation of the new case management system which was outlined in the LTA Safeguarding Strategy 2018-2020. It is described within the Safeguarding Strategy as a system which allows the LTA to track perpetrators and to manage concerns robustly. It aims to provide a clear reporting system particularly for the Board

and assist in tracking trends in cases and identify areas where preventative work is required. Thus, if this case management system is utilised in its most effective form it will avoid the mistakes made that led to this Review; it will help piece together crucial items of information from differing sources. It should not focus on the need for a formal complaint. If used effectively, it will draw together information and flag up quickly concerns.

32. We reviewed the policy now rolled out entitled "Management of Safeguarding Cases and Reporting Standards". It is therefore a recent document. The document puts together a robust framework to bring to its approach to safeguarding a standardised method of dealing with cases. It starts with indicating that there is an ISP and importantly enshrines the principle that the welfare of the child is paramount. It is very clear as to the circumstances which lead to a record on the case management system being created and gives a detailed and comprehensive list of categories. It then mandates that an investigation plan is compiled and sets out a helpful set of areas to be included, which will be of great assistance to less experienced members of the LTA ST. The case and its plan must be reviewed regularly by a safeguarding manager and also by the HoS. This provides 'checks and balances' at all stages of the process.
33. The new system now appears more robust and comprehensive, with more support for less experienced members of the team. The pathway in this Protocol is clear and comprehensive and is set out in a manner which will provide consistency across the Board. It provides for review by senior members of the team at an interval which should prevent drift and delay.
34. The advices from leading counsel did not cover the training and development of people making critical safeguarding decisions. We would raise here one concern however. We have read the Minutes of the SPC meeting held in May 2018. The Minutes record the discussions amongst the members present and their views on professional risk assessments. The responses as recorded (and we appreciate they are not verbatim) may (with respect) be indicative of an area in which further training is required to help those with safeguarding responsibilities to better understand how to utilise external risk assessments and where they fit in this area. We couch this recommendation in these careful

terms (deliberately) – **R9: The LTA should review and ensure that the present and future provision for training and development of the members of its Safeguarding Team and SPC is sufficient.**

C. TW

35. A number of contributors raised the question of whether TW should have a full-time safeguarding officer. No one questioned the ability or dedication of the present incumbent Ellie Lewis; the issue is whether the job is now full-time, occupied by a person who can dedicate their attention to the task. We see the wisdom in such views. **R12: TW should forthwith consider making the safeguarding officer a full-time position.**

36. In addition to the Safeguarding Policy which applies to TW (which can be found in the list of policies on TW section of the LTA website), there have been further TW safeguarding developments.

37. The present safeguarding page of the TW section of the LTA website proclaims:

"Tennis Wales work closely with British Tennis to ensure tennis in Wales takes place in a safe environment. Tennis Wales approve and adopt the All Wales Child Protection Procedures and implement all policies in-line with British Tennis."

38. The following also appears:

"Tennis Wales' Lead Safeguarding Officer in Wales is Ellie Lewis and she can be contacted at: ellie.lewis@tenniswales.org.uk / 07949 500497. Please contact Ellie for any query relating to Safeguarding & Protection."

39. It also lists the following policies (with inbuilt hyperlinks) under the heading

"Tennis Wales Trips Documentation - as from 1st September 2017":

- a. Tennis Wales Trips Policy
- b. Social Media Acceptable use Policy
- c. Rights and Responsibilities for Parents

- d. Rights and Responsibilities for Tennis Wales Support Team
- e. Rights and Responsibilities for Tennis Wales
- f. Tennis Wales Support Team - LTA Safe & inclusive Code of Conduct
- g. Player Pledges for U12
- h. Player Pledges for 12+
- i. Perkins and Slade Travel Insurance Document

R13: TW should forthwith review and update as appropriate its safeguarding policies in light of the LTA's 2018 safeguarding policies and the content of the safeguarding page of its website more generally.

40. By way of example, the Tennis Wales Trips Policy has been superseded by the LTA's 'Safeguarding at Events, Activities and Competitions' Policy (2018) but so far as we have been able to establish from the TW website and what TW has provided us, not adopted by TW. The Toolkit should also be available in the TW section of the LTA website. **R14: TW should have a clearly identified link to the LTA safeguarding page on the page of its website.**

(1) LTA/TW 'Governance Structure'

41. One of the issues which troubled us looking at the events in 2012-2017 was the absence of any clear 'governance' structure of relationship between WTC, TW and LTA. The LTA has taken meaningful steps to address that:
- a. TW, TS and County safeguarding officers are now all mandated to share information about safeguarding cases with the national LTA.
 - b. There is now a formal reporting system that establishes clarity around responsibility in safeguarding cases between the LTA at a national level, TW, TS and county LTAs.
42. We have seen the *'Management of Safeguarding Cases and Reporting*

Standards' document which applies to the LTA, TW and TS. It established standard operating procedures to provide clarity around information sharing with partners, County Associations and with TW/TS. It also clarified the minimum reporting standards when inputting cases, gave guidance on supervisory entries, and instructions for closing safeguarding cases.

43. Under the heading "*Recording Standards*", it establishes the standard operating procedures in respect of the following:
 - a. Creation of cases records – the circumstances where a case record must be created.
 - b. Initial actions to be taken by the ST following a referral, covering a number of different situations, including compliance with the '*Reporting a Concern Flowcharts*' (which is an appendix). It anticipates ongoing liaison between statutory agencies and the LTA, TW or TS and/or once the outcome of statutory intervention is known. It also offers advice where an individual has been taken out of the jurisdiction and abused.
 - c. Case plans and supervision – it mandates that a plan must be entered for every case deemed as requiring further investigation. It also contains a helpful checklist of points within an investigation plan, which should be considered and recorded in the case plan.
 - d. Supervisory updates - it further mandates written supervisory entries at set time periods.
 - e. Closing report - all concerns should be subject to a closing report which must be submitted to the HoS before any report is filed.
 - f. DBS/PVG cases – particular provision is made for these cases.
44. It also incorporates the draft ISP, which we analyse below. It ends by encouraging individuals who have doubts or want advice to call or email the ST.
45. Given our review of events during the period 2012-2014, this is to be hugely welcomed. We need hardly observe that the existence and proper application

of such standard operating procedures in 2012-2014 would have proved invaluable to all concerned.

