

# WELSH RUGBY UNION INDEPENDENT REVIEW RESPONSE SEPTEMBER 2024



	Recommendation summary	Recommendation	Initial WRU Board viewpoint on recommendation	Target date for implementation	Update as at April 24
<b>1</b>	<b>Appoint an oversight body</b>	a. The WRU should appoint an external oversight group of no fewer than 3 people. At least one should be nominated by an outside body and at least one experienced in people management or organisational culture.	We will appoint this oversight group.	Revised to 31 July 2024	Dame Anne Rafferty appointed as Chair and Dame Katherine Grainger has been appointed to the Group. Rachel Brace has recently been appointed to complete the Group.
		b. For the next 3 years the WRU should report quarterly to this group, setting out its goals, actions taken to meet them and how success is measured. We hope that substantial progress will be made in the first year but recommend that the body stays in place for 3 years so it can oversee the constitutional review and changes.	We will report quarterly to this external oversight group (EOG)	Week of 18 January 2024 and each calendar quarter thereafter	Reports to 14 January and March 2024 shared with Dame Anne; Report to 30 June 2024 to be published in July 2024
		c. The group's remit should be to consider steps by the WRU to implement the recommendations in this report and to create an inclusive environment for staff and for all those involved in rugby in Wales.	We will agree terms of reference for the EOG and include this in the remit	Date for terms to be finalised revised to 31 July 2024	Draft discussed with Oversight Group Chair and will be agreed with the group once all the members have been appointed. Target date of 31 July 24
<b>2</b>	<b>Continue reform of the Board</b>	a. The WRU is a national sporting organisation which is also a large corporate body. Its Board must be an efficient body with clear responsibilities for the governance of all aspects of the WRU and should not be seen as just representing the community clubs. The executive should report to the Board on all aspects of the WRU's work.	We agree – the full new Board has been announced and is in place as at 1 January 2024. The Executive does report to the Board on all aspects of its work. We will ensure the Executive reports on all aspects of work; concisely and effectively.	14-Jan-24	CEO reporting in place and will be further developed as goals and KPIs are developed for the new strategy from September 2024
		b. The size of the Board should be further reduced to 10 by lowering the number of Council representatives, elected or appointed, to 2 from currently 4. The changes made at the March 2023 EGM should be given time to take effect before further reform of the Board, so this change need not be immediate but be developed during the 3 years in which the oversight body operates.	The governance changes which were set out at the EGM on 26 March have been implemented within the specified time period with the number of Council Members elected to the Board reduced to 4. The new Board is in place as of 1 January 2024. We will commission the governance review after there has been a period of operation of the new Board and work with Member Clubs and Council to discuss these recommendations in the light of this review	To be discussed – 31 December 2025	Governance review to be commissioned Spring 2025 to report Sept 2025 and 2025 AGM. Implementation by December 2026
		c. We recommend that within two years the WRU commissions an external report on governance. That report should consider how the March 2023 reforms are operating and how committees can be streamlined to avoid duplication (along with other relevant matters).	We will commission an external report and review our sub-committees and establish the necessary number to ensure efficiency and effectiveness in the relevant subject areas. The Board Committees have been streamlined and in addition to the Professional Rugby Board ( PRB) and Community Rugby Board (CRB) will include a Finance Audit and Risk committee, and a People, Culture and Governance committee	31-Dec-25	Governance review to be commissioned Spring 2025 to report Sept 2025 and 2025 AGM
		d. Implement a "fit and proper person" test for Council/Board members and candidates for the Council/Board. Board members, elected or appointed, should be able to show that their membership of the Board would not undermine the reputation of the WRU or make it harder for the WRU to promote rugby in Wales. The test should consider honesty, integrity, public statements, experience, any breaches of club or WRU standards, and commitment to inclusion of all in the sport of rugby (for example, a commitment to the standards set out by World Rugby)	A fit and proper person test was introduced for appointments to the Board made over the last 6 months. It was also used for Council elections that took place in 2023. We will include a positive inclusion statement in all Council and Board member recruitment going forwards.	31-Mar-24	A fit and proper person test is in place for all current and future Board and Council appointments. It will continue to be used going forwards. Directors and Council Members will be asked to renew attestation on an annual basis.

