

Independent review of bowls in Wales

Final report with recommendations



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Context

Counsel Ltd was commissioned by Bowls Wales to conduct an independent review on its behalf, with oversight from Sport Wales, into the current functions, effectiveness and challenges within the sport of bowls in Wales. This was a wide-ranging review, with an open brief (details of which are below). This review was conducted entirely independently, with no influence or coercion of any kind being applied by Bowls Wales, Sport Wales or any other individuals or organisations. This report and its recommendations represent the views of Counsel Ltd.

We would like to place our thanks on record to all of those who took the time to contribute to this review.

Following publication of this report in draft form in December 2022, a short period of further consultation was undertaken. Formal input was made to this process by all member NGBs, supplemented by a small number of consultative interviews to test and refine recommendations. As such, there are some changes from the draft report although these are relatively minor.

Review scope

This was designed to be a wide-ranging review, covering multiple areas including:

- · Governance;
- · Structure;
- · Communications;
- · Safeguarding;
- · Development;
- · Performance;
- · Coaching and officiating;
- · PR and marketing;
- · Equality, diversity and inclusion.

Methodology

This independent review was conducted across multiple stages:

- Document review;
- Scoping;
- Survey (598 responses);
- In-depth interviews;
- Focus groups (five hosted in Newport, Merthyr Tydfil, Carmarthen, Abergele and Berriew, near Welshpool) - total attendees 45;
- Focused consultation to test recommendations;
- Delivery of report and recommendations in draft;
- Final consultation;
- Delivery of final report.

The core review ran from March to November 2022, with a pause during the summer/autumn period owing to the limited availability of consultees.



Interviews and focus groups were conducted on a non-attributable basis. Therefore, the comments that people made during these valuable sessions have shaped this report, but those individuals have not been identified.

The overall nature of engagement has been overwhelmingly positive and constructive, with people giving their time and views generously. There are some methodological challenges/observations to raise:

- The survey responses are generally of high quality, but represent a relatively small sample given the overall size of the sport;
- Focus groups were generally very positive, but planning was challenging with little indication of likely numbers;
- There is an issue of 'who shows up' we know from previous experience and from viewing online exchanges that there are a number of people with strong views who are not contributing to this review.

In addition, in this final report we wish to explicitly acknowledge the diversity and differences within the sport – the Codes are different and distinct. As such, not every finding or recommendation can relate in its entirety to every code, or every individual region, county or club. The findings should be interpreted in this way and are intended to give an accurate reflection of the current state of bowls in Wales overall.

The review team: lead reviewer

James Allen FRSA founded Counsel, building on several years in the sport, commercial, political and non-profit sectors. Previously, James led public policy and public affairs activity and later was the Head of Public Services at the National Council for Voluntary Organisations before joining the Sport and Recreation Alliance where he led several major projects as Director of Policy, Governance and External Affairs. He has worked as an adviser to senior Cabinet Ministers in the UK Government, to a range of corporates in financial services and in a variety of non-profit organisations.

He has extensive Board experience in national and international organisations and currently in community charities in London and Bristol. He is a pro bono adviser to the Palace for Life Foundation in Croydon, holds an MSc degree in Public Policy, and is ICSA Governance qualified, with distinction. James is a Fellow of the Royal Society of Arts, Manufactures and Commerce.

Adviser

Rhys D.W. Jones has experience working at all levels in the sport sector over the past 14 years, both at the coal face and at board level. In 2007 when working as a Tennis Coach he founded Tennis Squad, now South Wales' largest and most reputable coaching provider. Between 2014-17, he managed the turnaround of a Tennis Centre from the brink of closure to industry leader, winning the LTA UK national centre of the year at an awards ceremony at Wimbledon. He has worked in tennis clubs serving on their committees and as chair.

More recently he had a role as Governance Officer at the Sport and Recreation Alliance and advised national sporting organisations on governance issues including drafting the Sport Wales Governance and Leadership Framework for Wales and working intensively to improve governance at smaller sports organisations. He organised and delivered Wales' first sports specific governance events at



Sport Wales, bringing together organisations of all sizes to improve their performance through effective leadership. Rhys is an Associate at Counsel.

