



**Horse
Welfare
Board**

A life well lived

A new strategic plan for the welfare of
horses bred for racing, 2020-2024

Horse Welfare Board

February 2020

Foreword

Barry Johnson, Independent Chair, Horse Welfare Board

The welfare of the horse is the most challenging debate affecting the racing industry today. On behalf of the Horse Welfare Board, I am pleased and proud to share with you our agreed strategy for the future.

The process to develop this strategy was itself a significant step, bringing together representatives from the industry, alongside others with independent perspectives, to discuss, analyse and agree an innovative and aligned direction for racehorse welfare in this country.

This mix of perspectives has been important. Industry representatives have brought a wealth of knowledge and expertise, as well as the ability to drive operational action, while independent viewpoints ensure that we have considered the strategy and racing's work on welfare in terms of how things may look from the outside.

I emphasise that the Horse Welfare Board was given a remit from the sport to approach this strategy independently. We are not a BHA Board, and neither are we an advisory committee set up to regulate the regulator. We are an operational board, tasked with producing a blueprint for equine welfare in, and often either side of, racing.

This means we have had to work together to make decisions and to determine priorities for action by the industry. We have had to consider how to bring the industry with us, so that racing takes ownership of the strategy. We have also done our best to ensure that people outside the sport, including those watching us closely, will recognise racing's deep commitment to its horses.

We have designed this strategy so that it provides a clear framework but also so that those reading it can, wherever possible, see our "working out". We have set out our recommendations but also shown, in most cases, how and why we have arrived at those decisions. We encourage everyone with an interest in this subject to read the full strategy, and to do so objectively.

We do not expect everyone to agree with everything. There will be areas where some people feel we have gone too far, and others not far enough. We have challenged the industry in some areas, taking the view that, if everyone is completely comfortable with this strategy, we have perhaps not challenged hard enough. In areas where we feel there is more to do to bring people with us, in order to achieve an ambitious or challenging end goal, we have tried to set out a strong direction of travel, with a clear set of first steps.

The horse is at the core of our philosophy and purpose and our vision is one the industry should be inspired to attain. It ensures that, during the whole lifetime of the horse, all facets of its welfare are scrutinised, understood and, where possible, improved.

We are enormously grateful to all who helped us in the development of this strategy. From the industry's leaders, stakeholders and participants, including those who provided their views to us in surveys and elsewhere, to those critical friends outside the sport, who helped us to ensure that we considered alternative perspectives. We also thank the Horserace Betting Levy Board, for supporting the creation and development of the Horse Welfare Programme.

I would also like to say a personal thank you to my colleagues on the Horse Welfare Board who have worked tirelessly to produce this complex strategy in a comparatively short timeframe, whilst juggling their other roles in racing and elsewhere.

I am excited by the opportunities this strategy presents to all of us, and I look forward to sharing with you our progress towards achieving our vision. There is much for us all to do but, by working together, we can undoubtedly succeed.

February 2020

Contents

Foreword	3
Executive Summary	7
Introductory note	7
Purpose and scope	7
The Horse Welfare Board	7
Horse Welfare Board membership	8
Overview and approach	8
Our vision	9
Outcomes	9
Enablers	12
Recommendations	14
Key projects	17
1. Backdrop: Racing in a changing world	21
1.1 The role of horseracing in Great Britain	22
1.2 Racing in context	22
2. Introduction to the strategy	29
2.1 Definition of welfare	30
2.2 Welfare as an emotive issue	30
2.3 The role of regulation	31
2.4 Evidence-based decision making	33
2.5 Welfare, communication and evidence – the holy trinity	34
2.6 Leadership, project management and the need for clear focus	35
2.7 Effective investment	35
2.8 Culture, trust and collaboration	35
2.9 More effective communication	36
2.10 The ethical case for horseracing	36
3. About the Horse Welfare Board	39
3.1 Why have a Horse Welfare Board?	40
3.2 Objectives and remit of the Horse Welfare Board	40
3.3 Governance	41
3.4 Membership and structure	41
4. Our vision	43
5. Our approach	45
5.1 Outcomes-based approach	46
5.2 Projects and recommendations	46
5.3 Opinion polling	46
5.4 Key elements of the welfare strategy	47
6. Whole lifetime approach	49
7. Strategy framework	53
7.1 Evolving strategy	54
7.2 Piloting approach	55

8. Outcome 1: Best possible QUALITY OF LIFE	57
8.1 Encouragement of best practice	58
8.2 Effective regulation.....	59
8.3 Training and education.....	59
8.4 Welfare benchmarking	59
8.5 Disease control and biosecurity	59
8.6 Key projects: Best possible quality of life	60
9. Outcome 2: Collective LIFETIME RESPONSIBILITY	61
9.1 Clarification of responsibility	63
9.2 Traceability.....	63
9.3 Addressing welfare issues	67
9.4 Understanding responsibilities	67
9.5 Funding of aftercare	67
9.6 Euthanasia	68
9.7 Continued consideration of breeding methods	68
9.8 Key projects: Collective lifetime responsibility	68
10. Outcome 3: Best possible SAFETY.....	69
10.1 Continuous improvement	70
10.2 Current fatality rate.....	72
10.3 Understanding the causes of injuries and fatalities	73
10.4 Minimising reasonably avoidable risks – evidence-based approach.....	73
10.5 Data gathering.....	74
10.6 Suitability to race.....	75
10.7 Track factors	76
10.8 Race Factors.....	78
10.9 Key projects: Best possible safety	79
11. Outcome 4: Growth and maintenance of TRUST.....	81
11.1 The future of the whip	84
11.2 Public communications	94
11.3 Political engagement.....	94
11.4 Objective endorsement and the shift from informing to involving	94
11.5 Trust within the sport.....	95
11.6 Measuring opinion and measuring trust.....	95
11.7 Key projects: Growth and maintenance of trust.....	95
12. Enablers	97
13. Enabler A: Robust EVIDENCE AND DATA	99
13.1 Regulatory purpose vs research purpose	100
13.2 External and commercial data ownership	100

13.3 Aligning existing data projects	101
13.4 Welfare Data Unit	101
13.5 Analysis and interpretation	101
13.6 The role of research	101
13.7 Immediate priorities	102
13.8 Key projects: Robust evidence and data	102
14. Enabler B: High impact COMMUNICATIONS.....	103
14.1 Campaigning approach	105
14.2 Racing as a campaigning movement.....	105
14.3 Third party testimonials	105
14.4 Attitude change	106
14.5 Making the ethical case.....	106
14.6 Understanding the horse.....	106
14.7 Story capture and content development	107
14.8 Opening doors.....	107
14.9 The importance of language	107
14.10 Political engagement.....	108
14.11 Leadership	108
14.12 Broader requirements	108
14.13 Key projects: High impact communications	110
15. Recommendations and key projects	111
15.1 Recommendations	112
15.2 Key projects	116
16. Funding and resourcing	119
17. Concluding remarks	121
18. Appendix 1: Background information relating to the whip	123

Executive summary

Introductory note

While this Executive Summary provides an overview of themes and recommendations, it is **not an effective substitute for reading the longer document**, which explains how and why the Horse Welfare Board arrived at its conclusions and determined its priorities.

We emphasise that this strategy is a **living document and a work in progress**, which will continue to evolve, as we grow our knowledge and understanding.

Purpose and scope

The Horse Welfare Board has produced a **single, overarching strategy** for equine welfare in the racing industry. The strategy considers the whole of the racing industry, including sectors not currently fully regulated by the British Horseracing Authority (BHA), and looks across the lifetimes of all horses bred for racing.

The strategy is not limited to substantive 'welfare'. An effective **welfare strategy needs to include three elements working seamlessly together:**

- **Substantive welfare standards**
- **Effective communication and education**, to ensure British racing is equipped to respond to evolving social and political expectations.
- **Robust data and evidence**, required to drive improvements, tackle areas of risk, and provide the proof of racing's performance on welfare.

We have looked across the industry's work in these areas, with the aim of bringing it all together and making it more than the sum of its parts. This approach allows us to identify any gaps, and to address areas where more focused attention and urgency is needed.

Greater coherence will allow racing to **target investment more efficiently and effectively**, generating more impact from our total welfare spend.

The Horse Welfare Board

The **independently chaired** Horse Welfare Board was established in April 2019, in recognition of the need for greater cross-industry alignment and focus on welfare.

While the sport's governing and regulatory body, the BHA, regulates and sets minimum standards for the welfare of horses when racing and while in training, many racecourses and participants routinely exceed these standards.

Meanwhile, the Thoroughbred's life before and after racing, i.e. during the breeding, pre-training, sales and post-racing phases, is largely outside the BHA's regulatory remit. While standards in these areas are often comparably high, they are potential areas of both welfare and reputational risk to the regulated sport. We must aim to apply the same standards to all sectors of the industry.

The establishment of the Horse Welfare Board was commissioned by the industry's Members' Committee. It should be noted that, in its terms of reference, the Horse Welfare Board was asked specifically to **consider the question of whip use in racing and to provide a policy position** on the whip.

Horse Welfare Board Membership

The Horse Welfare Board includes representation from racing's tripartite system of governance (the BHA, the "horsemen" and the racecourses), alongside independent perspectives from outside the industry.

Independent chairing and representation provide assurance that the Board will always take an objective approach, acting in the best interests of the horse.

Members of the Horse Welfare Board, who have worked together on this strategy, are:

- **Independent members:** Barry Johnson (Chair, veterinarian, former President of the Royal College of Veterinary Surgeons), Tracey Crouch MP (Former Minister for Sport)
- **BHA members:** Alison Enticknap (Programme Director, BHA Head of Stakeholder and Internal Engagement), David Sykes (BHA Director of Equine Health and Welfare)
- **Horsemen:** James Given (Racehorse trainer and veterinarian), Charlie Liverton (CEO, Racehorse Owners Association)
- **Racecourses:** Caroline Davies (Racecourse Services Director, The Racecourse Association Ltd), Simon Knapp (Racecourse Veterinary Surgeon)

David Muir MBE has provided independent equine welfare advice and consultancy to the Board.

Overview and approach

The Horse Welfare Board has taken an evidence-based approach to the strategy. The key themes underpinning our approach are outlined below.

Background context

We conducted an analysis of the political, economic, social and technological context, noting **changes in public attitudes** to animals and the treatment of animals, which may affect views on the acceptability of the use of animals in sport. Any welfare issues or concerns about racing can now spread rapidly – and internationally - via **social media**.

The electoral and parliamentary climate of the past few years has increased the likelihood that **politicians will be responsive and reactive to public opinion**. Racing must be proactive in engaging public and politicians, speaking positively about our welfare record, being seen to strive for improvement, and providing strong proof of the effectiveness of the work being undertaken.

We conducted **public and industry opinion polling**, to garner views on welfare and the whip. Public polling suggests that fatalities and the whip are the areas of greatest public concern, while a lack of information and engagement has encouraged the growth of negative perceptions. However, there is a strong opportunity to improve this.

Based on the industry polling, racing's **participants and stakeholders are positive about welfare**, particularly in the regulated parts of the sport, though they do recognise that improvements could be made, most notably in aftercare, and in improving public perceptions of the sport.

Welfare: challenges and opportunities

The term "welfare" is problematic and means different things to different people, so we have deliberately **not provided a precise definition**. We have instead adopted an outcomes-based approach, to provide clarity on our welfare-related priorities.

Welfare is understandably a sensitive and challenging issue within racing, with many people dedicating their lives to the care of horses. This can lead to unproductive dialogue and defensiveness when welfare standards are challenged, which may also fuel negative perceptions of the sport.

Racing's discussions around welfare must be characterised by **greater collaboration, confidence and unity**. Care and concern for the horse is the thing that most obviously unites us and which therefore presents an enormous positive opportunity.

Collaboration with other racing jurisdictions and other equine sports and sectors is important in driving up standards and making a strong ethical case for the continued involvement of horses in sport.

Regulation of welfare is also not without its challenges, with the BHA caught between participants, who often feel the BHA is too remote from the sport, and outside audiences and critics, who feel the BHA is too close to the sport.

The BHA's remit is also restricted largely to the racing/racecourse and training sectors, which means it has limited control over the wider industry, from which welfare and reputational issues could emerge. We set out the clear need for **collective lifetime responsibility** for all horses bred for racing.

We support the need for **effective regulation**, but feel a **more collaborative approach** is needed around welfare, to involve participants in the development of smarter regulation, whilst also encouraging the industry to see welfare, and the promotion of welfare, as a **shared responsibility**.

We also **support the principle of self-regulation**. While self-regulation must be appreciated by racing as a privilege and not a right, the sport could argue that it takes more responsibility for welfare than would be possible under a more independent model.

Our vision

Before developing this strategy, we set out a vision:

Respect for the horse is at the heart of everything we do: Every horse bred for racing will enjoy a life well lived

To be achieved through:

- (a) **Effective governance**, with clear structures and accountabilities ensuring horse welfare.
- (b) **Evidence-based decision-making**, to achieve optimum outcomes.
- (c) **Collaboration**, both within and outside racing.
- (d) **Openness**, in explaining what we do and engaging constructively with others.
- (e) **Pride** and confidence in our dedication to the welfare of horses.

Outcomes

We identified **four key outcomes**:

1. **Best possible QUALITY OF LIFE** – the substantive “health and welfare” outcome.
2. **Collective LIFETIME RESPONSIBILITY** – incorporating e.g. traceability across the lifetimes of horses bred for racing, and initiatives fostering greater understanding, encouragement and effective enforcement of responsibility.
3. **Best possible SAFETY** – the understanding and analysis of multiple risk factors and the continuing reduction of reasonably avoidable injuries and fatalities.
4. **Growth and maintenance of TRUST** – the culmination of the first three outcomes, including a policy position and recommendation regarding the future of the whip.

These outcomes are supported by **two cross-cutting “enablers”**, which are major cornerstones of the strategy, as follows:

- A. Robust evidence and data** – including the creation of a cross-industry welfare data programme and an integrated welfare data unit.
- B. High-impact communications and engagement** – including a mix of promotional welfare messaging, content and storytelling, and strategic reputational work.

From these outcomes and enablers, we have made **20 recommendations** and identified **26 key projects**, which the industry will be asked to develop, resource and take forward.

Outcome 1: Best possible quality of life

This outcome relates to the **encouragement and furthering of best practice** in all aspects of health, care, husbandry and disease control. It is underpinned by effective regulation and supported by training and education, whilst also requiring that unregulated parts of the industry apply similarly high standards.

Standards of **disease control, prevention and treatment** should be maintained, whilst acting appropriately, swiftly and effectively as credible new information or new threats emerge.

This area **builds on strong foundations**, but we recommend the **development of welfare benchmarking** to build capability and consistency, looking beyond racing and into other equine sports and sectors.

We also felt that wider best practice could be encouraged through a **greater emphasis on training and Continuing Professional Development (CPD)**.

Outcome 2: Collective lifetime responsibility

This is an area in which a **step change and greater alignment** is needed across the industry. While responsibility for horses is high in many areas, when looking across a horse's lifetime there are **significant gaps in information and accountability**.

Responsibilities must be clarified, particularly:

- The responsibilities of owners, in relation to horses at the end of their racing careers.
- Responsible breeding, as **lifetime duty of care starts with the decision to breed a Thoroughbred in the first place**, where there is a need to ensure sustainable and responsible production.
- The responsibilities of **sales houses, pre-training yards and rehoming centres**.

Traceability is a vital first step in achieving this outcome. We need fullest possible traceability of horses bred for racing, throughout their lifetimes. While we acknowledge that traceability could highlight challenging issues, we feel that, as a responsible industry, which takes a positive approach to the management of risk, racing must be appropriately proactive on this.

We noted:

- **Significant gaps** in the industry's knowledge of the whereabouts of Thoroughbreds bred for racing.
- Concerns over traceability and the possibility that previously unknown welfare and reputational issues may emerge. As a responsible industry, we must be prepared to **take responsibility and to be proactive in tackling any issues that may emerge**.
- That there are limits to what racing can do in relation to any horses that fall into difficulties several steps down the line after leaving the sport, or which are sold to – or imported from – overseas.

With that in mind, racing needs to ensure:

- That any welfare cases are **rare exceptions**, and be able to demonstrate this, with evidence of positive outcomes in the overwhelming majority of cases.
- That **positive and reasonable efforts** have been made, to ensure that we have the **right preventative, educative and remedial measures** in place.

Gaps in traceability data and information should be filled, with the industry focusing on **removal of barriers to improved traceability**, including commercial barriers, and/or the **development of incentives**.

Euthanasia is an important part of the welfare mix when used responsibly, ethically and in the best interests of the animal. This is not always fully understood, particularly amongst public audiences. While euthanasia codes exist in parts of the industry, we recommend the **development of a single code of practice**, with a clear decision process or decision tree, that is adopted and clearly communicated by the whole industry.

The pros and cons of different **breeding methods** merit consideration but we note that this a complex area that cannot be resolved in the short term, nor by the Horse Welfare Board in isolation. British racing, particularly via the BHA and the Thoroughbred Breeders' Association (TBA) should continue to play a representative role in the conversation, both at home and overseas.

Outcome 3: Best possible safety

This outcome ultimately aims to **reduce and minimise, as far as reasonably possible, avoidable injuries and fatalities** to racehorses.

While the **risk of fatalities in racing is generally low** as a proportion of total runners, particularly in Flat racing, and while continuous improvements have **reduced the fatality rate by one-third over the past 20 years**, the sport must remain vigilant and make further progress.

There is an **urgency around this issue**. Fatalities are routinely cited by politicians and policymakers as the issue that must remain at the top of racing's agenda.

The Horse Welfare Board supports the view that **risk can never be eliminated entirely**, a view also accepted by Defra¹. We support the current approach of the sport to **minimising reasonably avoidable risk**, as set out in the BHA's Cheltenham Festival Review (2018).

Applying an evidence-led approach is important, to avoid unintended consequences. We agree that a persistent, long-term focus on driving down risk is the best way forward.

Some key areas of work in this area relate to:

- **Data gathering and analysis:** e.g. The Jump Racing Risk (predictive) Model; rider and trainer engagement; collection and analysis of medication data and clinical records relating to fatalities.
- **Track factors:** Deepen understanding of racing and training surfaces, with development of performance quality standards, and training for trainers and their staff to develop expertise in this area; improving the safety and visibility of obstacles; reviewing stalls and starting procedures to provide reassurance.
- **Race factors:** Assessing any welfare link with prize money provision for lower placed horses; feasibility of linking fixture and/or race allocation with welfare considerations.

Outcome 4: Growth and maintenance of trust

Achievement of **trust hinges on getting the other three outcomes right**. Trust is based on being – and being seen to be – effective in terms of ensuring racehorses' quality of life and safety throughout their lifetimes.

We examine this in terms of:

- **Public and political trust:** Ensuring we are seen to prioritise the welfare of racehorses, are open, ethical and transparent, are dealing effectively with issues of perception, collaborating with others, and can be trusted to self-regulate.
- **Trust within the sport:** Greater collaboration and unity, recognising that all parts of the industry are playing their part in maintaining and advancing horse welfare. Trust that those parts of the industry currently outside of the sport's core regulation are applying the same standards and levels of responsibility.

¹ <https://deframedia.blog.gov.uk/2019/05/15/minister-rutley-meets-with-horseracing-industry-to-discuss-welfare-and-invasive-species-week/>

The future of the whip

The Horse Welfare Board was **specifically asked to consider the question of whip use** in racing and was **required to form a view**, in the form of a policy position.

In recognition of the different views that exist on whether the whip is a substantive welfare issue or merely one of perception, we have included our discussion of the whip under the “Trust” outcome.

We looked at information and data from a number of areas before forming our view, including current rules and penalties (GB and international), data on whip offences, scientific and ethical research, and political, public and industry context and opinion.

Our **main insights** were:

- While we applaud efforts from the industry that have resulted in a notable decrease in whip offences since the 2011 Whip Review, the number of offences remains too high, suggesting that **current sanctions do not provide an adequate deterrent effect**.
- There is **no recent scientific evidence** that use of the whip is, or is not, a welfare issue. **Making an ethical case** for the use of the whip for encouragement is challenging.
- While the whip **may be a barrier to greater support** and the public feels change/action is needed, consumers are not prescriptive about what that change should be, favouring a whip ban or increased penalties.
- Industry survey data suggests that removal of the whip for encouragement would be unpopular in most parts of the sport, but there was still **a sense that some form of change is needed**, with fairly widespread support for increased penalties.
- While many in the sport favour more education of the public on the whip, this is not practical, as we lack the resources to do this at the mass audience scale required.
- There is currently no justification for – or support/pressure for – removal of the whip for **safety reasons**.

With all this in mind, the Horse Welfare Board formed the following **overarching position**:

Racing must signal a proactive, positive direction of travel in relation to the whip, taking steps to eliminate misuse and leading any discussions around the future removal of the whip for encouragement

This position led us to recommend that the BHA should conduct a thorough consultation on the whip in 2020, with a view, **regardless of other outcomes discussed in the consultation, to reviewing and increasing penalties** for any violation of the whip rules **as quickly as possible and ideally by the end of October 2020**, noting that the need to increase penalties is a **clear, minimum recommendation** of the Horse Welfare Board.

We have made NO explicit, immediate recommendation regarding future removal or retention of the whip for encouragement. We also recommend that the BHA develops a timetable and process for this consultation, to be published alongside this strategy.

The full recommendation is provided in the list of recommendations at the end of this summary.

Enabler A: Robust evidence and data

Data and evidence are essential to evidence-based decision making. Our enabler looks at all elements of the data process: Gathering, analysis, interpretation and application. We have identified gaps at the latter end of this process that the industry must address and on which the sport’s leadership must involve the **practical expertise of participants**.

Within this we noted:

- That the sport would benefit from a **clearer demarcation of data** collected for regulatory reasons and data/information collected for research and understanding.
- The challenge, which must be addressed, that some Thoroughbred data, including some data essential to traceability, is **only accessible via commercial agreements**.
- Potential benefits, including cost benefits, in aligning a number of the industry's existing data projects under a single, **industry-wide Data Unit**. We therefore recommend creation of a **Welfare Data Unit**, to be scoped as part of a cross-cutting **Welfare Data Programme**.

Enabler B: High-impact Communications

Communication (including engagement and education) around welfare is an area in which the industry has lacked impact with important audiences.

We examined two interrelated areas, broadly defined as:

- **Positive promotion** of welfare
- **Reputation and issues management**

We concluded that the sport needs:

- **A more “campaigning” approach** in its communication of welfare.
- To **behave less like an industry and more like a movement**, in which racing's people and supporters stand together in support of racing and the racehorse.
- To make **better use of credible third-party testimonials**, from people willing to testify to the high welfare standards in racing.
- To **focus on attitude change**, where we break down unhelpful misperceptions and stereotypes of welfare in racing.

Every interaction on welfare is an opportunity to surprise people, to dispel a myth, or to change someone's mind. In every interaction on welfare, we need to be inspiring a positive change in attitudes, not simply seeking to make a difficult conversation go away.

This should involve:

- Positive **engagement in ethical debates** about racing, and the use of horses in sport, emphasising **the benefits that horses derive from racing**.
- Development of a **Code of Welfare Ethics**, to be supported and communicated by the whole industry.
- Efforts to **grow the public's understanding of horses** and to put a **stronger focus on horses in our communications**, explaining more about what motivates and stimulates horses, and what constitutes “a life well lived”.
- Telling the many **inspiring stories of the horse/human relationship that exist in racing**, which present a positive welfare message, and which are capable of changing perceptions.
- Supporting the efforts that many in racing have made to **open their doors to public audiences**, particularly through the popular open days and developing this further into a “National Racehorse Day”.
- Assessing the **language used to describe welfare**, to avoid using language or phrases that reinforce the impression of an underlying welfare “problem”.
- Appointment of a **senior level communications lead** to co-ordinate welfare communications across the industry.

Recommendations

The Horse Welfare Board made the following recommendations:

A: Standards and benchmarking

1. **Welfare benchmarking:** The Horse Welfare Board recommends the continued development of a system for benchmarking welfare of Thoroughbreds, working with other racing jurisdictions, equine sports and equine sectors as far as possible. This should be a scientifically grounded but practical checklist, which has the potential to be used as evidence of welfare standards in racing. To be led by the BHA as an industry-wide project, with sponsorship from the HWB to ensure this work is developed collaboratively both across and outside the industry.
2. **Euthanasia code of practice:** We require the development and implementation of a single euthanasia code covering the whole industry, including breeding, pre-training, sales and aftercare, building on existing codes and including a clear decision tree to ensure euthanasia is used appropriately. This code should be communicated to industry and external audiences, to encourage understanding of responsible, ethical euthanasia as an important element of the welfare toolkit. To be led by the BHA and utilising appropriate expertise from e.g. the Veterinary and Ethics Committees.
3. **Code of Ethics:** Racing to develop and communicate an ethical case for racing, including a Code of Ethics. Code of Ethics to be commissioned from the BHA's (independent) Ethics Committee by the HWB and which can potentially be developed with other sports as a "Sport Horse Charter".
4. **Ground and going improvement and benchmarking:** Racing to undertake a project to develop performance quality criteria and measurement for ground and going, to cover first racing, then training surfaces, with an associated education and accreditation programme. This project should also assess, with the help of predictive modelling, any safety or welfare issues linked to ground or going, in relation both to turf and artificial surfaces, and the preparation and irrigation of surfaces, making recommendations for action as appropriate. This project to be led by a subgroup of the BHA's cross-industry racecourse committee, with sponsorship and funding from the Horse Welfare Board.
5. **Continued consideration of breeding methods:** British racing should continue to play a role internationally on the relative merits of different breeding methods, led by the TBA and BHA and helping the Horse Welfare Board to maintain its understanding of developments in this area.

B: Safety improvements

6. **Obstacle improvement:** Continued, continuous improvement of obstacle design, visibility, layout and structure, beginning with the further development of safer hurdle design and obstacle visibility. To be led by the Horse Welfare Board Chair, working with the group already convened, including representatives from racecourses, BHA and RSPCA, working with expertise from British Eventing.

C: Reviews of current policies and practices

7. The BHA should conduct a consultation on the whip in 2020, as follows:

With a view, regardless of other outcomes discussed in the consultation, to reviewing penalties for breaches of the whip rules as quickly as possible and ideally by the end of October 2020, noting that the need to increase penalties is a **clear, minimum recommendation** of the Horse Welfare Board, with particular consideration of increased penalties for:

- **Whip action offences**, e.g. use of the whip over shoulder height, where evidence suggests that greater deterrents are required.
- **Whip modification offences**, penalties for which are felt to be inadequate.
- **Repeat/multiple offences** by the same jockey, increasing the progressive penalties applied for multiple offences.

- Consultation on penalties should seek views and ideas on a range of sanctions, e.g. **fines and/or suspensions** for jockeys, and **prize money** sanctions.
- The Horse Welfare Board recognises that different views exist on the feasibility and desirability of sanctions involving **disqualification of the horse** but feels this question could usefully be considered and resolved through consultation. Should the BHA choose to exclude this from the consultation, it must set out clear reasons for doing so.

In that consultation, the BHA should also take the opportunity to gather views, and potentially to consider:

- **Future banning/retention of the whip for encouragement**, in order to foster a controlled, constructive and managed discussion.
- Changing the rules to place further **restrictions on use of the whip for encouragement** (e.g. reduction in number of permitted strikes, or restricting use during particular stages of a race).

The Horse Welfare Board wishes to be clear that the only explicit recommendation for immediate action on the whip relates to the need for increased penalties and for the industry to take greater control of conversations relating to the use of the whip for encouragement, initially expressing views via an open, managed consultation process.

8. **Stalls and starting assurance review:** Racing to conduct a short review of stalls and starting, including: Assessment of risk of injury to horses from stalls starts and jumps (tape and flip) starts, to ensure risks are as low as possible. If risks are identified, causes to be ascertained and addressed. Review to include consideration of stalls loading procedures and assessment of any real or perceived welfare issues, with appropriate action to be taken as necessary. This short review to be led by the BHA and RCA, but with a view to regular future reassessment, in line with new information and data, or utilising improvements made in overseas jurisdictions.
9. **Lower place prize money review:** Racing to conduct a short analysis to assess any welfare or safety issues arising from lower place prize money and to provide reassurance, or to make changes to prize money allocation if required. Led by BHA.
10. **Improved accountability in non-regulated sectors:** The Horse Welfare Board recommends that the same standards of welfare, safety and traceability are applied in non-regulated parts of racing, as the lack of regulation may compromise the welfare of Thoroughbreds, as well as creating vulnerabilities that may affect the sustainability and reputation of the regulated sport. This applies to the breeding, pre-training, sales, transportation and aftercare sectors.

At this stage, we have not formed a definite view on how this accountability is best achieved, e.g. by registration or accreditation schemes, codes of practice, or through more formal regulation. The Horse Welfare Board will consider this alongside the BHA and relevant stakeholders, conducting or commissioning a review as required.

11. **Welfare financing review:** The industry to conduct an analysis of racing's funding model for welfare, with a particular focus on the aftercare sector to ensure appropriate sustainability of the rehoming sector, developing new funding models and subsidies as required, and on opportunities in relation to research and development. This work will be scoped and commissioned appropriately by the Horse Welfare Board.

D: Data and risk analysis

12. **Establishment of cross industry data unit and programme:** Recognising the importance of robust data, racing to establish a cross-industry data unit and programme, coordinated by the BHA, with the sponsorship of the Horse Welfare Board to ensure alignment and prioritisation of data projects, with a focus on the recommendations in the remainder of this section, as follows:
13. **Traceability:** Racing should aim for the fullest possible traceability, during the period of this strategy (2020-2024), across the lifetime of all horses bred for racing, with the initial priorities being:
 - 100% data completion and traceability of racehorses' **first step away from racing**
 - Improved understanding of **second and subsequent** steps away from racing, via improved traceability and fuller engagement with commercial rehomers, to be led by RoR
 - Analysis and understanding of any **gap between 30-day foal notification and entry into racing yards**, with actions being developed to address any welfare issues that may emerge from this analysis, to be led by BHA and TBA
 - Addressing **gaps and accessibility challenges** in the data, working with e.g. Weatherbys and Defra
 - Devising solutions that **remove barriers and provide incentives** to ensure fullest possible traceability
 - **Working with others** where control is limited to minimise welfare risks, e.g.
 - Working with other equine sports and sectors on collaborative approaches
 - Working with sales houses to ensure a responsible approach to overseas sales and to restrict sales or exports where there is evidence of risk
 - Providing education and support to rehomers, as per recommendation 16 below
14. **Predictive risk modelling:** Continued development, improvement and implementation of the predictive risk modelling approach, beginning with the Jump Racing Risk Model, led by BHA and reporting into the industry data programme. Further information and data, including that obtained via trainer and jockey engagement, and ground and going projects, to be added when available.
15. **Medication data:** Racing to establish a project relating to the gathering and analysis of medication data and clinical records, to understand any areas of risk in relation to injuries and fatalities, to be led by the BHA, working with the NTF and BHA Veterinary Committee.

E: Training and education

16. **Training and CPD:** The Horse Welfare Board recommends an improved and more aligned focus on training, education and CPD programmes across the industry, to ensure best practice, with a particular onus on:
 - **Breeder education** to ensure responsible breeding practices and to ensure that standards required in regulated sectors are respected and applied in the breeding sector, to be led by the TBA but with support from the wider industry.
 - **Owner education** to ensure responsible ownership, particularly in relation to owners' responsibilities to horses following the end of their racing careers.
 - **Education and support for rehomers and potential rehomers**, to be led by RoR but with support and promotion by the wider industry.
 - **CPD programmes** for trainers, to be developed by the NTF and BHA and to form part of the licence renewal process.

F: Communication, engagement and reputation management

17. **Promotion of welfare and the horse:** Racing to develop and implement an approach and plan that puts the importance of the horse at the centre of its promotional activity, using a balance of strong storytelling, strong evidence and data and which makes the ethical case. This to be led by a new senior communications role, which will work with the Horse Welfare Board, GBR, BHA and an industry communications group.
18. **Issues management:** Racing to reconsider its issues management approach and associated messaging, to ensure this is effective in providing reassurance and building (and measuring) trust

with key public and political audiences. This to be led by a new senior communications role, in line with recommendation 17 above and working particularly with the BHA.