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	<p>e. There should always be a current strategic plan for key areas of the sport, shared with relevant managers and (subject to competitor knowledge) published. This should include professional rugby, community rugby, men's rugby, women's and girls' rugby, rugby for those with disabilities, and broadening inclusion. All plans must be approved by the Board. Staff need to understand what they are asked to deliver.</p>	<p>We commit to this and to make this public. Our new strategic plan conversations have already started and will be completed with the support of stakeholders. This plan will be reviewed at least annually going forwards. We will produce a WRU Group Strategic Plan ready to be published by 30 June 2024.</p>	<p>30/6/2024. Revised date for publication of full strategy 30 September 2024. Further revised date for full publication to November 2024.</p>	<p>Strategy process is moving towards the end of completion. Engagement with key stakeholders is continuing. Top level strategic plan was published in June 2024. The full strategy will be released in November 2024. The delay is due to exceptional financial challenges which directly impacts key components of the strategy, therefore more time is required to resolve prior to full release.</p>
	<p>f. Set up a structured system for reporting to the Board which includes:</p> <ul style="list-style-type: none"> <li>i. Written reports to the Board from the executive at least quarterly and always in good time prior to each Board meeting.</li> <li>ii. Papers to the Board should identify relevant options and include clear decision-making principles or criteria.</li> <li>iii. Each report should include KPIs for individual members of the executive and departments of the WRU which should be monitored and appraised.</li> </ul>	<p>We commit to ensuring that the reports available to the Board are clear, concise and contain the relevant amount of information to inform, discuss or make decisions as appropriate. We commit to ensuring that all Executive KPIs are shared and monitored once they have been thoroughly developed to align with our new strategy. The KPIs will cover all aspects of WRU performance, including People, Operational Performance, Finance, Programme Delivery, Risk and Assurance.</p>	<p>31/03/2024 Executive Board KPIs to initially be short term and then from 30 September 2024 in line with new Group Strategy</p>	<p>New dashboard was launched in September, and will be used to report progress against KPIs linked to Strategy in addition to key operational updates.</p>
	<p>g. The administration of the Board should be streamlined: A dedicated support service should be provided to help the Chair, chairs of committees and Board members with their roles.</p>	<p>We have already hired some immediate support and we commit to ensuring the resources are available to enable us to deliver on this element</p>	<p>14-Jan-24</p>	<p>Support in place to identify needs and develop capacity. Ongoing resource requirements are being reviewed to ensure right level of capacity and capability is in place.</p>
	<p>h. Each Board member should participate in a skills review, have a skills matrix drawn up on appointment and be encouraged to undertake appropriate development according to needs identified on their skills matrix.</p>	<p>A skills and experience review of the existing Board was carried out prior to the recruitment of the new Board members; this will be populated further with the skills of the new Board members and refreshed every year.</p>	<p>31-Mar-24</p>	<p>Skills and EDI audit for current Board in place. Skills review to be done annually thereafter. Paper on approach to ongoing review of Board performance and effectiveness agreed at People Culture and Governance Committee in June 2024.</p>
	<p>i. Everyone appointed to the Board should be offered induction training on (i) their duties as a director; (ii) good practice in governance; (iii) equality, diversity and inclusion; (iv) representing the WRU; and (v) the current state of Welsh rugby and the WRU's strategic plans.</p>	<p>Induction training has already been discussed by the Board and a new comprehensive induction programme has already commenced. We will take on board recommendations from throughout this report and integrate relevant points into the induction process. We commit that all Board and Council Members will receive a detailed induction and the development training as identified in the recommendations.</p>	<p>31-Mar-24</p>	<p>Induction programme has been implemented, with all new Directors having received an induction. Feedback on induction programme has been requested from Directors. Induction programme will be reviewed and refreshed, taking into account feedback received. Training offering to Directors will then be tailored (also linked to Board effectiveness review).</p>
	<p>j. Everyone appointed to the Board should be offered induction training on (i) their duties as a director; (ii) good practice in governance; (iii) equality, diversity and inclusion; (iv) representing the WRU; and (v) the current state of Welsh rugby and the WRU's strategic plans.</p>	<p>Induction training has already been discussed by the Board and a new comprehensive induction programme has already commenced. We will take on board recommendations from throughout this report and integrate relevant points into the induction process. We commit that all Board and Council Members will receive a detailed induction and the development training as identified in the recommendations.</p>	<p>31-Mar-24</p>	<p>Induction programme has been implemented, with all new Directors having received an induction. Feedback on induction programme has been provided by Directors. Induction programme will be reviewed and refreshed, taking into account feedback received. Training offering to Directors will then be tailored (also linked to Board effectiveness review).</p>