46. There is much to praise here. We have this residual issue however. We have commented on the 'safeguarding no-man's land' inhabited by TW. As we understand it, individual cases are - rightly - managed by the LTA. However, TW has a duty to "*promote safeguarding*". We remain uncertain as to TW's precise safeguarding role. By way of an example, take the LTA present specific County Safeguarding Policy template. Therein one finds the following: "*The LTA Safeguarding Team and Tennis Scotland, Tennis Wales and Tennis Foundation Safeguarding Leads can offer support to [name of county association]*". We are not sure which counties TW or TS will support.
47. We understand the LTA and TW are working at this. In this context, we would make this recommendation **R10: LTA and TW continue to work to achieve clarity as to TW's precise safeguarding duties and responsibilities.**
48. We have one further recommendation in relation to these documents. To give it meaning, we need to set out the part of the *Management of Safeguarding Cases and Reporting Standards* to which our recommendation relates:

"Other Circumstances which may require a case record

In the following circumstances the LTA, Tennis Wales and Tennis Scotland do not necessarily need to create a MyConcern record, however liaison with the LTA National Safeguarding Team should take place to ensure information is linked (if previous records exist) and to agree upon suitable method of resolution;

i. Lower level breaches of policy and misconduct issues below LTA thresholds e.g. inappropriate response to legitimate complaints, employment or volunteer misconduct e.g. lateness to young person's coaching session, parental misconduct representing a safeguarding issue, photography issues – taking or publication of images without consent (local level in first instance), bullying (in first instance)

Action in the following cases could include;

- *Referring the matter back to appropriate organisation.*

- *Provide support/guidance on how to manage the issue.*
- *Liaise with National Team to ensure no pattern of behaviour or conduct further research.*
- *Refer to statutory agencies.*

A record of action taken in such cases should be held by the owning body.

A monthly meeting will be held between the LTA, TW and TS to discuss cases not placed onto the CMS. This is to ensure consistency in recording standards and identify any cases which, on reflection, should have been recorded on MyConcern."

49. Our recommendation is modest, but we consider it important and derives from what happened in 2012. The recommendation is aimed at addressing how the LTA identifies and monitors low-level repeat offenders and/or those who may have the potential for more serious offending. **R11: The LTA should review how it records the low-level concerns that do not meet the threshold for 'MyConcern'.**

(2) LTA/TW Information Sharing Protocol ('ISP')

50. The Review has considered the draft ISP, which was the last of the Camina Review recommendations. It is in draft at present; and is being considered in light of the General Data Protection Regulation 2018, which took effect on 25 May 2018⁴¹.
51. The document sets out the legal and practical basis on which the LTA and TW agree to share sensitive personal information which may be relevant to the safeguarding of children and vulnerable adults. It supplements professional judgment and training and provides a very useful framework to assist in the lawful sharing of information.
52. It addresses concerns raised by a number of TW contributors, including the former TW CEO. They have opined that such an arrangement would have

⁴¹ The document makes express reference to the fact data protection law is changing on that date and that the parties undertake to review the Protocol lightthereof.

helped, especially around events in 2012-2014. The TW timeline document states:

"Between 2012 and 2017 the LTA received several major red flags regarding child protection issues from Wrexham parents. These should have been shared with Tennis Wales and Wrexham Directors, and should have been acted on in light of what had already occurred with the 2012 investigation. Recommended Action: a formal policy should be agreed between the LTA and Tennis Wales on the sharing of safeguarding information."

53. The TW CEO has emphasised to us the problems caused, especially during 2012-14 by the lack of communication and proper information sharing between people and between institutions. He complained that VB did not share with him what she learned; and D1 and the Wrexham Board did not share with TW the continuing problems with and disclosures about DS.
54. Therefore, the draft ISP is a conspicuously helpful document and a welcome development. Its overriding objective is to ensure parties help create safer environments for children and adults at risk by sharing relevant information with relevant people and with confidence. It has wider application beyond TW. It sets out the legal basis for sharing, absent express consent of the individuals to whom the sensitive personal data relates. Such grounds include the prevention of crime and the duties under the Data Protection Act 1998.
55. It also addresses difficult practical issues as: (a) when and what to share; (b) who to share with; (c) how to share; (d) recording keeping around sharing; and (e) the use and retention of personal data. There is proper reference and advice concerning respecting the rights of individuals affected.
56. It is worth repeating that in light of what happened during 2012-2014, this is likely to prove welcome clarity and guidance.

D. WTC

- (1) Gill Camina

57. The focus of the Camina Review was the following:
- a. Exploration of the general culture and ethos at WTC;
 - b. Exploration of WTC's safeguarding culture;
 - c. The "perception" of WTC (internal and external);
 - d. Review of its policies and procedures for safeguarding and whistleblowing; and
 - e. On-site review of safeguarding arrangements on a day-to-day basis.
58. The Camina Review was published on 31 May 2017. Therein she concluded that:

"Consideration should be given to implementing the following recommendations:

a. 4.1. All people entering the Centre should be required to register at the reception and the purpose of their visit recorded. They should sign out when leaving. Currently there is no means of knowing who is on site or the location of children if they do not join the activity which they are registered for.

b. 4.2. The Centre has visible CCTV installations and the potential for this live footage to be viewed continuously from reception should be explored to increase safeguards for unattended young people as they move between activities around the venue.

c. 4.3. The appointment of a welfare officer and deputy welfare officer who are independent from the Board of Directors and of the coaching workforce is a priority. These individuals should have a regular and visible presence at the Centre.

d. 4.4. Those with designated safeguarding responsibilities should be provided with basic awareness training and designated welfare officer training to ensure they feel competent and confident in the roles. This includes the Tennis Wales Workforce Manager.

e. 4.5. The Board in the entrance hall to WTC should show photographs

of the designated people/welfare leads with their names and contact details. These should be displayed at a level which can be seen by children. Internal and external sources of safeguarding support and advice should be actively signposted and supported.