19. **Industry engagement:** Racing to build the capacity of the sport to engage effectively on welfare, including support for industry engagement initiatives (e.g. open days), developing and broadening capacity to engage with the public and politicians, keeping the sport informed of important welfare developments, and equipping them with communications content, materials and messaging led in line with, and with content drawn from, recommendations 17 and 18 above.
20. **External stakeholder engagement:** Racing to step up its engagement and collaboration with other equine sports and sectors, working together on key initiatives, as well as deepening its engagement and dialogue with trusted welfare organisations and charities, with a view to improving equine welfare and promoting trust. This plan to be facilitated by the senior communications lead, working with the BHA and the Horse Welfare Board.

Key projects:

A summary of the key projects listed in this strategy and which relate to the recommendations listed above is provided in the table below (include table of projects as per the strategy).

	Project name	Summary	Outcome or enabler supported
1	Welfare benchmarking tool	A practical checklist that allows those responsible for the care of Thoroughbreds to self-assess welfare levels against a common benchmark, to drive consistency and to facilitate the sharing of best practice. Tool to be developed in collaboration with international jurisdictions and other equine sports and sectors.	1, 2, 4 A, B
2	Training and CPD	Training and education programmes to ensure that those responsible for Thoroughbred care, whether in regulated or unregulated roles, understand their responsibilities, are aware of current best practice and commit to continuous learning.	1,2,3, 4 B
3	Education of/support for rehoming and potential rehoming	To minimise the risk of negative welfare outcomes and to ensure the sport is seen to make positive and reasonable efforts to protect horses outside its immediate control, we recommend a strong emphasis on education of those rehoming racehorses, or who are considering doing so.	1, 2, 4 B
4	Traceability	An industry-wide project, linked to one of our key enablers, to ensure fullest possible traceability across the lifetime of all Thoroughbreds bred for racing, from the point of 30-day foal notification onwards. To include the plugging of gaps and shortfalls in the data, communication of traceability requirements, removal of barriers to traceability and the streamlining of traceability processes.	1, 2, 4 A, B
5	Welfare funding model	Analysis to be undertaken into racing's model for funding welfare, including e.g. the development of new partnerships for innovative product and technological development, and an assessment of the funding model for aftercare to ensure sustainability of the rehoming sector.	2, 4
6	Euthanasia code/policy	The development of a single euthanasia framework, building on existing codes, for use across the industry, including a clear decision tree to ensure euthanasia is used appropriately. Communication of this code to industry and external audiences, to encourage understanding of euthanasia as an important and ethical element of the welfare toolkit.	1, 2, 4 B

7	Review of breeding, pre-training, sales and aftercare	Consideration of those parts of the industry not currently subject to full BHA regulation, to assess potential benefits of registration schemes, codes of practice, accreditation schemes, or licensing arrangements. Balance of focus to be on rewarding and encouraging alignment and best practice with core standards.	1, 2, 4
8	Continued consideration of breeding methods	Continuing consideration of the pros and cons of different breeding methods in the context of welfare and international considerations. The HWB to work with the TBA and the BHA to maintain understanding of developments in this area.	1, 2
9	Jump Racing Risk Model (JRRM)	The further development and application of the JRRM, which will identify risk factors linked to falls, injuries and fatalities in Jump racing.	3, 4 A, B
10	Racing fatalities occurring off the racecourse	The continued gathering and analysis of data of fatalities linked to racing that occur off the racecourse, to build a more complete understanding.	1, 3 A
11	Medication data and clinical records analysis	The continued gathering, and subsequent analysis, of medication data and clinical records linked to general welfare considerations and to racing-related fatalities.	1, 3 A
12	Rider engagement	The gathering of rider insight into falls and fatalities to build a fuller understanding of risk factors.	3 A
13	Trainer engagement	Collaboration with trainers to build understanding and share trainer expertise and best practice on training regimes that may reduce risk of racehorse injury and fatality.	3 A
14	Suitability to race	Assessment of perception-related suitability issues, to ensure research is robust, to address misperceptions and to provide evidence and information.	3, 4 B
15	Ground/going research, development & training	Further research into ground and going to build a common framework for “what good looks like”, to apply this to racecourses and training surfaces, with the development of training programmes for participants and their staff.	3, 4 A, B
16	Obstacle improvement & development	Continued, continuous improvement of obstacle design and structure, beginning with the further development of safer hurdle design and obstacle visibility.	3, 4 B
17	Stalls & starting review	Review of stalls design, stalls loading procedures, and Jumps starting procedure, to provide reassurance that risks are low and to address negative perceptions.	3, 4 A, B
18	Review of impact of prize money for lower placed horses	Consideration of any welfare link with prize money availability for lower placed horses.	1, 3, 4 A, B
19	Fixture timing & allocation	Continued assessment of fixture allocation, race conditions and race timing in relation to welfare considerations.	1,3, 4 A, B
20	The future of the whip	Following the HWB’s recommendation to the BHA for future action on the whip, the development of the resulting consultation, implementation plans and related sub-projects.	4 B
21	Welfare Data Programme and establishment of a Welfare Data Unit	The establishment of a cross-industry data programme, with the aim of establishing an aligned data strategy and an integrated, cross-cutting data unit for racing.	1, 2, 3, 4 A, B
22	Thoroughbred Welfare Database	The further development of the BHA-led project to create a single aligned database for the sport, integrating this across the industry, as part of the Data Unit project (project 21).	1, 2, 3 A
23	Communications strategy and plan	A cross-industry communications strategy and plan, to be developed by and for the sport, based on this overarching welfare strategy, with appropriate co-ordinating, senior-level leadership, and appropriate alignment with racing’s overall communications strategy.	4 B

24	Promotional welfare communications plan	Development and execution of the promotional plan, including consideration of the requirements outlined within the Horse Welfare Board strategy.	4 B
25	Corporate communications (welfare) plan	Development and execution of the corporate communications and issues management plan, including consideration of the requirements outlined within the Horse Welfare Board strategy.	2, 3, 4 B
26	Code of ethics	Development and communication of a welfare-related code of ethics for the whole industry, working with the BHA's (independent) Ethics Committee and with stakeholders, and external consultants as required.	1, 2, 3, 4 B





1. Backdrop

Racing in a changing world

1. Backdrop: Racing in a changing world

1.1 The role of horseracing in Great Britain

Horseracing is both a major sport and a significant industry in Great Britain, with a long history and a place in the national consciousness.

It remains a huge spectator sport, with 5.77 million attendances at 1,500 fixtures held across 59 racecourses in Great Britain, including four of the top ten best-attended British sports events.

Racing's economic impact is significant, with annual expenditure of over £3.5 billion, and a tax contribution of over £300 million from racecourses, participants and a world-leading breeding industry.

Racing is responsible for over 17,400 FTE jobs across the industry, many of which are in rural communities. British racing employs over **6,500 stable staff** and **licenses 600 trainers** to provide care and attention for the **14,000 horses** in training at any one time, providing them with a level of care and a quality of life that is virtually unsurpassed by any other domesticated animal.

British racing plays a leading role in setting standards internationally, and across the equine sector more generally. We also play a leading international role on the course. For example, in 2018, British-trained horses won 37 Group One races outside Britain, including an historic 1-2-3 in the Melbourne Cup.

1.2 Racing in context

Any strategy reflects the context in which it is written, and anticipation of the evolving context in which it will be implemented. Here, we set out this context, which seeks to answer the following questions:

- Why do we need an industry welfare strategy?
- Why do we need one *now*?

(a) History of continuous improvement

The context of our strategy includes the long history of continuous improvement of welfare standards in British racing. It is important to emphasise that the Horse Welfare Board is not starting from scratch, but building on an impressive body of work already undertaken by the sport, often in association with others. Over time, research and experience has provided new knowledge and information, which have enabled racing to make informed changes.

While there is much to be proud of, the goalposts of welfare are constantly shifting as new information comes to light and in line with a changing world. The industries and businesses that survive in any sector are those that successfully evolve with the times. The leaders and trailblazers are those that see change coming and adapt *ahead* of the times.

British Racing must be a world leader on equine welfare. In defining this new approach, racing should seek not only to survive, but to flourish.

(b) Why do we need a welfare strategy?

Racing does remarkable work relating to the welfare of horses, but it does not have a single, integrated welfare strategy that reflects the contributions made by all parts of the industry. Parts of the sport have their own welfare strategies, which are hugely valuable and from which we have borrowed extensively in writing this document, but there is no single, aligned approach, uniting the whole industry.

The benefits of a single strategy are:

- To make the work already in progress more than the sum of its parts.
- To identify and address any gaps in the overall body of work.
- To facilitate the sharing of learning and best practice.
- To integrate non-regulated areas into the strategic mix, driving positive outcomes throughout the lifetimes of horses bred for racing.
- To develop stronger and more impactful communications and messaging.
- To ensure the sport is aligned on priorities and is resourcing these accordingly.
- To identify and manage risks across the whole industry, including risks to the health, safety and well-being of horses, as well as reputational risks, including those arising from myths and misperceptions.
- Ensuring that risks emerging in one area of the industry are visible across the industry.
- To pool resources and to benefit from economies of scale.
- To test and pilot ideas prior to wider rollout.
- To drive collaboration and unity within the sport.

Bringing this work together is not just about providing racing's defence, it is also **a great opportunity**. Racing is passionate about the horse, particularly the welfare of the horse; this is a chance to share that passion, to build on it together and to tell our welfare story to the outside world.

(c) Why now?

Over the past 12-18 months, perhaps more than ever, equine welfare has been a hot topic of discussion and debate both within and outside racing. Anecdotally, some feel more can and should be done across the board, others feel that we simply need to educate the public, so they understand us better, while some feel that we only create perceptions of a welfare "problem" when we talk defensively about it. There is some truth in all these perspectives, but we urgently need to reconcile them and agree a way forward.

During the past 18 months, we have seen:

- **The BHA's Cheltenham Festival Review** (December 2018), which was instigated following the 2018 Festival. The Review was notable for its emphasis on evidence-based decision-making and the need for robust data.
- A **UK Parliament Petition**, set up by animal rights campaigners, calling for the establishment of an independent welfare regulator, which generated more than 100,000 signatures and resulted in a parliamentary debate on the subject in October 2018. While the premise of this petition and the notion of independent regulation of welfare was rejected by the Government and Opposition, a variation of the petition pledge was adopted as Liberal Democrat party policy at their 2018 conference and was included in the party's 2019 General Election manifesto.
- A variety of public statements by people inside and outside the sport about the **whip**: While many see the whip more as a perception issue, rather than a substantive welfare problem, the whip has a totemic significance in racing. Regardless of one's view (and many views are available), the issue rumbles away almost continuously.
- Concerns expressed, sometimes very publicly and very vocally, about **welfare regulation** and whether the BHA's approach is proportionate, or whether the regulatory approach is inadvertently fostering negative perceptions. The BHA, meanwhile, was making the case for a greater focus on, and investment in, welfare. There was probably significant common ground on all sides but a difference of view on how best to get there.
- **The temporary shutdown of racing following the identification of equine influenza** cases in the racehorse population in February 2019: While there are different views on whether the response was proportionate, there was much in this episode of which the sport could be proud. The speed and unity of the response, the confirmation that disease resilience amongst racing Thoroughbreds as a result of vaccination requirements was exceptionally high, and the evidence of effective biosecurity protocols, all underlined that British racing is a responsible sport, particularly where the

health of its horses is concerned. Racing also showed leadership by using the episode to promote vaccination in other equine sectors.

(d) Why the Horse Welfare Board?

It was against this backdrop that an interim group, drawn from within the industry, discussed the challenges and opportunities relating to equine welfare. The conclusion of these discussions was the decision, approved by the industry Members' Committee, to create an industry-wide Horse Welfare Programme, to bring the sport's combined contribution to welfare together and to develop a new strategy for the racing industry.

It was important that this new Board was cross-cutting in its remit, capable of producing an agreed strategy and of driving practical, operational action on welfare. Almost more important was what the Horse Welfare Board was not designed to be. It is **not a regulator**, as regulation remains the role of the BHA (though the BHA provides the regulatory contribution to the much broader welfare programme). Furthermore, the BHA's regulatory contribution is not, and should not be, the sum total of the industry's overall contribution to equine welfare.

It was also **not set up to be a specialist advisory committee**, as this remains the role of a number of expert committees in racing, such as the Veterinary and Ethics Committees, which are BHA-run but which have authoritative, independent membership.

The importance of **independent representation** was recognised from the start. The interim group believed strongly that an independent Chair, along with further independent representation on the Welfare Board, was essential, to ensure:

- That outside perspectives were provided, to prevent insularity and to provide reassurance to stakeholders outside racing.
- That the Board acts in the best interests of the horse at all times.
- Balanced and objective mediation across racing's tripartite groups, i.e. the BHA, the horsemen and the racecourses.
- That unregulated aspects of the industry are brought into the strategy.

More detailed information about the Horse Welfare Board, its remit and membership, is provided in section 3 below.

(e) External context

Any strategy must consider the broader external context in which it is developed. We have set this out in the form of a PEST analysis, looking in turn at the Political, Economic, Social and Technological backdrop for this strategy.

(i) Political context

The political context in Great Britain during the past 3-4 years has been unusually turbulent with one issue – Brexit – dominating political and policy debates to an arguably unprecedented degree.

The UK General Election of 2017 resulted in widely unexpected gains for the Labour Party, often attributed to the increased turnout of the youth vote in support of Jeremy Corbyn. While this “youthquake” has been partially debunked as a myth by the British Election Study team, who noted little change in turnout by age group between the 2015 and 2017 elections, the same study did conclude that those younger people who did vote were generally more likely to vote Labour.²

² <https://www.bbc.co.uk/news/uk-politics-42747342>. Original source: <https://www.britishelectionstudy.com/bes-resources/british-election-study-2017-face-to-face-survey-v1-0-release-note/#.XcP1nzP7RPZ>

The unusually high political salience of the youth vote was noted by the Conservative Government. Amidst the overwhelming legislative demands of Brexit, policies appealing to younger voters were arguably more likely to find their way to the front of the queue. This gave strong impetus to, for example, policies aimed at protecting the environment and improving animal welfare, both areas likely to appeal to younger voters.

The General Election of December 2019, which returned a Conservative majority of 80, should bring greater clarity and certainty to the parliamentary mathematics at Westminster. However, we note the strong likelihood that the Government will seek to introduce new laws relating to animal welfare and/or animal sentience, so racing cannot afford to be complacent, but must instead be proactive in demonstrating bold ambition and high performance in relation to equine care, safety and welfare.

Animal welfare is also a devolved policy area, with Scotland and Wales having their own powers, while Defra has primary responsibility for animal welfare in England. This creates a need for racing to engage across Great Britain, in London, Cardiff and Edinburgh, and ideally at constituency level. With Brexit likely to create a changed regulatory and legislative landscape, and with many new faces at Westminster following the 2019 General Election, racing must step up its political engagement, particularly at the grass roots, and must be prepared to invest time and resources in doing so.

The BHA and the Horse Welfare Board have, both separately and together, engaged with politicians and policymakers in recent months. **The principal racing-related concern of the Conservative Government in 2019 was racehorse fatalities.** The BHA and Horse Welfare Board responded to a request for information on actions that are being taken – and will be taken in future – in this area, which are reflected in section 10 of this strategy. This response was subsequently discussed with Defra, who recognise and acknowledge that no sport can ever be entirely risk-free, endorsing the industry’s approach of minimising reasonably avoidable risks.³

The whip is the occasional subject of parliamentary questions, but it has not been a major political concern in recent months, though it is worth noting that the Labour Party pledged an independent review of the use of the whip for encouragement in its 2019 Animal Welfare Manifesto. While the election result made the likelihood of such a review recede, our position on the whip, explored in section 11, may in any case have rendered that pledge unnecessary.

As noted in section 1.2 above, a petition orchestrated by animal rights activists and prompted by fatalities at the 2018 Cheltenham Festival, gained enough signatures to trigger a parliamentary debate in October 2018. This debate was framed around a call for an independent horse welfare regulator. While Defra statements around this issue have been supportive of the BHA’s regulatory role, the Liberal Democrats repeated this call for independent welfare regulation in its 2019 General Election manifesto.

It is important that any political “threat” to racing is kept in perspective and for the response, while proactive, to be proportionate. If the threat is overstated or poorly evidenced, it not only loses credibility within the sport, but may also magnify the issue and create a misleading impression of a significant welfare “problem”.

Brexit and its implications may continue to tie up the parliamentary timetable for some time, and racing must ensure it makes a strong, positive case around welfare in the meantime. This may also include the need to advocate that the welfare of racehorses, e.g. in relation to movement of equines, is maintained and not compromised following the United Kingdom’s exit from the EU on January 31, 2020.

(ii) Economic context

The economic context is important in relation to welfare, as it is a reasonable hypothesis that welfare standards are at risk of compromise when resources are limited.

³ <https://deframedia.blog.gov.uk/2019/05/15/minister-rutley-meets-with-horseracing-industry-to-discuss-welfare-and-invasive-species-week/>

This is a welfare strategy and racing's financial and commercial strategy is not our area of focus. However, racing's economic context needs to be noted and considered.

At a macro level, the prospects for Britain's economy are felt by many to be uncertain. Forecasts vary, and we will not discuss these in detail, though the general consensus indicates that some adverse impacts are to be expected in some economic sectors. Increased costs and squeezes on disposable income are factors that could, directly or indirectly, affect racing.

Meanwhile, the availability of stable staff is already a major challenge with which racing is already grappling.⁴ Uncertainty alone, whether justified or not, can lead to caution as economic sectors retrench in readiness for worst-case scenarios.

Pressures on the industry's income from betting activity will also impact revenues, including central funding from the Horserace Betting Levy. Add to that the continuing competition from other sports for sponsorship, for providing the gambling product, for attendances and media exposure, and the industry is facing a range of challenges. Racing is essentially a community of businesses of varying sizes, which are as vulnerable as any others to fluctuations in the overarching economic context.

From a welfare perspective, we must be alert to potential issues, such as:

- Squeeze on racehorse ownership, with the supply of horses potentially exceeding demand.
- Stable staff reductions and/or shortages, potentially impacting the ratio of staff to horses.
- Increased costs leading to more horses needing to be rehomed, or cost considerations becoming a barrier to rehoming.
- Euthanasia of injured horses for economic reasons, where injuries may be treatable but would not return the horse to an athletic function, or where its quality of life would be compromised.

In summary, the industry must ensure it is operating sustainably and with strong financial forecasting and planning, to minimise any risks that welfare will be compromised for economic reasons at any stage of a racehorse's life.

(iii) Social context

Social changes impacting on horse welfare are a frequent topic of conversation, with a particular focus on society's changing attitudes to animals and the acceptable use or treatment of animals, including their participation in sport.

Veganism is reportedly on the rise in the UK, particularly amongst younger people, though it is hard to identify a clear and credible statistic to quantify this. Research by Kantar found that only 3% of the UK identify as vegan, with millennials and females making up a significant proportion of these, driven mainly by ethical and environmental concerns.⁵

The rise of veganism is often cited as an indicator of changing attitudes to animals and animal welfare. It is a useful guide, but it is important to get this in perspective and, most importantly, not to conflate it directly with attitudes to horseracing. It is a reasonable assumption that there are vegans working in, or following, horse racing. Similarly, there will be many non-vegans who oppose the use of animals in sport, but who are still happy to eat meat.

Changing attitudes to animals, and human behaviour towards animals, means that society has changing views on what is and is not acceptable. In May 2019, the Government announced a new Bill to ban the use

⁴ While industry staffing is outside the remit of the Horse Welfare Board, we underline the importance of a robust industry staffing strategy, given the correlation between full/skilled staffing and high standards of horse welfare.

⁵ Source: Kantar Worldpanel, February 2019

of wild animals in travelling circuses in England⁶, while some travel operators have introduced policies that prevent animal attractions, experiences or sports being sold as part of tourism or travel packages.⁷

Perhaps more notable is the **growing disconnection of people from nature and the countryside**. Around 90% of the UK population now live in towns and cities⁸, with the number of people living in minor and major cities increasing by 2.4 million between 2001 and 2011 alone⁹. People are less exposed to the countryside, and to farming and farm animals, than previously. A 2017 poll of 18-24 year-olds by the Prince's Countryside Fund found that 12% of those surveyed had never seen live cattle in the flesh.¹⁰

There are no comparable figures quantifying society's exposure to horses but horses are increasingly viewed as an animal of the countryside, and particularly as a companion animal. With the exception of police horses, they are rarely seen in cities, where they were once employed widely, particularly in transport.

This modern lack of familiarity with, and understanding of, the horse, gives rise to myths and misperceptions. People may assume, for example, that a horse turned out in a field will be happier and safer than a working horse, whether that working horse is a police or military horse, or a sport horse, whereas the opposite may well be true.

Racing must work together, along with other equine sports and sectors, to grow public understanding of, and exposure to, horses, to manage this gap in perception and understanding, particularly amongst young people and in urban communities.

A wholly different social issue, with which racing is inextricably linked, is the **change in attitudes to gambling**. Racing is fully supportive of efforts to reduce problem gambling. From a welfare perception point of view, the link with gambling can fuel impressions that racehorses are raced – or perhaps even exploited – purely for commercial gain. While commercial gain may be involved (though many in racing would ruefully dispute this), it does not follow that “exploitation” is automatically taking place. However, racing must work hard to dispel that myth, while highlighting that the Levy has funded valuable research and projects advancing welfare knowledge and standards.

Therefore, the Horse Welfare Board advocates more prominent positioning of the horse in racing's messaging and promotion.

Again, some perspective on social change is necessary. As noted in section 1.1 above, **horseracing remains a popular sport in Great Britain**. ITV Racing recently released its 2019 Flat season audience figures, which showed a 13.5% year-on-year increase, while figures for Royal Ascot increased by 19% year-on-year.¹¹ The 2019 Cheltenham Festival saw record attendances of 266,779, with record figures recorded on each of the four days.¹² Meanwhile, betting activity on horseracing in the year to March 2019, was up by 4%.¹³

There are opportunities as well as threats, and engaging more effectively on the subject of welfare, through more effective messaging and storytelling and with the horse front and centre, has the potential to engage new and bigger audiences.

⁶ <https://www.gov.uk/government/news/gove-delivers-legislation-to-ban-wild-animals-in-circuses>

⁷ <https://www.thomascookgroup.com/blog/details/the-next-step-in-our-animal-welfare-policy> (prior to liquidation) and https://www.airbnb.co.uk/help/article/2578/what-are-the-animal-welfare-guidelines-for-airbnb-experiences?set_bev_on_new_domain=1574787514_J34C7L7JBlzPJ%2Ff3

⁸ United Nations Population Fund, 2007

⁹ Government Office for Science, 2014

¹⁰ <https://www.telegraph.co.uk/news/2017/07/31/one-eight-young-people-have-never-seen-cow-real-life/>

¹¹ Source: ITV Racing

¹² Source: The Jockey Club

¹³ <https://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Statistics/Industry-statistics.aspx>

(iv) Technological context

Technological changes always bring challenges and opportunities and the digital revolution has already brought many changes to horseracing.

The continuing growth of social media and other online communication platforms, as many of us know from personal experience, is a double-edged sword. It brings the ability to engage directly with millions of people, but that engagement can be both positive and negative. As we have seen from electoral and other scandals, it can sometimes be manipulated by vested or malign interests, or be used to bully and abuse.

Social media is an effective way to engage on welfare and it is already home to some wonderful storytelling by racing's participants, who do a good job of showcasing the care given to horses. Yet it sometimes answers back. Racing's people should continue to engage on social media but be armed and supported with the messaging and content that can help them to rebut criticism or negative campaigning.

Social media can make the world smaller. **Welfare issues and scandals from other jurisdictions** can cross continents in seconds, and social media communities are rarely discerning enough to distinguish between what happens in Britain, and what might have happened elsewhere. Social media is just one of many reasons why the Horse Welfare Board believes strongly that the BHA should continue to use its position in the International Federation of Horseracing Authorities (IFHA) to lobby hard for **collaboration, harmonisation and action at international level**.

Technology can also assist directly in welfare and this strategy encourages the sport to embrace new technologies wherever possible. There are numerous examples and we will not seek to list them here, instead using just one by way of illustration: Traceability is discussed at length in section 9 of this strategy. The advent of microchipping has already taken us forward in terms of identifying and tracing horses. The development of electronic passports will not only improve traceability in Thoroughbreds, but in all other equine breeds. The arrival of 5G and the use of GPS tracking could take us still further.

It is a huge opportunity if we care to embrace it, though we must recognise that all technologies have the potential to uncover problems and issues to which the industry may need to respond. This is the case in relation to the traceability issue, as above.

(f) Context: Summary

We have taken each of these contextual backdrops in turn, though it should be noted that they frequently interact and interrelate.

While context is important, and while racing needs to be on the front foot more than previously, we emphasise again the need for a **proportionate response, based on an evidence-based assessment** of that context.

Qualitative research with a small number of trainers, jockeys and racecourses, undertaken by the Horse Welfare Board in July and August 2019 underlined this. Some interviewees were conscious of an undefined "threat" to racing but were unclear how big or tangible this was. They felt they lacked clarity and facts, so were understandably unsure whether the sport's response to this threat was proportionate. Are we complacent, or are we overreacting? People's different responses to this question are often at the heart of divisions in the sport over welfare, which we have already highlighted as a barrier to positive progress.



2. Introduction to the strategy

2. Introduction to the strategy

A hallmark of any successful industry is its ability to adapt to a changing world and to avoid complacency. This applies in sport as much as anywhere else. We need, arguably more than ever, to work hard to retain our relevance to modern Britain.

With that in mind, it is important to review what we are doing, ensure we are on the right track, and make changes and improvements where necessary.

While this applies to racing in general, it is particularly important in the area of welfare and the care and safety of the horse.

The Horse Welfare Board has taken the opportunity to review the suite of work, consolidate and align, identify gaps and set priorities. In doing so, we have identified and discussed some important background considerations and insights, which are set out below.

2.1 Definition of welfare

The Horse Welfare Board has discussed the definition of the term “welfare”, recognising that it means different things to different people and is therefore problematic. There is no single, accepted definition.

For some, it can be suggestive of a need to support the disadvantaged, using an approach based on intervention, partly because of its widespread use in the context of human social security and social care. The use of the phrase can therefore be unhelpfully or inaccurately suggestive of an underlying systemic “problem”.

In general, when used in the context of animals, “welfare” is linked to the absence of negative states and increasingly also to the experience of positive states. However, the negatives and especially the positives are neither clearly defined nor universally accepted.

The term can also be linked, particularly in public debate, to human perceptions of what constitutes acceptable and/or ethical treatment of an animal. Again, this is an imprecise and slightly subjective perspective, but it is one that must be considered in framing our approach.

We also discussed the alternative phrase “well-being”, though this also has varied definitions and has come to be associated more, in humans especially, with mental health and happiness, so may fall short as a definition.

In consequence, **we have deliberately not provided a precise definition of welfare in this strategy**, recognising that it will always be subject to different interpretations. We have chosen instead to adopt an outcomes-based approach, which will provide clarity on our welfare-related priorities. Where we have used “welfare”, it is a convenient shorthand for the full suite of outcomes discussed in this strategy.

2.2 Welfare as an emotive issue

Equine welfare is a highly sensitive issue in racing. There are few issues that generate such emotion, passion and debate.

For people working directly with racehorses, care for the horse is a way of life, 24 hours a day, 365 days a year. Speak to almost anyone in the sport who works directly with horses and you hear real enthusiasm, an empathy for the horse, and an understanding of the quirks, characters and different needs of individual horses. People work in racing typically because they *want* to work with horses.

It is unsurprising then, that racing’s people become upset and defensive when that care or concern is criticised or questioned, particularly when this comes from anyone who does not live and work directly with horses, or when spoken from a position of limited knowledge.

Criticism of welfare standards can be an affront to the core values of people in racing, thereby eliciting a defensive response. This defensiveness can be misinterpreted as evidence that the sport is resistant to change, when people in racing generally agree that it is always desirable and possible to strive for improvement.

All this naturally makes conversations about welfare challenging and frequently unproductive. It is a core aim of this strategy to change the overall tenor and tone of the sport's conversations around welfare, both internally and with wider audiences, to foster a more constructive and empathetic dialogue and to encourage greater collaboration, confidence and unity.

2.3 The role of regulation

Regulation of welfare in racing has been a notable source of discussion over the past couple of years, both within the sport and outside.

It is important to be clear from the outset that the BHA's regulatory remit does not extend fully across all areas covered in this strategy. Breeding, pre-training, sales and aftercare, as well as aspects of data and traceability processes, are not subject to full regulation. The limits on regulation are discussed in this strategy with reference not only to the welfare of horses bred for racing throughout all stages of their lives, but also in relation to the reputational risk that racing's regulated "core" carries on behalf of unregulated (or partially regulated) sectors within the wider racing and bloodstock industry.

Meanwhile, the BHA's approach to welfare regulation has sometimes been questioned from within the sport, with doubts expressed about whether the burden of regulation is proportionate to its positive impact, accompanied by a more general concern that the BHA is too remote from the sport to regulate effectively on welfare.

The tone and effectiveness of the BHA's communication on welfare-related matters has also been challenged at times, with some feeling that, rather than defending the sport, the regulator's stance can sometimes encourage and amplify negative perceptions.

Meanwhile, and in direct contrast, critics from outside the sport regularly claim that the BHA is too close to the sport, which impedes its ability to act strongly and objectively.

The BHA therefore operates between a rock and hard place, which is not always recognised by participants. We note that the BHA has made recent public statements in which it has acknowledged its need to work more closely with the sport it regulates, and to develop stronger links outside the sport.¹⁴

The Horse Welfare Board wishes to support the BHA in its efforts to do this. Our role is not to regulate the regulator. The Horse Welfare Board can support and challenge, however, and act as a forum for discussion. With that in mind, the HWB has considered the question of regulation in relation to welfare and makes the following observations, which have been major considerations in the framing of this strategy:

(a) Core standards

The BHA's regulatory role is to set and enforce core minimum standards in racing, but there is widespread agreement, including from the BHA itself, that it is not possible or desirable for racing to regulate its way to success on welfare. **It is instead the responsibility of the whole sport.**

We agree strongly with this. Welfare is a day-to-day endeavour, subject to ever-shifting goalposts. The whole sport has a role to play in driving up standards, sharing best practice and fostering innovation.

¹⁴ As noted in a speech by the BHA Chair, Annamarie Phelps, to the World Horse Welfare Conference, 13 November 2019

The Horse Welfare Board was set up in recognition of the fact that the BHA's regulatory standards form the core of the sport's approach to welfare but also that **many people and parts of the sport regularly exceed those standards**. Regulation is therefore a significant contributor to the overall standard of equine welfare on British horseracing but it is only one element of a much bigger picture.

(b) Smarter regulation

With that in mind, a more collaborative approach to welfare is required, as there is an urgent need to build greater trust in the regulator. Participants from within the sport and those with expertise and common aims from outside the sport must be more actively involved in identifying areas for improvement and in designing and implementing solutions.

We have given some thought to the concept of "smart regulation", a regulatory principle applied by many governments, supranational bodies (e.g. the EU) and statutory regulators that seeks to ensure that clearly defined, measurable results are delivered in the **least burdensome way**¹⁵. This is achieved through transparent, objective and consultative processes and regular review. **The "how" of regulation is at least as important as the "what"**.

A smarter, more collaborative framework for welfare regulation would be beneficial in building trust in the regulator and in harnessing the vast expertise of those inside and outside the sport who work with horses. The Horse Welfare Board would support the BHA in any effort to apply these principles to welfare regulation.

(c) Independence

As noted above, the independence of the BHA as regulator has been regularly questioned from outside the sport, most notably by those with a strong anti-racing agenda. While racing is a self-regulating sport, the **BHA's ability to regulate autonomously on welfare is clearly defined and enshrined within its governance**, with welfare regulation being a reserved area, not requiring the consultation and agreement of its members.

Those who argue that government should impose statutory regulation on racing, on the other hand, underestimate the value of self-regulation. Racing jurisdictions with statutory regulation are not immune to welfare issues and breaches. **A self-regulating model arguably ensures that the sport takes more responsibility for welfare, recognising that it alone is accountable if things go wrong.**

British racing must retain an appreciation that self-regulation is a privilege, not a right, be willing to engage constructively with Government, and recognise that, if standards were to slip or fall short of expectations, the whole sport, not just the regulator, would be held to account.