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	k. The role of executive staff attending the Board should be clarified.	Agreed, this has been done.	14-Jan-24	Executive staff attend meetings for relevant agenda items, where the CEO requires specialist input. All Board meetings to have NED only session.
<b>3 Council</b>	a. In view of the duplication of Members between Council and Community Game Board, the shared responsibility for establishing the strategy for community rugby, seeking Board approval and then delivering the approved strategy, the constitutional structure should be streamlined and simplified in a single entity. It could perhaps be described as the Community Council. It should be expanded to include a wider group of stakeholders.	This will require the consent of member clubs and Council as this structure is embedded in our Articles. We will consult on these recommendations with these bodies, understand in more detail the concerns behind the current structure and develop a plan.	To be discussed – 31 December 2025	Consultation with stakeholders; Co-creation of a plan for way forward, AGM 2025 to discuss
	<p>b. To fulfil this role the Community Council should be drawn from a broader base of those involved in rugby in Wales:</p> <p>i. Membership of the Community Council should be a maximum 16 (Currently we understand the Council has 19 members: 5 National Council members and 14 District Council members – 2 each from Districts A – E and 1 each from F, G, H and J. Following the EGM in March 2023 the Board may appoint up to 6 Council members.): 9 elected from districts, 1 elected nationally and 6 representing other rugby community interests, as set out below.</p> <p>ii. The six new places on the Community Council should be for people representing (1) schools rugby; (2) rugby in colleges and universities; (3) community rugby players (The WRU will need to consult and draw up a definition. We recommend a broad definition. One option is election by captains of teams that play in leagues in Wales other than the regional sides in the United Rugby Championship. However, the exact approach we leave to the WRU.); (4) women's and girls' rugby (5) rugby for players with a disability and (6) officials. Where possible these should be elected but it might be difficult to identify an electorate and arrange elections at a reasonable cost in all these areas. If so, the WRU should run a competitive appointment process according to a person specification it should draw up.</p> <p>iii. Members of the Community Council should be limited to 3 consecutive terms of 3 years (with the possibility of re-election after one fallow period).</p> <p>iv. The individual elected nationally should chair the Community Council and have a seat on the Board. The other Board member should be elected by the Community Council.</p>	Noted. Again, the constitution of the current Council is included in our Articles so we will consult with Council and we will need the support of member clubs to implement this. The Articles post-EGM March 2023 provide Board with the ability to appoint six additional Council Members, the intention being that this would broaden the base of representation. The Articles do not specify who these need to be, so there is discretion for the Board. There would need to a change in the Articles to reduce the number of Council Members. We will consult with clubs and council on these proposals whilst understanding in more detail the concerns from the Independent Review to develop a plan.	To be discussed – 31 December 2025	Initial consultation with clubs prior to 2024 AGM in November and will be discussed at the AGM.

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	c. We recommend above that the Board should approve and maintain the strategy for all areas of the game, including the community game. The Community Council should be a representative, not a management, body and should not direct management or set strategies or budgets.	Noted. The Board does have responsibility for all aspects of the game. We will consult with clubs and council on these proposals whilst understanding in more detail the concerns from the Independent Review to develop a plan.	To be discussed – 31 December 2025	Council plan to be discussed and developed
	d. Membership of the Community Council should involve at least induction training on representing the WRU, its inclusion and diversity policies, its current strategic plans and their implementation.	We agree. We commit to ensuring that Council Members receive thorough induction training relevant to their role and representing the WRU. We will use the recommendations in this report to improve the induction programme.	31-Mar-24	Induction programme has been implemented, with all new Council Members having received an induction. Feedback on induction programme has been provided by Council Members. Induction programme will be reviewed and refreshed, taking into account feedback received. Additional training opportunities to also be identified.
<b>4 Take steps to become more transparent</b>	Publish the privileges associated with membership of the Board and Council, and for senior staff (distinct from, for example, attending matches as a host in a working role). The grounds for reduction or removal should also be set out.	We agree. A review of this will be carried out and published shortly for transparency.	31 January 2024	Privileges published in February 2024.
	When terminating employment, the WRU should only use non-disclosure agreements (NDAs) for an express purpose, not as a matter of course. This does not preclude the use of confidentiality clauses about the terms of a settlement agreement.	We agree. Settlement Agreements will continue to be used only on a case-by-case basis and not as a matter of course.	Immediate – 14 January	No change. No settlement agreements issued.
	When reports are commissioned about general matters (rather than specific employees) they should be published unless there is a particular and agreed reason not to do so. If publication is not appropriate, the authors should be asked to write a brief summary of the issues, and their conclusions, for publication. The WRU would have been in a better place at the start of 2023 had it been known that it had commissioned reports into women's national rugby, governance, and equality, diversity and inclusion which recommended significant change.	We agree that where appropriate either a summary disclosure or full disclosure of any report commissioned should be shared. This is something we will also consider within the recommendation regarding a transparency policy (as per recommendation 4(a)).	Immediate – 14 January	Update at June 24: No reports have been commissioned this quarter. However the Safeguarding Panel, which was established by the WRU Board to review and address all aspects of Safeguarding for young people within the fabric of the game of rugby, has reported to the Board highlighting over 20 recommendations and actions which have been completed to date. These include more effective abbreviated and relevant safeguarding policy, website audit and notification improvements, comprehensive training requirements, communication plan, KPI dashboard for ongoing monitoring and safeguarding digital strategy. These have resulted in greater engagement as evidenced by strong attendance at Safeguarding roadshows and mandatory reporting at executive and Board level.
	Debate about the organisation and funding of Welsh rugby should be actively encouraged and the WRU should seek to share information to engage people's productive participation in a structured, not speculative, way. Underlying this is greater acceptance of constructive criticism with a view to improvement. A number of people commented on the WRU seeking to control the rugby environment too much.	We agree and consider this a part of the strategy process that has just commenced.	30-Jun-24	We have launched the strategy and as part of this process we were transparent on the current financial position of WRU with the Community Clubs, the Professional Clubs and the broader public. When we publish the detailed 5 year plan in September, we will continue to encourage debate and constructive challenge.

