



Irish Greyhound Board

Ms Éilis Fallon
Committee Secretariat
Committee of Public Accounts
Leinster House
Dublin 2

7th October 2019

YR REF: PAC32-1-1541

Dear Ms Fallon

I refer to your letter of 27th September 2019 regarding the Public Accounts Committee meeting of 19th September 2019.

I respond to the various queries raised in your letter (using a similar sequence as set out in your letter) as follows:

1. The Irish Greyhound Board works with the Special Investigations Unit of the Department of Agriculture, Food and the Marine and An Garda Síochána in relation to animal welfare cases. Depending on the issue that requires to be addressed the prosecutions are generally initiated by the Department of Agriculture, Food and the Marine, An Garda Síochána or other agency with the relevant statutory powers. The Irish Greyhound Board would participate in the overall process through inspections and officers of the Board would appear as witnesses in relation to the particular case. Records of prosecutions would rest with the relevant bodies. 20 fixed payment notices were issued by the IGB in 2016. In 2017, 43 notices were issued, 2 no. in 2018 and 10 no. to date in 2019.

Adverse analytical findings related to the detection of prohibited substances in samples obtained from racing greyhounds are published since 2015. All decisions of the independent Control Committee and Control Appeal Committee (the bodies who investigate and determine any sanctions) are also published. 35 cases were dealt with by the Committees in 2017 with 14 cases being dealt with in 2018.

2. Of the 491 inspections undertaken in 2018, 79 of these related to welfare inspections of which 55 were single inspections and fourteen were inspected on more than one occasion. 412 inspections were undertaken at licenced trainer's premises which are routinely inspected by IGB Stewards.
3. The following table sets out the available data from 2015 (the earliest date on which the data is available) in relation to welfare and kennel inspections:

Year	No of Inspections
2015	569
2016	571
2017	477
2018	491
2019 (to 31 st August)	299

The number of staff designated under the Welfare of Greyhounds Act 2011 is 21, three of which have also been appointed under the Animal Health & Welfare Act 2013. Control Stewards and Stipendiary Stewards undertake dual roles including the stewarding of the racing function as well as undertaking welfare inspections. Details of welfare spend are included under section 10 below.

4. Up until January 2015, the Irish Greyhound Board operated an outsourced catering model. The contracts required the catering company in each location to pay a concession fee to each stadium calculated at a percentage of net food and beverage sales. There was also a requirement for the caterer to contribute towards a number of key cost items such as light & heat, security, entertainment and the sales centre operating costs.

During 2014 a competitive tender process for the Food & Beverage (F&B) operations was conducted. As part of this process a number of business models were outlined by the prospective caterers. Submissions from the tendering process indicated at an early stage that the terms on offer from the majority of applicants would be significantly less than what was currently being paid to the IGB stadia. Consequently, an in house alternative option for the provision of F&B services to the IGB stadium network was developed. This was evaluated in parallel with the tender process for implementation should a suitable solution not be identified during the tender process.

The table below displays the contribution from catering operations to the overall performance of the group from the period 2013 – 2018. It is worth noting that, following evaluation, the commercial terms from 'best viable tender offer' from the process referenced above were significantly reduced from the previous contracts with no cost contribution to stadia costs. This is reflected in the table below from 2015 onwards.

	2013	2014	2015	2016	2017	2018
TOTAL F & B SALES	6,499,869	6,836,820	7,303,224	7,479,704	5,591,415	5,825,498
OUTSOURCED MODEL *						
Concession Fee	1,065,510	1,160,359	912,903	934,963	698,927	728,187
Stadia Cost Contributions	379,180	406,550	-	-	-	-
Total	1,444,690	1,566,909	912,903	934,963	698,927	728,187
SURPLUS GENERATED IGB CATERING OPERATIONS **	1,444,690	1,566,909	1,427,201	1,456,291	694,149	823,612
VARIANCE TO OUTSOURCED MODEL	-	-	514,298	521,328	(4,778)	95,425

* The outsourced model until the end of December 2014 were operating under contracts awarded in 2008.

** The surplus generated from 2015 onwards consists of concession fees and stadia cost contributions paid by Abargrove to the various stadia while also taking into account the operational loss.

5. A separate Care Fund has been established by the IGB during 2019. The fund has been put into effect from 1st August and will be funded by the following components:

- 50% of all existing sponsorship from 1st August 2019.
- 10% of all admissions and restaurant packages from 1st September 2019.
- 5% of net tote profits from 1st November 2019.

The fund will be used to cover a range of projects and initiatives focussed on the care and welfare of the greyhound. These include rehoming, fostering, greyhound injuries support scheme, traceability and other initiatives focused on the care and welfare of the racing greyhound.

6. The IGB provides funding to rehoming organisations through a combination of direct support from the IGB and further support through its established entity, the Irish Retired Greyhound Trust. Payments made from both sources in 2018 are set out below:

Greyhound Rehoming Organisations

Rehoming Organisation	Location	<u>2018</u>
Homes For Unwanted Greyhounds	Killarney, Co. Kerry	€3000
EMOL Rescue	Kildimo, Co. Limerick	€3000
PAWS	Mullinahone, Co. Tipperary	€3000
Clare Greyhound Project	Kilrush, Co. Clare	€3000
All About Greyhounds	Belfast, Co. Antrim	€1000
Great Hounds In Need	Mullinahone, Co. Tipperary	€1000
Clare Greyhound Sanctuary	Sixmilebridge, Co. Clare	<u>€1000</u>
		€15000

Contributions to Greyhound Neuter/Spay **€12000**

Veterinary Assistance:

EMOL Rescue	€23830
Clare Greyhound Sanctuary	€4257
Clare Greyhound Project	€6135
HUG	€12374
PAWS	<u>€7023</u>
	€53619

Transport Assistance

GACI, Italy	€11980
EGN, Italy	€1100
Pro-Greyhound, Germany	€100
Greyhound Streunher, Germany	€3300

Greyhound Forever, Germany	€13100
Greyhoundhilfe, Germany	€9160
GPI, Germany	€600
Friends Forever, Sweden	€1900
Great Hounds In Need, Czech	€9600
Levriere Martyr, France	€600
Association Galgos & Greys, France	€300
Greyhound In Nood, Holland	€300
Greyhound Rescue Belgium	€2275
A Greys Home, Belgium	€1050
HUG, Ireland	€6780
Clare Greyhound Project, Ireland	<u>€680</u>
	€62825

Contributions

Greyhoundhilfe, Germany	€7200
Greyhound Rescue Belgium	€800
Association Galgos & Greys, France	€191
Great Hounds In Need, Ireland	<u>€300</u>
	€8491

Foster care

€4980

7. The current trustees of the Irish Retired Greyhound Trust (IRGT) are as follows:

- Denis Healy (Veterinary Director, IGB)
- Barry Coleman (Welfare Manager, IGB and Secretary to Trust)
- Brenda Powderly (Representative of Greyhound Owners)
- Pamela Holian (Representative of Greyhound Owners)
- Mattie Murphy (former Board member)

The Trust also operates a committee which membership includes representatives (currently 2 no. representatives) involved in rehoming activities.