(d) Communication

One notable challenge in relation to the BHA's regulatory remit is around communication. The sport has tended to look to the BHA to provide comment on welfare and, in particular, to defend racing's reputation.

This is problematic for several reasons:

- It creates the sometimes-unhelpful sense that the regulator is standing between the public and the sport and holding the sport to account. On one level, that is the fundamental purpose of a regulator, but it can inadvertently create **a false, negative impression that the sport only applies high welfare standards because it is obliged to do so by the regulator**. One role of the regulator is to guard against bad practice but its purpose in doing so is principally to protect the majority of licensed participants, who are following and often exceeding the rules.

¹⁵ https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en

- The BHA’s role in setting and enforcing minimum standards is naturally the basis of much of its messaging, which rightly reflects its specific role and responsibility on welfare matters. **However, it is arguably the responsibility of the whole sport, not just the regulator**, to demonstrate where it is doing more than the minimum required by the BHA.
- **Meanwhile, the BHA is not resourced to promote the sport’s welfare standards** on the scale required to cut through with public audiences, as it does not have large, mass market promotional and PR budgets. While the Horse Welfare Board applauds the leading role played by the BHA and others in the sport in the development and execution of The Horse Comes First campaign, we note that the budget and resourcing for this campaign has not been equal to the scale of the task.
- Where promotional budgets do exist, e.g. in Great British Racing, the focus has previously been **heavily skewed towards the marketing of racing as a consumer product**. The Horse Welfare Board believes that the year-round promotion of positive welfare messaging and storytelling needs to be done alongside, and as an essential component of, consumer promotion.

With that in mind, **the Horse Welfare Board strongly supports the ambition of Great British Racing (GBR) to broaden its remit to accommodate this, with the caveat that it would need a stronger reputational communications skillset in order to do so.**

(e) Lifetime responsibility

While the BHA regulates the core sport of horseracing, it does not regulate the entire racing industry. It is important to emphasise this. The Horse Welfare Board will seek to work (and continue to work, where this engagement is already happening) with those areas falling outside this core regulatory area, to ensure that the welfare requirements of **all horses bred for racing** are reflected in this strategy.

Areas not currently fully covered by BHA regulation include:

- Breeding
- Pre-training
- Sales houses and the sales process
- Slaughterhouses
- Overseas exports
- Aftercare and rehoming, though noting that Retraining of Racehorses (RoR) is the BHA’s charity, with the BHA overseeing aspects of RoR’s governance, e.g. appointments to the RoR Board

The Horse Welfare Board has noted that the high-profile, regulated sport of **horseracing would inevitably absorb much of the reputational damage** arising from any welfare issues or concerns in the areas above. For example, any welfare issues in overseas jurisdictions would reflect negatively on British racing. While there is clearly a limit to what BHA regulation – or UK law - can do to protect a horse in some circumstances, e.g. once it has been exported overseas, risks might be minimised via changes to the sales or export process, or the introduction of stronger safeguards. All parts of the industry, not just the regulated sport, have a role to play in identifying and minimising risks.

The Horse Welfare Board’s remit is to look across the lifetime of the horse and to consider steps that should be taken to secure the outcomes identified in this strategy. This will be discussed in more detail in sections 6 and 9.

2.4 Evidence-based decision-making

We will discuss frequently the vital importance of a strong evidence base, which underpins all outcomes in our strategy. This evidence base takes many forms and applies in multiple situations.

For example, evidence is important in:

- Identifying welfare issues.
- Justifying regulatory interventions linked to welfare.
- Understanding, managing and mitigating risks.
- Understanding and addressing audience perceptions and misperceptions.
- Ensuring proportionate responses to problems and perceived problems.
- Developing and testing innovative ideas and solutions.
- Making sound decisions, rather than making decisions based on assumption or anecdote.
- Avoiding unintended negative consequences.

Racing possesses significant data and evidence but these are incomplete and widely dispersed. Evidence and data are therefore not widely available to everyone in racing who may find them necessary or useful. Information is also not always clearly communicated, either within the sport or outside. Our strategy sets out to address and improve this.

2.5 Welfare, communication and evidence – the holy trinity

In developing this strategy, we have heard a range of views on what the Horse Welfare Board should and should not consider, where its priorities should lie, and even whether such a Board is necessary at all.

Some in the industry consider that welfare standards are high and that the sport simply needs to communicate them more effectively. Others, both inside and outside racing, feel that more can and should be done to raise standards. A third school of thought believes that negative attitudes to welfare in racing are based entirely on a lack of public understanding, and that the sport needs to educate using evidence.

Our approach is based on the key insight that a **welfare strategy needs to include all three elements working seamlessly together:**

- **Substantive welfare standards**
- **Effective communication and education**
- **Robust data and evidence**

The reasons why all three are needed are:

- The substantive welfare standards can be the best in the world but, if they are not communicated effectively, with strong supporting evidence, misperceptions and myths can develop.
- Conversely, brilliant communications that are not rooted firmly in genuine substance and strong evidence are easily dismissed as PR spin. This is the basis of reputational risk, where an industry is consistently managing the gap between what its PR and marketing says it does, and what it *actually* does in practice.
- Evidence and data underpin both – driving stronger understanding, informing the development of substantive welfare improvements, and providing the proof points for communications and messaging.

This means that our welfare strategy is looking not only at substantive welfare, but also at the communication of welfare, including issues of perception, recognising that both are necessary to ensure the sport is leading public opinion, not following it.

In short, the strategy aims to ensure the maintenance of high welfare standards and the effective communication of those standards, with robust evidence underpinning both.

2.6 Leadership, project management and the need for clear focus

In developing our strategy, we have been struck by some excellent work that is done across the industry and the longstanding commitment to continuous improvement.

However, we have also found a lack of alignment and leadership in some areas, with work done piecemeal, or occasionally duplicated, in multiple parts of the sport. This is in part a result of the complex web of organisations, committees and governance structures that exist in racing, including in the welfare sphere.

The Horse Welfare Board's ambition is to simplify this and draw it all more tightly together, so the whole body of work becomes more than the sum of its parts and to ensure that our impact with wider audiences is maximised.

At a more functional level, we have identified a shortage of strong project management skills, linked to a wider lack of clarity over ownership and leadership of key initiatives. This can mean a lack of prioritisation, or sometimes competing priorities.

In establishing our priority projects, we will echo our call for clear ownership of key initiatives and for strong planning and project management to bring them to fruition.

2.7 Effective investment

In line with the point made above, in applying greater coherence and prioritisation to our welfare work, we can also **target investment more efficiently and effectively**. At present, projects are started but often not completed, as their importance is not universally agreed amongst the sport's stakeholders. There is under-investment in a number of key areas, and some projects could be more cost effective if resources were pooled.

With the sport facing financial challenges, it is essential that welfare funding is set at an appropriate level and targeted on the areas likely to deliver the biggest impact. The Horse Welfare Board wishes to work closely with both the Horserace Betting Levy Board (HBLB) and the Racing Foundation as it implements its strategy, to ensure this.

2.8 Culture, trust and collaboration

As already noted, welfare is a challenging and emotive area. Where there are underlying cultural or trust issues within the sport, these are more likely to boil over on the subject of welfare than almost anywhere else.

However, we have identified **significant common ground** across racing's participants, regulators and stakeholders. Care and concern for **the horse is the single thing that most obviously unites us** and which therefore presents an enormous positive opportunity.

Seizing that opportunity requires all parties to recognise positive intent in others. While we may differ in our views on how to get there, we share the same end goals. **Making progress requires a cultural change and a different tone of engagement**. We ask ALL parts of the industry to consider how they engage with others, both inside and outside the sport: Whether we are all sufficiently collaborative in finding solutions; whether we are genuinely taking time to listen and to understand others' perspectives and challenges, and whether the tone of our engagement is as constructive and productive as it could be.

This does not mean that the sport should not debate the issues, or challenge others' views. Doing so constructively, in the right place, is the hallmark of a mature industry. Doing so negatively and destructively, on the other hand, has the effect of shutting down conversations and stifling ideas. Doing so publicly via the media or social media exacerbates the issue. It plays badly to wider audiences, creating the impression of an industry that is reluctant to listen and resistant to change.

Collaboration with other racing jurisdictions and other equine sports is important. In today's fast-moving communications landscape, issues from overseas racing jurisdictions are rapidly broadcast here. People will assume that the same issues are replicated in all racing, or in all equine sports, all over the

world, so the **harmonisation of standards and an awareness of the international context** is vitally important.

Meanwhile, there is a small minority, in the form of the animal rights lobby, that wants to see an end to the use of animals in sport. It is important that all equine sports work together to demonstrate world-leading welfare standards, making a convincing case that horses derive more benefit than harm from their participation in sport.

A lack of unity around welfare is therefore highlighted here as a significant reputational risk for the sport, which racing's leaders, regulators and participants must work together positively to address.

2.9 More effective communication

The Horse Welfare Board has spent considerable time discussing communication of welfare. Whilst acknowledging a lack of investment in this area (see section 2.3 above), we would like to see a notable shift in tone and approach to communication. The following points underpin the approach to communications in this strategy, which is discussed in more detail in section 14:

- (a) A more positive, confident tone:** We would like to see a shift in messaging. There is currently an imbalance, in which the sport too often justifies what it does to prevent bad practice, rather than **highlighting the good practice** that more frequently exists.

This is what we mean when we talk about a defensive approach to messaging. It fosters insularity within the sport, which in our view inhibits learning and innovation, and which undermines confidence both inside and outside the sport. This does not mean that the sport should not set out the steps it is taking to address any risks or negatives, but that it should always ensure this is balanced with the positives.

- (b) More emphasis on the horse, and the bond between racehorses and the humans that look after them,** in racing's communications: It is our contention that the horse has become somewhat marginalised in the sport's communications and marketing. The best way to showcase welfare in the sport is to tell much more effectively the thousands of stories of the bond between racehorses and those who care for them.

This implicit, positive welfare story needs to be told all-year round, by the whole of the sport, correcting the current imbalance in favour of consumer promotion. Our hypothesis is that putting racing's horses and humans more to the fore will promote - and drive more interest in - the sport.

- (c) Evidence-based communication:** These stories need to be underpinned by data and evidence, demonstrating progress. Critically, racing's leaders need to ensure that its participants are supplied with this information, to support them in promoting the sport as they go about their daily business.
- (d) Transparency:** The Horse Welfare Board supports the ambition for greater openness and transparency in the sport's communication with wider audiences. However, this must be truly transparent, ensuring that all the facts are known, and placed in their full context, avoiding misleading statements and innuendo, before communicating.
- (e) Involving the sport's participants:** Racing's story needs to be told by the sport, not told on behalf of the sport. Racing must identify and develop its best communicators and storytellers, ensuring they are equipped and supported to represent racing in the media, on social media, at public events, and in parliament.

2.10 The ethical case for horseracing

An important consideration for the Horse Welfare Board in the development of racing's future communications and messaging, is the need to make the ethical case for horseracing and for the use of

horses in sport. In a context where the use of animals in sport is increasingly questioned, it is not enough simply to emphasise standards of care, facilities or to quote statistics.

The Horse Welfare Board has noted calls by Dr Madeleine Campbell of the Royal Veterinary College for the sport to engage more positively in ethical debates.¹⁶ Dr Campbell has suggested that racing should consider utilitarian arguments, in which the benefits that horses derive from racing are clearly shown to outweigh harm or risk, while noting too that the humans working with racehorses also derive significant benefits, including in terms of their health and mental well-being.

The Horse Welfare Board supports the need for **a greater emphasis on the ethics of racing** and would like the sport not only to make use of these arguments and to engage more fully in discussions around ethics, but also to develop a Code of Ethics, which underlines the sport's commitment to its horses. This could potentially be developed with other equine sports as a "Sport Horse Charter".



¹⁶ <https://www.racingpost.com/news/racing-told-to-focus-on-ethical-argument-in-engaging-with-sport-s-critics/365126>



3. About the Horse Welfare Board

3. About the Horse Welfare Board

3.1 Why have a Horse Welfare Board?

The Horse Welfare Board was set up in April 2019, on the basis that regulation alone does not lead to greater success in improving the welfare of animals. The sport's governing and regulatory body, the British Horseracing Authority, currently regulates horses' welfare whilst racing and in training and sets minimum standards, but the Horse Welfare Board was set up in recognition that racecourses and participants routinely exceed these standards.

The Horse Welfare Board also considers the Thoroughbred's life before and after racing, i.e. during the breeding, pre-training and post-racing phases, which are largely outside the BHA's regulatory remit.

Finally, the Horse Welfare Board was set up to pull together a broad programme of work relating to welfare. This means its role is to look beyond substantive 'welfare' and to consider the communication of the sport's record on welfare to a range of internal and external audiences, in a changing social and political context, with evolving expectations.

3.2 Objectives and remit of the Horse Welfare Board

The objectives and scope of the Board were set through a process involving racing's Members' Committee, the BHA's Director of Equine Health and Welfare, and industry bodies. They are:

- ✓ Equine Safety
- ✓ Veterinary projects and initiatives
- ✓ Pre-racing provisions; e.g. activity linked to the breeding sector
- ✓ Post-racing provisions, e.g. activities and organisations linked to retraining and rehoming of racehorses
- ✓ The sales, auction and import/export process
- ✓ Owner awareness and education initiatives
- ✓ Industry public awareness and engagement activities linked to equine welfare
- ✓ Research on industry, public and political attitudes to equine welfare in racing
- ✓ Emerging risks & opportunities, e.g. climate change, environment, disease, genetics, legal

3.3 Governance

The Board reports to the sport's tripartite Members' Committee, where the BHA, racecourses and participants share responsibility for the industry's strategy.

This strategy therefore takes the form of a recommendation to the Members' Committee, who are asked to approve it on behalf of the sport. While the Horse Welfare Board will oversee the implementation of the strategy and support the sport in seeking funding and other resources, it is the responsibility of the whole industry to ensure that the strategy is adopted and taken forward.

An implementation plan will be developed following the approval of this strategy.

3.4 Membership and structure

The Horse Welfare Board includes representatives from the sport's tripartite structure of the BHA, racecourses and horsemen. Its independent chair, Barry Johnson, is a former President of the Royal College of Veterinary Surgeons and former Chair of World Horse Welfare. The former Sports Minister, Tracey Crouch MP, is our other independent member. We have also received expert advice from David Muir MBE, who has worked with us as our independent equine welfare consultant.

Across our membership we have experience and expertise in equine veterinary science and medicine, racehorse training and ownership, racecourse management, regulation, communications and campaigning, and politics and public affairs.

Membership of the Horse Welfare Board, at date of this strategy:

- **Independent members:** Barry Johnson (Chair), Tracey Crouch MP (Former Minister for Sport)
- **BHA members:** Alison Enticknap (Programme Director, BHA Head of Stakeholder and Internal Engagement), David Sykes (BHA Director of Equine Health and Welfare)
- **Horsemen:** James Given (racehorse trainer and veterinarian), Charlie Liverton (CEO, Racehorse Owners Association)
- **Racecourses:** Caroline Davies (Racecourse Services Director, The Racecourse Association Ltd), Simon Knapp (Racecourse Veterinary Surgeon)

It was considered important, as we developed this strategy, to ensure that the membership of the Horse Welfare Board contained a mix of specialist expertise, independent perspectives and 'executives' who could drive action and unlock project resources. As the strategy is implemented, the Board has a long-term aspiration to make the Horse Welfare Board less reliant on personnel from racing's existing leadership structures, potentially bringing in more grassroots and independent representation. Expertise in racing, horses and the dynamics of the industry will always be necessary, however.



4. Our vision

4. Our vision

The Horse Welfare Board's vision, which underpins this strategy is:

Respect for the horse is at the heart of everything we do: Every horse bred for racing will enjoy a life well lived

We will achieve this through:

(a) Effective governance

Ensuring that the decision-making structures in British racing are set up to provide clear, objective, horse-centric decision-making, with clear lines of accountability, including in relation to those parts of a horse's life that fall outside of the sport's core governance and regulation.

(b) Evidence-based decision-making

Gathering, analysing and acting on data and information, to achieve the best outcomes and to avoid unintended consequences, ensuring that evidence has precedence over anecdote.

(c) Collaboration

Harnessing the collective expertise that exists in the sport, and working in partnership with those outside the sport who share a commitment to the practical care and well-being of horses. Involving practitioners and participants in the design of effective, practical solutions to issues and challenges that emerge from the evidence.

(d) Openness

A willingness to listen to the views of others and to demonstrate and explain what we do, combined with a recognition of the need to engage positively and constructively with the public and politicians, making the ethical case for racing and for the continued use of horses in sport, to maintain and grow racing's social licence.

(e) Pride

Taking and demonstrating a positive pride in racing's dedication to the welfare of horses, the long history of continuous improvement, and the leading welfare role played by British racing both at home and internationally. Using that pride to speak confidently and passionately about racing's commitment to welfare and our respect for the horse.



5. Our approach

5. Our approach

5.1 Outcomes-based approach

In developing this strategy, we have used an outcomes-based approach to identify our priorities. These outcomes need to be as clear as possible, so they can be shared across the sport. We encourage the sport to unite in support of these common goals. Support for resources and funding in racing should be based on how effectively a welfare initiative or project delivers against these outcomes.

5.2 Projects and recommendations

We have made 20 key recommendations, detailed in section 15 of this strategy. For reasons of clarity, we have not listed recommendations under the various outcomes, simply because so many of them cross multiple outcomes. We have also listed a number of key projects, which will need to be developed and implemented in order to achieve the outcomes.

5.3 Opinion polling

As part of the strategy development, the Horse Welfare Board did some qualitative and quantitative opinion surveys, to help us to understand the views of both the public and of racing's participants and stakeholders. These were not formal consultations or ballots but were instead designed to help us identify common themes and areas of disagreement.

Consideration of survey responses was done carefully, recognising variances in knowledge or expertise across, and sometimes within, different audience segments. The value of a survey is sometimes in identifying where myths and misperceptions exist, which may need to be addressed in any subsequent strategy, or where there are differences of opinion between different groups and audiences, which may need to be reconciled.

We will reference these insights throughout the strategy, with attitudes to the whip being discussed in more detail in section 11.1, but the overall findings are summarised here.

The public survey was conducted on behalf of the BHA and Great British Racing on a wider range of subjects but included questions relating to welfare and the whip¹⁷. It was a "nationally-representative" survey, so is an accurate representation of public opinion.

12% of respondents stated an interest in horseracing (compared with e.g. 47% who were interested in football and 6% in other equestrian sports). The survey suggested that many respondents (47%) were relatively agnostic or neutral towards racing, with comparatively few holding strongly positive (18%) sentiments. 32% had negative sentiments.

The most strongly held negative general perceptions related to concerns over horse safety and racing's link with gambling. Negative welfare perceptions were typically linked to equine injuries and fatalities, and the use of the whip, with welfare-related concerns typically around 10% higher amongst younger consumers and/or females.

However, these concerns must be viewed proportionately against the overriding neutrality and indifference, which suggests that racing has an opportunity to convince and convert public audiences, through more effective engagement and communication around welfare.

As you might expect, racing industry stakeholders and participants were much more positive about welfare in the sport, in a survey conducted in November 2019 for the Horse Welfare Board¹⁸. 61% of the 718

¹⁷ Consumer research of 1486 adults conducted by Hall and Partners on behalf of the BHA and GBR, November 2019

¹⁸ Survey of 718 racing industry participants and stakeholders, conducted by Hall & Partners on behalf of the Horse Welfare Board, November 2019

industry respondents were positive about welfare standards, with trainers (74% positivity) and jockeys (71% positivity) particularly so. Industry attitudes to the use of the whip will be discussed in section 11.1 of this strategy and are therefore not discussed here.

The industry survey respondents believed that aftercare, i.e. the welfare of horses at/following the end of their racing careers, could be improved, with only 26% feeling that horses' welfare after racing was of a high standard. By contrast, 83% felt that standards on the racecourse were high, and 75% noted high standards for horses in training.

The industry also recognises that there are challenges for the sport in relation to public perception, acknowledging the need to tackle this, with 34% believing that racing is currently accepted. More importantly, when asked to consider public perceptions in five years' time, should welfare standards and communication remain exactly as they are now, only 18% felt that racing would be accepted.

All of which suggests, perhaps unsurprisingly, that there is a gap between public and industry perceptions of welfare in racing, but:

- The industry recognises that racing suffers from negative public perceptions and understands the need to tackle this
- There is still an opportunity to influence public attitudes in a positive direction and grow support for the sport.

5.4 Key elements of the welfare strategy

The Horse Welfare Board considers that the three interlocking areas of strong welfare, effective communications and robust data are all essential in ensuring that British racing has the trust and confidence of the public and politicians, and in providing racing with greater self-confidence in its own performance.

As noted in section 2.5 above and as illustrated in Figure 1 below, an effective strategy requires all three areas, working together in combination.

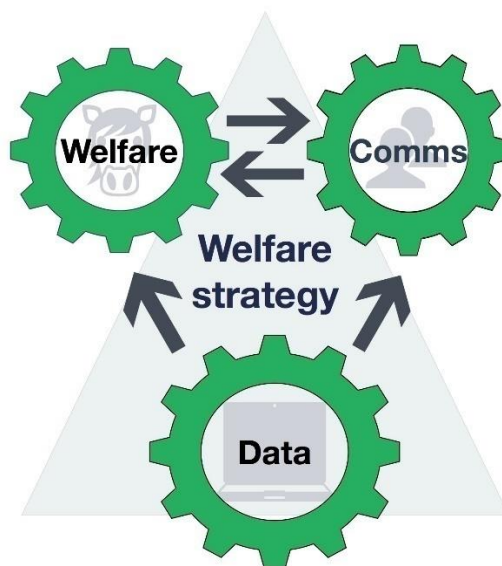


Figure 1: Key elements of a welfare strategy



6. Whole lifetime approach

6. Whole lifetime approach

The strategy provides a framework for action to improve standards of care for thoroughbreds throughout the full lifecycle of horses bred for racing, not just during their career as a racehorse. The framework includes consideration of welfare standards covering, as far as reasonably possible, the period before the horses reach the racecourse and once their careers have concluded.

Where the industry has limited control, e.g. in relation to horses exported overseas, or to horses that change ownership multiple times on retiring from racing, we will make best efforts to ensure and to demonstrate that any welfare issues arising in these circumstances are rare exceptions and that we have taken all reasonable steps to prevent them.

The concept of lifetime responsibility is illustrated in Figure 2 overleaf, which discusses the duties of care owed to Thoroughbreds at different stages of their lives. Lifetime responsibility, in terms of its practical implications for this strategy, is discussed in more detail in section 9 below.



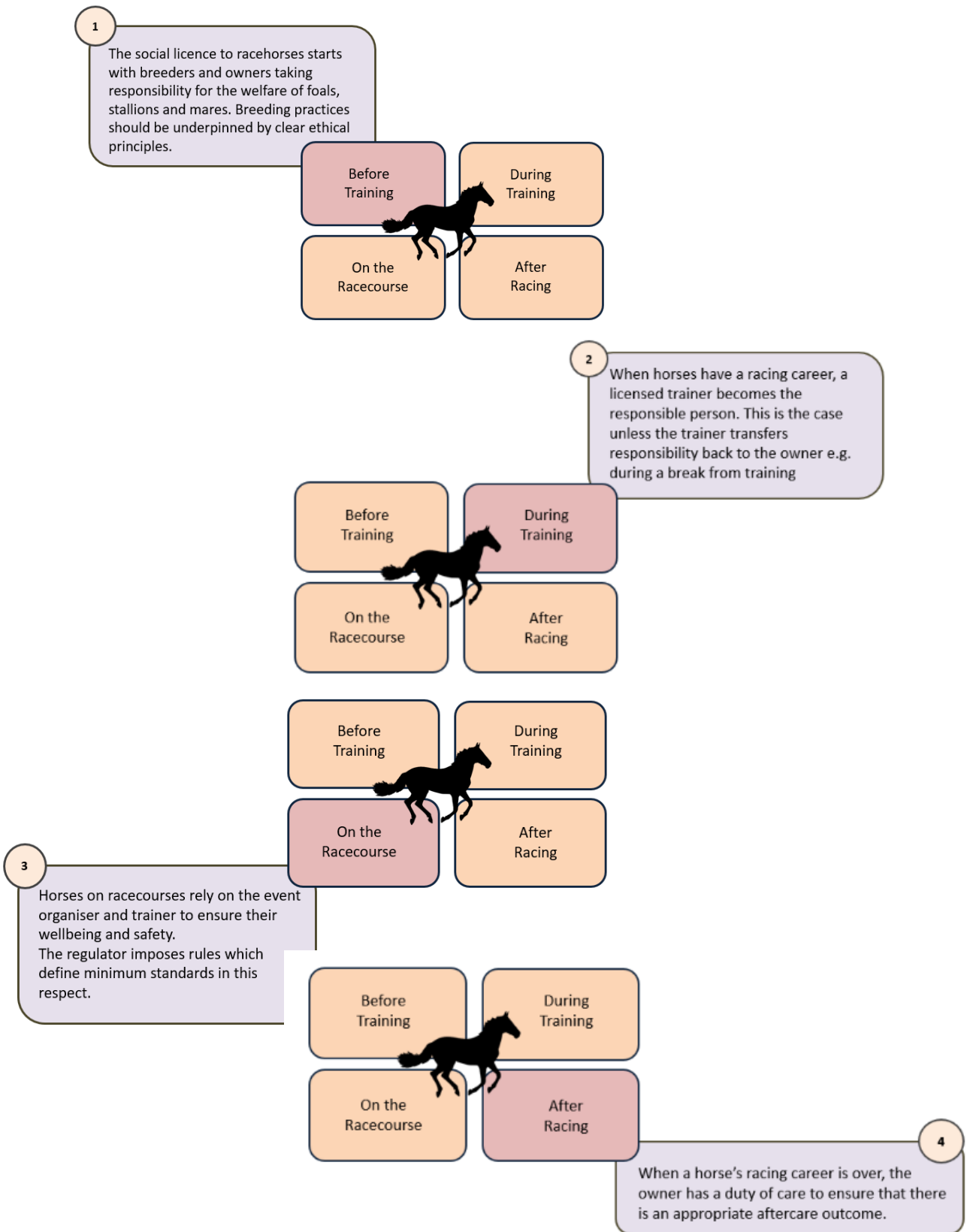


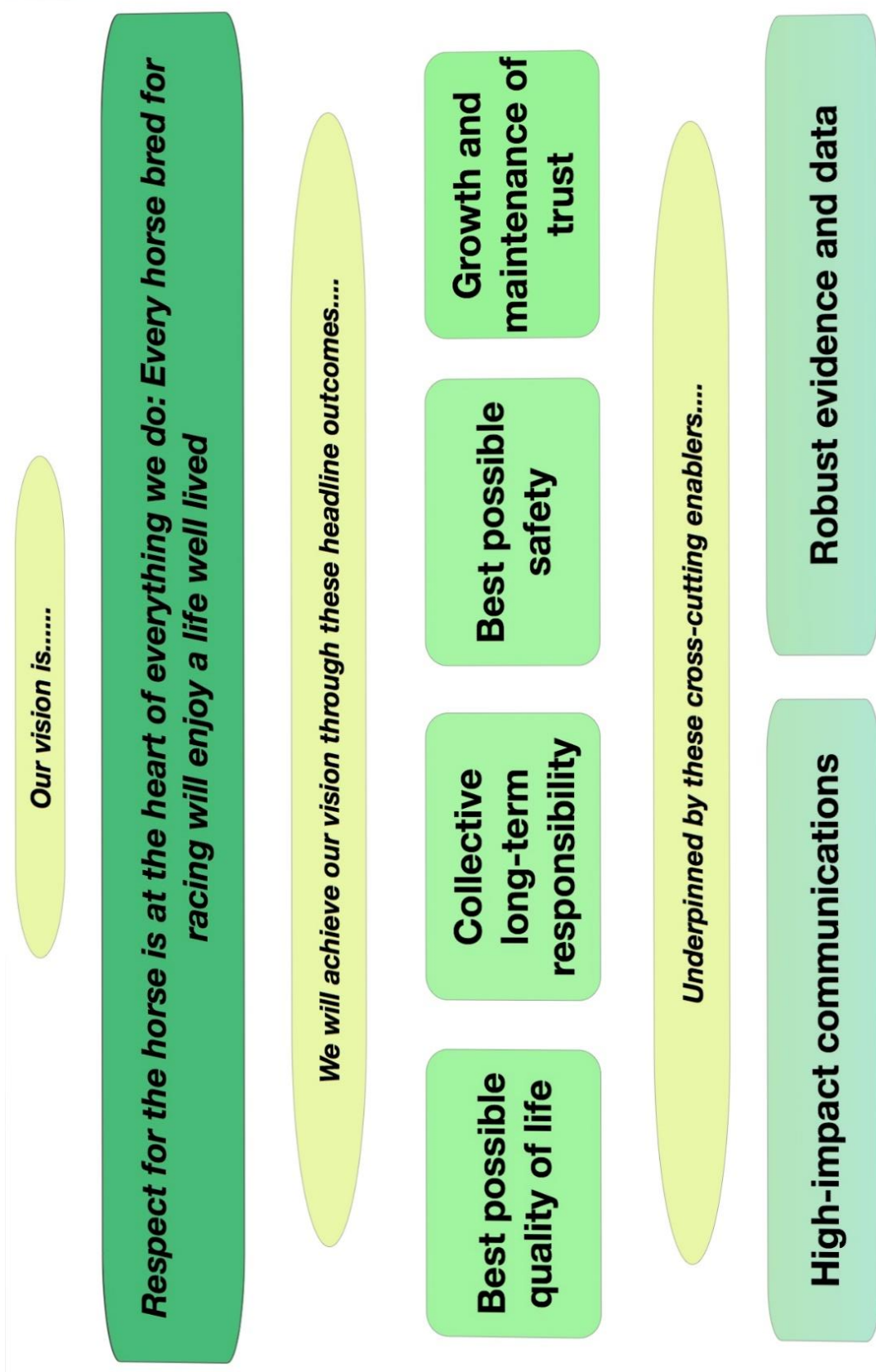
Figure 2: The concept of lifetime responsibility (source: BHA)



7. Strategy framework

7. Strategy framework

This strategy is based around four key outcomes that we wish to achieve, along with two cross-cutting enablers, which are essential to the success of all four outcomes. These are discussed in detail in sections 8 to 14 below.



The outcomes and enablers are discussed in more detail in the sections that follow, along with the priority projects associated with them, which the Horse Welfare Board has identified.

Please note that the **projects listed are not the sum of the industry's current work** in these areas, but are the areas of focus that will help to drive positive change and improvement. Some projects appear more than once, as they contribute to the achievement of multiple outcomes.

Please also note that **few of these projects have yet been fully scoped or costed**. In the few months during which this strategy has been developed, the Horse Welfare Board has focused on aligning existing work and determining its priorities.

Following the approval of this strategy, the Horse Welfare Board will work with industry stakeholders to progress these projects in more detail, including the development of more detailed success measures and performance indicators, and to identify the most appropriate ownership and leadership from within the industry and, where appropriate, outside it.

7.1 Evolving strategy

We emphasise that we see this strategy as a **living document and a work in progress**, which will **continue to evolve** throughout its lifetime (2020-2024) and beyond. The Horse Welfare Board will review and report the progress of the strategy both on a regular, annual basis, but also as new information requires.

This is mainly because we aspire to grow our knowledge and understanding. In some areas, this is currently incomplete, and we feel it would be unwise and potentially counterproductive to develop projects and solutions in areas where more evidence is required. We must ensure we are focusing on the right things, and developing proportionate responses, at the scale required.

We are also conscious of the **inevitable limitations in the Board's own expertise**. We do not have, and should not seek to have, all the answers ourselves. Greater collaboration both inside and outside the sport, with the utilisation of practical knowledge and external perspectives, is an important cornerstone of this strategy.

7.2 Piloting approach

In implementing this strategy, we encourage the sport to adopt a more agile approach, in which ideas and solutions are tested and piloted, rather than seeking single right answers, which are debated for years and which rarely exist. Our mantra should be **progress, not perfection**, as this is a basis for innovation, collaboration and action, and fosters a more positive, can-do culture.