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5	<b>Equality, Diversity and Inclusion</b>	Align the WRU clearly and publicly with inclusion and diversity, demonstrating visible and vocal leadership on equality, diversity and inclusion. The WRU's commitment to inclusion and its opposition to abusive behaviour, exclusion and discrimination need to be unambiguous.	We commit to doing this authentically and openly.	30-Jun-24	Our commitment is demonstrated in the WRU Group Strategy document published in June. We will follow this up with our EDI strategy in Sep 24 and with updates to our website late summer. (More to come essentially)
		Amend the WRU's statement of values to include one related to diversity and inclusion.	A values review will be a part of the strategy exercise and we will prioritise the identification and roll out of our values as a part of the output of the strategy.	Revised to 30 September 2024	Values are being explored as part of engagement on brand repositioning. This will follow strategy launch with engagement expected to take place late summer/autumn
		Give greater publicity to women's rugby and rugby for people with disabilities.	Our EDI plan is aligned with this, we agree we need to invest more into this area.	30-Sep-24	Publicity (comms, brand, marketing) plan – from the strategy work . In the short term, a women's and girls conference has been arranged for 26/27 April 2024, targeted marketing campaigns to be agreed and delivered, training for our players to enable them to self promote on social media and the WRU will showcase our players as role models
		Respond robustly to discrimination and hate crime in stadia and online.	In line with our zero tolerance approach to discrimination, we agree that we need to improve our reporting mechanisms and ensure our process for dealing with reports is efficient and effective. We will further improve on the stadium reporting system by regularly publicising anti-racism and discrimination messages on the concourses and stadium TV systems and emphasise the need to report this type of behaviour to Principality Stadium personnel on event days.	31-Mar-24	We operate a 'Respect' Campaign both in stadia and direct to fan communications via the online fan guide for every event at Principality Stadium. We clearly display messages regarding zero tolerance towards anti-social behaviour/discriminatory behaviour across all stadium screens. We encourage spectators to report any incidents immediately to stadium stewards. In addition we work closely with local authorities on additional messaging that is displayed throughout the stadium, this includes working collaboratively with Six Nations on their anti-racism campaign for each rugby international.
		Express clearly and publicly the WRU's commitment to the inclusion of all members of Welsh society both in rugby and in its own staff group.	We will make our clear and unambiguous statement public as a part of our strategy.	30-Jun-24	We have made a statement as part of our strategy about having an inclusive culture. We will go further than this when we launch our full strategy in September 2024, we will also be launching a new set of values, which will put inclusion at the heart of how we want people who engage with rugby in Wales to feel.
		Have a clear equality, diversity and inclusion strategy underpinned by a delivery plan.	The WRU's EDI policy has been revisited over recent months and approved by the Board. Women's rugby is at the heart of this document. We agree that we need to work harder and move more quickly on our Inclusion delivery plan. We will develop a clear EDI delivery plan to underpin our strategy.	30 June 2024 for EDI Plan - in line with strategy; 30 September for EDI Delivery Plan	High level EDI Strategy in draft alongside WRU Group Strategy. Full EDI Plan with Delivery plan to be in place by 30 September 2024.
		Work collaboratively with the EHRC, should the EHRC take any steps in relation to WRU.	We commit to working with the EHRC.	TBC once initial scope and process is agreed with EHRC.	Engagement with the EHRC continues.