The IGB is currently in the process of restructuring the IRGT to provide for an oversight role in relation to monitoring the Care Fund and the associated income and expenditure.

8. I attach an information note relating to the Impairment process relating to the Bord na gCon accounts for 2018.

9. The breakdown of consultancy fees for 2017 is as follows:

Consultancy	Amount
Legal	€138,336
Taxation & Financial Advisory	€12,500
Strategic & Organisational Restructuring	€153,558
	<i>Preferred Results</i> €130,068 <i>Tandem Consulting</i> €12,000 <i>Professor Duff</i> €4,800 <i>Power Economics Ltd.</i> €6,690
Pension & Human Resources	€227,001
	<i>Pension Fees & Management</i> €180,616 <i>Human Resources</i> €46,385
PR & Marketing	€102,510
	<i>PR</i> €87,936 <i>Marketing</i> €14,574
Total	€633,905

The figure for legal and professional fees in the Statement of Income & Expenditure for 2017 is €654,675. The additional sum of €20,770 relates to training and other miscellaneous consultancy costs.

10. The Travel & Subsistence expenditure included in the accounts for 2017 is €509,015. This sum includes €110,008 for leasing of vehicles for a number of Board employees. (2018 : €78,530). In respect of individual claims for Travel & Subsistence, the most up-to-date data for 2018 is analysed in the table below:

Less than €5,000*	88 employees
More than €5,000 less than €10,000*	22 employees
More than €10,000 less than €20,000*	7 employees

**analysis includes Board members*

In addition to the items raised in your letter of 27th September 2019, the following matters were also referenced by the Committee:

- A redacted copy of the Preferred Results Report (pages 66 – 93) was sought and same is enclosed for circulation to the Committee.
- An extract from the Board Minutes relating to December 2017 where the Preferred Results Report was discussed was requested and is included below:

6) Consultant's Report and Proposals on IGB Business Model Analysis

It was agreed that the document is thought-provoking but contains some impractical short and medium term measures. The CEO confirmed that the organisational structure would feed through to the Board in a variety of processes.

- Concerns regarding the ticketing system in operation were raised by the Committee. It is accepted by the IGB that the system in operation requires improvement and this is being addressed.
- The 'real spend' on welfare was also sought by the Committee. In the 2017 accounts an expenditure of €363,989 is included under the heading of 'contributions to Greyhound Welfare and IRGT'. This spend is broken down as follows :

	2018	2017
Contribution to IRGT	€106,609	€95,766
Welfare Contribution & Initiative	€111,487	€47,029
Veterinary Fees (Board Stadia)	€157,700	€115,733
Staffing & Administration	€114,255	€105,461
	€490,051	€363,989

The above represents an element of overall welfare spend. In addition the following expenditures arise:

	2018	2017
Veterinary Fees (Private Tracks)	€62,754	€86,657
Laboratory Operations	€373,975	€375,906
Stipendiary Stewards & Integrity Officers	€194,794	€233,207
Control Stewards (on/off track)	€513,874	€522,603
Control Committee/DNA Sampling	€69,548	€84,810
2% of Winning Prize Money from Owners to IRGT	€106,240	€93,946
Regulation & Control	€631,529	€560,607
	€1,952,714	€1,957,736

	2018	2017
Private Track Operating Grants	€319,708	€254,100

- Members requested examples of where the Board had previously raised the issue of traceability in the public domain. I would reference Recommendation 10 of the Report of the Joint Oireachtas Committee on Agriculture Food and the Marine on the Greyhound Industry (January 2016) and also the Report on the Pre- Legislative scrutiny of the General Scheme of the Greyhound Industry Bill 2017 (Key issue 8) by the same Committee in June 2017.
- Members queried the position regarding animal disease control. This falls within the remit of the Department of Agriculture, Food and the Marine.

If there is any further information required you might please let me know.

Yours sincerely



Gerard Dollard
Chief Executive Officer

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BORD NA GCON - IMPAIRMENT PROCESS 2018

In accordance with the accounting policies of Bord na gCon and its subsidiaries an annual impairment review was carried out as part of the preparation of the 2018 financial statements. The accounts are prepared in accordance with FRS 102.

The subsidiaries apply a consistent policy of initially recording property, plant and equipment, including those at the racetrack at cost, and subsequently at cost less any accumulated depreciation and impairment losses. In completing an impairment review the first step is to establish if there is any indication that an asset might be impaired.

The starting point for determining the recoverable amount in impairment testing is at the level of individual assets, unless the asset does not generate cash inflows that are largely independent of other assets or groups of assets. Where there are no such independent cash flows, the recoverable amount is determined for the cash-generating unit (CGU) to which the asset belongs. A CGU is the smallest identifiable group of assets that generates cash inflows that are largely independent of the cash inflows from other assets or groups of assets.

At the time of the preparation of the 2017 Financial Statements and the 2017 impairment review it was deemed reasonable to view the income generating unit as the combined group from all stadia due to the interdependency between stadia. Following the disposal of Harold's Cross Greyhound Stadium and having regard to the rationalisation at present of the subsidiary company structure it is now deemed prudent and reflective of the current commercial environment that the income generating unit for the stadia is considered to be the individual stadium. Therefore the 2018 impairment assessment was conducted at an individual racetrack level.

The result of the review deemed that there was impairment in 6 locations as outlined below where the market valuation was less than the carrying value in the financial statements.

Impairment Review Summary 2018

	Asset Impairment	Capital Grant Impairment	Net Gain/ (Loss)
	€	€	€
Tralee	435,738	366,347	-69,391
Galway	669,687	786,330	116,643
Waterford	3,064,171	2,028,792	1,035,379
Limerick	14,117,083	13,509,493	-607,590
Clonmel	837,861	837,861	0
Mullingar	1,490,756	1,490,756	0
			-
Total	20,615,296	19,019,579	1,595,717

There was no impairment booking required in Cork and Shelbourne where the carrying value was less than the valuation. In the case of Shelbourne and Cork the increase in value over the carrying value of €7.7m is not included in the accounts as Bord na gCon, in compliance with its accounting policies, is not permitted to include same.

The impairment does not affect the business from a cash flow or an operational perspective.