8. Outcome 1:

Best possible QUALITY OF LIFE

8. Outcome 1: Best possible QUALITY OF LIFE

This outcome, which is the one that fits most closely the standard definitions of “welfare”, aims to ensure that all horses bred for racing enjoy the best possible quality of life.

By “best possible”, we do not assume that all horses will have the same experience, but instead recognise that there will be significant variations in care regimes between, for example, different-sized training yards or racecourses, or between horses, where there is inevitably a range of individual requirements. For example, horses will sometimes, like any of us, be temporarily in poor health, but this is not necessarily an indicator of poor welfare or care.

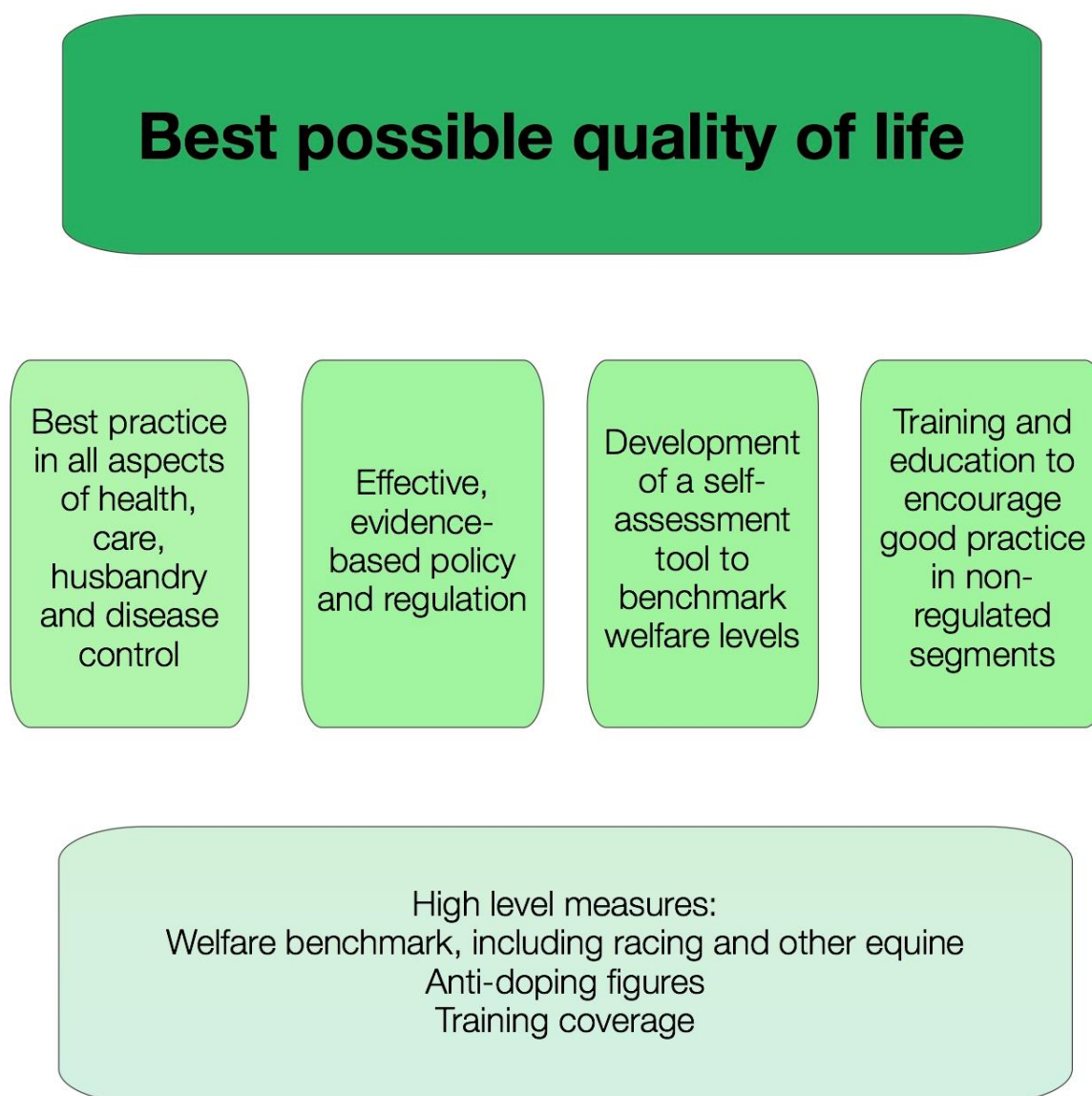


Figure 3: Outcome 1 strategy framework

8.1 Encouragement of best practice

This outcome requires the encouragement of best practice in all aspects of care, including healthcare, disease prevention and treatment, medication, nutrition, housing, quality of staffing, training methods, etc.

We have developed this outcome from strong foundations. We need to be able to demonstrate high standards, whilst recognising also that improvement is always possible and desirable, particularly as new information becomes available.

Our focus is therefore on ensuring standards are maintained, making continuous improvements where necessary, whilst also ensuring that the sport provides strong evidence to answer questions and counter criticism. We also wish to ensure that unregulated parts of the industry adhere to similar standards, both for ethical reasons and to avoid any potential reputational risk.

8.2 Effective regulation

We strongly support the use of regulation and animal welfare legislation to prevent bad practice or abuse, as these are the baselines of effective welfare. Regulation should be regularly reviewed for effectiveness and policy changes must be evidence-based and proportionate, demonstrably maintaining and improving standards across the industry.

However, we also believe that a stronger focus on **celebrating and sharing good practice** is desirable, encouraging everyone involved in racing to emphasise the many positives, to highlight success and innovation and to be more confident when discussing welfare both within and outside the sport.

8.3 Training and education

While regulation ensures a minimum standard of care for horses in training and on the racecourse, this strategy also seeks to ensure, as far as reasonably possible, that similar standards are applied during the unregulated stages of a Thoroughbred's life, e.g. the breeding process, pre-training and post-racing/retirement. Where this cannot be controlled directly, the industry must ensure it has taken reasonable steps to identify and educate those responsible for a horse's care, whether racehorse owners, breeders, pre-trainers, or rehomers.

Those in licensed roles must also commit to continuous learning through training and **Continuing Professional Development (CPD)**, to ensure they remain aware of current thinking and best practice. Training and CPD are listed under more than one outcome in this strategy. In relation to this specific outcome, many programmes of training and CPD are already in place, but we specifically recommend formalising CPD for trainers, e.g. in the form of mandatory seminars.

8.4 Welfare benchmarking

The Horse Welfare Board wishes to support those with responsibility for horses to assess and benchmark welfare levels, to build capability and consistency. A project is already underway, led by the BHA, but the Horse Welfare Board considers that this needs to be developed and refocused as a cross-industry project, ensuring that it reflects qualitative, as well as quantitative, assessment criteria. Ideally, we will seek to develop this benchmarking system alongside international jurisdictions, other equine sports, sectors with working horses (e.g. the police and the armed forces), rehoming centres and livery yards, with racing leading the way in developing a common baseline and standard for all horses.

This piece of work (the **Thoroughbred Welfare Study**) will look across a range of different welfare and well-being criteria, which will need to be determined and finalised, deploying the practical insight of experts from within racing, and those with expertise in the welfare of equines more generally.

8.5 Disease control and biosecurity

The Horse Welfare Board recognises and emphasises that effective disease prevention, control and treatment, and robust biosecurity are essential in ensuring the welfare and quality of life of horses bred for racing. This is of the utmost importance and an area in which the industry performs well at macro level.

This was demonstrated during the Equine Influenza virus incursion into the racing population, when racing was shown to have effective vaccination and biosecurity measures in place, with the ability to mobilise a rapid and united response. The Horse Welfare Board has confidence that policies relating to disease control are informed by the latest information and opinion, noting particularly the contribution of the BHA Veterinary Committee. The Animal Health Trust, with its Levy-supported equine disease surveillance programmes and strong record of international collaboration, underlines the strength of investment in veterinary research made possible by the Levy.

Through its investment and expertise in this area, racing can claim to have significantly advanced the veterinary care and quality of life of all equines, with knowledge and best practice originating from racing often setting standards elsewhere.

We underline the importance of continual disease control, research and surveillance and of the need to make changes and improvements as appropriate, e.g. in acting on credible new research and data, or in ensuring that protocols addressing new and evolving vector-borne diseases are collated, readily implementable and effective.

We also emphasise the need for the industry to retain its focus on, and investment in, this area. Concerns have been raised with the Horse Welfare Board on a number of issues, ranging from the local (e.g. standards of hygiene and cleaning in specific stabling facilities), through to the high-level (e.g. concerns around funding of academic research and of vital partners/suppliers). The Horse Welfare Board will continue to liaise with the industry on such matters and will refine its priorities in this area during the lifetime of this strategy, should the need arise.

8.6 Key projects¹⁹: Best possible quality of life

1. Thoroughbred Welfare Study
2. Training and CPD
3. Education of/support for rehomers



¹⁹ Projects listed are not the sum total of the industry's work in this area, but areas of focus for the purposes of this strategy. The full list of all projects outlined in the strategy, with the outcomes and enablers supported, can be found in section 15.2 of this strategy.



9. Outcome 2:

Collective LIFETIME RESPONSIBILITY

9. Outcome 2: Collective LIFETIME RESPONSIBILITY

This outcome requires the industry to make a step change, particularly in terms of alignment across the industry. While responsibility for horses is high in many areas, when looking across a horse's lifetime there are significant gaps in information and accountability. These gaps are a source of reputational risk, either because we are unable to provide clear evidence of high standards, or because there may be substantive welfare concerns of which we are currently unaware.

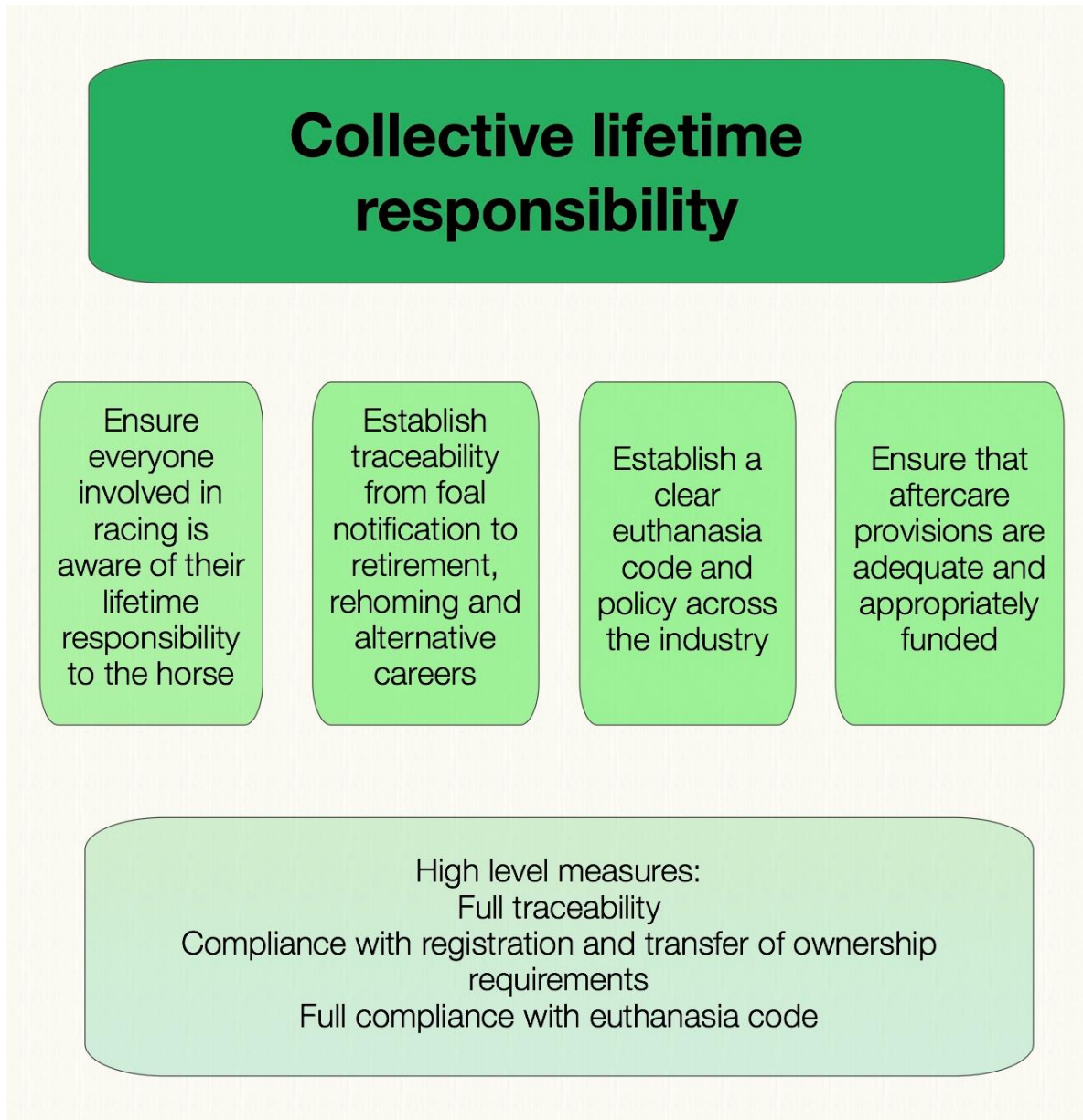


Figure 4: Outcome 2 strategy framework

The issue of responsibility is a live topic across the equine sector in relation to welfare. World Horse Welfare made it the theme of their 2019 conference, where their Chief Executive, Roly Owers, defined responsibility as follows: “It is a combination of both a personal and collective duty – and is most certainly not always just ‘someone else’s responsibility’”.²⁰

He went on to say:

“Horse sport is certainly very much in the spotlight when it comes to responsibility....There is a growing acceptance that this responsibility is for the lifetime of the horse, which is an integral element of horse sport earning its social licence to operate.”

The Horse Welfare Board agrees strongly with these comments and has tried to reflect them in our approach to this outcome.

9.1 Clarification of responsibility

In discussing lifetime responsibility, the Horse Welfare Board concluded that, amongst some key segments (e.g. owners) there is frequently a **lack of awareness of the extent of individual responsibilities** towards the horse. This sometimes includes a lack of moral responsibility and/or a lack of awareness of more practical responsibilities.

In general, our somewhat subjective assessment was that responsibility amongst trainers is typically high, as they recognise levels of risk and their role is clearly defined within their licence and under the Rules of Racing. There is, perhaps because of this, a tendency amongst some owners to place the burden of responsibility wholly on the trainer, expecting the trainer to retain responsibility for what happens to a horse when it leaves racing.

Most trainers accept this post-racing responsibility, partly because they have the connections to do so, they are keen to make life easier for the owners to encourage them to have another horse, and most often because they have a concern for the horses in their care. However, it is our contention that **owners should not expect this from trainers**.

If you buy a horse, or a share in a horse, you are its owner, and legally and morally responsible for its welfare once the trainer’s role is completed. This ownership responsibility is only patchily understood, and the Horse Welfare Board would like to see more **training and education of owners**, ideally before a horse is purchased.

To improve traceability at the point of leaving racing, there needs to be a change in the administration and recording of Transfer of Ownership, Non-Racing Agreement and passport administrative functions. This will require collaboration with Weatherbys, who are encouraged to assist racing in its efforts to ensure the welfare of the horse.

Similarly, while many breeders are highly responsible, **lifetime responsibility starts with the decision to breed a Thoroughbred in the first place**, where there is a need to ensure sustainable production of high quality bloodstock, where supply does not exceed demand, and to eliminate, to use that terrible phrase (which we are keen to eradicate from racing’s lexicon), “wastage”.

We also feel that the **responsibilities of sales houses, slaughterhouses, pre-training yards and rehoming centres** would benefit from clarification and communication. These are not currently subject to BHA regulation (e.g. via registration or licensing) but all have significant welfare responsibilities.

9.2 Traceability

Traceability is a key priority in this strategy. There are significant gaps in the industry’s knowledge of the **whereabouts of Thoroughbreds bred for racing**. Until those gaps are filled, we have only a partial

²⁰ Speech by Roly Owers, CEO World Horse Welfare, to World Horse Welfare conference, November 2019

picture of welfare standards. While we might assume that there are no significant issues, those opposed to the sport will assume that the opposite is true. With fullest possible traceability, we would have the evidence to rebut negative accusations and the information needed to address and manage any welfare problems that may emerge.

We freely acknowledge that there are arguments against traceability. The Horse Welfare Board has occasionally heard the view that, “It is better not to know” and that establishing improved traceability could open a Pandora’s Box. **We reject this view, as it is not one that should be held by any responsible industry**, let alone a sensible approach to the management and mitigation of reputational risk.

We must be prepared to take responsibility and to be proactive in tackling any issues that may emerge.

Another view, with which we partially agree, is that racing cannot be responsible for horses that fall into difficulties several steps down the line after leaving the sport, or which are sold to – or imported from – overseas. While there is some truth in this at a practical level, it is nonetheless the high-profile sport of horseracing that would absorb the reputational risk, with any media story likely to explain that a horse was, “trained by *this* trainer, and raced at *that* racecourse.”

With that in mind, racing needs to ensure:

(a) That these cases are the exceptions, and be able to demonstrate this, with evidence of positive outcomes in most cases; and

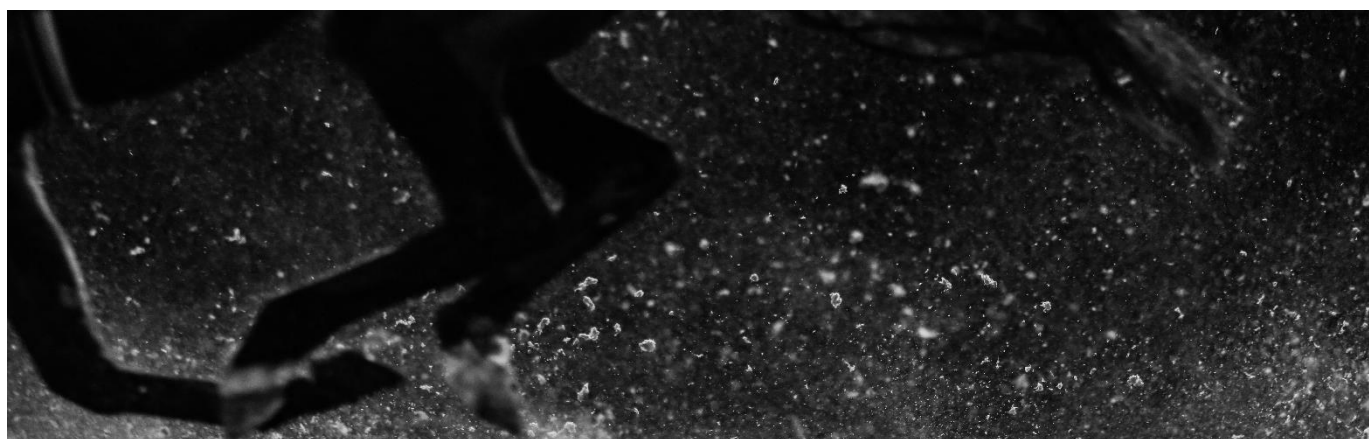
(b) That we have made positive and reasonable efforts to ensure that we have the right preventative and remedial measures in place, ranging from education of rehoming and potential rehoming, or liaison with sales houses, through to the maintenance of an effective safety net for vulnerable horses.

The BHA has done considerable groundwork in identifying critical traceability points at the various stages of a Thoroughbred’s life, as illustrated in Figure 5 below. The colour coding explains who controls these data points:

- **Blue:** BHA-owned and accessible data.
- **Green:** Weatherbys-controlled data.
- **Red:** Currently controlled by a third party (e.g. BE data being British Eventing-owned), or does not yet exist in a digital format (e.g. vaccination records which are currently in paper passports).

Furthermore, parts of this data are incomplete, sometimes due to low compliance rates, so the traceability task is not only to cover all the data points, but also to ensure that each data point is fully populated.

With that in mind, as well as the data component of this project, there is a strong communications element, encouraging (and, where necessary, compelling) those responsible for horses to fulfil their traceability responsibilities and obligations.



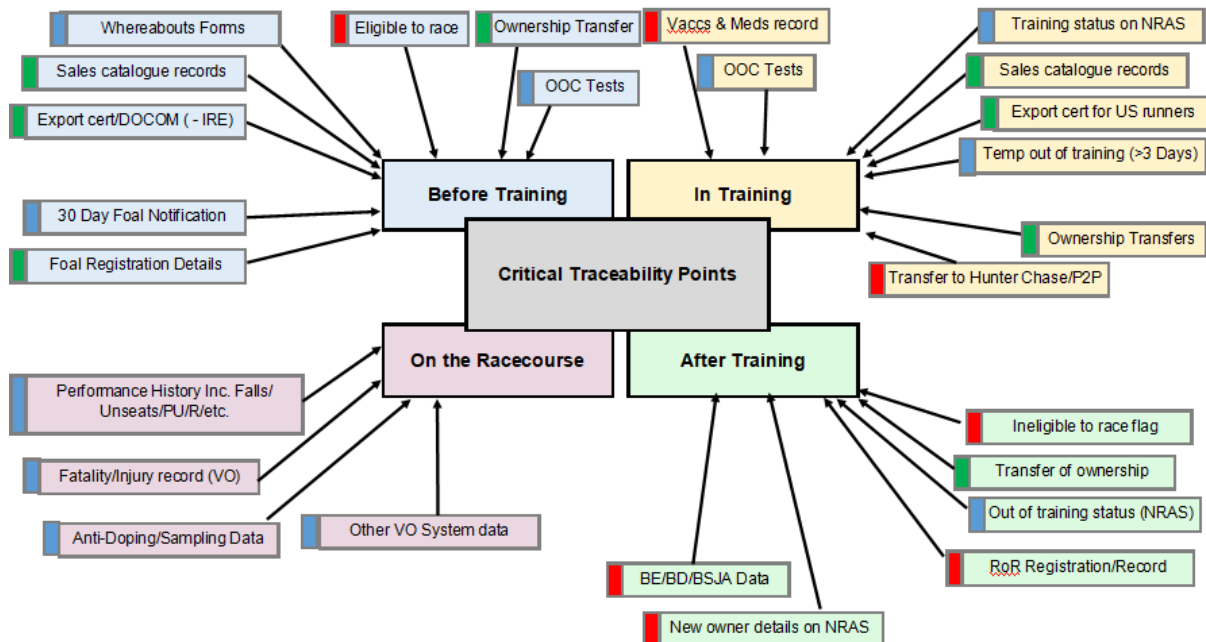


Figure 5: Critical traceability data points²¹

The Horse Welfare Board has noted with concern that there a number of **barriers to improved traceability**. These include:

- **Costs**, e.g. the costs of registering transfers of ownership, as some elements of traceability involve data which is under commercial control
- **Accessibility** and the ease with which requirements can be understood and information submitted, where there are currently alignment (multiple forms and processes) and digitisation (manual processes and forms) issues
- **Lack of awareness** of, and/or accountability for, traceability requirements, including the legal requirements instituted by local government and recorded in the Defra Equine Database
- **Lack of enforcement** of mandatory requirements
- **Multiple ownership of data** points, as noted above



²¹ Source: BHA, 2019

The elements that need to be in place to ensure traceability are shown in Figure 6 below:

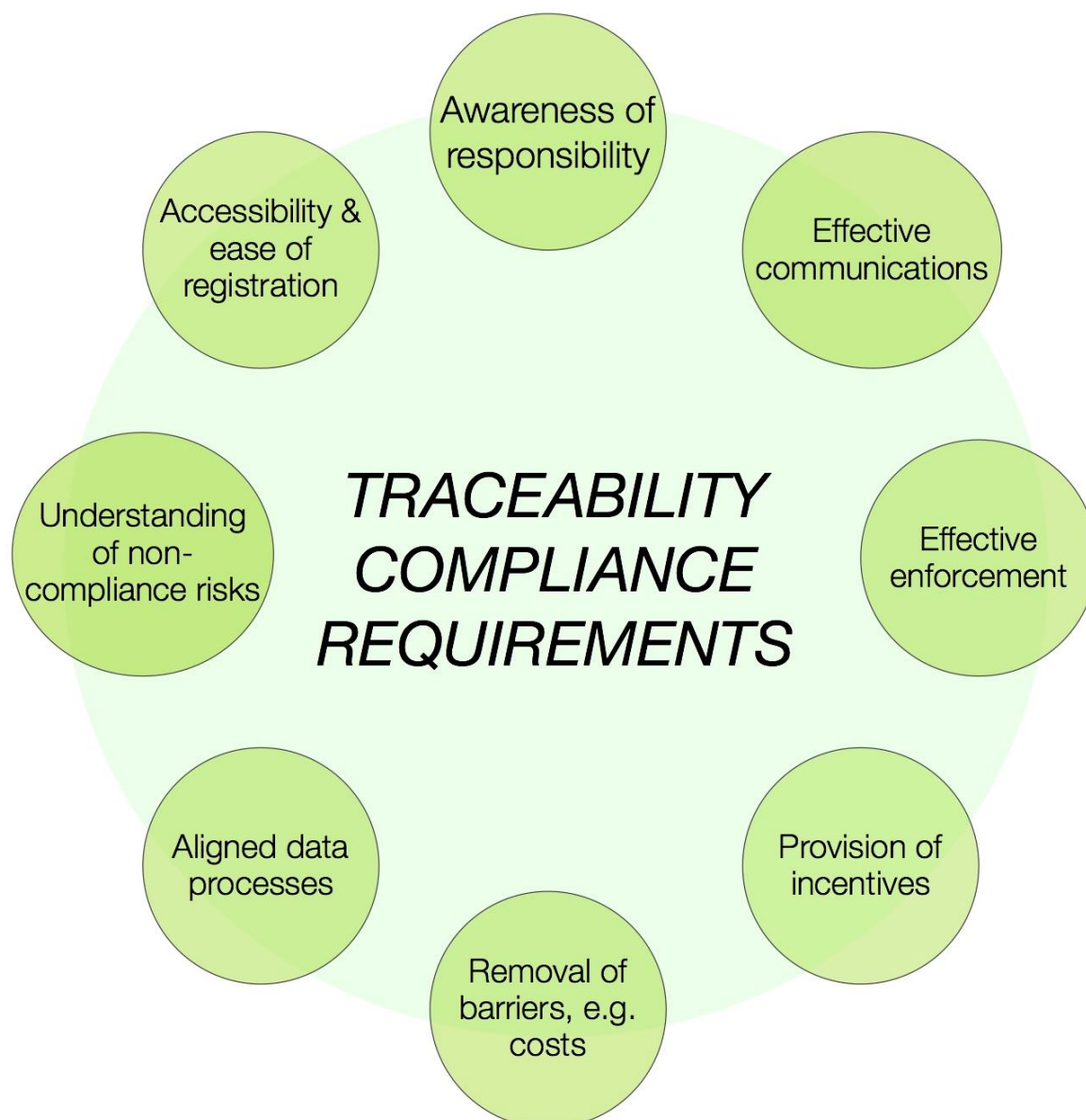


Figure 6: Traceability compliance requirements

In developing this work, which will need to be an industry-wide effort, racing is encouraged to seek the **removal of the various barriers to traceability and to consider what incentives could be provided**. This will require the involvement of Weatherbys and the sales houses, and discussions with the Department for the Environment, Food and Rural Affairs (Defra), who have ultimate ownership of elements of the traceability process via the Central Equine Database.

This is not an overnight win, nor are we addressing this from a standing start, as the industry has already done considerable work in this area. Obtaining high levels of traceability will take several years and a strong focus to accomplish, but it must be done, whereas previously it may have been put into the “too difficult” box.

In terms of ambition, as a starting point, racing needs to ensure it has:

- 100% traceability of a **horse’s first step away from racing** and a clear understanding of where these horses go.
- A clear understanding of the **gap between the number of 30-day foal registrations** and the number of horses that enter training.

9.3 Addressing welfare issues

While the fullest possible traceability will take time to implement, we can tackle it in stages. Where data does exist, e.g. the new but growing 30-day foal notification data, this will need to be collated, analysed and interpreted.

Until this is done, there is a risk that we make assumptions about welfare issues and design incorrect or inadequate solutions, potentially targeting resources at issues that subsequently turn out to be low priorities, while missing those that prove to be more urgent.

Technology will also evolve in this time and the Traceability project must be alert to opportunities, and potentially to risks, as new technology comes on-stream.

Traceability is therefore the essential first step in the further evolution of this strategy and must be a priority in the next 2-3 years. Once data is in place and assessed, we will need to work across the industry to identify any issues and their solutions. Consequently, we caution that this entire strategy may need to be reviewed in the light of new information and may look very different by 2025. It should certainly be more detailed.

9.4 Understanding responsibilities

Prevention is always better than cure and it is vital that we help those who are, or seek to be, involved in the breeding, pre-training, selling, racing and rehoming of Thoroughbreds to understand their duty of care to these remarkable horses.

It is our view that these responsibilities are not always fully understood and/or acted upon. In particular, this strategy underlines the importance of:

- Working with the Thoroughbred Breeders' Association (TBA) to help **breeders and prospective breeders** to understand their responsibilities before a Thoroughbred foal is bred.
- Working with the Racehorse Owners Association (ROA) and BHA on owner education schemes, so that **racehorse owners, and prospective owners**, understand that they are ultimately accountable for the horse, particularly when its racing career is over, and to ensure they are equipped to exercise that duty of care.
- Working with **Retraining of Racehorses (RoR)** and others in the aftercare sector to ensure that those rehoming and rehabilitating horses, whether individuals or rehoming centres or sanctuaries, are equipped to do so financially, as well as effectively and responsibly.

These educational responsibilities should be taken on and supported by the entire industry, not just those organisations noted above, as well as woven into the sport's core messaging and communications.

9.5 Funding of aftercare

It is vital that the sport ensures that an effective funding model for the aftercare sector is in place, at the scale required, and is operating sustainably. There are many models of aftercare, operating both commercially and on a charitable or not-for-profit basis.

It is not the specific role of the Horse Welfare Board to provide or oversee funding for aftercare, particularly as we lack specific expertise in this area. **Responsibility must be taken by the whole industry.** We believe that the racing industry should conduct an **expert funding review of this sector**, to ensure that it is operating sustainably and to consider new funding models or subsidies, as required. This review will be scoped and commissioned, as appropriate and in consultation with key stakeholders, by the Horse Welfare Board.

9.6 Euthanasia

One issue that emerged, in discussing this outcome, was the responsibility to a horse at the end of its life. As with any animal, **euthanasia is an important part of the welfare mix** when used responsibly, ethically and in the best interests of the animal. This is not always fully understood, particularly amongst public audiences.

For example, recent research conducted by Bristol University on behalf of World Horse Welfare has indicated that failure to euthanise early enough is a significant welfare problem.²² Euthanasia can therefore sometimes be effective in preventing unnecessary suffering and avoiding a welfare problem.

Euthanasia is also sometimes utilised for economic reasons, when a horse is potentially treatable but where the cost and timescales of remedial care are prohibitive, or where it will not be possible to return the horse to an athletic function. This can potentially apply at any stage of a horse's life. While this is also sometimes a valid route, it should only happen once other options have been properly assessed.

We emphasise that this economic consideration is not unique to racehorses, nor to horses in general, but it is often a consideration in relation to the euthanasia of any animal. It would be helpful if the euthanasia of racehorses were talked about more proactively in this broader context.

While euthanasia on the racecourse is very visible, its use in the breeding, pre-training, sales and aftercare sectors is potentially in need of greater scrutiny, particularly given the relative lack of traceability and regulation in these areas.

Euthanasia codes do exist within the sport but we recommend the development of a single code of practice, with a clear decision process or decision tree, that is adopted and clearly communicated by the whole industry, to ensure consistency and to build understanding.

9.7 Continued consideration of breeding methods

The Horse Welfare Board has listened to a range of opinions relating to the pros and cons, from a welfare perspective, of different breeding methods, i.e. natural breeding and artificial insemination.

This area merits consideration but it involves a range of complex issues, which cannot be resolved in isolation, within Great Britain alone, or by the Horse Welfare Board alone. British racing, particularly via the BHA and the Thoroughbred Breeders Association (TBA), should continue to play a representative role in conversations around this, both at home and overseas.