Findings

The review identified a number of key findings. The themes that emerged were corroborated strongly across the various stages – there were very few 'outliers' where, for example, interviewees offered markedly different views to survey respondents or focus group attendees. There is a strong level of consistency which gives us a high level of confidence in the findings. The findings here are drawn from interviews and focus groups. For completeness, survey responses are provided separately and offer a valuable dataset in their own right.

Whilst there were many different and sometimes conflicting views on the best way forward, the overwhelming majority of those who contributed to this review strongly supported the need for change in order to allow the sport to be sustainable and to thrive in future.

Headline findings

- Bowls in Wales is in a challenging position with a number of issues across the sport. The
 structure is complex and although this is improving it still poses challenges including
 confusion, duplication and frequent examples of mutual suspicion. Access to facilities and
 funding were consistently highlighted as problematic and there are widespread concerns
 about the perception of the sport as being 'one for old people';
- 2. There is a strong sense that the sport is in long term decline in terms of participant and club numbers with increasing shortages in other key roles including coaching and umpiring;
- 3. The role of Bowls Wales is still not well understood by large numbers of people within the sport. There is still a lack of consensus on respective roles and responsibilities between NGBs, service organisations and Bowls Wales. However, when prompted further, the role of Bowls Wales in the following areas was widely endorsed: (i) Relationship management with Sport Wales and key external partners, (ii) administering and allocating funding, (iii) providing general training and support within bowls in areas including communications and safeguarding, (iv) playing a greater role in commercial development including sponsorship, (v) co-ordinating central business functions including procurement;
- 4. Communication is a significant concern, with overly convoluted communication chains. Messages and information often do not reach their intended audience. In addition, there is a pervasive problem of 'misinformation' and widespread confusion about what is going on within the sport;
- 5. There is widespread acknowledgement of the need for the sport to change to be sustainable. There are some areas in which a degree of consensus over these changes is now emerging. There is widespread enthusiasm for change in specific areas including in formats, marketing, clothing, social events and, in particular, an enthusiasm to welcome new people into bowls (young people and those 'retiring' from other e.g. contact sports are the two most frequently cited groups). We found widespread support for mixed bowls in terms of gender, ability/experience, age and greater inclusion of those with disabilities into the sport;
- 6. There has been notable progress in some areas including the successful unification process and, hopefully, more to come in this area;
- 7. There is a degree of optimism about the potential for growth and development in the sport, but frustration that bowls currently feels like it is underperforming against its potential.

 Areas in which it was felt the sport could make a bigger contribution included various social



- policy areas such as combating loneliness and isolation and the delivery of partnerships with the NHS and other public bodies including through social prescription;
- 8. There are barriers to people becoming involved in the sport (visibility and perception are the most significant) and barriers to those within the sport, who often leave. These include an unwelcoming atmosphere/behaviour, traditionalism, cost and a reluctance to return to bowls in the post Covid period.

Findings by theme

Perception of the current state of bowls in Wales

- 1. Bowls was widely felt to be in a very challenging position, with declining participant numbers. There are concerns around the long-term sustainability of the sport from members/bowlers to bowls volunteers, committee members and governance volunteers, umpires and coaches;
- 2. Many consultees were unclear about the role of Bowls Wales. There remain tensions with comments such as 'we don't know what they do' or 'they won't meet us' made frequently. A lot of this tension appears to emanate from historic issues. Particular areas of concern as highlighted included funding processes, organisational purpose and strategy, impact and reporting on performance. Impact reports, accounts and statutory documents appear not to have been shared as widely as possible (though they have been shared with NGBs);
 - a. Bowls Wales as well as all individual NGBs should have a clear, public strategy with robust KPIs and success metrics;
 - b. The principle of financial transparency should apply at all levels with high quality accounts and financial information made available as a default and where possible and appropriate;
- 3. Facilities were consistently highlighted as a challenge, in terms of availability and quality, with particular challenges in more rural and isolated areas;
- 4. Despite the challenges, there is a widespread acknowledgement of the huge potential of the sport;
- 5. The concern that bowls is seen as an 'old person's sport' was very widely reported;
- 6. There are several examples of good practice within the sport innovative approaches to attracting new people, adaptations to the game and good examples of marketing, but these are inconsistent and sporadic;
- 7. There remain concerns about behaviour in the sport. This is primarily an observation of the review team, though it was also mentioned by small number of respondents but there are on occasion levels of hostility and aggression directed at other members and staff within the sport that are not acceptable and will be a significant barrier to sustainability and growth;
- 8. Respondents from outside of the Cardiff, Swansea and M4 corridor/South East Wales area consistently reported that they feel neglected and perceive a degree of favouritism towards these areas;
- 9. A lack of younger people coming into the sport was very frequented cited as a concern, though amongst the young people who are in the sport, standards are high and a very high level of success is being achieved in elite bowls. Elite bowls could be more effectively used as a promotional tool a 'shop window' for the sport;