Section 4

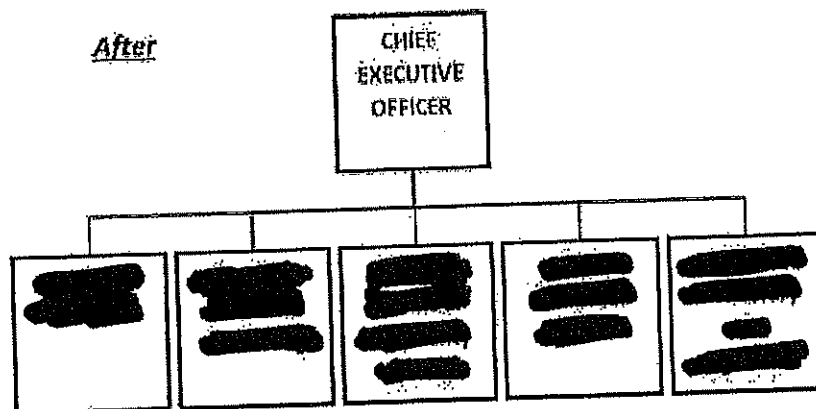
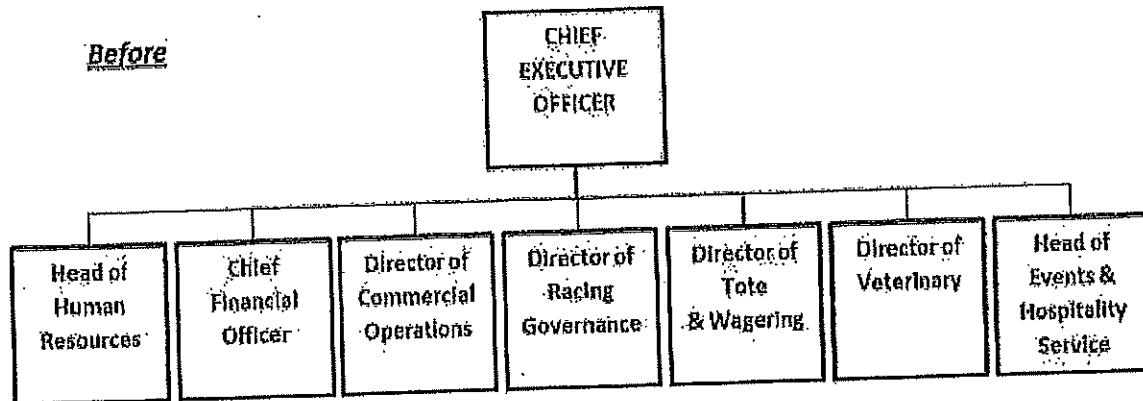
Organisation Restructuring

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Organisation Restructuring

The proposed new business model for IGB puts Racing at the heart of the Primary Value Chain and creates a clear separation between the Commercial functions and the Regulatory role for the industry. It also separates the Finance Function into a commercial-level serving the profit centres of IGB and the Group and Industry level.

The 'Before & After' Organisation structures are presented below.

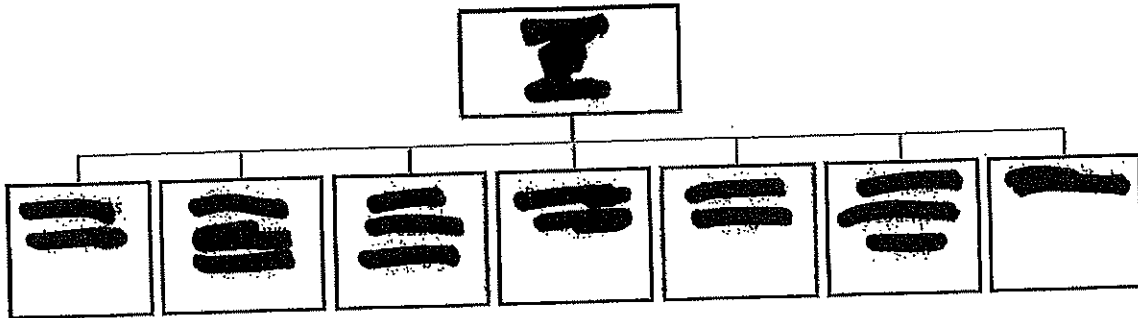


The significant changes at the level of the Top Team is due primarily to the reconfiguration of the organisation structure in line with the changes proposed as a result of the Dog Pool Analysis which was conducted.

In the sections which follow, a review of the proposed structure for each of the Departments is conducted, which traces how and why the new departments emerge from the current organisation structure.

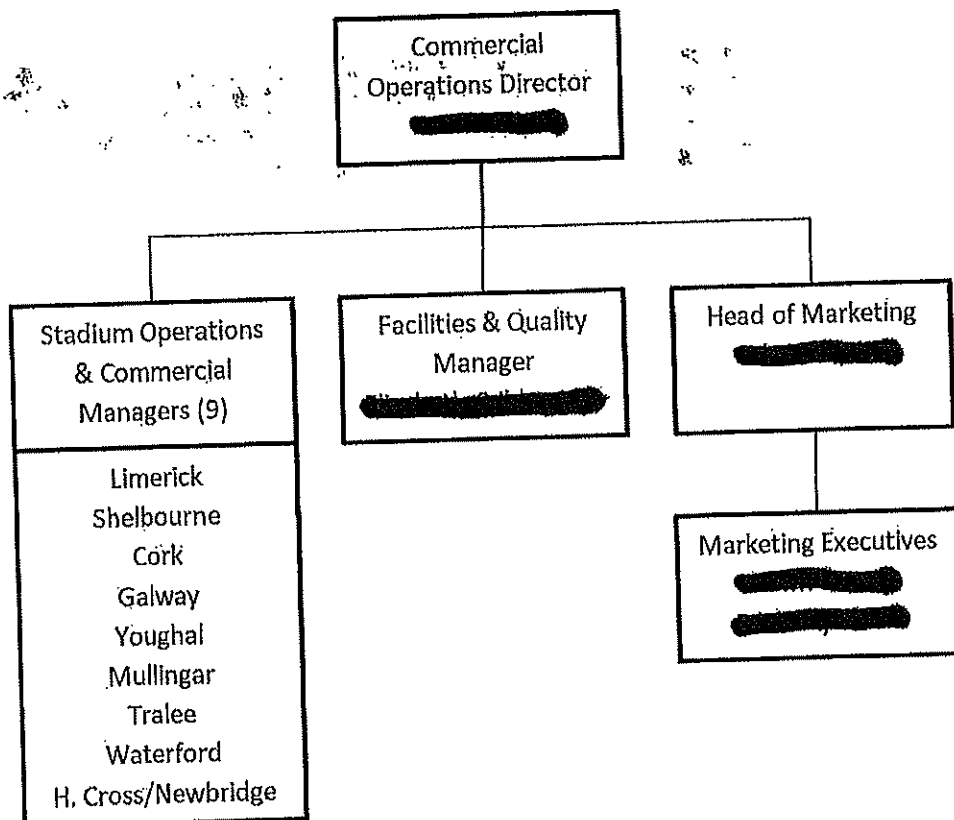
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This is a new position which is aimed at putting Racing at the commercial heart of IGB. When PRL commenced the assignment the proposed new position of 'Racing Operations Director' was put on hold in order not to conflict with any proposals which might be brought forward. While PRL completely supports the idea of raising the profile of Racing within the organisation, it believes that the new position should be a [REDACTED], and should not be limited to [REDACTED] alone. The top line proposed structure is set out below.