f. 4.6. Until new Welfare Leads are appointed, the current arrangements for welfare support must be clarified as a matter of urgency and actively promoted by all staff and via the noticeboard and on all programme materials. Any safeguarding concerns arising should be discussed by the welfare leads with the national LTA safeguarding team and advice sought.

g. 4.7. All staff should wear clear photo-identification badges on lanyards to ensure all Centre users can identify them with confidence.

h. 4.8. A 'Who's Who' board for Centre users should be sited in the Centre entrance/café area and on the WTC website which provides names, roles and brief biographies for all staff (Directors, General Manager, Duty Managers, Coaches, support staff).

i. 4.9. The Centre's policies need to be reviewed and updated in line with the recommendations outlined in Section 3.2.

j. 4.10. The Directors and General manger [sic] should take up the offers of support and increased collaboration from Wrexham Council and Tennis Wales for WTC in relation to developing the Centre's safeguarding framework.

k. 4.11. The welfare role of Duty Managers should be reflected in their job/role descriptions and in their recruitment and selection. All Duty Managers are effectively in regulated roles and should be subject to criminal record checks and the uptake of references which indicate their suitability and appropriateness to work with children and young people.

l. 4.12. All staff should have an annual safeguarding briefing that emphasises the need to respond positively to any reporting of concerns or observation of behaviours which have a potentially negative impact upon other centre users, with particular focus upon those who are additionally vulnerable (children, young people, participants with disability and/or communication differences, elite level/talented athletes). Confidentiality, recording and reporting procedures (WTC, LTA and whistleblowing) should

be clarified. This is critical and a priority for duty managers.

m. 4.13. A number of businesses are located within the centre. Their contracts should include safeguarding minimum operating standards as a condition of office rental specifically relating to safe recruitment of staff (DBS checks, professional qualifications, references and safeguarding/child protection basic awareness training) and adoption of the WTC safeguarding policies once these have been revised.

n. 4.14. Recruitment of some new directors with current governance experience and appropriate expertise should be recruited. A model where individual quality and contribution should be recognised and valued rather than the existing model where an expectation of significant time commitment which precludes younger individuals from applying. Consideration should be given to appointing a senior coach to the Board. This proposal has reportedly been rejected previously because of a perceived conflict of interest but coaches are key stakeholders who are critical to the success of WTC. The current Board are each volunteers but, as financial investors, could also be argued on this basis to have a potential conflict of interests. The Articles of Association clarify this situation in respect of both the Director's financial loans to WTC (see Section 3.1.2) and also in relation to a contracted coach undertaking a director role. It states that contracting a director's services for payment is acceptable where: 'The other directors are satisfied that it is in the best interests of the charity to contract with the supplier rather than with someone who is not a director or connected person. In reaching that decision the directors must balance the advantage of contracting with a director or connected person against the disadvantages of doing so'. [Article (4(C)(c)].

o. 4.15. Regular Wrexham Council and national governing body representation at meetings should be facilitated by more formal advanced scheduling and administration of Board meetings.

p. 4.16. Regular stakeholder consultations and opportunities for feedback should be facilitated to ensure that the needs and views of all parties continues to inform the Centre's vision and an understanding of the priorities of WTC.

q. 4.17. An information sharing protocol should be developed and agreed between the LTA and Tennis Wales to ensure effective cross boundary

working in relation to the management of safeguarding concerns and the provision of support.”

59. The Camina Review advised that a “*safeguarding implementation plan*” should be agreed, which would indicate lines of responsibility and accountability, resource allocation and timescales for enacting those recommendations.
60. The present WTC manager has assisted this Review. We have received an Action plan devised to implement the Camina Review recommendations. As at 5 July 2018 we were informed that those Action Plans have been completed and the Camina Review recommendations have been implemented by WTC, subject to the ISP, which we consider below. The WTC manager also commented on the support received from Ellie Lewis.
61. The Review Panel considered with care the Camina Review recommendations. We note that the Camina Review is silent so far as attending tournaments and trips with coaches is concerned. **R15: All accredited tennis clubs including WTC should adopt the LTA’s Safeguarding at Events, Activities and Competitions 2018⁴² policy immediately.**
62. Further, the Camina Review recommended “*those with designated safeguarding responsibilities should be provided with basic awareness training and designated welfare officer training*”. The Action Plan reported that the action “*Welfare officer to complete Welfare Officer e-learning course*” had been completed. The LTA requires a Welfare Officer to undertake online training and what is described as “*face-to-face training*”. We agree. **R16: Individuals at WTC (and all accredited clubs) with designated safeguarding responsibilities should complete successfully online and face-to-face safeguarding training.**
63. We recognise that the Camina recommendations will do much to address the complaints that parents were fully informed of the safeguarding procedures. By way of example the parents who did not even know who the welfare officer

⁴² We have v1.1 17/1/18. That is the version available on the LTA website, though the relevant link appears to foreshadow v1.2 22/3/18

was after years of their child playing at WTC. However, they relate only to WTC. More could and should be done. **R17: children and parents upon obtaining British Tennis membership should receive an information sheet which includes details of (1) where they can find online the LTA and local (i.e. club, county and TW or TS) safeguarding policies, (2) the identity and contact details of the LTA regional safeguarding officer and (3) the identity and contact details of their club welfare/safeguarding officer.**

Christopher Quinlan QC (Independent Chair)
On behalf of the Review Panel
January 2019

Appendix 1 – Abbreviations

The following abbreviations are used in this Report:



CEO	Chief Executive Officer
CITC	Community indoor tennis centre
CLRC	the Coach Licensing and Registration Committee
CMG	Case Management Group
CPC	Child Protection Committee
CPS	Crown Prosecution Service
CPSU	NSPCC Child Protection in Sport Unit
DO	LTA Disciplinary Officer
DP	Disciplinary Panel
DS	Daniel Sanders
GVTC	Garden Village Tennis Club
HOS	Head of Safeguarding
HPC	High Performance Centre(s)
HPP	High Performance Programme
ISP	Information Sharing Protocol
LADO	Local Authority Designated Officer
LRC	Licensing and Registration Committee