9.8 Key projects: Collective Lifetime Responsibility

4. Traceability (including also projects: 2. Training and CPD and 3. Education of/support for rehomers and potential rehomers)
5. Welfare funding model
6. Euthanasia code/policy
7. Review of breeding, pre-training, sales and aftercare
8. Continued consideration of breeding methods

²² Horses in our Hands (2016), University of Bristol <https://www.worldhorsewelfare.org/what-we-do/research/horses-in-our-hands>



10. Outcome 3:

Best possible SAFETY

10. Outcome 3: Best possible SAFETY

This outcome ultimately aims to reduce and minimise, as far as reasonably possible, avoidable injuries and fatalities to racehorses. While this most obviously applies to highly visible racecourse injuries and fatalities, it also considers injuries and fatalities occurring in, or as a result of, training or pre-training methods, or which are linked to breeding.

While the risk of fatalities in racing is generally low, particularly in Flat racing, the sport must remain vigilant and commit to continuous improvement. The Horse Welfare Board supports the view that **risk can never be eliminated entirely**. If horseracing ended tomorrow, horses would still be subject to risk. Based on the findings of a 2011 study by Liverpool University for The Horse Trust, the risk to horses when turned out in the field (62%) is significantly greater than during ridden exercise (13%).²³

Consequently, we do not recommend the adoption of specific targets for fatality reduction, nor do we believe that an ambition of zero fatalities is realistic. We support the current approach of the sport to **minimising reasonably avoidable risk**, though we feel that more could be done to explain the ethical case for racing, in which the benefits of racing are shown demonstrably to outweigh risks. We also believe that more research could be commissioned and conducted along the lines of the Liverpool University study noted above.

However, there is an urgency around this issue. Fatalities are routinely cited by politicians and policymakers in meetings with BHA or Horse Welfare Board representatives as the issue that must remain at the top of racing's agenda. While Defra has endorsed the regulatory role of the BHA in relation to welfare, we should never take self-regulation for granted, but remain conscious that fatalities are an emotive area, on which we must strive continuously to improve.

10.1 Continuous improvement

We have already discussed racing's commitment and track record of continuous improvement. This is particularly true in relation to safety, so we cover this in more detail here. This has been achieved via a range of scientific, evidential, regulatory and educative steps, including:

- **Course & obstacle design, construction, visibility and placement:** Racecourses have made continuous improvements to courses in recent years, perhaps most notably at Aintree, where changes have been made to the physical structure and composition of these unique fences, the visibility of fences has been improved and safety bypass areas created. All other racecourses make regular enhancements and modifications to obstacles and course layout. Examples of racecourse



²³ K.R. Owen et al. Identification of risk factors for traumatic injury in the general horse population of north-west England, Midlands and north Wales. *Equine Vet J*, March 2012

improvements made between the 1960s and 2015 are shown in the timeline in Figure 7. Since then, the improvements have continued, with the more recent changes being reflected in this outcome.

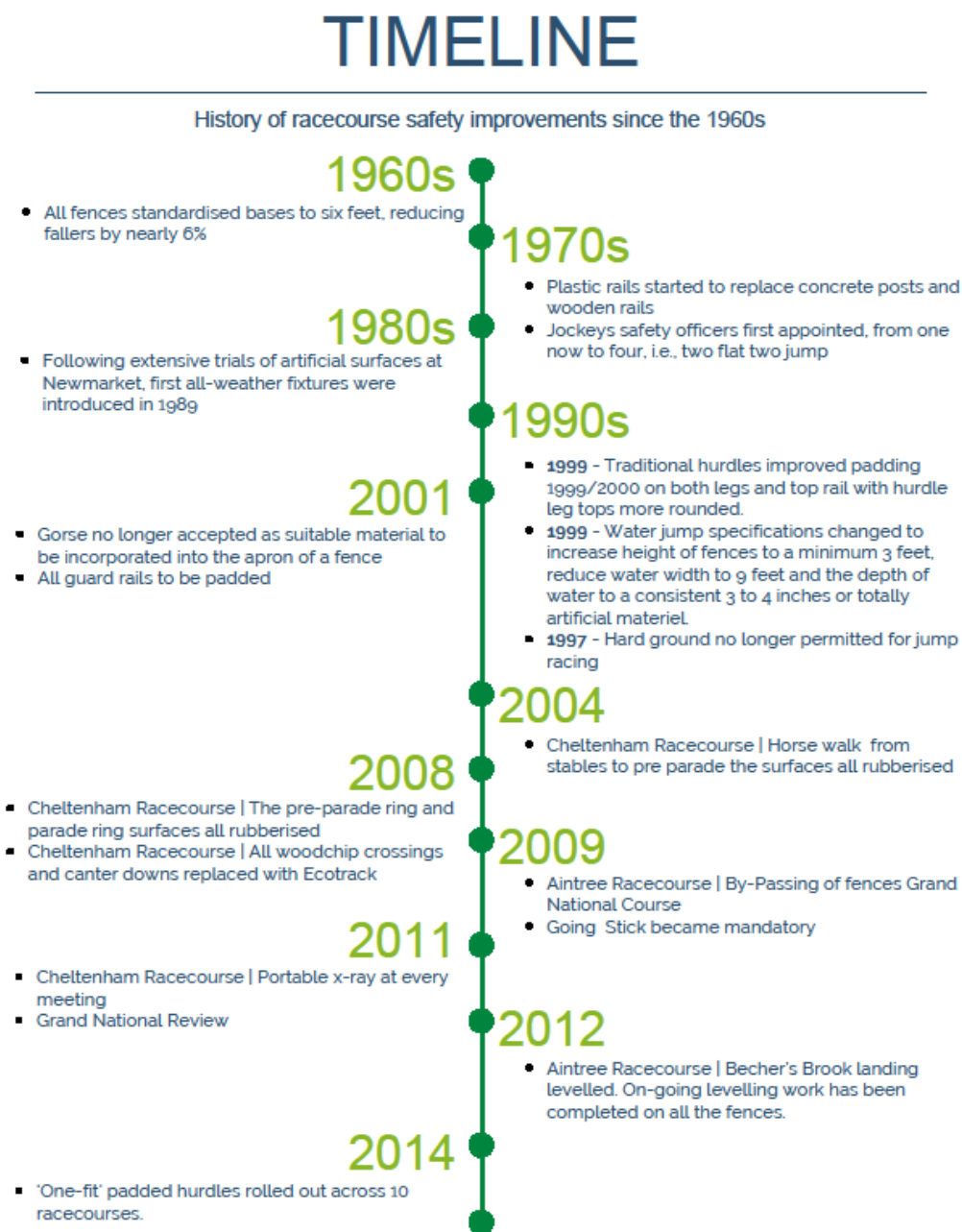


Figure 7: Timeline of selected racecourse safety improvements between the 1960s and 2015 (Source: BHA)

- **Turf and surface management:** All courses invest significantly in the management of turf and racing surfaces, using the latest technology and, where necessary, using irrigation systems to water the turf and provide the safest ground.
- **Veterinary care:** Minimum of one BHA Veterinary Officer and up to three specialist, appropriately trained Racecourse Veterinary Surgeons at any raceday. This is higher for festival meetings. At the 2019 Cheltenham Festival, there were seven BHA Veterinary Officers and Ten Racecourse Veterinary Surgeons on duty.
- **Facilities:** Racecourses, trainers and the BHA have invested in a wide range of state-of-the-art vet and stabling facilities, including purpose-built equine ambulances, cushioned horsewalks, cooling facilities, and wash down areas.
- **Veterinary research:** Since 2000, more than £35m has been invested by British racing in veterinary research and education.

- **Licensing and rule enhancements:** Racecourses, trainers and jockeys are subject to strict licensing and rule requirements. Standards are monitored via disciplinary and licence renewal processes, as well as by regular, unannounced racecourse and stable inspections.
- **Jockey training and coaching:** Jockeys are required to demonstrate a strong understanding of welfare requirements and the rules relating to the welfare and safety of horses. Apprentice and conditional jockeys are allocated a qualified coach, who will ensure they continue to develop their riding competence and skill.
- **Data:** The industry is committed to capturing increasingly accurate data, to give us a robust, evidence-based understanding of the causes of fatalities, enabling preventative measures to be put in place.

As a result of these continuous improvements, the sport’s overall equine fatality rate **has reduced by one-third in the last 20 years**. The BHA continues to monitor fatalities and are alert to changes in overall trends, as well as investigating specific incidents. This matter is approached transparently, with annual fatality data published on the BHA website, an approach endorsed at Westminster by the EFRA Select Committee in 2016.

10.2 Current fatality rate

The BHA notified Defra in January that there had been a year-on-year increase in the number and rate of fatalities in British racing in 2018. In doing so, however, the BHA recommended strongly that single-year data is only considered in the context of long-term trends, as part of three-year and five-year year rolling averages, across all racing, across all types of racing, and by racecourse.

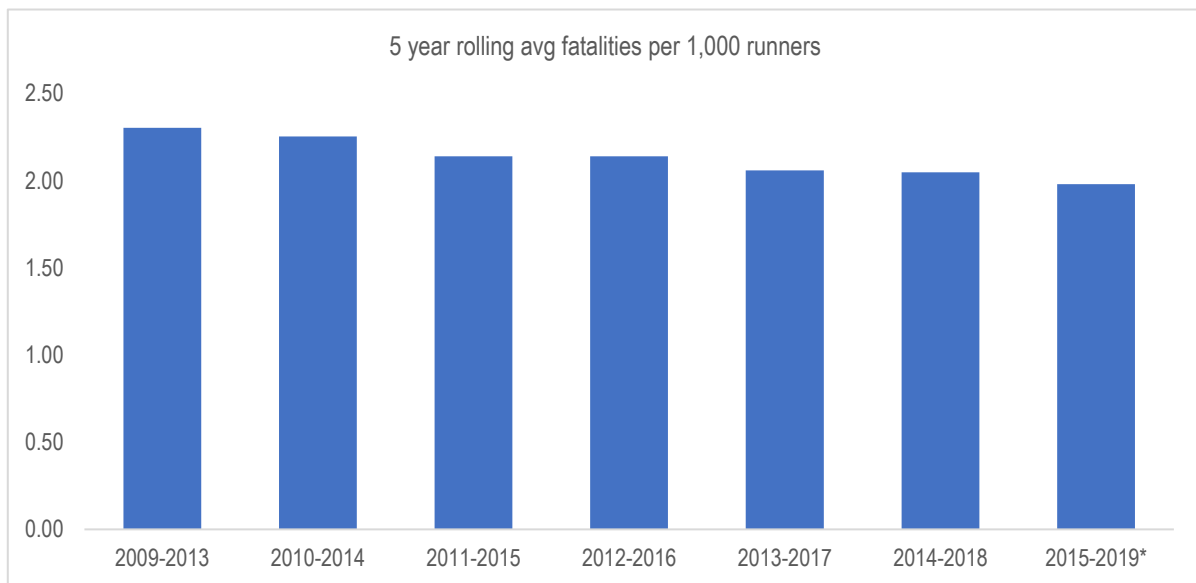


Figure 8: 5-year rolling average fatalities per 1,000 runners

The current five-year average is shown in Figure 8 above. Despite the 2018 increase, the five-year fatality average at the end of 2018 was at a record low of 2 fatalities per 1,000 runners. At the end of 2019, the five-year average stood fractionally below 2 fatalities per 1,000 runners. Year-on year data since 2015, up to the end of November 2019, is shown in Table 1 below.

	Runners	Fatalities	%
2015	88075	163	0.19%
2016	89612	176	0.20%
2017	90979	173	0.19%
2018	93004	206	0.22%
2019	91937	173	0.19%

Table 1: Fatality figures, January 2015 - December 2019 (Source: BHA)

We have looked at three-year averages to assess recent trends more closely, breaking this down by code, race type and surface. Our overall findings were:

- The fatality rate on Flat Turf racecourses is very low, with just 0.5 fatalities per 1,000 runners in 2019, against a three-year average of 0.8 per 1,000.
- While the rate on artificial surfaces is higher, this has been the subject of closer analysis in 2019 and the three-year average continues to drop.
- The 2019 fatality rate for Jump racing, except for National Hunt Flat (NHF), was fractionally above the three-year average of 4 fatalities per 1,000 runners. As such, many of the actions contained in this strategy will be focused on Jump racing in the first instance. Racing must continue to monitor the rate and assess the causes of any increases, making specific, evidence-based interventions where required.

As stated above, while we reject the notion of targets, we do believe that racing should continue to explore ways of driving the fatality rate downwards, particularly in Jump racing.

10.3 Understanding the causes of injuries and fatalities

Racing's approach to the management of risk was set out very clearly in the BHA's Cheltenham Festival Review (December 2018)²⁴. This review noted that it is difficult to pinpoint specific causes of fatalities in racing. Instead, a range of variables or factors, either alone or in combination, can potentially increase the risk of falls, injuries and fatalities. These include, for example:

- **Track factors:** Course layout and topography, visibility/contrast, obstacles (take-off/landing, construction, layout), racing surface and going.
- **Clinical factors:** Previous or undiagnosed injuries or conditions, medication history, breeding.
- **Participant factors:** Horse experience; horse age; rider type, experience and performance (e.g. jockey error or interference); trainer experience; training methods and performance; owner impact.
- **Race conditions and programming:** Race type, race length, race class, race timing/season, field sizes, race conditions/eligibility to race.
- **Other factors:** Race starts and starting procedures, race tempo.

The sport is building on the principles set out in the Cheltenham Festival Review in deepening its understanding of the range of possible risk factors and, where appropriate, taking steps to minimise or mitigate reasonably avoidable risks. This means looking in detail at a range of data, underlining the importance of data to both this outcome and to the overall strategy.

10.4 Minimising reasonably avoidable risks – evidence-based approach

The BHA and the wider sport are continuing to gather a broad range of data related to fatalities and to look for risk patterns and common factors. Applying an evidence-led approach is important, as making changes based on assumptions could have unintended consequences, or may simply have no tangible impact.

For this reason, we are wary of suggesting interventions that are not rooted in clear evidence, and believe that a persistent focus on driving down risk is the best way forward. This is the approach that racing has followed over several years and which has contributed to the long-term reduction in the overall fatality rate.

This is the basis on which the strategy framework for this outcome has been developed.

²⁴ <https://www.britishhorseracing.com/wp-content/uploads/2018/12/Cheltenham-Festival-Review-2018.pdf>

Best possible safety

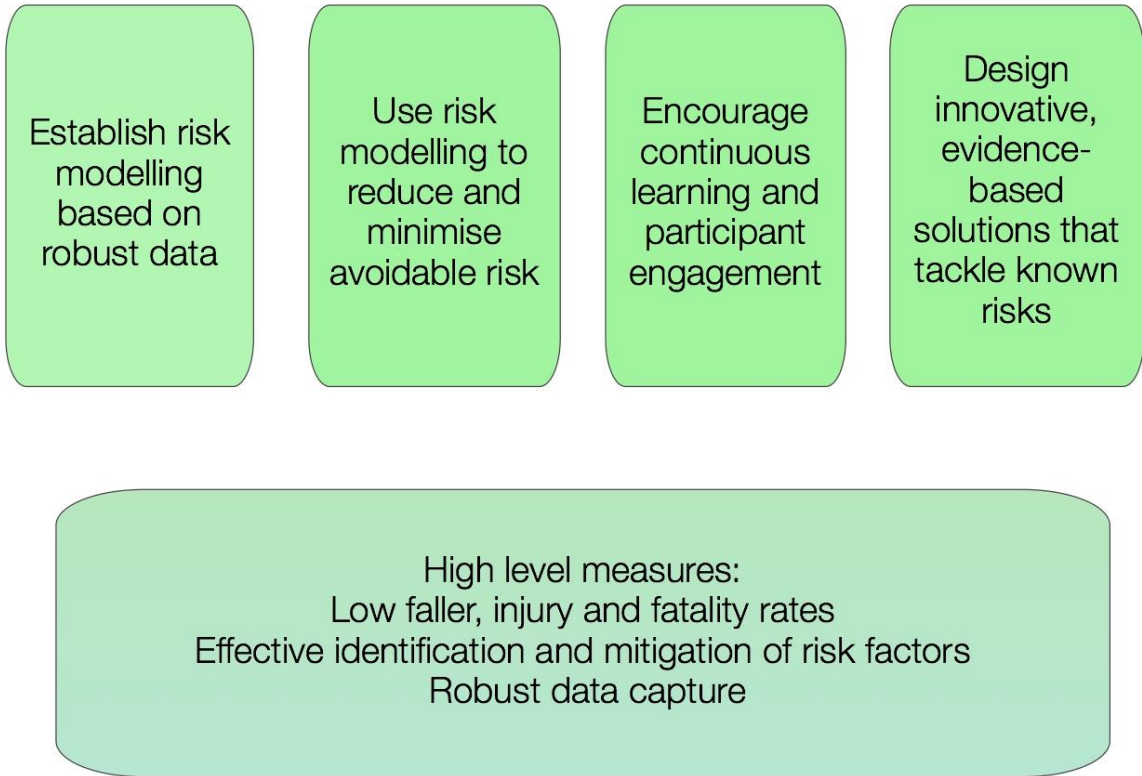


Figure 9: Outcome 3 strategy framework

10.5 Data gathering

We have identified a number of initiatives, at varying stages of development, aimed at capturing more information that could reduce the risk of racehorse injuries and fatalities:

(a) Jump Racing Risk Model (JRRM)

The development of a “predictive model” was a recommendation of the BHA Cheltenham Festival Review. The objective was to design and build a dynamic data model capable of qualifying and quantifying the risk factors associated with British Jump racing. These factors are both horse and environment specific, in order to inform policy, race conditions and best practice in a way that aims to reduce faller, injury and fatality rates.

The model, developed in collaboration with Professor Tim Parkin of the University of Glasgow, funded by the Horse Welfare Board and resourced from within the BHA, is being designed in a way that enables new data sources to be incorporated over time, as and when they become available. This will result in a constantly evolving and therefore more accurate predictive model. It can also form the nucleus of wider data projects, which will be discussed in more detail in section 13.

(b) Data gathering and analysis linked to racing fatalities occurring away from the racecourse

At present, BHA fatality reporting covers fatalities that occur on racecourses, using data gathered on racedays, which is typically more reliable than data recorded or reported elsewhere. Information on fatalities which occur off-course, e.g. following post-race assessment, or following/during surgery linked to injuries sustained in a race, requires closer analysis. As part of a comprehensive approach to fatality reduction across the sport, consideration of injuries and fatalities occurring post-racing, or in training more generally, will give us a more complete picture.

The BHA has already begun work with trainers and veterinarians to consider how data on racing-related, off-course fatalities and long-term injuries (LTIs) might be recorded and assessed. The initial analysis will focus on fatalities linked to racing that occur within 48 hours of a race. This will help to build understanding before longer-term reporting mechanisms (including reporting of fatalities occurring in training but which are not directly related to raceday incidents) are put in place, which could place additional burdens on trainers and veterinarians.

(c) Medication data gathering and analysis

Ascertaining links between fatalities and medication history is also already work in progress, led by the BHA. Medication records are now collected for all fatalities, as well as from a control group of other horses in races where fatalities have occurred. The BHA has been collecting this data for over 18 months; however, owing to the relatively small sample size, it will not be possible to draw statistically significant conclusions until at least three years of data has been gathered. As with other long-term data analysis, we note that this may influence the evolution of the strategy over time.

We also recommend that the feasibility of gathering and analysing clinical records is considered and have referenced this in relation to project 11 on our list.

(d) Rider engagement

A proportion of falls and fatalities in jump racing can be loosely attributed to horse or rider error. Video analysis is already conducted by the BHA, but a project is being developed to look at this in more detail.

The project will focus on rider engagement, e.g. working with current or recently retired jockeys, to provide expert insight alongside the existing video analysis team. Feedback will also be sought from jockeys following falls. The purpose would be to gather data never recorded before and to build understanding, not for specific disciplinary or remedial purposes. As part of this, a data collection survey is already being developed to capture feedback from jockeys involved in equine fatality incidents.

(e) Trainer engagement

It is currently not known whether differences in training methods and practices have any impact on faller or fatality rates, in terms of either cause or prevention. The range of variables could include anything from schooling methods, training history, exercise regimes, training surface types, clinical history and veterinary support, or even indirect factors such as staffing levels. The Horse Welfare Board recommends an information-gathering exercise, in which data would be anonymised and used solely to address safety issues, to ensure it does not compromise competitive or commercial sensitivities.

The sport should seek to understand training methods in more detail, working supportively and collaboratively, ensuring that trainers' expertise is utilised, and their views on any underlying causes of injuries, falls and fatalities discussed and understood, in order to share innovation and best practice.

10.6 Suitability to race

Racing is often subject to claims that there are welfare issues linked to the racing of particular categories of horses. These claims are often amplified or distorted by animal rights activists. The Horse Welfare Board's starting premise is that many of these claims are myths, but that the sport should do more to present the

evidence that debunks those myths, providing greater reassurance to those with concerns, in the interests of the sport's reputation.

Often cited claims relate to, for example:

- The **racine of pregnant mares**, where restrictions already exist, where risks are extremely low, but where the rhetoric used by opponents can be emotive and misleading.
- The **racine of juvenile horses**, particularly 2yo horses, where there is strong veterinary evidence showing that the risk of serious injury is actually lower in horses that have been raced as 2yos.
- The **racine of older horses**, which are subject to the same levels of care and assessment as younger horses, and which generally have greater racing experience.

10.7 Track factors

The Cheltenham Festival Review highlighted that fatalities are rarely a direct consequence of track factors alone, though this is the most common assumption or misperception. However, the sport should continue to investigate track factors amongst the range of contributory risks, as part of the Jump Racing Risk Model (see 10.5 (a) above). Alongside this, this strategy has identified the following projects:

(a) Racing and training surfaces

The quality of the surfaces on which horses compete and are trained is of vital importance to their safety and welfare. Under the terms of their BHA Licence, racecourses are responsible for the condition of the course and must aim to produce consistent ground in line with industry best practice (contained within BHA General Instruction 3.2) and arrange their pattern of fixtures so as to be conducive to good turf management.

Clerks of the Course and groundstaff must be trained to standards set by the Institute of Groundsmanship and undertake informal CPD training. Each course must retain the services of a turf and/or synthetic surface consultant as appropriate and provide a copy of this report to the BHA annually. A full audit of the track must be undertaken at least every four years. Each year the BHA Inspectors of Courses regularly inspect the racecourses to ensure that they are compliant with the Rules of Racing and General Instructions and that the turf maintenance programme is being managed appropriately.

The BHA has convened a "Going Group", comprised of relevant stakeholders, to review the Going Stick and the circumstances surrounding the withdrawal of runners due to unsuitable Going. The work of this group forms the basis of this strategic project.

The Institute of Groundsmanship has produced Performance Quality Standard (PQS) Tables for Grass (horse) racetracks, which are divided into three categories:

- Structural
- Presentational
- Racing Quality

Currently the PQS tables are used to determine the winners of the Racecourse Groundstaff Award Champion, where each course is visited by an independent agronomist and assessed against the PQS criteria.

One of several hypotheses that the group will explore, using information drawn initially from the Jump Racing Risk Model, is that firmer Going, both on racecourses and training surfaces, contributes to higher numbers of fatalities and long-term injuries. This requires further investigation, with monitoring of consistent improvements in ground conditions during dry, hot weather, to see whether a reduction in faller and injury rates results.

If links are found, the group will consider this evidence, consulting agronomic experts as appropriate, and form a view of any potential longer-term impacts, e.g. the effects of climate change.

The Horse Welfare Board has heard many concerns about “Summer Jumps” fixtures, which are sometimes cited anecdotally as an area of welfare concern. **We feel it is unhelpful to make generalisations about Summer Jumping per se**, when conditions can vary both between different tracks (based on soil type, natural drainage, etc.) and with the weather. Rather, in line with the above, it makes more sense to investigate ground and going conditions and any link with safety concerns **at any and all times of the year**.

The initial focus of this work will be the racecourse, but we expect its findings to be relevant to training and schooling surfaces, where no formal licensing criteria or husbandry qualifications are required. The longer-term aim is potentially to support trainers to develop their expertise in this area, through a programme of turf husbandry training for trainers and their staff.

(b) Obstacle improvement and development

Much good work has already been done over many years to improve the design, structure and positioning/spacing of hurdles and fences at Jumps courses and schooling grounds. This development work should continue, with new learning being regularly tested and applied and with a particular focus on reducing the risk of rotational falls.

The Horse Welfare Board has played a role in bringing several existing projects together in this area, where work was in need of alignment, cohesion, funding and appropriate prioritisation.

- A project is underway, in collaboration with the BHA, the racecourses, Southampton University and the RSPCA, to design, build and test a **new collapsible hurdle**. World class expertise from Eventing is also being utilised. The new design is in early testing. Once the project team are satisfied, the aim is to test and refine it further with a small group of trainers and will then be more widely tested over the next few months, prior to further testing, and potential rollout, on racecourses.
- The findings of the BHA-led **equine vision project**, in collaboration with Exeter University, which assessed equine visibility of different fence colours, are also being implemented. This strategy will involve the introduction of white fence elements on racecourses during 2020.
- To help inform the above, and as part of the Jump Racing Risk Model, the BHA and racecourses are working together to develop **improved reporting and analysis of incidents at individual fences** – and improved sharing of data linked to this. This involves more detailed review of fences where falls and fatalities have occurred, to understand commonalities in design, construction, location, race positioning, approach/landing, and e.g. whether the fence is downhill.
- **Jumps courses with consistently low injury and/or fatality rates** to be assessed in more detail, with a view to understanding why this is the case and, where possible, applying any learnings to other courses.

(c) Stalls and starting review

An often-cited issue, which may be one of perception, relates to the welfare of horses at the start of races. Stalls design and the stalls loading process on the Flat, and the starting of Jumps races, are all subjects on which concerns have been raised with the Horse Welfare Board, particularly by members of the public.

The Horse Welfare Board will commission a short review into race starts. Our initial hypothesis is that **the incident rate in the stalls is low**, with injuries uncommon and with fatalities exceptionally rare. We will consider perception issues, however, and what could be done to address negative perceptions of racing that may arise from starting processes.

The review will therefore be in three parts:

- **Stalls safety:** Data relating to stalls incidents will be analysed to determine the level of risk. If required, any common factors relating to e.g. stalls design, positioning, etc. will be considered and explored, with remedial action being taken if appropriate, following consultation with participants and racecourses.
- **Stalls loading process:** Assessment of negative perception issues will be made, with a number of actions possible if this is deemed a significant issue. For example, this could involve working with stalls handlers to improve awareness of perception, consideration of the loading process could be improved, or efforts to build greater understanding amongst public audiences.
- **Jump racing start process:** Members of the public have also contacted Horse Welfare Board members to raise concerns about the Jumps start process, e.g. a perceived risk of injury to horses from the release of the starting tape. This will be assessed as part of this review, with a view either to providing reassurance that the risk of injury is low, or taking action if improvements or modifications are necessary.

10.8 Race factors

(a) Prize money provision for lower placed horses

The availability of prize money in some races for horses finishing as low as 6th, 7th or 8th place, which was put in place to encourage larger field sizes, is often cited anecdotally as a potential welfare concern, particularly in longer distance Jumps races, raising the possibility that a jockey may be encouraged to continue racing on a tired horse that ought really to have been pulled up.

This is a hypothetical scenario and we are not aware of any research that identifies links between prize money availability and specific welfare issues. We have also heard the perception expressed, which is again unsubstantiated but linked to this “appearance money” concept, that horses are kept in training for longer when it may not be in the best interests of the horse, or indeed of the race programme.

However, as prize money arrangements are frequently raised as an issue that could have welfare implications, including by the sport’s own participants, the Horse Welfare Board will work with the BHA and other stakeholder bodies to determine whether any link can be established and, if not, to ensure that details of any analysis are shared to support the sport to counter any criticism relating to this.

(b) Fixture/race timing, conditions and allocation

The Horse Welfare Board considered the feasibility of linking fixture or race allocation with welfare considerations. For example, if higher risks are apparent in relation to specific courses, would this suggest a need to make corresponding changes to race programmes, race conditions or fixture allocation?

We noted that racecourses already review and make changes to fixtures and race conditions where this is considered necessary, including for reasons linked to horse and rider safety. For example, racecourses have worked with the BHA to adjust the fixtures programme for some racecourses, to avoid challenging ground/going conditions that might give rise to welfare issues.

The wider race planning and fixture allocation process is complex, with factors ranging from the nature of horse population and the development of the Thoroughbred breed, to the overall economics of the industry (which remain challenging), being considered. Given this complexity, **no immediate changes to the wider process** are suggested here, but the Horse Welfare Board will work with the BHA and the racecourses to consider the principle of a more explicit linkage between welfare outcomes and future fixture/race planning.

10.9 Key projects: Best possible safety

9. Jump Racing Risk Model (JRRM)

10. Racing fatalities occurring off the racecourse

11. Medication data and clinical records analysis

12. Rider engagement

13. Trainer engagement

14. Suitability to race

15. Ground/going research, development & training

16. Obstacle improvement & development

17. Stalls & starting assurance review

18. Review of impact of prize money for lower placed horses

19. Fixture timing & allocation





11. Outcome 4:

Growth and maintenance of TRUST

11. Outcome 4: Growth and maintenance of TRUST

This outcome recognises the importance of trust to the achievement of the overall welfare strategy. There are multiple dimensions to this, both between the industry and wider audiences, and within the sport itself.

In terms of **public and political trust**, we must be able to demonstrate that:

- The racing industry prioritises the welfare of racehorses over e.g. commercial considerations.
- The racing industry is responsible, ethical, open and transparent.
- The racing industry is responsive to outside concerns about welfare. Where these concerns relate to genuine welfare issues, the industry will address them. Where they are based on myths and misperceptions, the industry will take steps to build greater public understanding.
- Racing can be trusted to be self-regulating.
- British racing is a world leader in furthering the welfare of racehorses and of horses in general.

In terms of trust **within the sport**, we must foster:

- Mutual trust and recognition that all parts of the industry are playing their part in maintaining and advancing horse welfare.
- Growth of greater mutual trust and collaboration in the welfare sphere between the regulator and the sport's stakeholders/participants.
- Trust that those parts of the industry currently outside of the sport's core regulation are applying the same standards and levels of responsibility.
- Greater unity and common purpose within the sport on welfare, reflecting this in our outward facing communication and engagement.

To a large extent, the achievement of this outcome hinges on getting the other three outcomes right. Trust is based on being – and being seen to be – effective in terms of ensuring racehorses' quality of life and safety throughout their lifetimes. This outcome is therefore largely dependent on the success of the substantive welfare strategy.

It goes further than that, however. **To achieve trust, particularly with outside audiences, we must also consider issues of perception**, which may not be explicit welfare issues.

We recognise that the industry has clear concerns about being overly responsive to public perception, particularly when these perceptions are based on a lack of understanding.

We have been very mindful of this concern in writing this strategy. Yet there is a balance to be struck and racing must be cognisant of changes in public and political attitudes that could affect the long-term sustainability of the sport. The sport must be prepared to engage in debates around the ethics of racing and be able to do so confidently. Where an aspect of racing is responsible for negative perceptions, we must be willing to ask ourselves whether it is genuinely essential to defend and maintain it, or whether we would do more good, and win more support, by changing it.

These are judgement calls, where there are often no definitive right or wrong answers. They will require the sport to engage in mature debates, where issues are considered from all sides, where compromise may at times be required, and where assumptions and long-standing traditions may need to be challenged.



Growth & maintenance of trust

Open, evidence-based communication and engagement

Greater collaboration and mutual understanding within the sport

Engagement of key political audiences and influencers

Understanding of - and responsiveness to - changes in public and political attitudes

High level measures:
Measurement of political/parliamentary support
Measurement of public support through e.g. pulse surveys, audience data, etc
Effectiveness of communications campaigns
Shifts in public & political opinion on key issues

Fig 11: Outcome 4 strategy framework



11.1 The future of the whip

(a) Context

One area that the Horse Welfare Board was specifically asked to consider, and which forms part of our core purpose, was the question of whip use in racing. Our view on the whip takes the form of a policy position, in which we have set a clear direction of travel, within which there are some specific recommendations for action by the sport.

In this section, we will explain our position in more detail, outlining the approach we have taken to understanding and discussing the issue, along with recommended next steps.