- 10. Joint working within the sport is limited. This applies at all levels from clubs upwards. There are examples of good practice for example where NGBs effectively came together in preparation for the 2022 Commonwealth Games;
- 11. Generally speaking, those engaged in indoor/outdoor bowls appear to be more engaged with the formal structures of the sport (including Bowls Wales) than those primarily engaged in Crown Green or short mat bowls.

Issues relating specifically to the sport

- 1. The rules of bowls and wider informal 'codes' and approaches to etiquette are complex and can be hard to understand, particularly for new people;
- 2. There were mixed views on the role of traditions within the sport. Some favoured a protection of traditional approaches to dress code, etiquette and game formats whereas others argued that these can be off putting to new people. Where the idea of 'both' rather than 'either-or' i.e. allowing people to continue to participate in more traditional ways alongside trialling new approaches was suggested this was met with a very favourable response overall. Some rules/requirements were felt by some to be unnecessary and/or applied disproportionately outside of higher-level competition (for example, requirements to stamp bowls);
- 3. There were mixed views on changes to game formats and wider moves, for example, towards the 'Super 10s' format. It appears likely that a number of different formats could potentially be accommodated, but clear communication around changes and the rationale for them is essential;
- 4. International decisions are having consequences within Wales including in changing formats of the game but the rationale for these and communication of changes is not as consistent or coherent as it should be;
- 5. There were specific issues raised in relation to elite and performance bowls. These included a lack of clarity around funding and future funding and a desire to move these areas onto a more strategic footing where possible. Wales is very successful on the world stage, particularly considering relatively small player numbers and it was felt that this is not always sufficiently acknowledged or celebrated;
- 6. The COVID pandemic had a significant impact on the sport and is continuing to do so with widespread reports of nervousness and decisions of individual bowlers and volunteers to scale back involvement or withdraw from the sport altogether.

Structure

- 1. The structure is overly complex, though this is improving slowly with the achievement of one unification process and another forthcoming;
- 2. There is widespread confusion and, in some cases, a degree of hostility around mutual roles and responsibilities. There is widespread acknowledgement of the need for more collaborative work within the sport but limited agreement around the specifics and a widespread concern that key people being 'territorial' would remain an issue;
- 3. The specific role of Bowls Wales is still poorly understood by many within the sport.



Governance

- 1. The formal governance of Bowls Wales as an organisation appears to be strong in terms of its adherence to corporate governance, legal and Sport Wales requirements. There is potential to do significantly more to increase the levels of engagement and buy-in;
- 2. There are ongoing concerns around how 'representative' the Bowls Wales Board is of those in the sport and of NGBs. There have been issues of high turnover and of vacancies on the Bowls Wales Board. There is no 'right answer' here, beyond saying that there is a need to balance a skilled and experienced professional Board with a level of representation and those with a knowledge of the sport;
- 3. Governance at individual NGB level can best be described as patchy. There are some examples of good practice and many committed, engaged volunteers. However, there are many challenges and a lack of understanding of modern governance practices. Examples of this include a lack of term limits, very limited examples of skills based and/or independent appointments, limited acknowledgement of the importance of diversity in recruitment and several examples of a lack of understanding of legal governance responsibilities;
 - a. Officer posts should be recruited through a transparent and robust process, with clear role descriptions and a system of accountability through appraisals and performance reviews;
- 4. The financial governance of Bowls Wales and the process applied to the allocation of grant and other funding appeared to be appropriate and fit for purpose in terms of compliance and probity. However, there remains confusion within the sport around how Bowls Wales allocates funds and the processes attached to this. Some of this should be attributed to legacy issues around funding within the sport. Some respondents did report a favourable impression of Bowls Wales funding processes and how these have improved;
- 5. Greater clarity around the role of Bowls Wales and further rationalisation of governance arrangements were the most common response in the survey 'open text' questions in relation to governance.