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<p><b>6 Financial support to clubs</b></p>	<p>Reform financial support to clubs with a view to achieving key goals reflecting the WRU's strategy for the community game. These should include all facilities for women and girls (including training and club house facilities), steps to broaden access to rugby for all communities, proper disciplinary policies and procedures in clubs for responding to unacceptable behaviour (including discriminatory behaviour) off the pitch.</p>	<p>We have recently rolled out a suite of services under the heading WRU Dysgu which are learning tools and tips for clubs to make their club houses and facilities welcoming to all sectors of society. How to take appropriate action should unacceptable behaviour be identified or witnessed is an element of this service. Dysgu is a re-education programme where we will be expecting all clubs to have an EDI plan by the end of 2024. A working group has been established to look at how investment is distributed. We have rewritten the payment of players (Integrity Statement) and reviewed our approach and policy in relation to our core grant. A self-assessment tool has been approved for clubs. The club development team will guide clubs in Wales through this process in 2024. Attached to this are supportive tools which will support the discipline procedures to enable clubs to address all behaviour which falls short of acceptable standards. Aim to align all funding to safe, inclusive and compliant clubs across the country. We agree that we need to do more in this space, linking financial support for clubs to our strategic aims around safe, inclusive, welcoming clubhouses. We will need our clubs support to move forward with changes to funding to support our ambitions. We will carry out a review of how we deliver support to our clubs and what the appropriate linking mechanism is as a part of our strategy process.</p>	<p>Already started; quarterly reviews. Strategy to be agreed 30 September 2024, Implementation 30 June 2025</p>	<p>A key objective in our strategy is to 'maximise the impact of community game by redefining club support'. We are developing KPIs that will measure progress against achieving this objective.</p>

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<p><b>7 Invest in the women's and girls' game:</b></p>	<p>Analyse the expenditure on the women's and girls' game in light of</p> <ul style="list-style-type: none"> <li>i. income and expenditure of other unions;</li> <li>ii. growing sponsorship, broadcast revenue and attendances at women's matches; and</li> <li>iii. the need to invest to develop the game so that funding for women and girls is benchmarked and expressly managed based on data. Spending should be in line with other unions and with spending on men and boys and appropriate to a growth and investment phase. This analysis will require decisions about allocating income (For example how does one allocate general sponsorship? The sponsor will want the exposure from large TV audiences currently obtained by the men's first team. That will affect how much they pay. However sponsors will pay nothing to an organisation the public sees as excluding groups in society.) and expenditure and is not intended to be an exact exercise but to inform decisions. The analysis should include support for the community game as well as player development and national squads.</li> </ul>	<p>We have made progress in this area but we know more needs to be done. We commit to the recommendations to support further development. We will look at areas that require investment and ensure we align that with identified sponsorship opportunities. We will review our spending and ensure that it is comparable with other competitors and our own comparable investment in the men's and boys' game, appropriate to growth. Detailed work has been done on establishing a strategy for women's and girls' rugby and this now needs to be integrated into the overall WRU strategy. This will be published by not later than 30 June 24. The appointment of a board member who has expertise in the women's game, Amanda Bennett is a key development. Amanda has played a key part in the development of the strategy to date as a member of the Women's Strategy Group. The WRU has increased its investment in women's rugby considerably over the last two years both in the community and at the top of the performance pyramid. An assessment of our competitors' spend and our own individual needs were central planks to the focus of this additional investment. The WRU's partnership with Vodafone is an excellent example of a targeted approach, regarding sponsorship investment, improving the opportunities available in the girls' and women's game at all levels. Initial professional contracts commenced on 1 January 22 with the total number and the quantum of the contracts increasing for the second round based on what our immediate rivals were paying and the desire to raise performance levels by giving the women's squad coaches greater access to their players. There are currently 31 contracted players with 32 budgeted for. In addition, there are 2 Hybrid contracts with GB7s. For WXV there were also 5 Fixed Term (FT) contracts, and the intention is to have 3 FT contracts for the Six Nations in 2024.</p>	<p>30 Sept 2024 to publish strategy and an update on all other matters</p>	<p>A Women's and Girls Strategy Group has been established, chaired by Amanda Bennett. It met for the first time on 8 April to critique the work done on the strategy to date and will meet regularly over the coming months. The key focus over the next few months will be agreeing on the domestic game beneath the Celtic Challenge.</p>
	<p>Keep the salary for professional female players at a level competitive to other careers and other nations and ensure the number of contracts is sufficient to support full national teams.</p>	<p>The level of payment and the number of players contracted will be kept constantly under review to ensure that it is competitive, fair and in line with other careers. It should be noted that the senior squad has risen to 6 in the world rankings over the last two years and that immediately beneath that level Wales will have two teams taking part in the Celtic Challenge with U20 and U18 teams also being established in the past 18 months too.</p>	<p>30 June 2024 – subject to an annual review -</p>	<p>We are in the process of negotiating and finalising the new contracts. We did not complete this in June, but they will be done by end of July.</p>