(b) The whip's place in this strategy

Some people will feel that the use of the whip in racing should not be discussed in a welfare strategy, believing that the whip is purely an issue of perception, with no substantive welfare impacts when used within the rules. Regardless of one's view and as already noted, our strategy addresses both substantive welfare AND perception issues that may be linked to welfare concerns in the minds of the public and politicians.

In section (l) below, we will explain that use of the whip is cited by public audiences, rightly or wrongly, as a reason for believing that racing is cruel. As such, it does have a place in this strategy and there is a clear need for racing to take greater control of the debate around the whip. We must demonstrate appropriate responsiveness to public and industry sentiment, whilst also asserting positively the progress the sport has already made – and continues to make - in relation to responsible use of whip.

In recognition of the different views that exist on this question, we have included our discussion of the whip under the "Trust" outcome and will discuss the role of the whip in influencing perceptions of, and support for, British racing.

(c) The trouble with the whip

Even anecdotally, people in racing know that the whip divides opinion. Gather any number of racing people into a room and you are likely to hear the same number of different perspectives on the subject.

Views on the whip are rarely black and white, with few people being stridently pro or anti. There are many grey areas and nuances. Someone may have no personal objection to the whip but may still oppose its continued use because of concerns about public perceptions. Someone else may personally dislike the whip, but find themselves speaking up in support of it, for fear that relinquishing the whip would require the sport to bow to public pressure in other areas.

The Horse Welfare Board mirrored the sport in this respect, its members voicing a range of different opinions and viewpoints in developing its position on the subject. However, unlike in the numerous other conversations on subject, which are rarely resolved, we were required to reach agreement on a way forward.

The whip, therefore, is "difficult". **There are no definitively right or wrong answers**; ultimately the future of the whip is a judgement call, which needs, as far as possible, to be informed by a range of (sometimes contradictory) considerations.

(d) Our approach to the whip

We have expressed throughout this strategy the need for the sport's approach to welfare, and its response to perceptions of welfare, to be clearly rooted in **evidence-based decision making**.

We have also stated strongly the need for **unity and collaboration** within the sport, as a lack of unity can be detrimental to public and political perceptions of racing, especially when interpreted as resistance to positive change.

Finally, we have stated the need for the whole industry to make a strong **ethical case for racing**, and the overall vision of this strategy is framed around **respect for the horse** and the need for horse-centric decision-making.

We have borne all these considerations in mind in our discussions around the whip.

(e) Information considered

We have looked at information and data from a number of areas²⁵ before forming our view, including:

- The current **rules and penalties**
- Statistical data on **whip offences** since 2011
- **Overseas jurisdictions**, to get an international picture of the use and regulation of the whip internationally
- Current **scientific research**
- **Social, political and ethical** considerations
- Jockey training and education
- Analysis of recent **consumer and industry surveys**, to assess current opinion on the whip and any similarities or gaps between public and industry attitudes

(f) Current whip rules

The current rules relating to the whip have, in broad terms, been in place following the BHA's 2011 Whip Review.²⁶ These rules are explained in Appendix 1.

(g) Whip offences, 2010-2018

The BHA provided a report to the Horse Welfare Board of whip offences between 2010 and 2018, which we further summarise as follows:

- Between 2010 and 2018 the **number of whip offences has decreased** by nearly 40%, with 2-day suspensions being the most common, accounting for 63% of suspensions during this period.
- This is a significant decrease and the Horse Welfare Board commends those jockeys who have operated within the Rules and who have shown leadership in this area. We also commend the greater focus on education in this area and the efforts of a number of industry organisations in this regard.
- There has been a significant relative and absolute **increase in the use of the whip with the arm above shoulder height** since 2016, which is a concern.
- While Hunter Chases continue to experience comparatively high incidences of whip offences, there has been a 70% reduction in whip offences relative to the number of Hunter Chase runners between 2010 and 2018. This is the highest relative reduction in whip offences by any race type.
- Meanwhile, Category B Licensed jockeys and Irish licensed Amateur Jumps jockeys consistently incur suspensions above average length.

²⁵ Information relating to rules, penalties, whip offences, overseas jurisdictions, scientific research and jockey training and education was collated by Megan Hughes, who was commissioned by the Horse Welfare Board via the BHA. Original sources are cited wherever available.

²⁶ <https://www.britishhorseracing.com/wp-content/uploads/2017/03/WhipReview.pdf>

(i) Total offences

The total number of whip offences, relative to the number of runners, is summarised in Figure 10 below:

While we welcome that both the number and proportion of whip offences have declined, which is a demonstration that strong progress has been made since 2011, the assessment of the Horse Welfare Board is that the **overall number of offences (over 500 in 2018) remains unnecessarily high**, and the current penalties **do not provide an adequate deterrent effect**. Furthermore, the year-on-year **rise in offences in 2017 and 2018**, despite the high public, political and media focus on the issue, indicates a need to reassess the current rules and/or penalties.

All Racing	2010	2011	2012	2013	2014	2015	2016	2017	2018
Runners	92,025	94,376	90,174	90,836	87,531	88,075	89,617	91,002	93,022
Offences	887	892	623	565	580	515	459	518	542
% of runners	0.96%	0.95%	0.69%	0.62%	0.66%	0.58%	0.51%	0.57%	0.58%

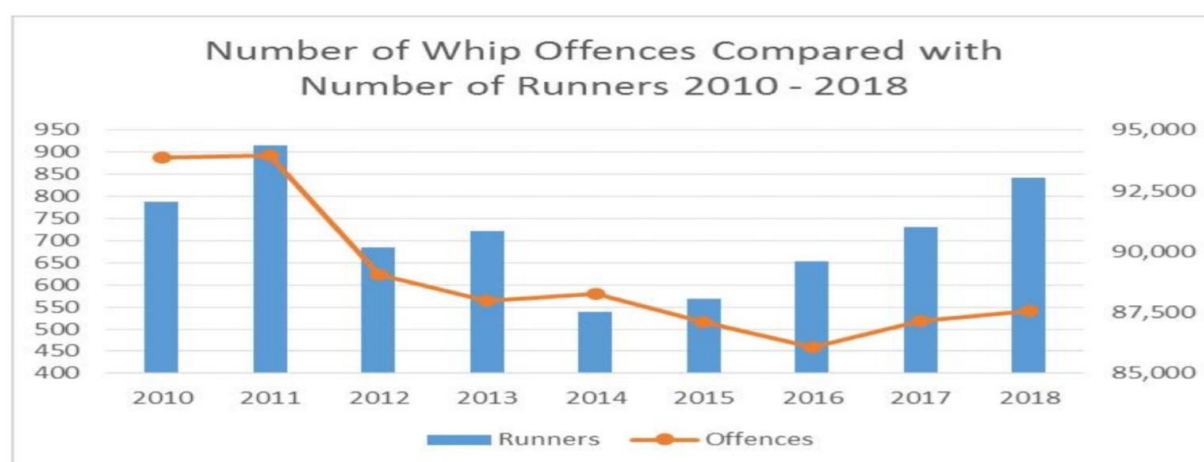


Figure 10: Number of whip offences as proportion of total runners, 2010-2018 (Source: BHA)

(ii) Offence type

Data relating to whip offences is summarised in Appendix 1.

Use of the whip above the permitted level is the most common offence type, accounting for, on average, 78% of total offences. There has been a 19% reduction in the use of the whip above the permitted level between 2010 and 2018. Our view is that this is a **disappointingly low reduction**.

There has been a notable recent increase, in both absolute and relative terms, in offences relating to use of the whip with the arm above shoulder height. There were 49 such incidences between 2010 and 2016. In 2017 and 2018 alone there were 42 incidences.²⁷

(iii) Race type

There appears to be a link between race type and the number of whip offences. This data is summarised in Appendix 1. This was informative and showed, for example, that Hunter Chases continue to experience a comparatively high number of whip offences but was also the race type that has seen the biggest relative decrease in whip use since 2011. The Horse Welfare Board felt that it would be challenging to distinguish between race types when considering potential approaches to the whip.

²⁷ One possibility for this increase is the improvement in technology, which allows Stewards to identify these offences more easily than previously. Since the beginning of 2018, the BHA has invested c.£100k+ annually in higher resolution HD imaging. The system was trialled selectively in 2017, prior to full rollout in 2018.

(iv) Licence types

There are differences in the number of offences between licence types, with amateur riders, especially those with a Category B Licence, frequently incurring longer suspensions on average than their professional counterparts.

Irish Licensed Amateur Jumps jockeys consistently incur longer suspensions than the average.

(h) International context

The Horse Welfare Board has considered whether the BHA's current approach to the use of the whip reflects international best practice, or if there are lessons to be learned from other racing jurisdictions.

Regulation of whip use in horseracing internationally is varied. The International Federation of Horse Racing Authorities (IFHA) has developed minimum standard guidelines for the use of the whip, which are outlined in Appendix 1.

The variations in regulation partly reflect some differences between countries in the nature and strength of their racing (and breeding) industries, as well as some strong cultural and societal differences. Comparisons of Britain with overseas jurisdictions should take account of this, noting that these differences will be a significant factor in any attempt at international harmonisation of the whip rules.

While most members of the IFHA have adopted the minimum standard guidelines, there is little consistency amongst its members in terms of the specific rules regulating the use of the whip. Similarly, penalties vary greatly across the different racing jurisdictions.

A summary of the current situation in relation to whip rules and policies internationally is provided in Appendix 1.

We concluded that the general trend internationally is towards further tightening of the whip rules, with most jurisdictions making changes in response to concerns that use of the whip is a negative advertisement for the sport. There is also international recognition, however, that the whip is an **important tool for safety and correction purposes**.

We are aware that conversations about the whip are continuing around the world. It is important that British racing works internationally, playing a leading role and not being a follower.

(i) Science of the whip

The BHA's 2011 Whip Review dedicated a chapter to the Scientific Evidence Base relating to the effects of whips on horses.²⁸

The Review Group's view at the time was that, when used properly, "the whip stimulates a horse and should not cause pain. Inappropriate use of the whip during a race may be counterproductive and may not produce a positive response from a horse. A horse in pain will not perform at its best and is likely to underperform."

They also noted that the available scientific evidence broadly supported the conclusion that, "The use of the whip in Racing should continue – providing strict controls are enforced – for safety and encouragement. However, the evidence is limited in some areas and further research is needed".

In the eight years since the publication of the Whip Review, while there have been some further studies involving the whip, the science remains inconclusive. On scientific grounds, the **evidence supports neither the continued use of the whip in racing nor a ban on the use of the whip**. Indeed, the science does not provide a definitive answer to any of the main questions raised concerning the whip, such as its

²⁸ BHA Whip Review (2011), Chapter 3

effect on the performance of the horse, effect on the behaviour of the horse, or the physiological effects experienced by the horse.

Further research has not been commissioned or produced. This may be because it is difficult, and potentially unethical, to develop a study that measures or assesses a horse's pain level. A study undertaken in 2014 concluded that, "to investigate the welfare concerns of whip use, an objective measurement of pain perception by the horse needs to be explored. Given the intricacies involved in pain perception, this may prove a difficult and complex endeavour."²⁹

The Horse Welfare Board has discussed the question of further research and concluded that **further scientific research is not a viable option** because:

- Research to assess pain would be complex and potentially unethical.
- Research to assess stress caused by stimulus of the flight response is likely to be inconclusive and potentially subjective.
- Crucially, even if further credible research were possible, in the time it would take to commission and complete it, the public and political debate is likely to have overtaken us. Racing must remain on the front foot.

(j) Whip design

The design of the whip currently approved by the BHA has not changed since the publication of the 2011 Whip Review. It is understood that the manufacturers are seeking to improve on the existing design by removing the seams from the foam cushion. To date no further changes have been made.³⁰

(k) Political context

In the parliamentary debate in October 2018, which was the result of a petition calling for the creation of an independent welfare regulator for British racing, the use of the whip was raised by a number of speakers. These speakers felt that continued use of the whip in British racing was a welfare concern and suggested that a further review of the whip was necessary.

As noted in section 1.2 (e)(i) above, the Labour Party's 2019 Animal Welfare Manifesto stated that a Labour Government would "carry out an independent review of the use of the whip to establish if its use for 'encouragement' can be justified."³¹

While the victorious Conservative Party did not make provision for whip reform in its manifesto, racing should be nevertheless be mindful that votes relating to animal welfare or ethics in parliament tend to be "conscience votes", in which parties do not impose the party whip on their own MPs.

While the main area of racing-related political concern up to now has been around fatalities, and the whip has not been a major topic for recent parliamentary questions, we **cannot afford to be complacent in relation to the salience of the whip as a political issue**. While we are careful not to overstate this, we do feel that the sport needs to be cognisant of the political risk to self-regulation on both welfare and the whip and proactive in responding to that risk

²⁹ Determining forces generated using a padded whip and impacts on the horse: Glenys Noble, Jessica Dodd, Sharon Nelson, Brian Spurrell and Peter Knight 2014 Rural Industries Research and Development Corporation

³⁰ In the USA, a new whip has recently been approved for use, known as the 360 GT (Gentle Touch) Crop, designed by retired jockey Ramon Dominguez. He has eliminated the seams on the cushion by creating a completely cylindrical popper. For more information on the 360GT see <https://www.rydersup.com>, <https://pennhorseracing.com/thoroughbred-racing/360-gt-revolutionizing-the-riding-crop/> and <https://www.paulickreport.com/news/ray-s-paddock/dominguezs-360-gentle-touch-riding-crop-why-its-different-and-how-it-fits-into-the-whip-debate/>

³¹ <https://labour.org.uk/issues/animal-welfare-manifesto/>

(I) Public attitudes

British Racing has recently conducted research into public attitudes to welfare and the whip, via the cross-industry “Racing Futures” project.

As discussed in section 5.3 above, this nationally representative research found that **engagement of the British public with racing was low**, relative to other sports, with only 12% of consumers expressing an interest in horseracing.³²

The survey identified that welfare concerns, along with concerns linked to gambling, are the main barrier to deeper public engagement with racing. Data from respondents who had a perception that racing is cruel, ranked **concerns around the whip at a similar level to concerns around injuries and fatalities**.

However, when asked to state which whip-related actions would encourage them to feel more positive about racing, **two options were supported by more than 50% of respondents** (see Appendix 1 for more information):

- Increasing penalties for jockeys when a whip offence is committed (52%)
- Banning the whip (51%)

To ensure that these courses of action were not popular solely amongst consumers who have little interest in racing, we assessed the answers against the declared level of respondents’ engagement in racing. These results were instructive: **Consumers who were “committed”** (visiting racecourses at least monthly, with the intention to visit in future), **were actually more likely to want change on the whip than those with no interest in the sport**.

The results of the 2019 survey are broadly in line with research conducted by the BHA in 2018, which suggested a hardening of public attitudes towards the whip, with 66% of the 2018 sample agreeing that the whip should be banned, an increase on the 57% who agreed with this statement in a comparable survey in 2011.³³

From the 2019 survey, the Horse Welfare Board concluded that:

- A large proportion of the British public has low engagement with, or interest in, horseracing.
- Where **negative public perceptions** of horseracing exist, racing’s use of the whip is a significant contributory factor.
- Continued use of the whip is potentially a **barrier to greater engagement** with, and support for, racing, though we note that it is difficult to quantify this.
- The public is relatively open to more than one course of action on the whip, saying that either a ban on use of the whip, OR increased penalties for improper use, might encourage them to have a more positive perception of the sport.
- The desire for **increased penalties or a ban** on the use of the whip is, perhaps surprisingly, **strongest amongst racing’s most committed fans and supporters**, relative to those who are unengaged or uninterested in racing.
- Based on the change recorded between the 2011 and 2018 surveys, we also concluded that **public attitudes to the use of the whip in racing are hardening** over time and racing needs to take steps to arrest this trend.

³² Survey conducted by Hall & Partners for Great British Racing and the BHA, October 2019

³³ Survey conducted by ComRes for the BHA, September 2018

(m) Racing industry attitudes

At the same time as the consumer research was undertaken, and as explained in section 5.3 above, the Horse Welfare Board commissioned a parallel representative survey to gain a greater understanding of racing industry attitudes to welfare and the whip.³⁴

In general, and in contrast to the public, the **racing industry is positive towards the whip, when used correctly**. The industry feels strongly that it is an **important tool for safety and correction**.

Views on the need for change differ across the industry and there are differences between the various industry groups. We found little correlation between any view on the whip and the age and/or gender of industry respondents.

For example, when asked how they would feel were there NO change in the rules or penalties relating to whip use, jockeys, trainers and stable staff were generally more positive than racecourse staff and those working for governing bodies and membership associations, who were typically less satisfied with the status quo. Owners and breeders had mixed views.

However, there is more **consistent support across the industry for changes to the penalties for whip offences**, with 48% of all respondents favouring both higher financial penalties and longer suspensions. There is again some variation between groups, as tougher jockey sanctions are, perhaps understandably, relatively unpopular with jockeys.

When asked to choose just one option from a list of five possible future scenarios, the favoured option across the entire industry sample was increased penalties, with a total whip ban the least popular option. “No change” ranked third of the five choices.

When split into segments, it is easier to see that there is, in fact, reasonable openness to **changes to the penalties** (see Appendix 1) and/or the rules in almost all industry groups, with comparatively **little support for an outright ban**. While jockeys, as noted above, index lower than average in their positivity towards increased penalties, this was nonetheless the favoured option of 36% of jockeys, with a further 12% favouring changes to the rules and penalties.

Racing has a **very strong understanding of the public’s views** on the whip. When asked about public perceptions, the industry recognised correctly that the principal barriers to public support were likely to be around equine fatalities and the use of the whip. However, the industry is perhaps a bit **misguided in thinking it can fix this by educating the public**, a view we will discuss in point (p) below.

From our analysis of the industry survey, the Horse Welfare Board concluded:

- Across the industry, there is reasonable support for the view that some form of action on the whip is necessary or desirable.
- There is also recognition that the whip is a source of negative public attitudes towards racing.
- However, most of the industry **does not support a ban on use of the whip for encouragement**, favouring instead courses of action that encourage **responsible use within the rules**.
- There is a relatively high level of support for increased penalties, compared to other actions.
- Support for changes to the Rules is relatively limited.

(n) Opinion polls: health warning

In setting out the survey results, as above, we emphasise that the Horse Welfare Board was very mindful of the limitations of such surveys. While both surveys were statistically representative, they were expressions

³⁴ Survey conducted by Hall and Partners on behalf of the Horse Welfare Board, November 2019

of people's opinion at a given moment in time and, while they are a valuable litmus test of instinctive attitudes, such surveys are not always fully accurate or reliable.

Such surveys are also not "weighted" to reflect different levels of knowledge and expertise. It is reasonable to assert that, as in any debate, some opinions carry more weight than others and an opinion poll does not allow such distinctions to be easily made.

In particular, we were conscious that respondents were asked for their opinions without being presented with all the evidence, some of which may have altered their views. For example:

- Consumers were not given information on the design of the whip, or about the rules and penalties in place to control its use
- Industry audiences were not given information about public opinion, or about the political context
- Neither audience was presented with data on whip offences

This is a key difference between an opinion survey and a more formal consultation, in which respondents would be presented with detailed information to help inform their responses and which allows fuller and more considered responses.

(o) Unity or division?

In noting that racing is positively disposed to the correct use of the whip, it would be easy to assume that this puts the sport at odds with public opinion. This is a simplistic view.

Our analysis is that **there are areas of common ground**. There is a desire and impetus for change amongst both public and industry audiences. The major difference is in the range of potential solutions:

- The public favours either a whip ban OR an increase in penalties
- The industry favours an increase in penalties but there are strong pockets of resistance to the idea of banning the whip

Therefore, the desire for increased penalties is a potential area of consensus and would be a positive step for many people both within and outside the sport.

(p) The myth of "education"

One comment we have often heard, and which came out strongly in the industry survey, is the view that there is no substantive welfare issue with the whip, and public audiences just need to be educated on that point.

The Horse Welfare Board rejects this view, and calls on the industry to do the same, on the grounds that it is simply not a realistic or effective approach, for the following reasons:

- The industry lacks the **promotional resources and budgets** required to conduct an effective mass audience education campaign to change public attitudes, at either the **scale or the pace** required.
- Even if we had this capacity, the consumer survey showed that most of the public are at best agnostic or apathetic towards racing and, by extension, would have **little interest in being "educated"** about the whip.
- It would be difficult to deliver a campaign that looked anything other than **defensive**, or which risked making the whip an even bigger subject of debate. The pay-off is unlikely to outstrip the risk.
- A mass audience campaign around the whip would **divert resources** from the more positive communications strategy around welfare in racing, outlined in section 14 of this document.
- While we should, of course, take opportunities to explain the whip and to address misperceptions, this alone will not be sufficient to put racing in control of the conversation.

(q) Ethics

A question we asked ourselves, but did not fully resolve, related to the ethics of the whip. We have argued the need to make an ethical case for racing, using a utilitarian definition in which the benefits derived by horses from racing are shown to outweigh the harms.

Benefits to the horse are hard to assess in relation to the whip. Clearly a case can be made when use of the whip helps to ensure the safety of both horses and jockeys, but the case is unclear when applied to the use of the whip for encouragement, where it is hard to find proof of benefits.

This has been argued by Madeleine Campbell of the Royal Veterinary College³⁵. While Dr. Campbell argues that, in racing generally, the benefits to horses outweigh the harms, she does not believe this applies in relation to the use of the whip for encouragement.

The whip, she says, has some effect, which could be psychological or physical, which makes most horses run faster. She argues that this effect is unlikely to be pleasant and the horse's response may therefore be an aversive response to a harm. If there is no beneficial effect to the horse to offset this, there is little justification for using it.

This is an area that warrants further consideration, as the industry develops in more detail the ethical case for racing.

(r) Leadership and collective will

In assessing the information detailed above, the Horse Welfare Board concluded that **racing must demonstrate leadership** and take greater and more effective control of this issue. We must work together positively, beginning with areas of common ground, being prepared to make compromises where necessary.

Reputational risk is best defined in terms of the gap between what the public expects and what an industry actually does. Failing to be proactive on the subject of the whip increases reputational risk and is a threat to the sustainability of the industry. It is also a threat to racing's ability to self-regulate. Our view, recognising that the sport is reluctant to be led solely by public opinion on this issue, is that any change therefore needs to be driven by the **collective will of the sport**.

We recognise that this is a divisive issue but we call upon the whole industry to conduct this debate constructively and with an awareness that dogmatic viewpoints and a refusal to listen to other perspectives will simply give oxygen to the view that the sport is out of touch and, worse, incapable of governing itself responsibly.

We emphasise that this applies across all sides of the whip debate. Those who favour the removal of the whip must be prepared to listen to the views of those who do not, just as those who want to keep it should approach this with an open mind.

All these considerations have informed the Horse Welfare Board's policy position and recommendations, which are set out in section (s) below.

³⁵ Speech to the Horseracing Industry Conference, Liverpool University, February 2019

(s) Whip position

The Horse Welfare Board's overarching position on the whip is:

Racing must signal a proactive, positive direction of travel in relation to the whip, taking steps to eliminate misuse and leading any discussions around the future removal of the whip for encouragement

This position leads us to make the following recommendations.

(t) Recommendation

The Horse Welfare Board reiterates that the following is a **recommendation and not a requirement**, recognising and in no way undermining the BHA's autonomy on regulatory matters of this nature.

We recommend that the BHA should conduct a consultation on the whip in 2020, as follows:

With a view, regardless of other outcomes discussed in the consultation, to reviewing penalties for breaches of the whip rules **as quickly as possible and ideally by the end of October 2020**, noting that the need to increase penalties is a **clear, minimum recommendation** of the Horse Welfare Board, with particular consideration of increased penalties for:

- **Whip action offences**, e.g. use of the whip over shoulder height, where evidence suggests that greater deterrents are required
 - **Whip modification offences**, penalties for which are felt to be inadequate
 - **Repeat/multiple offences** by the same jockey, increasing the progressive penalties applied for multiple offences
- Consultation on penalties should seek views and ideas on a range of sanctions, e.g. **fining and/or suspensions** for jockeys, and **prize money** sanctions.
 - The Horse Welfare Board recognises that different views exist on the feasibility and desirability of sanctions involving **disqualification of the horse** but feels this question could usefully be considered and resolved through consultation. Should the BHA choose to exclude this from the consultation, it must set out clear reasons for doing so.

In that consultation, the BHA should also take the opportunity to gather views, and potentially to consider:

- **Future banning/retention of the whip for encouragement**, in order to foster a controlled, constructive and managed discussion.
- Changing the rules to place further **restrictions on use of the whip for encouragement** (e.g. reduction in number of permitted strikes, or restricting use during particular stages of a race).

The Horse Welfare Board wishes to be clear that the only explicit recommendation for immediate action on the whip relates to the need for increased penalties and for the industry to take greater control of conversations relating to the use of the whip for encouragement, initially expressing views via an open, managed consultation process.

The Horse Welfare Board has also offered further guidance to the BHA in relation to any consultation on the whip, which is summarised in Appendix 1.

11.2 Public communications

Returning to the wider “trust” outcome, effective communication is clearly essential to the achievement of trust. This is discussed in more detail in section 14 below.

In general terms, we must engage a range of audiences, in a variety of ways, including maintaining the support of those already supportive of racing, as well as having a clear view on how/whether we engage or counter critics and opponents. Most important, perhaps, is the majority in the middle, who can be loosely described as agnostics or floating voters, who have the potential to be influenced in either direction. At the very least, we should take steps to ensure that this middle ground (“consideration”) audience, while it might remain passive towards racing, is at least accepting of the sport.

11.3 Political engagement

While there is frequently a link between the attitudes of politicians and the views of the voters they represent, we should ensure that we are proactive in engaging politicians direct.

The BHA plays a leading role for the sport in terms of high-level advocacy with parliamentarians and policy makers, supported by an industry-wide Public Affairs Group, which sets an annual strategy for this area. More could be done in terms of grassroots, constituency-level engagement, where participants can play a direct role, hosting yard or racecourse visits, encouraging political attendance at open days, or simply by lobbying constituency MPs direct.

The BHA cannot do this on its own, with limited resources, but can provide a template for the sport to implement at constituency level. Our hypothesis is that political trust will grow if politicians are exposed directly to the sport, seeing the care given to racehorses first-hand.

Political engagement is also discussed in more detail in section 14 below.

11.4 Objective endorsement: The shift from *informing* to *involving*

It is our view that racing would benefit greatly from objective endorsement from influential figures and organisations outside the sport. When the sport defends itself, however evidence based its arguments might be, we will encounter cynicism and the claim that, “Well, they would say that, wouldn’t they?”

We should not assume, however, that external support will be freely given. To secure this outside endorsement, efforts must be made to engage and consult with outside bodies and individuals, so we change our approach from *informing* them of what we’re doing, towards *involving* them more in our work and in our policy development.

This applies, for example, to respected animal welfare and equine organisations, such as World Horse Welfare, the British Horse Society, National Equine Welfare Council and the RSPCA. Racing must be sure to maintain and grow its relationships with such organisations, to get their perspective and, where possible, their support.

Racing must also be more open to the views of others who would act as critical friends to the sport. While someone may not be steeped in racing, they may offer a different perspective, or provide suggestions that racing may not have considered. Racing’s occasional reluctance to give credibility to outside voices reinforces views that racing is defensive and insular, undermining trust and potentially stifling progress.

11.5 Trust within the sport

It is clear from our conversations that the overwhelming majority of people involved in the racing industry have the same interests at heart, not least a shared admiration and respect for the racehorse. There is also a desire to see the sport thrive long into the future.

Trust issues are at the heart of many of the sport's most emotive debates. We are not going to list them here, but we note that criticism of one part of the sport by another is a frequent occurrence.

These issues, which can be about anything from the overall distribution of money and resources, to the day-to-day decisions made in the Stewards' Room, can influence the tone of debates on welfare. Every interaction on welfare takes place against this broader backdrop of racing's "politics".

We must work together to improve trust within the sport. In the welfare space, we must recognise that we have common cause, walk a mile in the shoes of others who may be grappling with different pressures, and recognise that we are stronger, and create a more positive impression, when we are united.

Debates are important and people should feel able to express a view, but we challenge the sport to do this constructively together, ideally avoiding the temptation to conduct debate and channel frustrations by way of negative and destructive comments in the media or on social media.

We encourage the sport's leaders and influencers to work together on this. Responsibility for changing this dynamic is a collective responsibility. It is essential in projecting the image of a sport that can operate responsibly, progressively and positively, and in a way that fosters trust outside the sport.

11.6 Measuring opinion and measuring trust

As already mentioned, we have often encountered the view that racing is too preoccupied with perception. Our view is that an understanding of outside perceptions is an important element of effective reputation management and effective promotion, but also that response to perceptions should be proportionate, appropriate and, wherever possible, based on objective assessment of the evidence.

Anecdotal views of public attitudes are unhelpful and often misleading. We must recognise that robust audience data and research is an essential element in the data and evidence mix, while also recognising that it is evidence of perception **ONLY** and needs to be interpreted accordingly.

Similarly, attitudes within the sport must be evidenced more accurately and assessed more regularly. It is easy to assume that everyone agrees with one's own view, or that the prevailing view is the one that simply shouts the loudest, particularly in the media or on social media.

11.7 Key projects: Growth and maintenance of trust

Note: It is the Horse Welfare Board's view that most projects listed under all outcomes in this strategy, together with the communications projects listed in section 14 below, contribute to the achievement of this outcome, which requires a mix of substantive welfare measures and effective communication and engagement. We have therefore not listed them all here, but they can be found in section 15.2 of this document.

As such, the only recommendation linked specifically to this action is **Project 21: The future of the whip**



12. Enablers

12 . Enablers

There are two enablers in our strategy, which are critical to our success in securing all four of the outcomes described above in sections 8 to 11.

The term enablers probably undersell their importance. In many ways, they are the cornerstones and the priority areas requiring the greatest focus and investment from the industry.

Data and evidence are essential to evidence-based decision making but it is not enough simply to gather mountains of data. It's what we do with that data that counts. Our enabler looks at all elements of the data process: Gathering, analysis, interpretation and application. We have identified gaps at the latter end of this process that the industry must address and on which the sport's leadership must involve the practical expertise of participants.

Communication of welfare is an area in which the sport has, despite the best efforts of some, lacked impact. It has arguably not been a high enough priority, has lacked adequate investment and has not been viewed as a shared responsibility, around which the industry should unite, and has therefore failed to cut through effectively with important audiences.

Sections 13 and 14 explore these two important areas in more detail and provide recommendations on the changes required, which are essential to the effective implementation of this strategy.





13. Enabler A:

Robust EVIDENCE AND DATA

13 Enabler A: Robust EVIDENCE AND DATA

During the Horse Welfare Board's discussions, the question of data in its various forms cropped up regularly and we have identified a clear need for the industry to approach this area differently, in a more focused and joined-up way.

As we noted in section 9 in relation to Traceability, welfare-related data is collected and housed all over the industry and outside, with some data being housed behind commercial paywalls. From a welfare perspective, there are inconsistencies and gaps in:

- Ownership of the data
- Availability of the data
- Cost of the data
- Completeness of the data
- Alignment of the data, i.e. multiple sources need to be accessed to provide a full data trail for any single racehorse
- Purpose for which the data is collected, i.e. some data that would be helpful in advancing welfare is collected for a different primary purpose

Some specific issues are:

13.1 Regulatory purpose vs. research purpose

The BHA collects data both for regulatory reasons (e.g. anti-doping), which can be linked to disciplinary and integrity processes, but also does so to advance understanding and to foster best practice within the sport. This creates challenges, as there is a reluctance amongst participants to share information with the sport's regulator if the ultimate purpose is unclear.

While this is partly a trust issue, we feel that the sport would benefit from a clearer demarcation of data collected for regulatory reasons and data/information collected for research and understanding. The latter would only be possible if this data function were either explicitly ringfenced within - or decoupled from - the BHA, via the creation of an independent data unit, operating on behalf of the whole sport.

This data could then be owned by/contributed to/available to the whole of racing. This would include the BHA, who could of course use data and information held there to inform strategy and policy, but it would be clear that this is distinct from data explicitly linked to integrity processes, which is collected under the Rules of Racing.

13.2 External and commercial data ownership

A particular challenge, noted particularly in relation to Traceability, as discussed in section 9 above, is that some Thoroughbred data is only available back to the sport via commercial agreements. This applies, for example, in relation to some data held by Weatherbys.