Communications and marketing/promotion

- 1. Communication is an area of concern within the sport;
- 2. Internal communication is often convoluted, with multiple layers in communication chains. This causes a number of issues communications do not reach the 'end user' every time, messages and intention get lost along the chain, some members receive more information than others and all of this leads to a sense of concern around a lack of transparency;
- 3. Intra-NGB communication appears to be very mixed and does not always work effectively. There were numerous instances of people finding out information during the focus group meetings, which had clearly been shared with some people but not others;
- 4. Marketing of bowls is limited. There are good examples but these are patchy. A lack of consistency in promoting the sport to attract new audiences was repeatedly highlighted as a problem;
- 5. Limited media coverage of the sport was mentioned by several respondents. This is a challenging area but with modern options in streaming and social media content, greater coverage of the sport should be possible;



6. 'Open text' survey responses indicated a desire for clearer, more regular communication. Online communication in various forms was by far the most popular method for communication moving forward.

Sustainability and succession planning

- 1. There are significant concerns around the sustainability of the sport;
- 2. Many respondents expressed a frustration that the future of volunteering within the sport looks precarious with a lack of new people stepping up. However, relatively little thought appears to have been given as to why this might be happening at individual club/NGB level or, crucially, how volunteer opportunities may be adapted to be attractive and feasible to a new generation;
- 3. Attracting new bowlers is absolutely essential. The two primary groups that were repeatedly cited as having the greatest potential were school aged young people and the 30-45 age group (including those scaling back involvement or leaving other sports);
- 4. Succession planning particularly in terms of identifying and developing future volunteers and those who will govern the sport in future remains very limited;
- 5. 'Open text' survey responses indicated several areas in which respondents felt growth could be better supported. The three most popular suggestions were greater relationships with schools, better communications and marketing to increase visibility and modernising the game (game formats and clothing were the two most commonly cited priorities);
- 6. By far the most commonly cited reason for leaving the sport in the survey 'open text' responses was old age and more limited ability to participate, with an overly traditional approach to the game as the second most commonly cited reason.

Safeguarding and welfare

- 1. This review did not identify any areas of concern in relation to specific safeguarding incidents. However, we did identify a widespread lack of knowledge of modern safeguarding practice. This was particularly prevalent in relation to adult safeguarding;
- 2. Clubs report being unclear about whether they are required to have a designated safeguarding officer;
- 3. There is significant demand for information and training around safeguarding, including the provision of model safeguarding policies;
- 4. Safeguarding of adults at risk is significantly less well understood than the safeguarding of children in the sport;
- 5. Processes around whistleblowing and complaints (both in relation strictly to safeguarding and concerns around broader behavioural and welfare issues) appear to be poorly understood by many within the sport.

Survey findings¹

As the survey focused primarily on 'closed' questions to generate quantitative data, rather than the more open and discursive nature of interviews and focus groups, key data is reported separately below. The open text, 'verbatim' comments have been included in shaping the findings above, unless otherwise indicated.

¹ All percentages are rounded.



The survey received 598 complete responses. This is a relatively small percentage of bowlers in Wales, but the sample did include a large majority of high-quality responses. A summary of key areas in the survey is included below, along with thematic analysis of qualitative responses from 'open text' questions.

- 1. The spread of responses across codes was reasonably strong;
- 2. The structure was either very well or quite well understood by 43% of respondents. This reflects a more positive picture than suggested by interviews and focus groups;
- 3. Similarly, communications were felt to be working very well or quite well by 49% of respondents. This reflects a significantly more positive picture than suggested by interviews and focus groups;
- 4. Safeguarding was felt to be understood very well or quite well by 78% of respondents. However, open text responses (further corroborated by other review stages) would suggest that there are significant gaps in knowledge. The handling of safeguarding by Bowls Wales scored positively though slightly less so with 62% feeling it is very/quite well handled;
- 5. Only 37% of respondents feel the sport is currently sustainable, 44% feeling it is not and 20% answering 'don't know' this is broadly consistent with other review stages;
- 6. Clubs remain the primary source of information (42%) with individual contacts (19%), member NGBs (2%) and Bowls Wales (5%) all scoring significantly lower. This further highlights concerns around communication and specifically communication getting 'stuck' at levels between Bowls Wales and individual bowlers;
- 7. The demographics of respondents reveal interesting patterns around bowlers in Wales these should be cross-referenced with other data held by Bowls Wales and member NGBs on participation. These would suggest significant areas of under-representation (comparisons to the population of Wales are provided below²):
 - a. 54% were aged 65 or over, with only 10% 34 or younger (this compares to 21% of the Welsh population aged over 65);
 - b. Respondents were 68% male, 31% female (census: 49%/51%)
 - c. Only 15% of respondents reported having a disability (Welsh Government data shows that 21% of the population has a disability, but notably this also increases markedly with age which suggests either an under-representation of disabled people in the sport, under-reporting or a lack of disabled people within the sport accessing and completing the survey);
 - d. 95% of the sample identified as being from a White Welsh/British/UK background (this is very similar to official Welsh Government data, though some local authority areas have significantly higher populations from ethnically diverse communities).