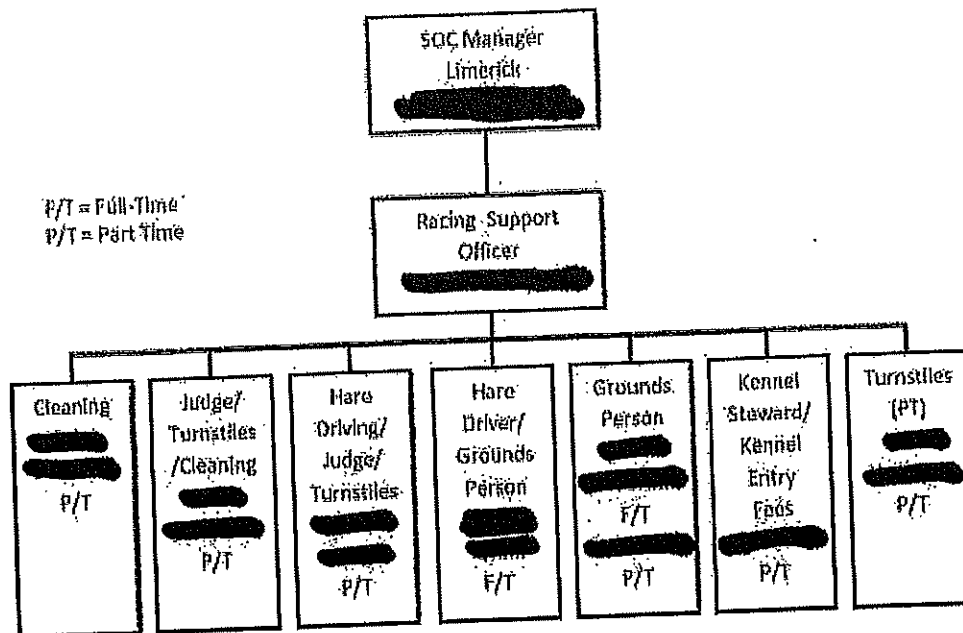
Review of Current Race Track and Stadium Management

Before entering into a discussion on the proposed new structure, a review of the current Race Track and Stadium Management structure is undertaken in order to explain the rationale for the changes proposed. At present, the Management of Race Tracks comes under the Stadium Manager for each stadium who in turn, reports to the Commercial Operations Director.



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Example of Stadium Operations & Commercial Structure



The Limerick structure above which is used as an example of a 'Typical' stadium structure which excludes a range of other services required for a racing event:

- Video Operator
- Commentator
- Vet
- Control Steward
- Security

While there is a certain superficial logic to the stadia structure, when one goes into the detail there are so many conflicts within it that it gives a very poor result. To begin with, it was never quite clear who the Racing Managers reported to as they appear on organisation charts as reporting to the Head of Regulation as well as to the Stadium Manager. When clarification was sought at a senior management level, both versions of the reporting structure were staunchly defended.

It was also not clear who the Grounds Man, the Hare Operator, the Kennel Hands and other such functions report to. Using the Limerick example, while they are shown to report to the Racing Manager, in practice, that is not the case.

In terms of the Fixed Contract positions, irrespective of the number of racing events in the week, people worked a 40-hour week. With respect to Grounds Men and Hare Operator positions, and in some cases Kennel-hands, these positions were seen to be justified based on Official and Un-Official Trials. However, in the Dog Pool Analysis which was conducted by PRL, it was concluded that Private Trials should be eliminated and that the number of Official Trials should be reduced to a fraction of what they are today by reducing the size of the Dog Pool. If the changes proposed by PRL are accepted it would significantly change the crewing requirements at a stadium.

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For his/her part, the SOC Manager is supposed to have a commercial role, but the role played in that respect is very limited; as distracted by responsibilities at the Stadium, they would not appear to be generating sufficient sales contacts to make a significant difference to the footfall. In the vast majority of cases, the commercial role would appear to be little more than a token role.

The title of 'SOC Manager' is also somewhat misleading as the Stadium Manager has no control over the EHS Manager, the Tote Manager, or Regulatory Functions during a racing event. Each of these areas 'do their own thing' with little or no joined up thinking or cooperation. It is understood that part of the problem is that when third party Catering companies which were managed by the stadia managers were replaced by EHS, the role of the SOC Manager was significantly impacted, but the issue was never addressed.

With respect to the critical function of Racing Manager, the individuals in these roles would appear to be very isolated. Their managers are more Stadium Managers than Racing Managers and spend little or no time reviewing the grading of races; and on the other hand, there is little or no contact between the Racing Managers themselves. The resulting environment is not conducive to the development of the knowledge and skills of the Racing Manager [REDACTED]

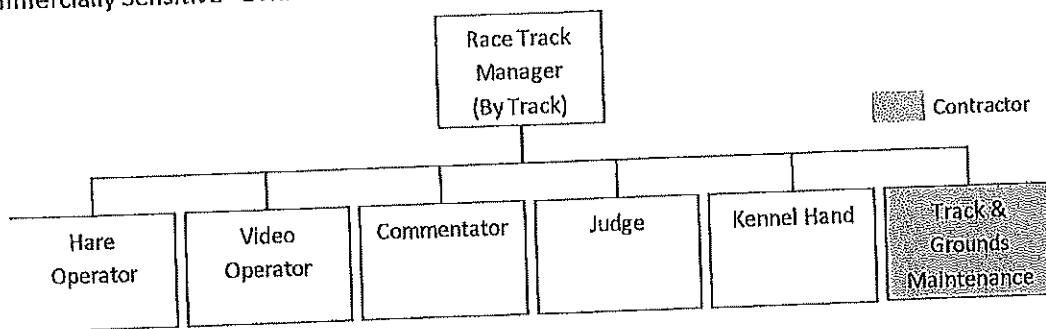
For all of the reasons mentioned above and more besides, it is proposed that the SOC Structure be dismantled and the constituent functions be reassigned as explained below.

Race Track Manager

At each Track, it is proposed that Part Time Race Track Managers be appointed, who would be responsible for all racing-related functions at a track for a racing event. The Part Time Race Track Managers would report to a Full Time Race Tracks Manager. Under the proposal, a Racing Events Team would be scheduled for each racing event in the same way as it is done for EHS and Tote.

IGB BUSINESS MODEL ANALYSIS

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Position	18:00	19:00	20:00	21:00	22:00	23:00	Activities
Race Track Manager							Heads up all things track. Stands in for Photos and Meets & Greets Customers, Owners etc.
Hare Operator							Including Maintenance of Racing Infrastructure: Hare, Traps, Rails ... Interchangeable with Kennel Hand
Video Operator							As is
Commentator							Race Commentary & Racing Comments
Judge							Updating of RMS and notification of results to Tote
Kennel Hand							Interchangeable with Hare Operator
Track & Grounds							Services Contract. Off-load Tractors and equipment. Plating of Track during racing and following Trials.

The Race Tracks Manager would be responsible for hiring and managing the individual Track Managers and their Reports and for the contracting of Services: Commentator, Video and Judge. He/she would also be responsible for the scheduling of resources, managing projects at tracks, and for the establishment and management of a Facilities Management Contract for the Tracks.