This is already the subject of discussion in relation to traceability projects, particularly those linked to the breeding and post-racing/aftercare areas. While we recognise that some consideration of commercial factors is necessary, we also feel there is need for this data to be more freely accessible to the sport when there is a clear requirement in relation to welfare and traceability.

It is the view of the Horse Welfare Board that Weatherbys must play a positive role in resolving this, as some of this data is essential in the management of welfare-related risks to the sport.

Defra also controls some data capture processes, notably via the Central Equine Database and racing would benefit from discussions with Defra relating to this.

13.3 Aligning existing data projects

There would be benefits, including cost benefits, in aligning a number of the industry's existing data projects under a single umbrella, as per the Data Unit concept discussed above.

For example, the BHA is currently leading on a project, funded by the Racing Foundation and in association with the University of Bristol, to develop an integrated Thoroughbred Welfare Database. This project is seen by the BHA as an industry-wide project, not as a BHA regulatory project.

There is an opportunity to align this work with the Jump Racing Risk Model, discussed in section 10 above, which is being led by the BHA with a cross-industry group, in association with the University of Glasgow.

Other parts of the industry are also progressing data projects, some of which we may currently be unaware of, which could usefully be aligned. These also need to be considered alongside the Racing Administration project, which could provide the basis for the cross-industry digital platform that would undoubtedly be an essential consideration in the development of an integrated welfare data unit.

13.4 Welfare Data Unit

We therefore recommend that a project to create a Welfare Data Unit be developed as part of a cross-cutting welfare data programme, led by the BHA, but involving other stakeholders and with independent validation from data specialists, and with the guidance/sponsorship of the Horse Welfare Board to ensure alignment.

This project will need to be fully scoped and costed but it is our view that the BHA's project scope for the Thoroughbred Welfare Database is the correct starting point and that seed funding for this work is provided for within the Racing Foundation's funding for that project. This includes provision for an experienced data analyst from Bristol University, who will provide the data expertise and skillset required to develop an effective project.

13.5 Analysis and interpretation

An effective data strategy requires three core elements³⁶:

- Data collection (the "What?")
- Data analysis ("So what?")
- Data application ("Now what?")

While we have identified that the sport has gaps and misalignments in its data collection, we note also that data is frequently collected but not analysed, usually because there is lack of capacity to do so, and even more frequently that it is not used as the basis for designing implementation plans and solutions. It will be important to place an equal emphasis on all three elements.

There may be a need to revise existing resourcing models to accommodate more analysts. There will also be a need to put more focus on designing solutions to issues the data may identify. This last point will need to draw on the practical expertise of participants, to ensure that solutions are grounded in day-to-day operational realities.

13.6 The role of research

An observation of the Horse Welfare Board is that the sport, particularly via the support of the Horserace Betting Levy Board (HBLB) and the Racing Foundation, funds significant amounts of veterinary and welfare

³⁶ <https://www.forbes.com/sites/georgebradt/2012/12/05/three-essential-questions-of-big-data-what-so-what-now-what/#6e072c5f79ec>

research. The Levy Board alone has funded veterinary research to the tune of over £35 million in the past few years. Not all this research has been fully assessed and, where appropriate, acted upon by racing.

The sport could be more co-ordinated and proactive in its use of such research, ensuring we are commissioning work that helps us to achieve the outcomes aimed at in this strategy, or which can provide evidence of welfare standards in racing, e.g. as compelling proof points in racing's communications.

13.7 Immediate priorities

We recognise that this is not an overnight win. However, we do wish to point the industry to some immediate priorities, which we believe are the highest priorities and the areas of potentially greatest impact:

- **Traceability:** This is a necessity, as it underpins the further development of this strategy and is essential to the management of the sport's reputation.
- **Jump Racing Risk Model:** This predictive modelling work could have real benefits in assessing and driving down avoidable risk on the racecourse and has been designed in a way that can be built on and developed.
- **Thoroughbred Welfare Database:** We welcome the work that the BHA has driven forward in this area and believe this, in line with the predictive modelling mentioned above, can form the basis of a wider, cross-industry welfare data unit.

13.8 Robust Evidence and Data: Key projects

A number of projects detailed in previous sections relate to evidence and data. We have not listed them again here. They can be found in section 15.2 of this document (project numbers 1, 4, 9-13, 15, and 17-19).

21. Welfare Data Programme and establishment of a Welfare Data Unit

22. Thoroughbred Welfare Database





14. Enabler B:

High-impact COMMUNICATIONS

14. Enabler B: High-impact COMMUNICATIONS

Communication is another linchpin of our strategy. Racing has high welfare standards, of which it is rightly proud and protective. There is an enormous opportunity to tell this story much more effectively than we have in the past.

This is not a criticism of those who have carried this responsibility. It is partly a consequence of the way the sport is set up, how it has prioritised its resources and where it has focused its communications investment, which has made it difficult for racing to tell the right story, in the right way, and in the right places.

In common with other elements of this strategy, there are many examples of great communications work in the welfare space happening across the sport. The main role of this strategy is to draw it together, identify gaps (including in leadership, co-ordination and resourcing), and make it work together more effectively and impactfully, so it is more than the sum of its component parts.

Our assessment is that much of racing's welfare communication has:

- Been **reactive**, or at least proactively reactive, and focused on higher risk times of the year, particularly around the major Jump racing festivals.
- Been **defensive**, focusing mainly on what racing does to prevent the proportionately small number of negative issues, rather than on the majority of positive things that the whole industry does on a daily basis.
- Focused too heavily on **statistics and data**. This is a balance issue: While these are important, it has been at the expense of more **emotive storytelling**, which can often sell a message more effectively to many audiences than broad data.
- Relied too heavily on a small number of **communication channels**.
- Been unhelpfully separated from the core **promotion and marketing** of racing
- Been done 'corporately' rather than via the **use of participants**, who can often tell stories more authentically and engagingly.
- Tended to be pitched, again because of the lack of promotional budget for welfare, at already 'warm' audiences, including industry audiences, with the net effect that racing has primarily been **talking to itself** and its existing supporters.
- Been **too explicitly 'welfare' focused**, which can amplify the impression that there is a welfare issue in racing, rather than showcasing and celebrating the magnificence of the horse, the powerful bond between people and horses, and the dedication and care that goes into looking after racehorses.
- Been **under-resourced** relative to other elements of racing's communications and promotional mix. This lack of resourcing explains many of the previous points.

Having said that, there is a huge opportunity to get this right, provided the sport:

- Supports and encourages Great British Racing to broaden its remit, adding the promotion of explicit and implicit welfare storytelling to its campaign portfolio, with the recognition that this should indirectly drive more commercial support for the sport, and with the caveat that GBR would need to broaden its current skillset to do this effectively.
- **Builds on the learnings** from The Horse Comes First campaign, in terms of what works and what is less effective, and how welfare campaigning could be better resourced, aligned and managed.
- Balances **strong storytelling** with effective use of data and evidence.
- Focuses more on the recognition and celebration of good practice, rather than on the management of bad practice, in its messaging.
- Uses its most **effective and engaging communicators**, drawn from across the sport, as ambassadors and spokespeople, rather than speaking corporately.
- Builds its communications approach both from the top down, with a clear messaging framework and narrative, and from the bottom up, harnessing the power of racing's ready-made movement of powerful, passionate advocates.

- Seeks to make an **ethical case for racing**, in which the benefits derived by horses from racing are shown to outweigh the harms.
- Plans **year-round campaigns**, so the welfare story is told consistently and continuously and not just at high-risk pinch points in the racing calendar, which are also likely to be prime targets for those who are ideologically opposed to the sport.
- Develops **compelling, engaging content** that takes the message that racehorses enjoy a high quality of life out to new audiences.
- Is willing to **take risks and be surprising**.
- **Prioritises and resources** this work adequately and appropriately.

14.1 Campaigning approach

It is our belief that racing should adopt a more “campaigning” approach, and deploy campaigning tactics, in its communication of welfare.

As animal rights activists know, campaigning is easier when you are campaigning *against* something, yet it is still possible to campaign positively *for* something. For example, it is possible to campaign for the truth, which is something that racing can undoubtedly do more effectively in the face of misinformation promulgated by its critics.

14.2 Racing as a campaigning movement

The most effective campaigns are those that inspire movements. Racing, in its approach to the communication of welfare, could behave less like an industry and more like a movement, in which racing’s people and supporters are seen to stand together in support of racing and the racehorse.

Racing has enormous potential to do this. We have large numbers of people and a passionate grassroots network. Instead of the industry’s leaders speaking on behalf of the sport on welfare, the industry’s leaders must focus on capacity-building, mobilising and equipping racing’s licence holders, staff and supporters to actively demonstrate racing’s everyday commitment to the care of its horses.

Furthermore, racing could also join forces with other equine sports and sectors in showcasing the importance of the horse, and of the horse-human relationship, in our national life.

We call on racing to unite in harnessing that pride and showing it outwardly to the world, rather than turning in on itself. The strength of any movement is in its diversity of approaches: We may have different views and make different contributions, but we are all working towards the same goals. We must recognise and embrace this.

14.3 Third party testimonials

Racing tends to speak for itself, often quite defensively, eliciting the inevitable, “They would say that, wouldn’t they?” response from our critics. In developing our communications work, we must make better use of credible third-party testimonials, from people willing to go on the record to vouch for the high standards in racing. This cannot be an empty exercise; it requires racing to work much more closely with others who have credibility in the welfare sphere.

Chief amongst these are respected welfare organisations such as World Horse Welfare, the RSPCA and the British Horse Society. For as long as these organisations continue to provide constructive challenge to racing and to work positively with us to help us improve, as we should be to them in two-way dialogue, we must seek to involve them more closely, getting their input and advice, working in partnership with them to drive key initiatives.

14.4 Attitude change

In adopting this approach, racing's communications must focus on attitude change, where we seek to break down existing perceptions and stereotypes of welfare in racing, many of which are ingrained, historical perceptions, which may not reflect the truth of how racing operates in the twenty-first century.

Effective attitude change campaigns are surprising and challenge people's views and stereotypes, sometimes by confronting myths directly. One good example of a brand attitude campaign was the "Surprises" campaign, which the supermarket chain Lidl used to change public perception of the quality of its products.³⁷ While this is obviously very different to racing's challenge on welfare, we refer to it here because the underlying communications principles are universal and are worth exploring. For example:

- The campaign did not rely solely on the company speaking for itself, but made use of **comments and testimonials** from real customers. Racing can and should do this.
- The campaign was based on a strong **understanding of its audience** and of the barriers that prevented people shopping at Lidl, so was clearly based on strong audience research and insight. We need to understand the motivations of racing's audiences, including our critics.
- The campaign did some **brave mythbusting** in repeating many of the negative things that people often said about Lidl and its products, then taking real customers behind the scenes, where they expressed surprise at the quality of those same products. Racing must confront popular myths directly. If we can't disprove a myth, it probably isn't a myth at all and we may need to make changes.
- It used its #LidlSurprises hashtag **across all its communications**, marketing, point of sale, online and internal content. Racing needs a proud, unifying welfare campaign message that is used everywhere in racing in a similar way.

Every interaction on welfare is an opportunity to surprise people, to dispel a myth, or to change someone's mind. In every interaction on welfare, we need to be inspiring a positive change in attitudes, not simply seeking to make a difficult conversation go away.

14.5 Making the ethical case

As noted above in section 2.10, we must ensure that racing engages positively in ethical debates about racing, and the use of horses in sport. By **emphasising the benefits that horses derive from racing** in our communications, at the same time as showing how reasonably avoidable risks are minimised, we can start to evidence and illustrate the point that the benefits to the horse outweigh the risks.

Underpinning this, we feel it would be helpful for the sport, working with the expertise contained within the BHA's Ethics Committee to develop a **Code of Welfare Ethics**, to provide confidence that the sport operates with honesty and integrity in its relationship with, and handling of, the horse.

14.6 Understanding the horse

Linked to the need to make the ethical case is the associated necessity to **grow the public's understanding of horses**. We feel that many public misperceptions about the welfare of racehorses develop because of a widespread lack of understanding of, and familiarity with, the horse, particularly the Thoroughbred racehorse.

By placing a **stronger focus on horses in our communications**, we can start to explain more about what their needs are, what motivates and stimulates them, and what constitutes "a life well lived". The inherent nature of the horse as a herd animal, a flight animal, and one which has evolved alongside humans for almost 6,000 years, needs to be explained more fully, in contrast with the views of those who

³⁷ <https://econsultancy.com/four-reasons-to-admire-the-lidlsurprises-campaign/>

anthropomorphise horses, or who assume horses have the same needs and responses as domestic cats or dogs.

The expertise of those in our industry who work with horses on a daily basis and who understand how to manage, motivate and care for horses needs to be asserted more positively, through effective storytelling that showcases the basis of this horse-human relationship.

14.7 Story capture and content development

We recognise that there are many hundreds of brilliant stories in racing, just waiting to be told, capable of telling a positive welfare message, giving racing an empathetic human face, and of changing perceptions. We need to capture those stories and translate them into strong content, pushing them out to new and existing audiences.

14.8 Opening doors

We strongly support the efforts that many in racing have made to open their doors to public audiences, particularly through the popular open days, held in our principal racing centres and communities.

We have also noted recent calls for a “National Racehorse Day”, in which these events are scheduled on a single day, as part of a whole-day celebration of the racehorse³⁸. We support this idea, whilst recognising that there may be some logistical challenges in finding a single day that works for the whole sport. We recommend that this is explored as part of the sport’s annual calendar, though emphasise the need for such an activity to be led by those who operate these events so brilliantly already, rather than being “taken over” by the sport’s corporate leadership.

The role of any central group should be to provide any necessary logistical, co-ordinating and promotional resource, as per the hugely successful Open Farm Sunday model³⁹. Open Farm Sunday started in 2006 and has grown steadily. A total of 1,600 farmers have opened their doors to 2.5million visitors, with almost half of 2019 visitors coming from urban areas.⁴⁰ It is also supported by a range of partners and sponsors, providing strong opportunities for engagement with businesses.

Again, there is potential to join forces with others from other equine sports and sectors, to create a **National – or even International – Horse Day**.

Racing’s existing open days provide outstanding foundations. This could also be done alongside other equestrian sports and racing should continue to explore the possibilities in our communications planning.

14.9 The importance of language

It is the Horse Welfare Board’s view that, in developing this work, the question of the language we use to describe welfare, both directly and indirectly, needs active consideration. We may inadvertently be using language or phrases in our formal and informal communication, which reinforce the impression of an underlying welfare “problem”.

For example, it is common for people in the sport to say of a horse before a race, “I just hope he comes home safe”. While this is undoubtedly an expression of how much that horse matters to the person in question, does it reinforce the perception of a high risk to horses when racing, when in fact it is far more likely that the horse *will* return safely? While this phrase is grounded in care and compassion and is understood by those in the sport, does it translate in the same way to the outside world? There will be other examples like this.

³⁸ <https://www.racingpost.com/news/henderson-and-johnson-give-strong-support-for-a-national-racehorse-day/406535>

³⁹ <https://farmsunday.org/>

⁴⁰ Source: LEAF Open Farm Sunday

Similarly, it is important that formal information released by the sport in, for example, stewards' reports, is carefully worded, as technology means this information is now readily accessible to large audiences. Information relating to welfare, or which may be perceived as relating to welfare, in formal reporting must be as complete and evidence based as possible and not left hanging or open to misinterpretation.

14.10 Political engagement

While many of the points above apply to both public and political communications, recognising that these are inextricably entwined, there are specific points worth noting in relation to engagement with parliamentarians and policymakers. The BHA leads political engagement on behalf of the sport, with the support of an industry-wide Public Affairs Group, and we welcome the recent increase in resource allocated to this area.

While central co-ordination of public affairs is important, it is another area in which we need to engage both centrally and at the grassroots. It is important that parliamentary representatives recognise the importance of racing in their own constituencies, where they have racecourses, training or breeding establishments there, or simply where they have racing staff or supporters as constituents.

The Horse Welfare Board is keen to support the BHA in its efforts encourage the sport to engage more effectively at constituency level, as this is indicative of the kind of racing "movement" we have described above. We are also keen to help resource and support the central operation, e.g. through identifying effective spokespeople who can represent the sport in discussions about welfare with MPs, and in the development of engaging stories and robust data.

14.11 Leadership

We feel that there is a need for a **senior level communications lead** to work with racing to make this happen, with a strong mix of campaigning and reputational skills, who can drive this element of the strategy. It is our recommendation that this role be recruited and based within Great British Racing, to:

- Ensure that the story of the horse – and those who take care of the horse - is integrated and aligned with the sport's overall marketing and promotional strategy.
- Make more efficient use of existing above-the-line marketing and content development budgets.

Our caveats are:

- This role needs to have a strong **corporate communications and campaigning** skillset first and foremost, with promotional marketing as a secondary consideration, not the other way around.
- This role needs to **work across the industry**, bringing all stakeholders and all elements of the communications mix together, to ensure an aligned approach, including in the communication of breeding and aftercare messaging. While different parts of the sport will continue to execute their own campaigns, this role will seek to integrate and amplify welfare messaging by working collaboratively across the industry.
- That the role works closely with the BHA and the industry-wide Public Affairs Group, to ensure that communications campaigns are integrated into political and policy strategy and plans.
- This role develops **relationships with others in the equine sector**, including other sports and charities, to build stronger combined messaging, campaigning and activities focused on the horse, e.g. the idea of a national day to celebrate the role of the horse in British life.
- That **GBR should work closely with the Horse Welfare Board**, to ensure that the explicit and implicit promotion of welfare and the racehorse is appropriately maintained and not eroded over time in favour of purely consumer marketing.

14.12 Broader requirements

Beyond this resourcing point, we have divided our overarching communications strategy into two core areas, broadly defined as:

- Positive promotion of welfare
- Reputation and issues management

We decided that these two interrelated areas are best described in terms of their requirements. We would expect these to form the basis for a more detailed communications strategy and plan.

(a) Positive promotion of welfare – requirements

- **Campaign strategy** and associated promotional plan, working with external agencies, including consideration of the bridge between the current Horse Comes First campaign and any new approach.
- **Audience strategy** and prioritisation, to identify, define and understand the key audiences that we need to reach.
- **Creative development**, including industry engagement to gather input and insight, and including some testing with target audiences.
- **Content development**, including digital content, messaging, and any supporting materials.
- **Channel development**, to ensure we are using an appropriate range of paid and unpaid channels to reach our target audiences, e.g. multichannel advertising, onsite promotion, social media, online/web, traditional news media, print and broadcast features, face to face, events, etc.
- **Industry engagement plan**, to support the sport to understand and make use of the messaging and content, to ensure that communications are executed BY the sport, and not simply on BEHALF of the sport.
- **Promotion and amplification of existing initiatives**, e.g. industry open days, behind the scenes racedays, education and training campaigns, industry awards with a welfare element (e.g. GSSSA, Lycett’s Awards, etc).
- **Digital communications strategy** for welfare, including more effective use of digital and social media, e.g. consideration of Search Engine Optimisation (SEO), to ensure that racing’s welfare messaging and content is more visible on internet searches than the messaging and content of the sport’s opponents and critics.

(b) Corporate communications (reputation and issues management) – requirements

- **Code of Ethics** development & communication, working with the BHA’s independent Ethics Committee and potentially other equine sports.
- **Identification and development of spokespeople**, to support racing’s best communicators, whether trainers, jockeys, owners, or breeders, or stable, racecourse, or regulatory staff, to champion the sport in a range of settings, e.g. media, parliament, conferences, social media, etc.
- **Issues management** planning, working with BHA and other key stakeholders, to ensure that the sport has clear processes, plans and messaging to manage any issues or incidents with a welfare dimension.
- Active consideration of how we **respond to ideological campaigns against racing**, where these are based on a negative agenda or which are based on misinformation.
- **Information/messaging** review and strategy, e.g. to determine what data we release, when, and how. What should our messaging, language and style of messaging be around welfare?
- **Communications support** (including kit and collateral) for parliamentary engagement strategy on welfare, including programme of MP racecourse/yard visits, conference activities, events, messaging etc.
- **“Internal” communications** across the sport, to build engagement with campaigns and campaign messaging, to keep people informed of key political and other developments, and to encourage constructive discussion of welfare-related issues.
- Co-ordination with – and support for – **communications and education strands undertaken within e.g. the aftercare, ownership and breeding sectors**, as led respectively by RoR, the ROA and the TBA, or to ensure these are incorporated into the sport’s core messaging and appropriately aligned with the overall communications strategy.

- **Stakeholder liaison** leadership, strategy and plan, e.g. with other equine sports, charities and other racing jurisdictions.

14.13 Key projects: High impact communications

As most projects in this strategy require a communications element, or may be used for engagement purposes, we have only listed communications-specific projects here. A full list of projects can be found in section 15.2

23. Communications strategy and plan

24. Promotional welfare communications plan

25. Corporate communications (welfare) plan

26. Code of ethics





15. Recommendations and key projects

15. Recommendations and key projects

In our discussion of the various outcomes and enablers contained in this strategy in sections 8 to 14, we identified a number of key projects that we consider essential. Many of these projects support multiple outcomes and enablers.

Recognising that we have identified a large number of projects, not all of which will be achievable in the short term and most of which were listed under more than one heading, we now summarise 20 key recommendations arising from this strategy, as follows.

The Horse Welfare Board wishes these recommendations and projects to be viewed and taken forward as a single complete set. Many of them are interconnected, with some being necessary precursors or dependencies of others.

15.1 Recommendations

A: Standards and benchmarking

- 1. Welfare benchmarking:** The Horse Welfare Board recommends the continued development of a system for benchmarking welfare of Thoroughbreds, working with other racing jurisdictions, equine sports and equine sectors as far as possible. This should be a scientifically grounded but practical checklist, which has the potential to be used as evidence of welfare standards in racing. To be led by the BHA as an industry-wide project, with sponsorship from the HWB to ensure this work is developed collaboratively both across and outside the industry.
- 2. Euthanasia code of practice:** We require the development and implementation of a single euthanasia code covering the whole industry, including breeding, pre-training, sales and aftercare, building on existing codes and including a clear decision tree to ensure euthanasia is used appropriately. This code should be communicated to industry and external audiences, to encourage understanding of responsible, ethical euthanasia as an important element of the welfare toolkit. To be led by the BHA and utilising appropriate expertise from e.g. the Veterinary and Ethics Committees.
- 3. Code of Ethics:** Racing to develop and communicate an ethical case for racing, including a Code of Ethics. Code of Ethics to be commissioned from the BHA's (independent) Ethics Committee by the HWB and which can potentially be developed with other sports as a "Sport Horse Charter".
- 4. Ground and going improvement and benchmarking:** Racing to undertake a project to develop performance quality criteria and measurement for ground and going, to cover first racing, then training surfaces, with an associated education and accreditation programme. This project should also assess, with the help of predictive modelling, any safety or welfare issues linked to ground or going, in relation both to turf and artificial surfaces, and the preparation and irrigation of surfaces, making recommendations for action as appropriate. This project to be led by a subgroup of the BHA's cross-industry racecourse committee, with sponsorship and funding from the Horse Welfare Board.
- 5. Continued consideration of breeding methods:** British racing should continue to play a role internationally on the relative merits of different breeding methods, led by the TBA and BHA and helping the Horse Welfare Board to maintain its understanding of developments in this area.

B: Safety improvements

- 6. Obstacle improvement:** Continued, continuous improvement of obstacle design, visibility, layout and structure, beginning with the further development of safer hurdle design and obstacle visibility. To be led by the Horse Welfare Board Chair, working with the group already convened, including representatives from racecourses, BHA and RSPCA, working with expertise from British Eventing.

C: Reviews of current policies and practices

7. The BHA should conduct a consultation on the whip in 2020, as follows:

With a view, regardless of other outcomes discussed in the consultation, to reviewing penalties for breaches of the whip rules as quickly as possible and ideally by the end of October 2020, noting that the need to increase penalties is a **clear, minimum recommendation** of the Horse Welfare Board, with particular consideration of increased penalties for:

- **Whip action offences**, e.g. use of the whip over shoulder height, where evidence suggests that greater deterrents are required
 - **Whip modification offences**, penalties for which are felt to be inadequate
 - **Repeat/multiple offences** by the same jockey, increasing the progressive penalties applied for multiple offences
- Consultation on penalties should seek views and ideas on a range of sanctions, e.g. **finer and/or suspensions** for jockeys, and **prize money** sanctions.
 - The Horse Welfare Board recognises that different views exist on the feasibility and desirability of sanctions involving **disqualification of the horse** but feels this question could usefully be considered and resolved through consultation. Should the BHA choose to exclude this from the consultation, it must set out clear reasons for doing so.

In that consultation, the BHA should also take the opportunity to gather views, and potentially to consider:

- **Future banning/retention of the whip for encouragement**, in order to foster a controlled, constructive and managed discussion.
- Changing the rules to place further **restrictions on use of the whip for encouragement** (e.g. reduction in number of permitted strikes, or restricting use during particular stages of a race).

The Horse Welfare Board wishes to be clear that the only explicit recommendation for immediate action on the whip relates to the need for increased penalties and for the industry to take greater control of conversations relating to the use of the whip for encouragement, initially expressing views via an open, managed consultation process.

- 8. Stalls and starting review:** Racing to conduct a short review of stalls and starting, including: Assessment of risk of injury to horses from stalls starts and jumps (tape and flip) starts, to ensure risks are as low as possible. If risks are identified, causes to be ascertained and addressed. Review to include consideration of stalls loading procedures and identification of any real or perceived welfare issues, with appropriate action to be taken as necessary. This short review to be led by the BHA and RCA, but with a view to regular future reassessment, in line with new information and data, or utilising improvements made in overseas jurisdictions.
- 9. Lower place prize money review:** Racing to conduct a short analysis to assess any welfare or safety issues arising from lower place prize money and to provide reassurance, or to make changes to prize money allocation if required.

10. Improved accountability in non-regulated sectors: The Horse Welfare Board recommends that the same standards of welfare, safety and traceability are applied in non-regulated parts of racing, as the lack of regulation may compromise the welfare of Thoroughbreds, as well as creating vulnerabilities that may affect the sustainability and reputation of the regulated sport. This applies to the breeding, pre-training, sales, transportation and aftercare sectors.

At this stage, we have not formed a definite view on how this accountability is best achieved, e.g. by registration or accreditation schemes, codes of practice, or through more formal regulation. The Horse Welfare Board will consider this alongside the BHA and relevant stakeholders, conducting or commissioning a review as required.

11. Welfare financing review: The industry to conduct an analysis of racing's funding model for welfare, with a particular focus on the aftercare sector to ensure appropriate sustainability of the rehoming sector, developing new funding models and subsidies as required, and on opportunities in relation to research and development. This work will be scoped and commissioned appropriately by the Horse Welfare Board.

D: Data and risk analysis

12. Establishment of cross industry data unit and programme: Recognising the importance of robust data, racing to establish a cross-industry data unit and programme, coordinated by the BHA, with the sponsorship of the Horse Welfare Board to ensure alignment and prioritisation of data projects, with a focus on the recommendations in the remainder of this section, as follows:

13. Traceability: Racing should aim for the fullest possible traceability, during the period of this strategy (2020-2024), across the lifetime of all horses bred for racing, with the initial priorities being:

- 100% data completion and traceability of racehorses' **first step away from racing**.
- Improved understanding of **second and subsequent** steps away from racing, via improved traceability and fuller engagement with commercial rehomers, to be led by RoR.
- Analysis and understanding of any **gap between 30-day foal notification and entry into racing yards**, with actions being developed to address any welfare issues that may emerge from this analysis, to be led by BHA and TBA.
- Addressing **gaps and accessibility challenges** in the data, working with e.g. Weatherbys and Defra.
- Devising solutions that **remove barriers and provide incentives** to ensure fullest possible traceability.
- **Working with others** where control is limited to minimise welfare risks, e.g.
 - Working with other equine sports and sectors on collaborative approaches
 - Working with sales houses to ensure a responsible approach to overseas sales and to restrict sales or exports where there is evidence of risk
 - Providing education and support to rehomers, as per recommendation 16 below

14. Predictive risk modelling: Continued development, improvement and implementation of the predictive risk modelling approach, beginning with the Jump Racing Risk Model, led by BHA and reporting into the industry data programme. Further information and data, including that obtained via trainer and jockey engagement, and ground and going projects, to be added when available.

15. Medication data: Racing to establish a project relating to the gathering and analysis of medication data and clinical records, to understand any areas of risk in relation to injuries and fatalities, to be led by the BHA, working with the NTF and BHA Veterinary Committee.

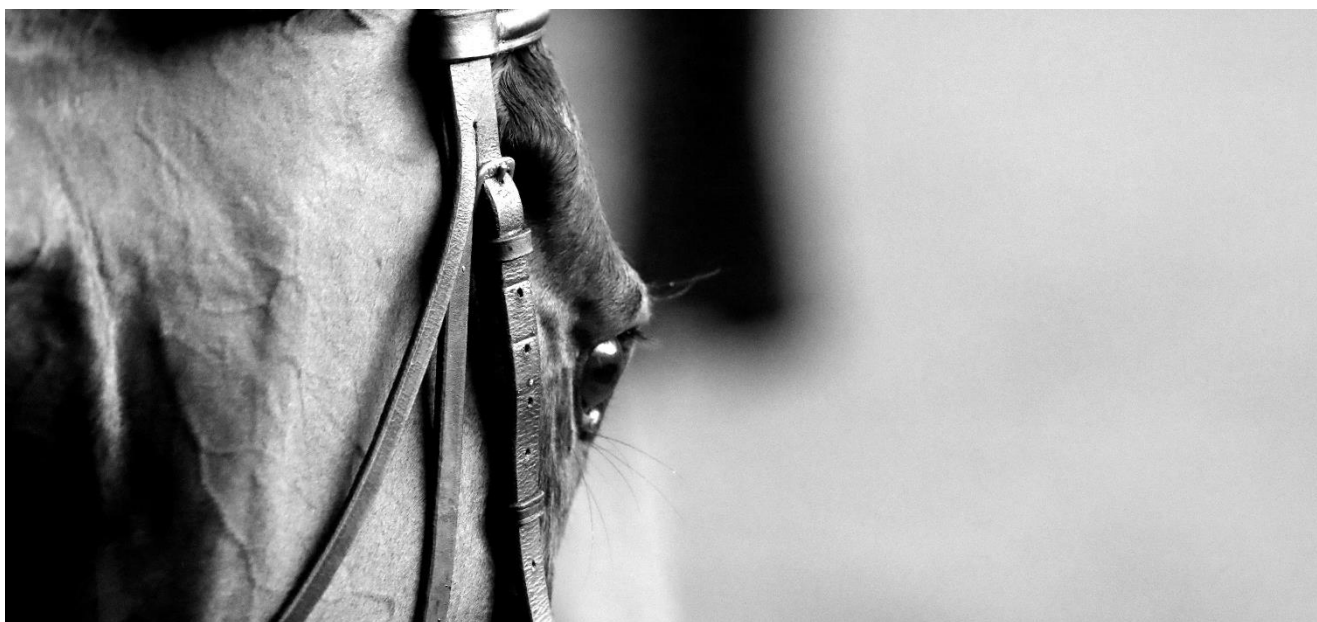
E: Training and education

16. Training and CPD: The Horse Welfare Board recommends an improved and more aligned focus on training, education and CPD programmes across the industry, to ensure best practice, with a particular onus on:

- **Breeder education** to ensure responsible breeding practices and to ensure that standards required in regulated sectors are respected and applied in the breeding sector, to be led by the TBA but with support from the wider industry.
- **Owner education** to ensure responsible ownership, particularly in relation to owners' responsibilities to horses following the end of their racing careers.
- **Education and support for rehomers and potential rehomers**, to be led by RoR but with support and promotion by the wider industry.
- **CPD programmes** for trainers, to be developed by the NTF and BHA and to form part of the licence renewal process.