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	Embed a player pathway for women and girls by completing development of the hubs offering support to players in Wales and by continuing outreach support to players at clubs in other nations. The specific approach might change but the WRU should continue to provide professional staff to support the pathway in women's rugby.	Further down the player pathway 3 player development centres have been established in East Wales, West Wales and in North Wales supported by player hubs. A Women's Pathway Physical Development Lead has been appointed who will oversee, all pathways' programmes and develop a curriculum for the physical development of our female pathway players. This position is seen as critical to the evolution of the Women's Pathway programme and underpins both our performance and injury prevention strategies.	30 June 2024 – subject to an annual review. Date to be reviewed once implementation plan is clearer.	Incomplete until domestic competition in place which is fit for purpose. The Celtic Challenge will continue and discussions are ongoing with various parties regarding future competition formats. Please see the update to 701 above.
	Ensure the women's team has (as a minimum) current levels of support staff and access to sufficient gym time with required equipment. If sharing resources with men, the division of time should be made clear.	The management team which supports the Senior Women's programmes, is consistent with that of our competitors in terms of number, quality and experience of staff. The men's and women's senior team managers meet regularly to discuss utilisation of the NCE facilities. If there are any queries/ issues these are brought to the attention of the PD to ensure performance and equity is at the heart of decision making.	Already in place – report 14 January 2024	Will continue to monitor across all administration support.
	Develop a maternity strategy for professional, or soon to be professional, players. This might involve additional funding to cover maternity and advice on return to work.	The maternity policy for our players was included in their contracts issued in January 2023 with all players entitled to the same benefits as other employees of the WRU. We will consult with our women players on the current maternity policy and support and make appropriate adaptations to support their needs where possible.	Already in place	Policy in place. Further consultation underway to see if this can be improved.
<b>8 Continue to improve employment practices</b>	<p>a. Regularly measure staff and player experience, separately considering players, coaching/ managing staff and administrative staff. A range of approaches should be used to include individual interviews and anonymous online surveys.</p> <p>b. Expand appraisals for senior staff to include 360-degree feedback - a structured approach to listening to those at and below their level of management - from people not chosen by the manager. Managers should be helped to a sense of how they are perceived by others.</p> <p>c. Offer mentoring and reverse mentoring. Each will best be used for limited groups and defined periods given the time commitment of proper mentoring.</p>	<p>Players, coaches and support staff have completed two surveys over the past 18 months with year-on-year analysis being monitored. All data is collected anonymously and discussed across a range of groups. We will consult with players to understand how best to feedback on player experience. We will consider the use of other approaches in addition to anonymous surveys to gain feedback on employment practices.</p> <p>KPIs for senior staff are currently being used. A Senior Leadership Group (SLG) was introduced in 2023 to improve communication and inter-departmental working throughout the organisation. We will implement 360 appraisals for all Executive and Senior Managers</p> <p>We recognise that a new systemic offer needs to be created across the whole WRU.</p>	<p>Already in place, Review 30 September 2024</p> <p>30-Sep-24</p> <p>30-Jun-25</p>	<p>Further consultation required. Review as part of Strategy</p> <p>"A new system has been identified and implemented that has the capability to include 360 feedback as part of appraisal process. This is on track for implementation in the autumn."</p> <p>Having reviewed our learning needs for 24/25 we will be prioritising EDI, sexual harassment, performance appraisal conversations and change management. This recommendation target date will be reviewed</p>



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d.	Include as KPIs for senior staff to be assessed in performance reviews (1) co-operation with managers at an equivalent level; (2) breaking down departmental barriers/ 'silos'; (3) adopting a collegiate management style towards junior colleagues.	We will include these as KPIs in the next iteration of our assessment process.	30 September 2024	"A new system has been identified and implemented that has the capability to include 360 feedback as part of appraisal process. This is on track for implementation in the autumn."
e.	Annual training in equality, diversity and inclusion should take place for all staff. This should be as broad as possible so it is delivered in different ways and different places. There are more engaging approaches than an annual zoom lecture.	Annual training was undertaken in 2021 and modular training offered to Board, Council and Exec in 2022. 2023 has seen EDI training made available to all staff with Show Racism The Red Card responsible for providing the training as part of a Welsh Government scheme. Additional training is planned for next year.	30 September 2024 delivery	Online learning system requires all staff to complete mandatory EDI training virtually. A learning plan is in development for annual EDI training for all staff
f.	Adopt a Speak Up approach, with systems to encourage communication and appoint a member of the executive to implement this and a Board member to oversee communication within the organisation.	We have already implemented our "Have a Voice" campaign led by our Director of People, Lydia Stirling; at Board level this will be overseen by our People, Culture and Governance Committee that is chaired by Alison Thorne.	30-Jun-24	Complaints system reviewed and implemented
g.	Designate someone responsible for managing the culture at the National Centre of Excellence. The success criteria should be to make the NCE more inclusive and facilitate frictionless sharing of facilities.	We take note of the comments regarding the NCE and are committed to making the necessary changes to improve the environment to ensure all staff and visitors have the experience they should expect. The Executive Director of Rugby, Nigel Walker, will be charged with improving the culture and will be measured on action taken.	Immediate – Nigel Walker appointed	Representatives for all teams resident at the NCE were brought together on 27 March to discuss the environment we want to create. Principles to be developed in the coming weeks which will be shared and debated and ultimately adopted by all who attend the NCE. Follow up meeting scheduled for 29 July.
g.	Designate someone responsible for managing the culture at the National Centre of Excellence. The success criteria should be to make the NCE more inclusive and facilitate frictionless sharing of facilities.	We take note of the comments regarding the NCE and are committed to making the necessary changes to improve the environment to ensure all staff and visitors have the experience they should expect. The Executive Director of Rugby, Nigel Walker, will be charged with improving the culture and will be measured on action taken.	Immediate – Nigel Walker appointed	Bring all teams resident at the NCE together by 31 March 2024
h.	Implement a zero-tolerance approach to language which excludes others from work or sport. By zero tolerance we do not mean that people must always be dismissed for exclusionary language but that it must always be reported, recorded and dealt with according to an express policy. If 'banter' is defined as making a comment which breaks social taboos, and waiting for nervous laughter, staff should be told it is not appropriate for the workplace.	We recognise there is more to do to embed our zero tolerance approach and we are reviewing our policies to make sure that they encourage people to come forward and report any exclusionary language. We will review our policies and statement of intent on EDI to ensure that it is clear that we are taking a zero tolerance approach. We will continue annual EDI training. We will continue to find ways to support reporting poor behaviour.	In place and ongoing	Internal complaints reporting system review and in place. EDI strategy in draft, full plan available in Sep 2024
i.	Ensure each team manager has as part of their role an objective of listening to concerns and helping communication. The approach is likely to include 360-degree appraisal and communicating to WRU necessary changes to manage stress, relationships, group and personal concerns.	We will embed this in guidance for WRU employees in the next appraisal and development round.	30-Sep-24	A new system has been identified and implemented that has the capability to include 360 feedback as part of appraisal process. This is on track for implementation in the autumn.