It would appear from discussions held with a wide range of stakeholders across the Industry that Greyhound Racing is seen as 'what the industry does', as opposed to being seen as a product. Nevertheless, it is a product and is as susceptible to the 4P's (Product, Price, Place and Promotion) as any other product. Producing the product would appear to involve four main elements:

- Race Type
- Grade
- Distance
- Grading

In order to clearly define 'Racing' as a product so that it can be formally managed as such, it is proposed that a position of [REDACTED] be created, which would be directly responsible for managing the first three elements while his/her reports, the [REDACTED], would be responsible for putting race cards together under his/her direction.

At a product level, the function of the [REDACTED] would be to keep racing entertaining and competitive across the IGB Stadia. At a promotional level, his his/her role would be to work with the Sales & Marketing function to promote the calendar of Racing Events by stadium, as well as racing as a whole. He/she would also advocate for the payment of supplementary prizemoney for higher quality racing events.

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At an Operational level, [REDACTED] would work with [REDACTED] to ensure that the presentation of the product is of the required standard, in terms of the appearance of the stadia themselves, the manner in which Dogs are presented and paraded during race events, the time-keeping for races, among other factors.

A figure of 4 Race Card Compilers has been suggested by PRL in order to be in a position to cover Holidays and other time off and to also have sufficient slack in the system so as to afford Race Card Compilers the time they would need to watch Greyhounds perform on the different tracks in order to enable them to improve the construction of Race Cards.

[REDACTED]

At the present time, there would appear to be limited management of the Racing Dog Pool, other than through the payment of Incentives to increase appearances, or to increase breeding. Managing the Dog Pool to ensure that dogs are not either in surplus or in deficit and that dogs are being well utilised by their owners, needs to be a core approach. Based on the Dog Pool analysis undertaken by PRL, it is suggested that its once-off analysis should be the central focus of [REDACTED]

Dog Pool Size

[REDACTED] would be responsible for determining the size of the Dog Pool required by Stadium, considering the necessary allowances for items such as Illness & Injury, the Resting of dogs, Scheduling Issues, among others. Based on requirements, he/she would apply to the Regulator for a Dog Pool Quota for each of the Stadia.

Once the overall Quota had been approved, a schedule of licenses required would be prepared by [REDACTED]. This should be done on line. The Regulator would then release the licenses so that they could be taken up for the Breeding of pups. Where licenses are not taken up by Approved Breeders, [REDACTED] could apply for the license in order to ensure that the required supply of pups is sustained.

Licences would apply to individual Dog Pools attached to a Stadium. While dogs could be transferred to another Dog Pool, that would depend on places being available and on a payment being made by the Owner. The reason for licencing breeding by individual Dog Pools, is to promote accuracy and accountability when it comes to the scoping of the Dog Pool by Stadium. If a Stadium Dog Pool is growing excessively one would anticipate that pressure would mount from those Owners and Trainers whose dogs are denied the opportunity of racing and earning them money because their pool is over-subscribed. On the other hand, if there are too few dogs in the pool the quality of racing will suffer and poorly graded dogs could also be expected to foster pressure from Owners and Trainers who bring their dogs to races with no expectation of winning.

However, even when dogs are assigned to a particular Dog Pool their Owners should have the option of registering the dog's availability to race in another Dog Pool and places permitting, their request would be accommodated. The objective is to ensure sufficient dog pool stability for [REDACTED] to confidently construct a Card, while at the same time making the best use of the Greyhound Resources available. That is, if there is a shortage in one pool it may be covered by another.

Owner/Breeder Relations

[REDACTED] would also be responsible for attracting new greyhound Owners and Breeders, and for retaining those already in the pool. Within this role he/she would be involved with helping Owners/Breeders to get the best returns from their greyhounds, which could vary from informative

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articles about issues such as nutrition, schooling, training among others; to the establishment of a Centre of Excellence for the Greyhound Industry.

Puppy Sales

Where Owners wish to sell their Pups at Qualifying Trials [REDACTED] would be responsible for overseeing the organising of the sale, with support from Racing Administration.

Costs Management

[REDACTED] would also be required to have an in-depth understanding of Ownership and Breeding costs and would use the purchasing power of the Industry to negotiate with Feed Companies and Manufacturers of Animal Health Products; potentially doing so under an IGB Own Label Brand. The objective would be to minimize the cost of ownership of dogs at all stages in their life cycle.

Appearance Money

Costings information monitored by [REDACTED] would be used as the basis for calculating appearance money for, both dogs which race, and for the reserves on the day. [REDACTED] would be responsible for bringing forward proposals on the level of Appearance Money and potentially other incentives, which would be treated completely separately from Prizemoney which would come within the remit of [REDACTED].

Re-Homing Services

In line with PRL's proposed strategy, of 'No Dog Left Behind', IGB would be responsible for ensuring that each Dog exiting the RMS system at whatever point and for whatever reason is re-homed; provided its quality of life is not compromised to the extent that it should be euthanised. [REDACTED] would be responsible for contracting the Re-homing Services and in the event of a position not being available when required, he/she would arrange for IGB to pay a re-homing fee to the Owner until such time as the dog can be moved on. This is proposed based on the fact that re-homing requirements are predictable and should be managed on a proactive basis. If hold-ups arise, the Owner should not be required to carry the cost.

Re-homing fees would not be paid on dogs which were retired before they had reached the end of their racing careers. The end of Career would be objectively confirmed by [REDACTED] based on qualifying times or by a VET where a greyhound is prematurely retired due to illness or injury.