Recommendations

The Review has identified a large number of recommendations. The priority recommendations are identified below, with further detail then provided by theme.

Overarching options

The overall decision for Bowls Wales and the individual NGBs and service organisations, in consultation with stakeholders from the sport and wider partners relates to the structure of the

²² This data is drawn from the Wales specific dataset from the UK Census 2021 and public Welsh Government data



sport moving forward. The current structure is excessively complex and convoluted and presents barriers to progress. However, there are significant legacy, reputational and emotional ties and investments related to the current structure.

Options for structural reform are as follows:

- Leave the current structure as is, pursue unification and actively promote incorporation
 where possible. Strong consideration should be given to whether unification and
 incorporation should become conditions of funding;
- 2. Embark in a further consultation exercise with a view to medium term consolidation towards one body with individual codes formally established as sub-committees of the Board;
- 3. Seek advice on options to move more quickly towards a unified structure, with Bowls Wales as the only recognised NGB.

It is important to acknowledge that the change management process which led to the creation of Bowls Wales was handled poorly. There are key lessons here for any future exercise in structural reform. Many changes outlined in this report would require change – and this is an opportunity to ensure that this process is significantly better handled.

Some of the recommendations outlined below will require investment. The review team is very mindful of constraints within Bowls Wales resources and as such recognises that some of these recommendations may take longer to implement and/or require an additional investment case.

Priority recommendations

- 1. Consider structural reform options at the earliest possible opportunity. Provide/procure support with further unification and advice on unification/legal status changes as a priority;
 - a. Develop an investment plan for Bowls Wales to secure additional resources and staffing;
 - b. Consider whether unification and incorporation (with an appropriate organisational form and status should be mandatory);
- 2. Develop a coherent strategy in relation to evolving formats within all codes of the game. Ensure that international/wider decisions are consistently communicated. Factor format changes into development and marketing plans where these can attract and sustain new audiences;
- 3. Develop an action plan to cascade good governance principles down throughout the sport;
- 4. Fundamentally review and reform the current approach to communication within the sport;
 - a. Commission specialist support to assist with the development of an inclusive, pan bowls PR and marketing campaign;
- 5. Conduct a risk assessment to identify particular threats to sustainability and opportunities for growth:
 - a. Develop a sustainability plan focused on the recruitment of new players with a particular focus on school aged children and particularly 'sport leavers' aged 35+ (approx.):
 - Work with Sport Wales and other partners to identify other growth options for example working with the NHS in areas including social prescription and joint working with NGBs, charities and others engaging with priority audiences;
 - c. Develop a volunteering plan with identified pathways for development;



- d. Analyse current data to fully understand the extent of under-representation of various groups within the sport and then develop a bespoke EDI plan;
- 6. Publicise centralised safeguarding support, information and training and cascade this through the sport;
- 7. Consult with international colleagues and World Bowls to better understand good practice elsewhere and how this can be applied in Wales. This should include both approaches to structure (looking closely at England and Scotland) and to formats and promotion (looking closely at Australia). This recommendation is not to suggest that a 'lift and drop' approach is sensible or even possible, but that good practice can be selectively applied where it would drive the sport forward;
- 8. Review the current approach to elite bowls and assess the possibility of more collaborative work and joint pathways for men and women;
- 9. Integrate disability bowls as far as possible (in consultation with key stakeholders) into core Bowls Wales functions, ensuring that current funding levels are protected and that, as a minimum, there is no detriment to disability bowls;
- 10. Assess current return to bowls approaches in light of ongoing concerns about COVID and work with clubs to communicate measures being taken to keep people safe in order to provide ongoing reassurance.