F: Communication, engagement and reputation management

- 17. Promotion of welfare and the horse:** Racing to develop and implement an approach and plan that puts the importance of the horse at the centre of its promotional activity, using a balance of strong storytelling, strong evidence and data and which makes the ethical case. This to be led by a new senior communications role, which will work with the Horse Welfare Board, GBR, BHA and an industry communications group.
- 18. Issues management:** Racing to reconsider its issues management approach and associated messaging, to ensure this is effective in providing reassurance and building (and measuring) trust with key public and political audiences. This to be led by a new senior communications role, in line with recommendation 17 above and working particularly with the BHA.
- 19. Industry engagement:** Racing to build the capacity of the sport to engage effectively on welfare, including support for industry engagement initiatives (e.g. open days), developing and broadening capacity to engage with the public and politicians, keeping the sport informed of important welfare developments, and equipping them with communications content, materials and messaging led in line with, and with content drawn from, recommendations 17 and 18 above.
- 20. External stakeholder engagement:** Racing to step up its engagement and collaboration with other equine sports and sectors, working together on key initiatives, as well as deepening its engagement and dialogue with trusted welfare organisations and charities, with a view to improving equine welfare and promoting trust. This plan to be facilitated by the senior communications lead, working with the BHA and the Horse Welfare Board.



15.2 Key projects:

A summary of the key projects listed in this strategy and which relate to the recommendations listed above is provided in the table below (include table of projects as per the strategy).

	Project name	Summary	Outcome or enabler supported
1	Welfare benchmarking tool	A practical checklist that allows those responsible for the care of Thoroughbreds to self-assess welfare levels against a common benchmark, to drive consistency and to facilitate the sharing of best practice. Tool to be developed in collaboration with international jurisdictions and other equine sports and sectors.	1, 2, 4 A, B
2	Training and CPD	Training and education programmes to ensure that those responsible for Thoroughbred care, whether in regulated or unregulated roles, understand their responsibilities, are aware of current best practice and commit to continuous learning.	1,2,3, 4 B
3	Education of/support for rehoming and potential rehoming	To minimise the risk of negative welfare outcomes and to ensure the sport is seen to make positive and reasonable efforts to protect horses outside its immediate control, we recommend a strong emphasis on education of those rehoming racehorses, or who are considering doing so.	1, 2, 4 B
4	Traceability	An industry-wide project, linked to one of our key enablers, to ensure fullest possible traceability across the lifetime of all Thoroughbreds bred for racing, from the point of 30-day foal notification onwards. To include the plugging of gaps and shortfalls in the data, communication of traceability requirements, removal of barriers to traceability and the streamlining of traceability processes.	1, 2, 4 A, B
5	Welfare funding model	Analysis to be undertaken into racing's model for funding welfare, including e.g. the development of new partnerships for innovative product and technological development, and an assessment of the funding model for aftercare to ensure sustainability of the rehoming sector.	2, 4
6	Euthanasia code/policy	The development of a single euthanasia framework, building on existing codes, for use across the industry, including a clear decision tree to ensure euthanasia is used appropriately. Communication of this code to industry and external audiences, to encourage understanding of euthanasia as an important and ethical element of the welfare toolkit.	1, 2, 4 B
7	Review of breeding, pre-training, sales and aftercare	Consideration of those parts of the industry not currently subject to full BHA regulation, to assess potential benefits of registration schemes, codes of practice, accreditation schemes, or licensing arrangements. Balance of focus to be on rewarding and encouraging alignment and best practice with core standards.	1, 2, 4
8	Continued consideration of breeding methods	Continuing consideration of the pros and cons of different breeding methods in the context of welfare and international considerations. The HWB to work with the TBA and the BHA to maintain understanding of developments in this area.	1, 2
9	Jump Racing Risk Model (JRRM)	The further development and application of the JRRM, which will identify risk factors linked to falls, injuries and fatalities in Jump racing.	3, 4 A, B

10	Racing fatalities occurring off the racecourse	The continued gathering and analysis of data of fatalities linked to racing that occur off the racecourse, to build a more complete understanding.	1, 3 A
11	Medication data and clinical records analysis	The continued gathering, and subsequent analysis, of medication data and clinical records linked to general welfare considerations and to racing-related fatalities.	1, 3 A
12	Rider engagement	The gathering of rider insight into falls and fatalities to build a fuller understanding of risk factors.	3 A
13	Trainer engagement	Collaboration with trainers to build understanding and share trainer expertise and best practice on training regimes that may reduce risk of racehorse injury and fatality.	3 A
14	Suitability to race	Assessment of perception-related suitability issues, to ensure research is robust, to address misperceptions and to provide evidence and information.	3, 4 B
15	Ground/going research, development & training	Further research into ground and going to build a common framework for “what good looks like”, to apply this to racecourses and training surfaces, with the development of training programmes for participants and their staff.	3, 4 A, B
16	Obstacle improvement & development	Continued, continuous improvement of obstacle design and structure, beginning with the further development of safer hurdle design and obstacle visibility.	3, 4 B
17	Stalls & starting review	Review of stalls design, stalls loading procedures, and Jumps starting procedure, to provide reassurance that risks are low and to address negative perceptions.	3, 4 A, B
18	Review of impact of prize money for lower placed horses	Consideration of any welfare link with prize money availability for lower placed horses.	1, 3, 4 A, B
19	Fixture timing & allocation	Continued assessment of fixture allocation, race conditions and race timing in relation to welfare considerations.	1,3, 4 A, B
20	The future of the whip	Following the HWB’s recommendation to the BHA for future action on the whip, the development of any resulting consultation, implementation plans and related sub-projects.	4 B
21	Welfare Data Programme and establishment of a Welfare Data Unit	The establishment of a cross-industry data programme, with the aim of establishing an aligned data strategy and an integrated, cross-cutting data unit for racing.	1, 2, 3, 4 A, B
22	Thoroughbred Welfare Database	The further development of the BHA-led project to create a single aligned database for the sport, integrating this across the industry, as part of the Data Unit project (project 21).	1, 2, 3 A
23	Communications strategy and plan	A cross-industry communications strategy and plan, to be developed by and for the sport, based on this overarching welfare strategy, with appropriate co-ordinating, senior-level leadership, and appropriate alignment with racing’s overall communications strategy.	4 B
24	Promotional welfare communications plan	Development and execution of the promotional plan, including consideration of the requirements outlined within the Horse Welfare Board strategy.	4 B
25	Corporate communications (welfare) plan	Development and execution of the corporate communications and issues management plan, including consideration of the requirements outlined within the Horse Welfare Board strategy.	2, 3, 4 B
26	Code of ethics	Development and communication of a welfare-related code of ethics for the whole industry, working with the independent Ethics Committee and with stakeholders and external consultants as required.	1, 2, 3, 4 B



16. Funding and resourcing

16. Funding and resourcing

This is an ambitious strategy. Its ambition must be shared by the industry, which needs to invest in it appropriately, as this is essential to its success.

However, in developing this document, we have identified several areas where funding efficiencies can be made across the sport. The big advantage of a cross-cutting, industry-wide strategy and programme is in allowing these efficiencies to be identified.

It is vital that the sport commits to funding this strategy and any associated implementation plan. That may mean additional investment in some areas, requiring funding from HBLB, the Racing Foundation, or increases to the core funding of industry-wide bodies, e.g. the BHA.

Resourcing is also important. The Horse Welfare Board has pulled this strategy together with the help of people employed in other roles within the sport. The industry must be prepared to provide dedicated and skilled resource, to ensure the effective implementation of the projects identified in this strategy. This includes resourcing both of welfare projects and communications, education and public affairs.

Our 2020 funding bid to HBLB made it clear that HBLB's funding is just one contribution to the overall sum of welfare spending in racing, and a separate Levy contribution should not, under any circumstances, be cited as a reason or justification, by any part of the industry, to cut welfare spending from other budgets.

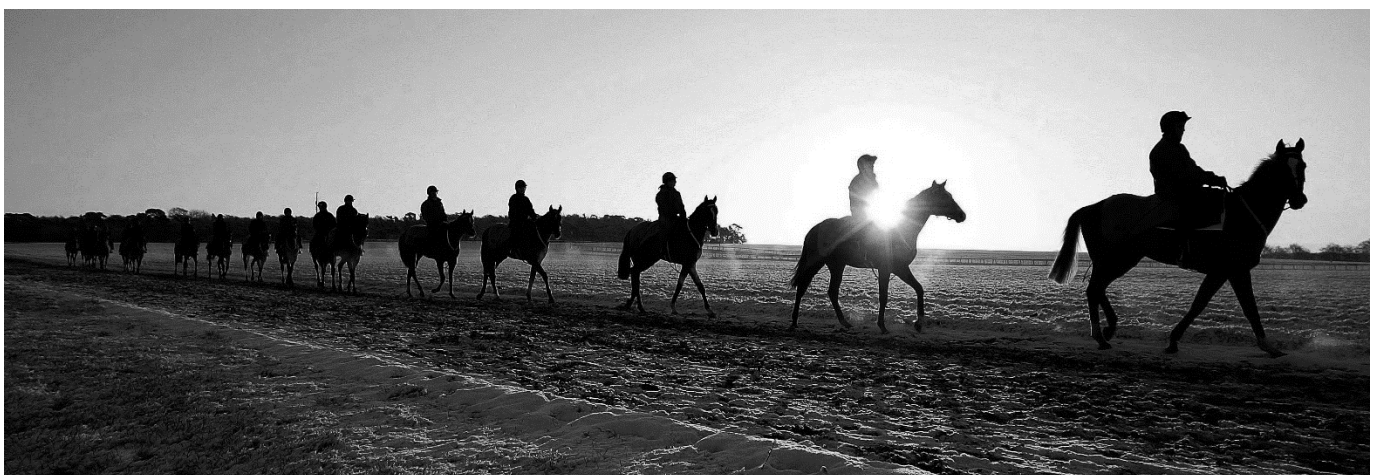
We have also discussed alignment of communications spending with Great British Racing, with a view to ensuring that the Horse Welfare Board retains strong oversight of the welfare communications strategy.

The Horse Welfare Board will seek, over the lifetime of this strategy, to quantify the industry's total spend on welfare more accurately, both in absolute terms and as a proportion of the sport's total revenues. This is an essential part of the case for self-regulation and valuable proof of racing's commitment and dedication to its horses.

We aim to work with the industry towards common oversight of relevant funding activities, to ensure appropriate investment in the priorities and outcomes identified in this document, and also to compare British Racing's contribution to equine welfare to the investment made in other jurisdictions.

We have also worked with the BHA to consider how the basis of the Data Programme and Data Unit discussed in section 13 can be developed using existing funding from the Racing Foundation.

Where we have requested funding direct from the Levy, these are largely where there is a need to move swiftly in areas that may not be covered within existing industry budgets, or where additional resource, or the recruitment of specialist skillsets, is required.





17. Concluding remarks

17. Concluding remarks

The development of this strategy has been a significant undertaking and was completed in a relatively short timeframe. It has been designed to be the start, not the end, of a conversation. Over the next few months, we will seek to broaden that conversation, and to work across the industry to develop the strategy into a clear, phased and costed implementation plan.

We have noted several times in this document that the strategy will always be a work in progress, which we will continuously develop and refine, particularly as new information comes to light and in response to changes in the external context in which we operate. The Horse Welfare Board will review the strategy and report on its progress on a regular, annual basis.

We do not expect everyone reading this strategy to agree with everything it contains. Yet we do expect that everyone will find something that resonates with their particular view. To produce a strategy, the Horse Welfare Board had to make decisions and choices, and sometimes compromises, and to reach a conclusion in any debates. We similarly encourage all readers of this document to focus on making strong, productive and positive progress.

Inaction, or endless debate leading to inaction, is not an option.

We hope that those involved in the racing industry will be encouraged that strong foundations are already in place, and be heartened by our call for greater confidence, positivity and unity in the communication of racing's welfare story.

Meanwhile, we hope that public and political audiences will be reassured and impressed by racing's dedication to the horses in its care, our willingness to listen and to be responsive to concerns, and our determination to strive for improvement wherever possible.

Most importantly, we must all join together in championing our industry's greatest and most cherished asset, the Thoroughbred racehorse.

We must celebrate the leading role these horses play in our sport and their unique bond with our people, demonstrating the highest possible levels of welfare, safety and collective responsibility, and ensuring that **all horses bred for racing enjoy a life well lived.**





Appendix 1:

Background information relating to the whip

Appendix 1: Background information relating to the whip

1. Current whip rules and penalties

The current rules in place pertaining to the use of the whip are described on the BHA website, as follows:

The basic rules are:

- *The whip can be used a maximum of seven times in a Flat race or eight times in a Jump race. Any more than this will prompt the stewards to review the ride*
- *As well as the number of times the whip is used, the stewards will look at the force with which it is used, whether the horse has been given time to respond, the purpose for which the whip was used, whether the horse was in contention or clearly winning at the time it was used, and whether the whip has been used in the correct place (i.e. on the horse's hindquarter rather than flanks)*
- *The stewards will consider the ride as a whole, in particular the closing stages, when determining whether the rider is in breach of the rules*

Any rider found to have contravened the rules will face a period of suspension, and any rider picking up five offences in a six-month period will be referred to the BHA for a more substantial penalty.⁴¹

The specific rules relating to the whip in the BHA Rules of Racing can be found in Chapter F at Rules 44 and 45:

WHIP

(F)44. A Jockey must carry, but is not obliged to use, a whip that complies with the Equipment Code.

(45). A Jockey must use a whip properly.

The latest version of the rules came into effect on 21 September 2019. However, it is important to note that, while the wording in the new rules has been simplified, the effect of the rules remain unchanged with the previous version. The simplicity of the new rule 45 – that the jockey must use a whip properly – needs to be read in conjunction with Part 4 of the Guide to Penalties and Procedures, which forms part of the Rules of Racing.

Part 4 of the Guide to Penalties and Procedures comprises the following sections:

Guidance on the Use of the Whip

When to hold an enquiry for breach - Rule (F) 45

Notes on Penalties - Rule (F) 45

Penalty Guidelines - Rule (F) 45 and

Fines.

The complete Guide can be found [here](#).

For Stewards, whose job it is to enforce the rules, the Guide provides that in assessing a rider's use of the whip, *the Stewards should always remember that the whip should be used for safety and encouragement. Whilst there is a requirement for all riders to carry a whip, there is no obligation on riders using their whip.*

It goes on to state:

⁴¹ <https://www.britishhorseracing.com/regulation/the-whip/>

Any use of the whip by a rider must be appropriate, proportionate, professional, and take account of the Rules and these Guidelines.

The whip may be used to encourage a horse and to maintain its focus and concentration.

The stimulus provided by the use of the whip must be limited so as not to compromise the welfare of the horse.

All riders must use an approved whip.

The industry has been working the current set of rules for almost 7 racing seasons and there is a view that the rules are now well understood by participants. In 2015, the BHA said:

The BHA's current view is that, overall, the new Rules and penalty structure have had a significant, positive effect on jockey behaviour, reducing the number of whip offences by almost half – within a threshold that itself has effectively been halved – and safeguarding the welfare of racehorses. The fact that some of British Racing's most prolific and successful Jump jockeys operate well within the permitted thresholds sends a positive signal to all riders that excessive use of the whip is not required in order to be successful.

The BHA will continue to monitor the use of the whip with horse welfare and public perception in mind, with a particular focus on high-value races. The BHA is currently carrying out a more detailed analysis of data relating to the penalties for all riding offences, including use of the whip, to ensure that the penalty structure remains fair and proportionate and that it provides a sufficient deterrent to breaches.⁴²

2. Whip offences by type, 2010-2018

Offence	Whip by Offence									% change 2010 - 2018
	2010	2011	2012	2013	2014	2015	2016	2017	2018	
Above permitted level	517	579	538	485	481	429	393	383	418	-19%
Arm above shoulder height	9	5	9	4	7	6	9	24	18	100%
Clearly winning	18	13	10	18	11	12	3	8	11	-39%
Down Shoulder in forehand	98	101	6	7	10	8	8	9	6	-94%
Excessive force	22	12	11	5	3	3	5	5	7	-68%
Horse injured	0	1	0	0	0	0	0	0	0	0%
Incompetent use	0	1	1	0	0	0	0	0	0	0%
Incorrect place	31	56	15	20	28	32	16	28	34	10%
Out of contention	104	47	17	11	10	9	7	13	1	-99%
Past the winning post	2	0	1	0	0	0	0	0	0	-100%
Showing no response	7	3	1	0	1	0	0	0	0	-100%
Wealed (consistent with use)	10	6	2	3	1	1	0	0	1	-90%
Without time to respond	69	68	12	12	28	15	18	48	46	-33%
Total	887	892	623	565	580	515	459	518	542	-39%

(Source: BHA)

⁴² <https://www.britishhorseracing.com/wp-content/uploads/2016/01/BHA-BRIEFING-2015-Whip-Data-14-01-16.pdf>

3. Whip offences by race type

Whip offences in Flat Turf Races correlate closely with the overall trend of a 39% reduction in whip offences between 2010 and 2018, with a reduction rate relative to the number of runners of 37%. This may be explained by the fact that, on average, 59% of total runners and 56% of total whip offences are in Flat Turf races.

Hunter Chases consistently have a comparatively high number of whip offences relative to number of runners. This may be because only amateur riders are able to participate in these races. However, Hunter Chases are also the race type that has seen the largest relative reduction in the number of whip offences between 2010 and 2018. A whip offence reduction rate of 70% suggests that, while Hunter Chases continue to experience a comparatively high number of whip offences, there are clear improvements in use of the whip.

The second highest whip offence reduction rate by race type has occurred in All Weather racing where the reduction rate relative to number of runners is 46%. The whip offence reduction rate relative to the number of runners for Flat Turf is 37%, National Hunt Flat is 31%, Hurdle is 29% and Steeple Chase is 24%.

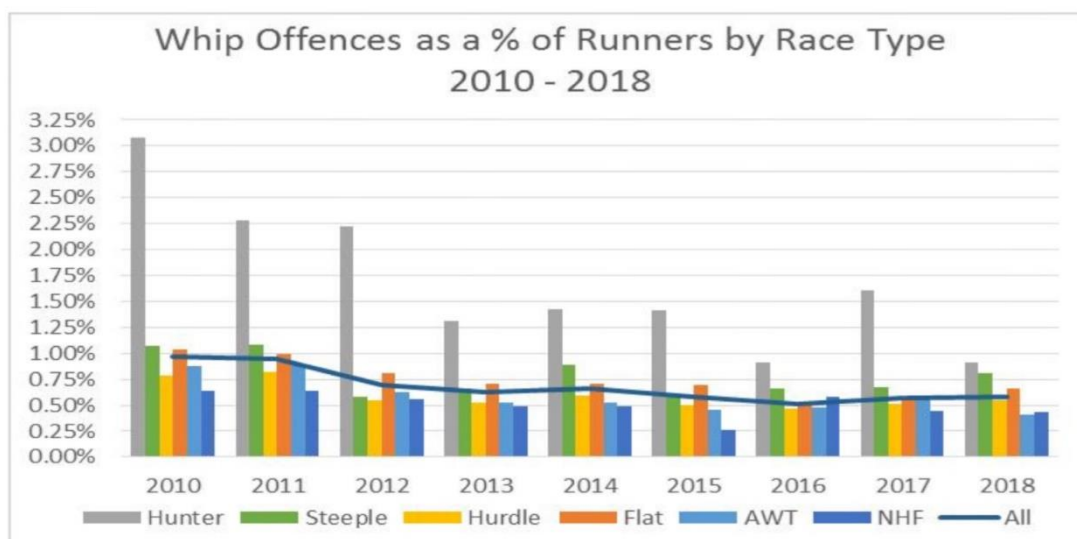


Figure 11: Whip offences by race type, 2010-2018 (Source: BHA)

4. International Federation of Horse Racing Authorities (IFHA) minimum standard guidelines for the use of the whip

Article 32 A (RACING) - MINIMUM STANDARD GUIDELINES ON THE WHIP AND ITS USE

Only padded/shock absorbing whips/crops which have not been modified in any way may be carried in a race.

This Guideline gives examples of use of the whip which are prohibited:

- Using the whip to the extent of causing injury.
- Using the whip with the arm above shoulder height.
- Using the whip with excessive force.
- Using the whip on a horse which is showing no response.
- The continued use of the whip on a horse after its chance of winning or being placed is clearly gone.

- The unnecessary use of the whip on a horse that has clearly won its race or has obtained its maximum placing.
- Using the whip on a horse which is past the winning post.
- Using the whip on the flank of the horse.
- Using the whip with excessive frequency.
- Using the whip on any part of the horse's head or in the vicinity of the head.
- The use of the whip in front of the saddle while the whip is held in the forehand position, unless exceptional circumstances prevail.⁴³

5. International context relating to the whip: summary findings

The Horse Welfare Board examined the current international context in relation to changes in policies and differences in the rules across jurisdictions.

Of particular note is the variation in definition of 'excessive frequency'. **France and Germany** state that the jockey must not use the whip on more than five occasions during the whole race. In **Ireland** the number is nine, in **South Africa** the number is 12, while in **Australia** it is no more than five hits prior to the 100-metre mark of the race but, after this point, it is unlimited.

In **Hong Kong and Singapore**, there are no prescribed number of hits. The Hong Kong rule states that, "any rider who misuses the whip or uses the whip in an improper manner will be subject to disciplinary action". In Singapore, the rule provides that, "No person in a race or trial, or in track works, or elsewhere shall use a whip in an excessive, unnecessary or improper manner". It is a matter for the Stewards in Hong Kong and Singapore to determine what constitutes misuse, whether excessive, unnecessary or improper.

In **Great Britain**, the BHA rules permit the whip to be used a maximum of seven times in a flat race and eight times in a jumps race. If a jockey goes over these numbers, the Stewards will review the ride, considering a range of other factors, prior to determining whether a penalty should be imposed.

Norway is currently the only country that bans the whip for encouragement and safety purposes. Use of the whip for encouragement was banned by the Norwegian Parliament in 1986, while its use for safety purposes was banned by the industry in 2009. In a recent speech, Hans Petter Eriksen, the former managing director of the Norwegian Jockey Club said:

Why did we choose to go all the way and remove the whip completely? Mainly because it was a natural step to take after more than twenty years with the existing rules. We also had experienced that carrying a whip was not necessary for safety reasons because we never had accidents during this timespan that could be related to our whip rules. A jockey has usually no time to react to use the whip if a situation occurs and accidents on the flat are mainly due to horses clipping heels, slipping or injuries.⁴⁴

The Thoroughbred Safety Committee of the Jockey Club of the **United States of America** recently recommended a ban on the use of the whip for encouragement.⁴⁵ While the complexity of racing's regulatory system in the USA means that it may be some time before the recommendation is adopted by any of the US racing jurisdictions, it is worth noting that the Jockey Club's recommendation was based on consumer research and results from a survey of Stewards undertaken by the Racing Officials Accreditation Program.

Separate to the Jockey Club's recommendation, the Californian Horse Racing Board voted unanimously in March 2019 to ban the whip except for safety purposes. This was one of several recommendations following a safety review of the Santa Anita racetrack in 2019. The recommendation to ban the "riding crop", was the subject of a public consultation in March. The resulting, slightly redrafted, rule is due to be considered at the December 2019 meeting of the Californian Horse Racing Board.

⁴³ <https://www.ifhaonline.org/resources/ifAgreement.pdf>

⁴⁴ Speech to European and Mediterranean Horseracing Federation conference, May 2019

⁴⁵ http://jockeyclub.com/pdfs/TSC/crop_misuse.pdf

There have also been developments in **Canada**. In October 2019, it was announced that jockeys riding at Woodbine would be subject to new riding rules during a test period, in which crop use has been restricted to the underhand position only, while also allowing no contact with the horse with the crop in the cocked position and prohibiting any hits to the horse's belly or surrounding area.⁴⁶

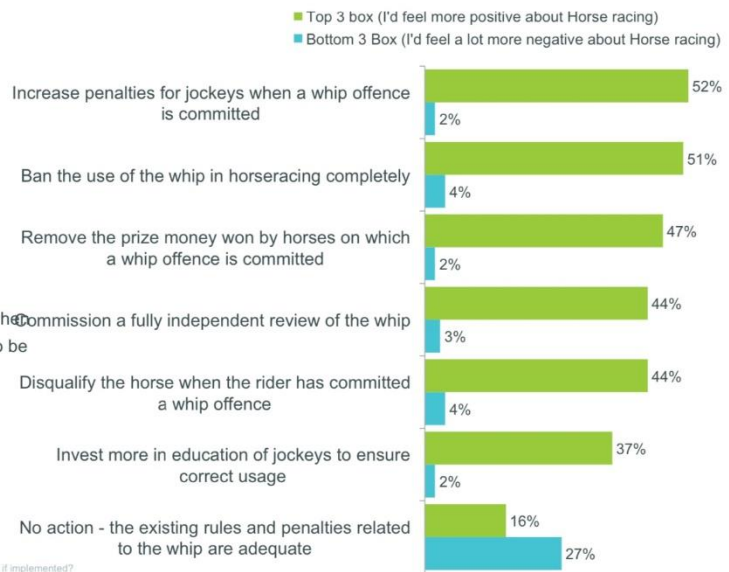
Following the end of the Woodbine race meet on 15 December 2019, the test will be evaluated to see if further revisions are necessary, prior to a planned full rollout at the Woodbine and Fort Erie racetracks in 2020.

6. Public opinion survey: Additional data

Clear call to action on the Whip

Half of consumers either want increased penalties when a whip offence is committed or the use of the whip to be banned completely.

QWFL6. To what extent would each of the below measures impact your views of horseracing, if implemented?
Base (1496)
Confidential & Proprietary. Not For Public Distribution. Do Not Copy.



- 25 -

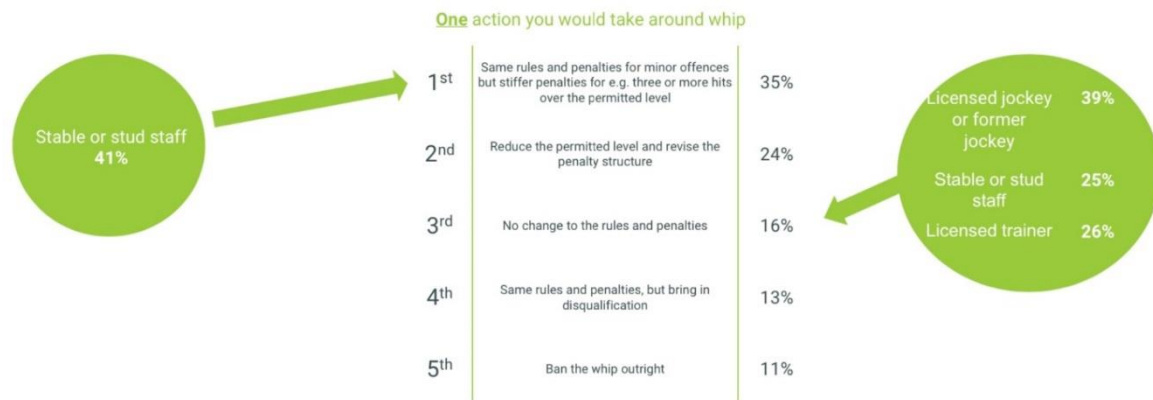
Hall Partners

Figure 12: Actions on the whip that would make public audiences more positive towards racing

⁴⁶ https://www.agco.ca/sites/default/files/thoroughbred_directive_no.4_-_2019_-_revision_to_urgency_provisions_registrar_approved_0.pdf

7. Industry Survey data

The most favoured action is stiffer penalties for major offences

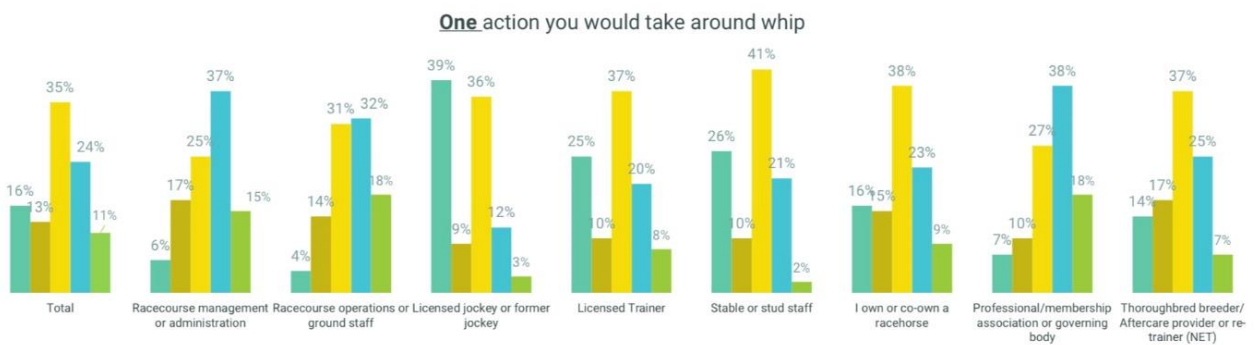


QWL12ANEW Imagine you were asked to agree to ONE of the following outcomes regarding the future of the whip, which would you choose?
 Base Total (718), Racecourse Ops/Ground staff (106), Racecourse management/admin (71), Licensed Jockey (107), Licensed trainer (115), Stable or stud staff (61), Owner (377), professional/membership association or governing body (146), Thoroughbred breeder/ Aftercare provider or re-trainer (NET) (161)
 Confidential & Proprietary. Not For Public Distribution. Do Not Copy.

Figure 13 (above): Industry preference on one action that could be taken on the whip

Licensed Jockeys are least in favour of a ban; most groups support some degree of change

- Ban the whip outright
- Reduce the permitted level and revise the penalty structure
- Same rules and penalties for minor offences but stiffer penalties for e.g. three or more hits over the permitted level
- Same rules and penalties, but bring in disqualification
- No change to the rules and penalties



6 out of 29 veterinarians selected a ban as their one action, evenly spread across the other options

Base Total (718), Racecourse Ops/Ground staff (106), Racecourse management/admin (71), Licensed Jockey (107), Licensed trainer (115), Stable or stud staff (61), Owner (377), professional/membership association or governing body (146), Thoroughbred breeder/ Aftercare provider or re-trainer (NET) (161)
 QWFLNEW1 Which of the following could the Horse Welfare Board do to help improve communication and engagement within and across the sport on matters relating to equine welfare?
 Confidential & Proprietary. Not For Public Distribution. Do Not Copy.

Figure 14 (above): Preferred actions on the whip, by industry group, with yellow bars showing level of support for increased penalties

8. Additional guidance provided by the Horse Welfare Board to the BHA in relation to any consultation on the whip

As well as the recommendation provided in this strategy, the Horse Welfare Board has provided the following supplementary guidance to the BHA, which reflect the HWB's discussions relating to the whip.

The consultation should:

- **Present a full suite of evidence and information** relating to:
 - Current rules
 - Current penalties
 - Statistical data relating to whip offences, covering the period 2010-2019
 - International rules and penalties, including information on recent and forthcoming changes
 - Scientific research
 - Social, political and ethical considerations
 - Jockey training and education
 - Public opinion data
 - Industry opinion data
- Be clear that any consultation relating to the restriction or removal of the whip, relates to its restriction or removal for encouragement and **NOT for safety reasons**. The Horse Welfare Board recognises that the whip is regarded as an important tool for safety and correction and believes it is not necessary to consult on this.
- Be clear that **misuse of the whip is still too high**, particularly in some circumstances, and setting the expectation that, should increases in the penalties continue to prove an insufficient deterrent, further steps will need to be taken.

In the meantime, the BHA and its stakeholders should also:

- Seek, as far as reasonably possible, **harmonisation with international jurisdictions** on the whip
- Ensure the whip rules are appropriately and **effectively enforced**
- Introduce trials and reviews of **hands and heels racing** in Great Britain, in both flat and jumps fixtures. These tests should assess, for example:
 - Impacts on **safety** (though noting that whips may still be carried for safety purposes in these races)
 - Attractiveness of these races to owners and/or trainers
 - Impacts on **horse and jockey performance**
 - Impact on **public opinion** (e.g. testing views via surveys of racegoers, focus groups etc) and attendance at meetings where hands and heels races feature on the racecard
 - Impact on **industry opinion** (i.e. does exposure to hands and heels racing change views on the necessity of the whip for encouragement)
 - In line with the above, whether there are any negative unintended consequences
- Assess any **further research** that comes to light, though noting the Horse Welfare Board's view that commissioning research to assess welfare impacts is likely to be impractical, unscientific and potentially unethical

The above will provide a clearer evidence base relating to the pros and cons of racing without the use of the whip for encouragement, which should be reviewed and assessed within 12-18 months of any changes taking effect.