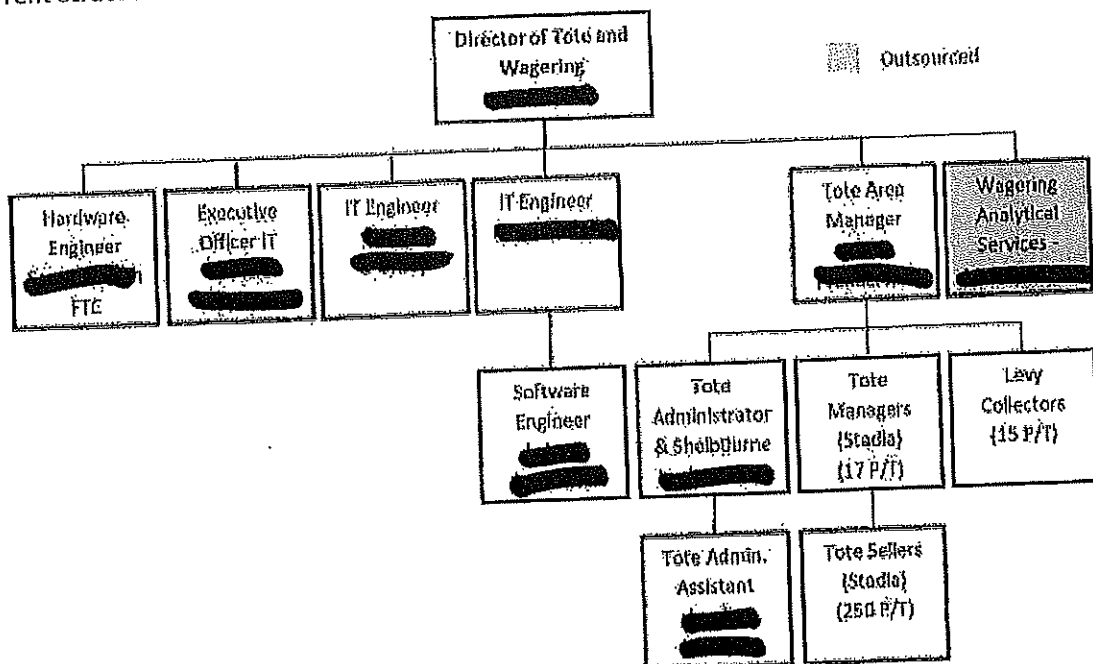
Tote & Wagering

Tote and Wagering and the Grading of Dogs is inextricably linked, which is why it is proposed that Tote & Wagering should come within the remit of [REDACTED]

As the quality of grading improves and confidence is restored in the product, Bookmakers and Punters should return to the tracks and Online Betting should also grow.

IGB BUSINESS MODEL ANALYSIS

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Current Structure: Tote & Wagering



In practice, what would happen is that [REDACTED] would become [REDACTED] and would be responsible for managing On-track Bookmakers: Who they are, how much they pay, the odds they provide and any other issues which arise. [REDACTED] would also be responsible for the IGB Betting App. The only other change which is proposed with respect to this area of the structure, is that [REDACTED] should be dispensed with and their function should be transferred to [REDACTED] at each location. This change has already occurred at a number of stadia.

This outsourced position would be eliminated in favour of [REDACTED] or position where the same skills, knowledge and experience are required to improve grading by building a strong team of [REDACTED]

IT

This function does not fall naturally within [REDACTED] remit. Neither does it fall naturally within any of the other senior team positions. IGB could consider the appointment of a 'Head of IT' and have it report to the CEO, but, if it is working as it is there is probably little to be gained from doing so. For that reason, PRL is proposing that [REDACTED] which is under consideration be [REDACTED] the IT Team, so that only a single point of contact is required with [REDACTED]

Other IT changes

- When [REDACTED] within the next 12 months that position would not be replaced.
- [REDACTED] would take up [REDACTED] in support of each of the areas within the Racing Department, with a particular, focus on supporting Racing Product

IGB BUSINESS MODEL ANALYSIS

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Management and Dog Pool Management. While [REDACTED] would spend most of his time working for others, he should report into [REDACTED] who would assign him as a resource.

Racing Administration

Racing Administration would provide administrative support to each of the areas within the Department. A core function would be the printing and distribution of Racing Programmes for Races. It would also provide front desk and Receptionist Services in Limerick. This function should report to the Financial Accountant for Racing.

Financial Accountant Racing

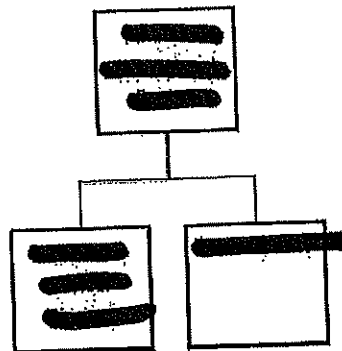
At the present time, there is 1 Track Accountant, 1 Finance Executive Officer with responsibility for Prizemoney and Payroll (excluding BDO and EHS) and 1 Tote Accountant working 3 days per week at Head Office; supported by 6 track-based Finance Administrators. However, as seen from the Dog Pool analysis conducted, there is no financial reality underpinning how Racing is structured or operated. The focus appears to be very much on accounting for money as opposed to analysing and managing it. The proposed restructuring is aimed at managing Racing as a Profit Centre/Business.

As already agreed by the IGB, as soon as it is feasible to do so, IGB will move from producing Accounts by Stadia to Centralized accounts; while maintaining reporting capability by stadia. This change is made feasible by eliminating Cash from the racing activities of stadia:

- Abolition of charges for Qualifying Trials (are given back as prizemoney)
- Eliminate private Trials
- Eliminate Race Entry fees as they would not make sense where Attendance Fees are paid
- Eliminate Re-Qualifying Trial Payments (dog not raced in 42 days) by deducting the cost of these trials from Appearance fees
- Establish 2 Facilities Management Contracts, one with EHS and the other with Racing Operations and eliminate all Supplier Invoices at a Stadium Level
- Complete the roll-out of Great Plains for the Finance Function

Racing Finance Model

Under the Proposed restructuring the Racing Department would be run as a Profit Centre and would be managed as a business with its own accounting capability along the lines of the EHS Model.



While at the present time there is an Accounting resource working a 3-day week which is dedicated to Tote and an Executive Officer responsible for making Prizemoney Payments and managing the non-BDO and non-EHS Payroll; this is a new unit which is both losing activities and taking on new ones, which is why PRL (without a more detailed analysis and discussion), does not see it as being appropriate to be more prescriptive than to outline the model and the skeleton structure presented

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 above. If and when appointed, [REDACTED] needs to decide on the assignment of activities and responsibilities between himself/herself and his/her team.

Revenue

The Department would have multiple sources of Revenue:

- Base Prizemoney Allocation
- Supplementary Prizemoney
- Tote
- Betting App
- SIS Racing Income
- Re-Qualifying Trials
- Bookmaker Fees
- Other

Base Prizemoney

The primary sources of Revenue for the Racing Department are its allocation of Prizemoney from the overall Prizemoney fund received from the Department of Agriculture. The Racing Department Finance Function would allocate the fund to the individual stadia based on the calendar of races and the agreed Base Prizemoney by race type.

Supplementary Prizemoney

Above and beyond the baseline prizemoney, on a case-by-case basis [REDACTED] together with [REDACTED] and [REDACTED] may make a case for seeking supplementary prizemoney from the Sales & Marketing Department. On other occasions, the proposal may take place in reverse, with the Sales & Marketing bringing forward the proposal to pay out supplementary prizemoney to support an event. Any money agreed would be released from Sales & Marketing and entered into the system as Supplementary Prizemoney. There must be a rationale/justification for supplementary prizemoney.

Re-Qualifying Trials

While owners would not be charged for the initial Qualifying Trials which are an essential step in the value chain, they would be charged for Re-qualifying trials when a dog goes beyond the maximum period of time allowed between races, which is currently 42 days. This charge would be made against the Owner's Account with IGB, in order to incentivise their participation in races. An allowance could be made for dogs with a Veterinary Cert but that would generate more administration and it could be argued that Owners would be even more careful about looking after the wellbeing of their dogs if the charge were to remain in place. From an administrative point of view, it would be easier if the Re-qualifying charge was to be equal to the Appearance Money for an event.

Other Revenue Streams

The rest of the Revenue streams highlighted above are self-explanatory and already in existence and do not need further discussion in this document.