Our strong recommendation is to independently recruit a working group, drawing on expertise from within and beyond the sport to assist Sport Wales and Bowls Wales with prioritising the content of this report and to develop a robust action plan for its implementation. The group should be independently recruited supported and supported, through a formal, skills-based application process. Groups of this nature would typically comprise 6-8 experts and work over a period of several months.

Recommendations by theme

<u>Issues relating specifically to the sport</u>

- 1. Develop a position on format changes within the sport and link this to wider plans;
- 2. Issue a clear statement that mixed bowls will be the default wherever possible, principally in terms of gender but also in terms of embracing mixed ability/experience forms of bowls where it is practicable to do so;
- Related to this, make it clear that unification of men's and women's bowls is not the 'end game', but that the intention is that mixed bowls becomes a reality on the ground.
 Unification needs to extend beyond national level into counties over time to make this process a success;
- 4. Develop easily accessible guides to the rules of different codes of bowls and publish these online;
- 5. Consider wider changes including to league and competition structures and dress code.

Structural

- 1. The overarching recommendation is to assess reform options for the overall structures over time;
- 2. Provide all possible support to accelerate further unification processes;



- 3. Procure specialist support to provide resources to assist with incorporation;
- 4. Make joint working the default wherever possible. This should include activity across all codes, across genders and working effectively with disability bowls and with service organisations. A working group should be established to identify priority joint working areas (marketing and safeguarding would appear to be two obvious options for this).

Governance

- Adapt the Bowls Wales governance action plans to be relevant and accessible and establish
 the expectation that all NGBs will work towards these. This should include details on basic
 governance standards, compliance, commitments to equality and safeguarding and agreed
 codes of conduct;
- Consult with all member NGBs about the most effective ways to promote Board vacancies in future and to encourage applications from across the sport (ideally with a spread of codes represented at Board level). This may require further education around governance practices and the provision of reassurance around conflicts of interest/obstacles and how this can be handled;
- General governance education and training should be promoted widely to all NGBs –
 including the promotion of all existing good governance resources within Wales across the
 sport;
- 4. Identify the 'next generation' of those to govern the sport and proactively target more diverse and younger people within the sport for governance positions. This could start with providing observer positions and inviting selected candidates onto Board working groups in order to become 'board ready'.

Communications and marketing/promotion

- 1. As far as possible, the communication chain should be radically streamlined. Bowls Wales should be able to communicate directly with bowlers and potential bowlers far more than it currently does;
- 2. Procure specialist support and advice to launch an inclusive campaign to promote bowls to new audiences;
- 3. Use Bowls Wales communications channels as central resources promoting all events across the sport:
- 4. Provide communication toolkits including social media techniques and content, working with local media and producing high quality newsletters. Training in social media and marketing should be provided to all clubs;
- 5. There are 'quick wins' which would both improve communication and drive governance improvements. As a first step, all formal minutes (redacted if necessary) at every level of the sport should be published online and be made freely available where appropriate though transparency should be the default;
- Develop bespoke development and marketing plans for key audiences. Further research to substantiate this fully is required, but the potential to better access the 35-45 year old market (particularly those scaling back involvement/exiting other sports) was frequently mentioned.

Sustainability and succession planning

1. Develop a focused recruitment plan for growth;



- 2. Enter into formal data sharing agreements with other sports to provide pathway options for those scaling back or leaving other sports and entering bowls;
- 3. Co-produce a volunteering plan with current volunteers and representatives within the sport;
- 4. Establish an EDI action plan to improve diversity at all levels of the sport, including in governance;
- 5. Ensure that succession planning is included within risk registers both at Bowls Wales and within NGBs, with mitigations and long term planning put in place;
- 6. Re-assess current funding patterns to assess what can be done to reduce the cost barrier to those entering the sport.

Safeguarding

- 1. Urgently assess available training around safeguarding and make this available to as many within the sport as possible;
- 2. Establish a named safeguarding lead within every club, every county and every NGB as a condition of funding. The same person may hold multiple roles;
- 3. Establish a central point of contact within bowls for safeguarding reports to be made by telephone and/or by email. This should include the facility for anonymous whistleblowing reports.