LTA	Lawn Tennis Association
LTA LD	LTA Legal Director
LTA ST	LTA Safeguarding Team
RPM FS	RPM Fitness Suite
SGCP	Safeguarding and Child Protection
SM	Safeguarding Manager
SoC	Statement of Case
SPC	Safeguarding & Protection Committee
SRUK	Sport Resolutions UK
ST	Safeguarding Team
TOR	Terms of Reference
TS	Tennis Scotland
TW	Tennis Wales
WTC	Wrexham Tennis Centre

Appendix 2 – Panel Biographies

Christopher Quinlan QC | Independent Chair

Christopher Quinlan QC is a Barrister (Guildhall Chambers, Bristol), Recorder of the Crown Court and a member of the Sport Resolutions Panel of Arbitrators. He is a legal member of both the National Anti-Doping Panel (NADP) and National Safeguarding Panel (NSP). Christopher is World Rugby's Judicial Panel Chairman, the most senior judicial role within the sport. Christopher sits on and chairs Football Association Appeal Boards and is a Specialist Member of the FA Judicial Panel. He is a member of the International Association of Athletics Federation, Disciplinary Tribunal and a Deputy Chair, Appeal Board, Table Tennis England. In June 2016, Christopher was appointed to lead a review of the structure, composition and operation of the British Horseracing Authority (BHA) Disciplinary Panel, Appeal Board and Licensing Committee. His final report, published in September of that year, received widespread industry support and the BHA accepted all of his recommendations.

Jane Aldred | Specialist Panel Member

Jane Aldred is a solicitor at Switalskis LLP in Leeds. She specialises in family law, particularly children's work and is qualified for the Law Society's Children Panel. She is a former grade 1 table official for basketball, chair of the Appeals Panel for England Basketball and a former school governor.

Ian Wilson | Specialist Panel Member

Ian Wilson is a Director of England Hockey and Chair of its Safeguarding Case Management Panel. He represents the governing body at all independent safeguarding disciplinary hearings. He has been a member of Sport Resolutions' National Safeguarding Panel since its inception in 2013 working across a range of

sports.

Keith Eldridge | Independent Investigator

Keith Eldridge is a retired police officer with the Metropolitan Police Service. He is a former chair of a Multi-Agency Risk Management Panel and senior investigating officer for homicide investigation. He is also a former elite athlete in the sport of Judo, rising to 5th in the British rankings in 1996. Keith retains an involvement in the sport of Judo by chairing the British Judo Association's Complaints and Conduct Panel and through his membership of the Association's Child Protection Working Party.

Peter Keen | Independent Investigator

Peter Keen is a former Senior Police Officer. He retired from Gwent Police in 2015 having served as Chief Superintendent, Head of Service Development and Head of Crime. Peter has worked in the public protection field for many years. He has led complex child abuse and vulnerable adult investigations and contributed to local safeguarding activity through membership of Local Safeguarding Children's Boards, Community Safety Partnerships and Youth Offending Team Management Boards. Peter has also worked with Mind Cymru, developing responses to mental health crisis and welfare support for Blue Light Organisations.

Appendix 3 – List of Contributors

	Contributor
1.	Jon Ainge
2.	Pam Alford
3.	Emily Brassington
4.	CPC Chair
5.	Vicki Broadbent
6.	Mike Clarke
7.	Stephen Clarke
8.	Mike Dunn
9.	Stephen Farrow
10.	Pam Griffiths
11.	Richard Hughes
12.	Sarah Hughes
13.	David Humphrey
14.	Adam Jones
15.	Dr Carwyn Jones
16.	Debra Jones
17.	Alex King
18.	Phil Leighton
19.	Ellie Lewis
20.	Martyn Lewis
21.	Nick McCormick
22.	Amanda Morris
23.	Mark Morris
24.	Chad Patel
25.	Performance Network Programmes Manager
26.	Katie Rayment
27.	Chris Rudkin
28.	Dan Thorp
29.	Joanne Trataris
30.	Rhodri Vaughan
31.	David Watts
32.	Martin Weston
33.	Detective Sergeant Jane Bowyer-Jones – Wrexham Police Station
34.	Detective Constable Jason Williams – Wrexham Police Station
35.	Contributor A
36.	Contributor B
37.	Coach 1
38.	Coach 2
39.	Coach 3
40.	Coach 4
41.	Coach 5

42.	Coach 6
43.	Concerned Parent A
44.	Concerned Parent B
45.	Concerned Parent C
46.	Concerned Parent D
47.	Daughter of Richard Hughes
48.	D1
49.	D2
50.	D3
51.	D4
52.	D5
53.	FC1
54.	FC2
55.	FP2
56.	FP3
57.	CLRC Chair
58.	LTA Disciplinary Officer
59.	LTA Director
60.	LTA Head of Performance Support
61.	LTA Employee A
62.	LTA Employee B
63.	LTA Employee C
64.	LTA Employee D
65.	LTA Safeguarding Manager A
66.	LTA Safeguarding Manager B
67.	LTA Safeguarding Manager C
68.	Member of Performance Network/Landscape Team A
69.	Member of Performance Network/Landscape Team B
70.	WTC Manager
71.	FP4
72.	FP5
73.	FP6
74.	TW CEO
75.	WTC Staff A
76.	WTC Staff B
77.	WTC Staff C