Cost of Sales

Analysis of the budgeted cost of sales v/s actual costs would be one of the most critical functions of the Racing Finance Department. The main cost of sales Items would be as follows:

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- Base Prizemoney
- Supplementary Prizemoney
- Appearance Money
- Track Payroll & Professional Services
- Track & Grounds Maintenance Contracts
- Facilities Management
- Printing & Distribution of Race Card Programmes

Track Payroll & Professional Services

Under the proposed model a standardized crewing model would be put in place for Racing Events. [REDACTED] would track the budgeted v/s actual costs for each racing event and highlight relevant deviations. Certain positions such as the Track Manager, Hare Driver and Kennel Hand would be Direct Employees, while Commentator and Video Services would most likely be provided in accordance with a Professional Services Contract.

Track and Grounds Maintenance Contracts

With the elimination of Private Trials, [REDACTED] to undertake track maintenance. Instead, this function would [REDACTED] and IGB would no longer invest in tractors and machines. Under the new arrangement, Tracks could be Power-harrowed and levelled at any time between the end of the last race on a card, until perhaps 3 hours before the next event. During an event, services would be required to level the track between races. When Trials are run prior to a Racing Event [REDACTED] would need to be present to level the track before Racing.

Facilities Management

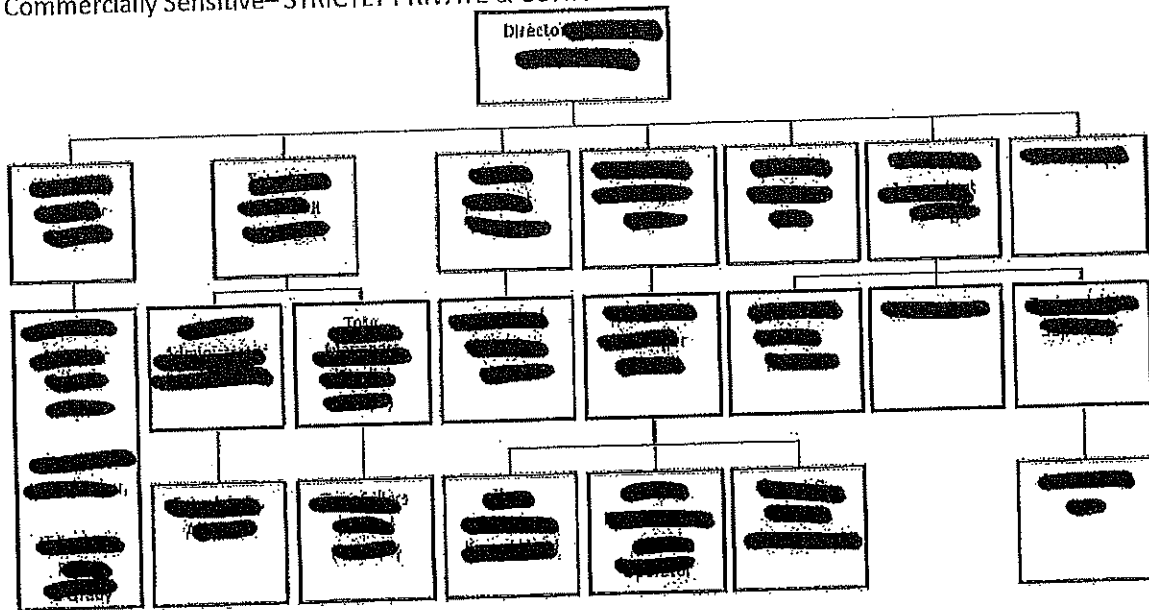
A National Facilities Management contract would be put in place for services to all IGB Stadia. This would cover periodic maintenance requirements such as Painting, Cleaning of Eve gutters, Power-hosing of terraces among other items. There would be a single monthly invoice from one Account Manager. The Invoices would be reviewed and approved by the Tracks Manager and sent for payment.

Printing & Distribution of Race Card Programmes

With the centralisation of Race Card preparation and the elimination of permanent structures at Tracks, the preparation and printing of Race Card Programmes would be centralised.

Proposed Organisation Structure: [REDACTED] Department

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Observations Regarding SIS Racing

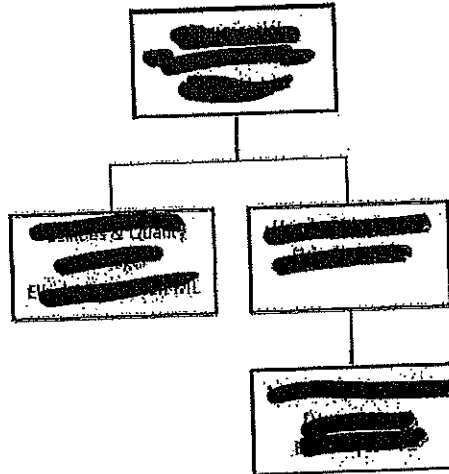
SIS racing is currently seen as a different type of racing and in so far as the betting requirements are concerned it is. However, in terms of the 'product specs' regarding finishes, recent races, presentation of owners and dogs, parading of dogs, among others; it would appear that what these specs highlight is the absence of an IGB Product Spec. It would appear that, what is required is an IGB Racing Spec which also fulfils the requirements of SIS. This is something which an empowered [redacted] and [redacted] could and should develop based on Customer Requirements.

Strategically, SIS and racing content sales in general, are of critical importance to the future of the Greyhound Racing Industry in Ireland and should be a priority for [redacted], supported by [redacted] and the rest of his team. A clear SIS Strategy is especially important to have in place, in the event that the recommendations contained in this report to eliminate below cost exports is followed.

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Director of Sales & Marketing

The sales and marketing functions of the business are currently split between the Commercial Operations Department and EHS. Not only are these functions split between Departments, they are also split geographically, with the National Sales Centre located in Thurles, the SOC Managers in each of the Stadia, the Marketing Department in Limerick and the National Sales Centre Manager [REDACTED] on the move internationally and domestically ([REDACTED]). And, following on the absorption of the Stadium Management Structure into [REDACTED], the Commercial Operations Department is reduced to the structure below.



There is a clear need to strengthen the sales and marketing capability of the business. With that objective in mind it is suggested that the current position of Commercial Operations Director be replaced by a 'Sales and Marketing Director' and that all sales and all marketing be brought under him/her. In creating the structure, a number of critical issues need to be addressed.

Digital Media

As the company builds its Digital Media capability from an ICT perspective, if it is to take advantage of that newly acquired capability, it will need [REDACTED] experienced resources. On that basis, it is proposed that [REDACTED] and that the resource appointed would be capable of developing the skills and competencies of his/her reports. It is also proposed that the number of reports be increased from 2 to 3 in order to deliver on the new marketing strategy proposed by the Executive.

Business Development

In order to bring a greater focus on numbers-based development of the business, it is proposed that the current position of [REDACTED] which involves attending trade shows and international sales, be eliminated and that a new position of Business Development be created. The person in this position would analyse opportunities to grow the business and would also be responsible for trade show attendance. He/she would also engage with large corporate accounts deemed to fall outside of the scope of the Regional Sales personnel.