# WELSH RUGBY UNION INDEPENDENT REVIEW RESPONSE SEPTEMBER 2024



	Recommendation summary	Recommendation	Initial WRU Board viewpoint on recommendation	Target date for implementation	Update as at April 24
		j. Arrange for someone independent of the WRU to sit in on final interviews for Board members, the Chair and Chief Executive and any members of the Community Council who are appointed (see above), reporting in writing to the Board on whether the appointment followed good practice and the stated process. This should not be an audit or lead to a detailed report but a simple conclusion.	An independent was part of the appointment panel for all Board (including CEO) appointments made in the last 6 months. We are committed to continue with this practice.	Already in place – 14 January 2024	No appointments this quarter
<b>9</b>	<b>Disability</b>	Continue to work with disability sports bodies, according to a published strategy.	The WRU has extensive links with a range of disability groups and has attracted major events to the Principality Stadium, such as the European Wheelchair Rugby Championship in 2023. The WRU commits to developing a strategy, in consultation with Sport Wales, to ensure maximum impact in this area. WRU will continue to deliver against the InSport Gold Strategy and support the DSW strategy	30 September 2024 as a part of our strategy	
<b>A1</b>	<b>EHRC</b>	<p>WRU will have all relevant policies reviewed, by an independent legal advisor or an appropriately qualified HR consultant (with knowledge of the Equality Act 2010) to ensure that they are sufficiently robust, legally accurate and compliant with the Equality Act 2010. These policies should include but not be limited to:</p> <ul style="list-style-type: none"> <li>• Sexual Harassment Policy</li> <li>• Harassment &amp; Bullying policy</li> <li>• Disciplinary Policy</li> <li>• EDI Policy</li> <li>• Grievance Policy</li> <li>• Whistleblowing Policy</li> <li>• Capability Policy</li> </ul> <p>WRU will ensure that all relevant policies refer to the requirements of the Worker Protection (Amendment of Equality Act 2010) Act 2023. EHRC guidance will be published in October 2024.</p> <p>WRU will develop a specific sexual harassment policy.</p> <p>Action 1: Undertake an Equality Impact Assessment for all policies</p> <p>Action 2: Instruct an independent legal adviser or hr consultant with knowledge of the equality act to review existing polcies and support with new polices</p> <p>Action 3: Develop sexual harrassment policy</p> <p>Action 4: Share policies with EHRC for review</p> <p>Action 5: Publish and communicate to staff</p>		TBA	<p>Awaiting timeframes from EHRC</p> <p>Equality Impact Assessment in development to be shared with EHRC and PCG Committee</p> <p>Seeking quotes for review of policies</p>