Appendix 4 – Documents Reviewed

Item No.	LTA POLICIES
1.	British Tennis Safeguarding Policy (2015 – current)
2.	LTA Safeguarding Children and Young People Policy (2012 – 2015)
3.	LTA Child Protection Policy (2008 – 2012)
	LTA FUNDING AGREEMENTS WITH WREXHAM TENNIS CENTRE
4.	North Wales Regional Tennis Centre HPC Agreement 2012-17
5.	North Wales Regional Tennis Centre Grant Funding Agreement
6.	North Wales Regional Tennis Centre, Variation AASE Funding Agreement sent 11.12.13
	TRAINING DELIVERED TO WREXHAM TENNIS CENTRE IN 2012
7.	LTA Equality, Diversity and Inclusion training (2012)
8.	LTA Safety and Well-Being in Tennis Training (2012)
	REVIEWS OF LTA SAFEGUARDING PROCEDURES
9.	LTA Disciplinary, Licensing and Safeguarding Processes – Draft Joint Advice
10.	LTA Safeguarding Report June 2017
11.	CPSU Safeguarding Framework Review 2017
	AUDIT OF WREXHAM TENNIS CENTRE SAFEGUARDING PROCEDURES
	Report
12.	Wrexham Tennis Centre, Independent Safeguarding Review/Audit, USS Ltd, Commissioned by the LTA, May 2017
13.	Appendix 2a_Coaching Survey Data_All_310517
14.	Appendix 2b_Coaching Survey Responses_All_310517
15.	Appendix 3a_Parents Carers Survey All Data_310517
16.	Appendix 3b_Parents Carers Survey Responses_All_310517
17.	Appendix 4a_Children and Young People All Data_310517
18.	Appendix 4b_Children and Young People Responses_All_310517
	Summary
19.	Wrexham Tennis Centre Independent Safeguarding Review/Audit Executive Summary, USS Ltd, Commissioned by the LTA, June 2017
	Wrexham Policies
20.	Briefing for auditors
	HR policies
21.	Anti-fraud and corruption policy
22.	Bereavement and Special leave policy

23.	Disciplinary Procedure and Policy
24.	Grievance Policy and Procedure
25.	Internet & Email Policy
26.	List of policies
27.	Parental leave policy
28.	Policy and Procedures Commitment Form - HR
29.	Recruitment policy
30.	Sick Pay & Absence Monitoring Policy
31.	Travel and other expenses policy staff
32.	Whistleblowing policy
	Operational Policies
33.	Anti-fraud and corruption policy
34.	Audit & Accounts Checklist
35.	Coaches pay and deployment
36.	Complaints Policy 2017
37.	Data Protection policy
38.	Equality and Diversity Policy
39.	Procurement Policy
	Other
40.	Articles of Association
41.	Directors
42.	Job description
43.	Plan of the Tennis Centre
44.	Service Agreement - template 2016
45.	TDO Agreement Sept 2017
	Safeguarding
46.	Coaches Code of Conduct
47.	WTC safeguarding policy - 2017
	2012 CASE
48.	LTA Safeguarding Log Sheet
	█ call with █ 26.03.12
49.	Telephone call with █ 26032012
	Wrexham Internal Investigation
50.	Report on Investigation of Complaints from █, █ & █
	Wrexham report and recommendations
51.	CONFIDENTIAL Wrexham HPC report & recommendations 09.05.2012
52.	Wrexham report
	North Wales Tennis Meeting Minutes

53.	█ & █ Minutes 21032012
	Disciplinary Officer
54.	Disciplinary Officer Letter to Dan Sanders letter 20 June 2012
	Licensing and Registration Committee
55.	CLRC Case Bundle 16.05.12
56.	CLRC Minutes 16 May 2012 (final)_Redacted
57.	CLRC outcome letter to DS 29052012
58.	Dan Sanders Statement of Case 16.05.2012
59.	Matters arising 16 May 2012_Redacted
60.	Minutes 16 May 2012 (original)_Redacted
	Safeguarding and Protection Committee
61.	Chair of CPC letter to DS 10042012
62.	Copy of Interim Suspension note to CPC 26032012
63.	Minutes 30 Mar 2012
	Letters
	2012
64.	IS letter █ to DS 16032012
65.	█ Letter to DS 04042012
66.	█ Letter to DS 23032012 re IS
67.	█ letter to █ 05042012
68.	█ letter to █ 05102012
69.	█ letter to █ 05102012
70.	█ letter to █ Mold Tennis Club
	2013
71.	Letter received 7 5 2013
	2014
72.	Letter from █ to █ 26.01.14
73.	Letter from █ to DS Re Follow up on Recommendations 09.01.14
74.	Letter █ to █ 12.03.14
75.	█ letter 31.03.2014
	LTA DISCIPLINARY CODES
76.	Disciplinary Code 20 September 2016
77.	Disciplinary Code 1 January 2015
78.	Disciplinary Code 1 April 2014
79.	Disciplinary Code 1 April 2013
80.	Disciplinary Code 1 January 2013
81.	Disciplinary Code 1 December 2011

	2017 CASE
82.	Sanders, Dan. Safeguarding Chronology
	<i>Safeguarding and Protection Committee</i>
83.	Statement of Case - interim suspension 16.02.17
	<i>Correspondence</i>
84.	Interim suspension letter 06.02.2017
85.	Interim suspension letter 27.02.2017
86.	Interim suspension letter 26.04.17
87.	Interim suspension procedures
88.	Letter from [REDACTED] 17.10.17
89.	Letter LTA to parents 13.03.17
90.	Letter to [REDACTED] 22.02.17
91.	SPC decision letter 04.09.17
	<i>Local Authority information</i>
92.	1. Daniel Sanders Part 4 1st Feb 2017 (REMOVED)
93.	2. Part 4 mins Daniel Sanders 080317 (REMOVED)
94.	3. Part 4 Minutes Daniel Sanders 090517(REMOVED)
	CORRESPONDENCE RELATING TO 2012 CASE
95.	<i>January 2012 Emails</i>
96.	<i>March 2012 Emails (enclosures to e-mails below)</i>
97.	<ul style="list-style-type: none"> • Report on Investigations re complaints from [REDACTED]
98.	<ul style="list-style-type: none"> • [REDACTED] Wrexham Report
99.	<ul style="list-style-type: none"> • [REDACTED] Report
100.	<ul style="list-style-type: none"> • [REDACTED] notes re DS Complaint
101.	<ul style="list-style-type: none"> • Letter to Dan Sanders from [REDACTED]
102.	<ul style="list-style-type: none"> • DS Account
103.	<ul style="list-style-type: none"> • Dan Sanders Account
104.	<ul style="list-style-type: none"> • Confidential
105.	<ul style="list-style-type: none"> • Copy of Interim Suspension note to CPC 26032012 (pw protected)
106.	<ul style="list-style-type: none"> • IS letter [REDACTED] to DS 16032012 (PW)
107.	<ul style="list-style-type: none"> • Report on Investigations re complaints from [REDACTED]
108.	<ul style="list-style-type: none"> • Closing Letter

109.	<ul style="list-style-type: none"> • Letter to [REDACTED]
110.	<i>April 2012 Emails (enclosures to e-mails below)</i>
111.	<ul style="list-style-type: none"> • [REDACTED] Letter to DS 04042012.pdf
112.	<ul style="list-style-type: none"> • [REDACTED] Letter to DS re Allegation made to the Safeguarding Team
113.	<ul style="list-style-type: none"> • [REDACTED] Letter to [REDACTED] 05042012.pdf
114.	<ul style="list-style-type: none"> • Letter from [REDACTED] (Chair of CPC) to Dan Sanders re Consideration of Interim Suspension at Child Protection Committee (CPC)
115.	<ul style="list-style-type: none"> • Chair of CPC Letter to DS 10042012.pdf
116.	<ul style="list-style-type: none"> • Facebook message to [REDACTED] from [REDACTED]
117.	<ul style="list-style-type: none"> • Dan Sanders Response to Letter dated 4 April from [REDACTED]
118.	<ul style="list-style-type: none"> • Response by Dan Sanders to the Statement of Case of the LTA
119.	<i>May 2012 Emails (enclosures to e-mails below)</i>
120.	<ul style="list-style-type: none"> • LTA Statement of Case – Mr Dan Sanders
121.	<ul style="list-style-type: none"> • [REDACTED] Letter to DS for final submissions
122.	<ul style="list-style-type: none"> • DS Final Statement
123.	<ul style="list-style-type: none"> • Wrexham HPC Report and Recommendations
124.	<ul style="list-style-type: none"> • LTA Coach Licensing and Registration Committee (CLRC) Minutes – Draft
125.	<ul style="list-style-type: none"> • Whistleblowing Policy
126.	<ul style="list-style-type: none"> • Actions and Matters Arising from the CLRC held on 16 May 2012
127.	<ul style="list-style-type: none"> • LTA Coach Licensing and Registration Committee (CLRC) Minutes
128.	<ul style="list-style-type: none"> • [REDACTED] Letter to DS re Decision of the LTA CLRC
129.	<ul style="list-style-type: none"> • CLRC Chair letter to DS May 2012
130.	<ul style="list-style-type: none"> • CLRC outcome letter to DS
131.	<ul style="list-style-type: none"> • LTA CLRC Minutes
132.	<ul style="list-style-type: none"> • Actions and Matters Arising from the CLRC held on 16 May 2012
133.	<ul style="list-style-type: none"> • CLRC Decisions – <i>The LTA have stated that this document is not relevant to the inquiry</i>
134.	<i>June 2012 Emails (enclosures to e-mails below)</i>
135.	<ul style="list-style-type: none"> • Wrexham Recommendations - Action Plan
136.	<ul style="list-style-type: none"> • Wrexham Report

137.	<i>July Emails (enclosures to e-mails below)</i>
138.	<ul style="list-style-type: none"> • [REDACTED] Letter to [REDACTED], Mold Tennis Club
139.	<i>August 2012 Emails</i>
140.	<i>September 2012 Emails</i>
141.	<i>October 2012 Emails (enclosures to e-mails below)</i>
142.	<ul style="list-style-type: none"> • [REDACTED] Letter to [REDACTED] 05102012
2013 CORRESPONDENCE RELATING TO 2012 CASE	
143.	<i>May 2013 Emails (enclosures to these e-mails listed below)</i>
144.	<ul style="list-style-type: none"> • Anonymous Letter
2014 CORRESPONDENCE RELATING TO 2012 CASE	
145.	<i>January 2014 Emails</i>
CORRESPONDENCE RELATING TO 2017 CASE	
146.	<i>January 2017 Emails</i>
147.	<i>February 2017 Emails (enclosures to emails below)</i>
148.	<ul style="list-style-type: none"> • Draft Letter to [REDACTED]
149.	<ul style="list-style-type: none"> • Anonymous attachment re Wrexham
150.	<i>March 2017 Emails (enclosures to emails below)</i>
151.	<ul style="list-style-type: none"> • Operation NetSafe Conference Flyer.pdf
152.	<ul style="list-style-type: none"> • Wrexham Letters FINAL
153.	<ul style="list-style-type: none"> • Letter LTA [REDACTED] to parents 13.03.17
154.	<ul style="list-style-type: none"> • Follow up to our meeting
155.	<ul style="list-style-type: none"> • Update on Wrexham performance support
156.	<ul style="list-style-type: none"> • Funding support for [REDACTED]
157.	<i>April 2017 Emails (enclosures to emails below)</i>
158.	<ul style="list-style-type: none"> • [REDACTED] Letter to LTA 2014 re WTC concerns

159.	<ul style="list-style-type: none"> • LTA Reply to [REDACTED]
160.	<ul style="list-style-type: none"> • Briefing for auditors
161.	<ul style="list-style-type: none"> • Anti-Fraud and corruption policy
162.	<ul style="list-style-type: none"> • Audit & Accounts Checklist
163.	<ul style="list-style-type: none"> • Coaches pay and deployment
164.	<ul style="list-style-type: none"> • Complaints Policy 2017
165.	<ul style="list-style-type: none"> • Data Protection Policy
166.	<ul style="list-style-type: none"> • Equality and Diversity Policy
167.	<ul style="list-style-type: none"> • Procurement Policy
168.	<ul style="list-style-type: none"> • Articles of Association
169.	<ul style="list-style-type: none"> • Directors
170.	<ul style="list-style-type: none"> • GM Job Description
171.	<ul style="list-style-type: none"> • Plan of the Tennis Centre
172.	<ul style="list-style-type: none"> • Service Agreement – template 2016
173.	<ul style="list-style-type: none"> • TDO Agreement Sep 2017
174.	<ul style="list-style-type: none"> • Coaches Code of Conduct
175.	<ul style="list-style-type: none"> • Safeguarding Policy
176.	<ul style="list-style-type: none"> • Junior Recreational Programme
177.	<i>May 2017 Emails</i>
178.	<i>June 2017 Emails (enclosures to emails listed below)</i>
179.	<ul style="list-style-type: none"> • Confidentiality Agreement: [REDACTED]
180.	<ul style="list-style-type: none"> • Confidentiality Agreement: [REDACTED]
181.	<ul style="list-style-type: none"> • Confidentiality Agreement: [REDACTED]
182.	<ul style="list-style-type: none"> • Confidentiality Agreement: [REDACTED]
183.	<ul style="list-style-type: none"> • Confidentiality Agreement: [REDACTED]
184.	<ul style="list-style-type: none"> • Confidentiality Report: [REDACTED]
185.	<ul style="list-style-type: none"> • Action Plan
186.	<ul style="list-style-type: none"> • Address Details
187.	<ul style="list-style-type: none"> • Audit Report
188.	<ul style="list-style-type: none"> • Copy Minutes of Directors Meeting in February 2014