# WELSH RUGBY UNION INDEPENDENT REVIEW RESPONSE SEPTEMBER 2024



Recommendation summary	Recommendation	Initial WRU Board viewpoint on recommendation	Target date for implementation	Update as at April 24
<p><b>A2</b></p>	<p>WRU will adopt a standardised, appropriate approach to reporting, investigating, and responding to complaints, allegations, and whistleblowing. WRU will monitor complaints and identify themes and trends. This approach will be appropriately robust and clear to demonstrate a lack of tolerance for discrimination (race and sexual orientation), bullying, harassment, and sexual harassment in the organisation</p> <p>Action 1: Undertake an Equality Impact Assessment on the reporting, investigating of complaints and whistleblowing processes</p> <p>Action 2: Develop a complaints reporting system, complaints to be disaggregated by protected characteristic, area of the business and type of complaint. A summary of the complaint, how it was resolved, whether there was evidence of Grievance or Disciplinary</p> <p>Action 3: EHRC to review complaints system</p>		TBA	<p>Awaiting timeframes from EHRC</p> <p>Equality Impact Assessment in development to be shared with EHRC and PCG Committee</p> <p>Complaints process in place, to be reviewed by EHRC</p>
<p><b>A3</b></p>	<p>WRU will appoint an [external] EDI Advisory Group to have oversight of the EDI work and to support the preparation of the EDI Delivery Plan and its subsequent delivery and implementation.</p> <p>WRU will finalise the Delivery Plan which underpins the 5 year EDI Strategy.</p> <p>WRU will regularly review the application of the EDI Plan.</p> <p>Action 1: Diverse group put together</p> <p>Action 2: Draft TOR and share with EHRC</p> <p>Action 3: Engage with clubs, leagues when developing the EDI delivery plan confirm timescales to EHRC</p> <p>Action 4: Delivery plan to be communicated internally and externally including with clubs</p>		TBA	<p>Awaiting timeframes from EHRC</p> <p>Group can be internal. Considering Inclusion Network, overseen by PCG and Independent Oversight Panel</p>
<p><b>A4</b></p>	<p>"Every senior executive employed across WRU will have personal EDI objectives as part of their annual performance targets, driving leadership accountability</p> <p>Action 1: Draft Objectives and share with EHRC</p> <p>Action 2: Put into annual appraisals"</p>		TBA	<p>Awaiting timeframes from EHRC</p>
<p><b>A5</b></p>	<p>Outstanding recommendations from the Independent Review implemented</p> <p>Action: Share timetable with EHRC for implementation of outstanding actions</p>		TBA	<p>Awaiting timeframes from EHRC</p>

# WELSH RUGBY UNION INDEPENDENT REVIEW RESPONSE SEPTEMBER 2024



Recommendation summary	Recommendation	Initial WRU Board viewpoint on recommendation	Target date for implementation	Update as at April 24
<b>A6</b>	<p>WRU to implement an all-staff mandatory training package, ensuring board, management and senior leadership are required to complete this. The training should cover diversity and inclusion, including sexual harassment, harassment &amp; discrimination (race and sexual Orientation)</p> <p>Specific mandatory training on the handling of sexual harassment complaints to be completed by all managers who may be required to consider a grievance or complaint, with all new managers required to complete the training within 3 - 6 months of starting in post as part of their induction.</p> <p>Managers will be required to undertake refresher training every 3 years with new case studies used as examples. to include real life examples.</p> <p>All training to provide post learning assessment as a built in effectiveness measure, and invite feedback from participants on whether the training could be improved.</p> <p>All training to be delivered in person.</p> <p>Action 1: Produce training plan and send to EHRC. Training plan to include harrassment, sexual harrassment and discrimination. How to report and how to intervene. To include. Zero tolerance in context of sexual harrassment</p>		TBA	Awaiting timeframes from EHRC Training plan in development
<b>A7</b>	<p>WRU will run a series of online, anonymised, pulse surveys dedicated to D&amp;I, including questions relating to sexual harassment, harassment and discrimination (race and sexual orientation) and share results with staff.</p> <p>Surveys to be run every 6 months to measure results and assess impact over time.</p> <p>Action 1: Develop new survey questions to include sexual harassment, harassment and discrimination and share with EHRC</p> <p>Action 2: Get baseline survey results</p> <p>Action 3: Run regular 6 month surveys to check progress"</p>		TBA	Awaiting timeframes from EHRC
<b>A8</b>	<p>WRU will consider relevant, external guidance and review the use of NDA's in settlement agreements and commit not to use them in respect of complaints relating to harassment, sexual harassment and discrimination (race and sexual orientation).</p> <p>Action 1: Share info with EHRC of any NDA from Jan 2023 onwards and why used</p>		TBA	Awaiting timeframes from EHRC
<b>SW1 Sport Wales</b>	Members of the BDO to observe a main board meeting		31-Jul-24	
<b>SW2</b>	Members of the BDO to observe a PRB meeting		31-Jul-24	
<b>SW3</b>	Members of the BDO to observe a CGB meeting		31-Jul-24	