189.	<ul style="list-style-type: none"> • CPSU Safe Sports Events Guidance
190.	<ul style="list-style-type: none"> • Updated Action Plan
191.	<ul style="list-style-type: none"> • Updated Policies
192.	<ul style="list-style-type: none"> • █████ - Investigation Report
193.	<ul style="list-style-type: none"> • Final Outcome Letter from Disciplinary Hearing
194.	<ul style="list-style-type: none"> • Executive Summary – WTC Audit
195.	<ul style="list-style-type: none"> • Safeguarding Certificate – █████
196.	<ul style="list-style-type: none"> • Revised Executive Summary
DOCUMENTS FOR WREXHAM	
197.	Action Tracker
198.	Business Case for Minimum standards
199.	Risk Register
200.	WBS Safeguarding
LTA TRIPS POLICIES	
201.	LTA Official Trips Policy
202.	Safeguarding at Events Activities and Competitions
CAMINA REPORT – LTA ACTION PLANS	
203.	Action Plan for Wrexham – June 2017
204.	Action Plan for Wrexham 24 Jan 2018
205.	Actions from Jan 30 th Meeting Wrexham
206.	Actions from Jan 30 th Meeting
207.	LTA Independent Review – Letter to █████, Wrexham Tennis Centre
█████ FILES – 2018 AND 2012 INVESTIGATIONS	
2018 Investigation	
208.	Interview Docs – interview plans, records of interview

209.	Screenshots
210.	Safe and Inclusive Tennis (SIT) Team – Statement of Case (9 May 2018)
211.	Witness Statements
212.	Correspondence
	June 2012 Investigation
213.	Report by [REDACTED]
214.	Correspondence – March 2012 to May 2012
215.	Safeguarding Team of the Lawn Tennis Association – 30 May 2012
	Oct – November 2012 Investigation
216.	Correspondence – October 2012
217.	Telephone Notes
218.	Timeline of Events
219.	Safeguarding Team of the Lawn Tennis Association – Statement of Case (7 November 2012)
220.	Letter to US Citizenship and Immigration Services (Vermont Service Centre)
221.	E-mails 2012
222.	Letters 2012
223.	[REDACTED] Case Details
224.	[REDACTED] Chronology
225.	Safeguarding Log Sheet
226.	Summary (15 March 2012)
	MISCELLANEOUS DOCUMENTS
227.	Action Plan 2017-2019 – Refresh
228.	Gemma White Recommendations
229.	Reporting Standards
230.	SPC minutes 160618
231.	Documents provided by North Wales Police re Dan Sanders
232.	Review of LTA By Child Protection in Sport Unity (CPSU) - National Governing Body (NGB) Safeguarding Framework Meetings 2018
233.	Governance Structure Summary – Relationship between LTA and Tennis Wales/Tennis Scotland

234.	LTA Tennis Association Limited: Disciplinary Code, Effective 21 May 2018
	<i>Review meetings between 2012 and 2016</i>
235.	<ul style="list-style-type: none"> • Framework review 29 04 14
236.	<ul style="list-style-type: none"> • LTA Framework Review 22 05 15
237.	<ul style="list-style-type: none"> • LTA Tennis Foundation Review 10 5 16
	<i>Safeguarding Elite Juniors</i>
238.	<ul style="list-style-type: none"> • Delegate workbook
239.	<ul style="list-style-type: none"> • Safeguarding handbook section
240.	<ul style="list-style-type: none"> • Guidance – supervising, travelling and overnight trips
241.	<ul style="list-style-type: none"> • International trip selection policy
	<i>Protocol for managing cases across home nations</i>
242.	<ul style="list-style-type: none"> • LTA Tennis Wales Information Sharing Protocol
	<i>Advanced Standards Accreditation</i>
243.	<ul style="list-style-type: none"> • Letter ██████ to ██████ – Advanced Standards Achieved – 07.07.2011
	<i>Wrexham Tennis Centre Investigation – Dan Sanders</i>
244.	<ul style="list-style-type: none"> • Case File (2012-2017) ██████
ADDITIONAL DOCUMENTS RECEIVED FROM CONTRIBUTORS TO THE REVIEW	
245.	█████ - ██████ on background and views on nepotism
246.	█████ - Letter from ██████ re. her NCAA eligibility
247.	█████ - Letter from ██████ re. ██████ USA tennis scholarship
248.	█████ - Letter from ██████ scholarship application
249.	█████ - Letter from ██████ scholarship application
250.	█████ - Letter from ██████ re. ██████ scholarship application
251.	█████ - Letter from ██████ re. ██████ scholarship application
252.	█████ - Letter from ██████ re. ██████ scholarship application
253.	█████ - Letter from ██████ re ██████ scholarship application
254.	█████ - Letter from Daniel Sanders re ██████ scholarship application
255.	█████ - Letter from ██████

256.	█ - █ response
257.	█ - Email correspondence between █ and █
258.	█ - Letter from █ to █ (Chair of Tennis Wales North Board); and
259.	█ - █ reply
260.	█ 'Who report it to/when' summary
261.	Reporting Chronology
262.	Recommendations for Improvements
263.	Letter to █ from █
264.	Letter to █ [sic] from █
265.	Letter to █ from █
266.	Letter to █ from █
267.	Timeline of Incidents
268.	Points for Consideration - as Parent of █ not director
269.	Letter re █ from █ and █, enc. E-mail correspondence with LTA
270.	Email correspondence between █ and Peter Keen re. █
271.	Letter to █ from █
272.	Email correspondence between █ and █ re. Letters of 12 July/25 September
273.	Letter to █ from █
274.	Letter to █ from █
275.	E-mail Correspondence re Investigation at Wrexham
276.	E-mail Correspondence re Safeguarding Referral
277.	Training: Safety and Well-Being in Tennis; Equality, Diversity and Inclusion
278.	Email sent to WTC directors re. █ complaint
279.	Email from █ of Tennis Wales re. Daniel Sanders
280.	Interview notes from 2012 Investigation
281.	• █
282.	• █
283.	• █

284.	• [REDACTED]
285.	• [REDACTED]
286.	• [REDACTED]
287.	• [REDACTED]
288.	• [REDACTED]
289.	• [REDACTED]
290.	• [REDACTED]
291.	• [REDACTED]
292.	• [REDACTED]
293.	• [REDACTED]
294.	Email correspondence between [REDACTED] and [REDACTED] re [REDACTED]
295.	Directors meeting minutes re. child protection policy
296.	Directors meeting minutes re. child protection policy
297.	Electronic folder of docs re. child protection policies/arrangements in 2008
298.	Section 3 - Policies and procedures Evidence File for Tennis Clubmark Application
299.	Policy and Procedures Commitment
300.	North Wales Regional Tennis Centre & Wrexham Lawn Tennis Club - Policies and Procedures
301.	• Introduction
302.	• Child Protection Policy - WTC
303.	• Child Welfare Policy - WTC
304.	• Complaints Policy - WTC
305.	• Equality and Diversity Policy - WTC
306.	• Equality and Diversity Procedures - WTC
307.	• Equality and Diversity Policy - WTC (2015)
308.	• Whistle Blowing Policy - WTC
309.	• Whistle Blowing Policy - WTC
310.	Email correspondence from [REDACTED] to Dan Sanders
311.	Email correspondence from [REDACTED] to Dan Sanders
312.	Email correspondence from [REDACTED] to Dan Sanders

313.	Notes of meeting with [REDACTED]
314.	Email from [REDACTED] to [REDACTED] re. [REDACTED] investigation
315.	Letter from [REDACTED] to [REDACTED]
316.	Letter from [REDACTED] to [REDACTED]
317.	Minutes of Directors Meeting
318.	Minutes of Directors Meeting
319.	Minutes of Directors Meeting
320.	Minutes of Directors Meeting
321.	Academy Action Plan - Update Jan 2014
322.	Letter from [REDACTED] to [REDACTED]
323.	Email from [REDACTED] to Peter Keen re. 2012 Policies
324.	<ul style="list-style-type: none"> • Child Protection Policy - WTC
325.	<ul style="list-style-type: none"> • Self-declaration form
326.	<ul style="list-style-type: none"> • Coaches and Volunteer Workshops for Tennis Clubmark (Signed by DS)
327.	<ul style="list-style-type: none"> • Photography and Filming Consent form
328.	<ul style="list-style-type: none"> • Tournament Trips Handbook
329.	<ul style="list-style-type: none"> • Policy on the use of images of children and young people (under the age of 18)
330.	<ul style="list-style-type: none"> • Section 3 - Policies and procedures Introduction
331.	Letter to [REDACTED] from [REDACTED]
332.	Wrexham Tennis Centre Safeguarding Case Timeline of Events 2011-17
333.	E-mail chain between [REDACTED] and others
334.	[REDACTED] Statement
335.	[REDACTED] Statement
336.	Email correspondence between [REDACTED] and [REDACTED]
337.	Email correspondence between [REDACTED] and [REDACTED]
338.	Email correspondence between [REDACTED] and [REDACTED]
339.	Email correspondence between [REDACTED] and Tennis Wales Board
340.	Email correspondence between [REDACTED], [REDACTED] and [REDACTED]
341.	Email correspondence between [REDACTED] and [REDACTED]

342.	Email correspondence between [REDACTED], [REDACTED] and [REDACTED]
343.	Email correspondence between [REDACTED], [REDACTED] and [REDACTED]
344.	Email correspondence between [REDACTED], and the Tennis Wales Board
345.	Email correspondence between [REDACTED], [REDACTED] and [REDACTED]
346.	Email correspondence between [REDACTED] and Tennis Wales Board
347.	Email correspondence between [REDACTED] and [REDACTED]
348.	Email from [REDACTED] to Peter Keen and attachments:
349.	<ul style="list-style-type: none"> July 2012 Board Minutes
350.	<ul style="list-style-type: none"> September 2012 Board Minutes
351.	December 2012 Board Minutes
352.	E-mail Correspondence re LTA Safeguarding Investigation
353.	E-mail Correspondence to LTA Safeguarding
354.	E-mail Correspondence with Sport Resolutions (UK) re LTA Investigation - Further Query
355.	Email correspondence between Sport Resolutions (UK) and [REDACTED]
356.	Letter from [REDACTED] to Dan Sanders
357.	Email correspondence between [REDACTED] and [REDACTED]
358.	[REDACTED] hand written notes of call with [REDACTED]
359.	E-mail correspondence with Sport Resolutions (UK) re Lawn Tennis Association Independent Review
DOCUMENTS RECEIVED FROM TENNIS WALES	
360.	Actions from Jan 30 th Meeting (30 January 2018)
361.	Board Minutes 10 September 2010
362.	Board Minutes 26 September 2007
363.	Implementation Plan: CPSU – A Framework for safeguarding and protecting children in and through sport in Wales (February 2014)
364.	Implementation Plan: CPSU – A Framework for safeguarding and protecting children in and through sport in Wales (January 2017)
365.	Standard Operating Procedures: Management of Safeguarding Cases and Reporting Standards

366.	Responsibilities for safeguarding and protecting children – Paper for Board of Tennis Wales – 26 September 2007
367.	Safeguarding Policy 2012
368.	Self-Assurance 2013 – Screenshot of Sport England Webpage
369.	Self-Assurance Report 2011 – Provided to Sport Wales
370.	Staff Handbook – Whistle-blowing Policy
371.	Whistle-blowing Policy 2015
372.	Whistle-blowing Policy 2017
373.	Tennis Wales Trips Policy (September 2017)
374.	Tennis Wales Limited – Articles of Association (3 September 2011)