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National Sales Centre

At the present time, the Customer Service Reps based in Thurles only take reservations, which is not only inefficient from a resource utilisation perspective, given that calls are not received in a continuous flow; it also misses the opportunity of calling potential customers for the purposes of Direct Sales as well as for setting appointments for the Regional Sales Reps. It is therefore proposed that the mix of resources located at Thurles be changed to include perhaps 3 sales personnel who would make outbound calls as well as taking incoming reservations when required to do so. The final mix of personnel between Sales and Reservations will need to be judged based on outcomes.

Regional Sales

The Stadia sales capability not only needs to be replaced following [REDACTED] it needs to be significantly strengthened compared to what it is today. In order to do so, it is proposed that 6 Regional Sales positions be created.

- Shelbourne Park/Mullingar/Newbridge 2
- Galway 1
- Cork/Youghal/Waterford 1
- Limerick 1
- Tralee 1

Responsibility for 'Foot Fall' should be brought together under these positions. That means, that the individuals occupying these positions need to be tracking and managing footfall by event and by stadium, and should be working closely with:

- The Sales Personnel from the 'Sales & Reservations Centre' lining up sales meetings and monitoring sales activity
- The Reservations Personnel from the Sales & Reservations Centre tracking group reservations
- Digital Media and Marketing to ensure that the events at the stadium are adequately promoted.

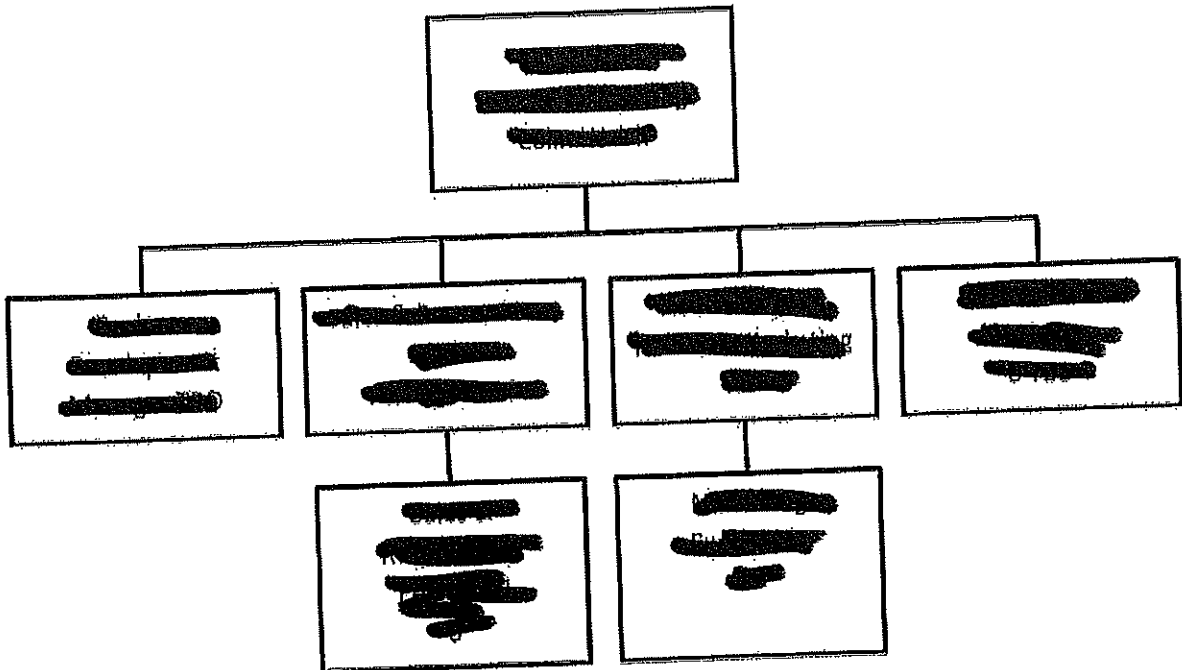
This are more 1pm to 9pm roles as opposed to being 9am to 5pm positions. The Regional Sales personnel will be key members of the Stadium Team, alongside the Track Manager, the EHS Manager and the Tote Manager. This team should have a formal catch-up once per week to look backwards at performance and forward to what they can improve. This catch-up should also improve crewing and customer service, as the team should be well informed and organised in advance of each event.

On Benefit Nights, Corporate Nights, and on nights when Tour Groups or other significant groups are scheduled to be at a track, the corresponding Regional Sales person should be there to 'meet and greet' them and introduce them to the other section heads. They also need to be available in the evenings to meet with representatives from GAA Clubs, Rugby Clubs and other amateur organisations.

Sales & Marketing as a Profit Centre

In the same way as EHS and Racing can be operated as profit centres, there would appear to be no reason why the same model should not be applied to Sales & Marketing Department, given that it has the primary responsibility for generating foot-fall. It also has the primary role in obtaining sponsorship and would have a budget for supplementary prizemoney; which is essentially promotion of the sport. Against these income flows, costs would be incurred in Advertising, Promotion, Tradeshows, Headcount, Travel & Subsistence, among other costs. It is likely that the accounting support required would not be very significant and could be provided at a Group Level. That remains to be decided.

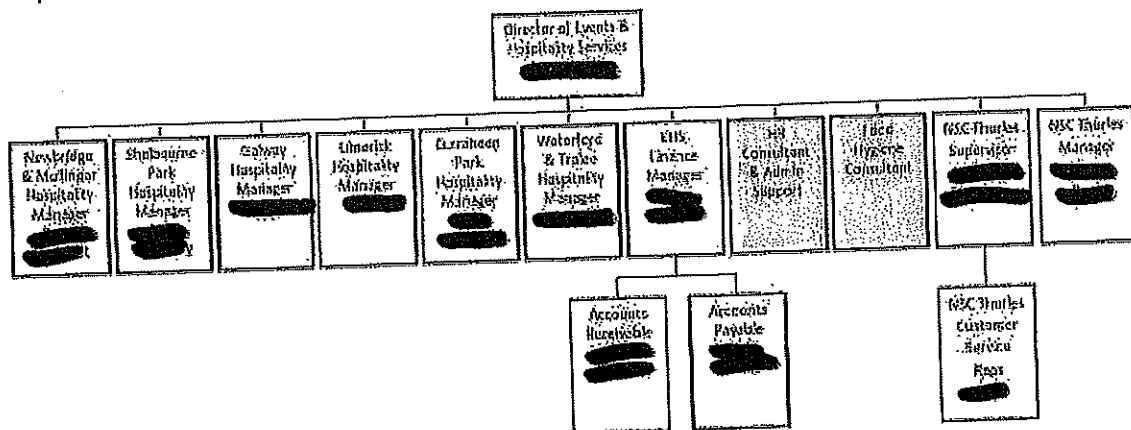
Commercially Sensitive— STRICTLY PRIVATE & CONFIDENTIAL
Proposed Organisation Structure: Sales & Marketing



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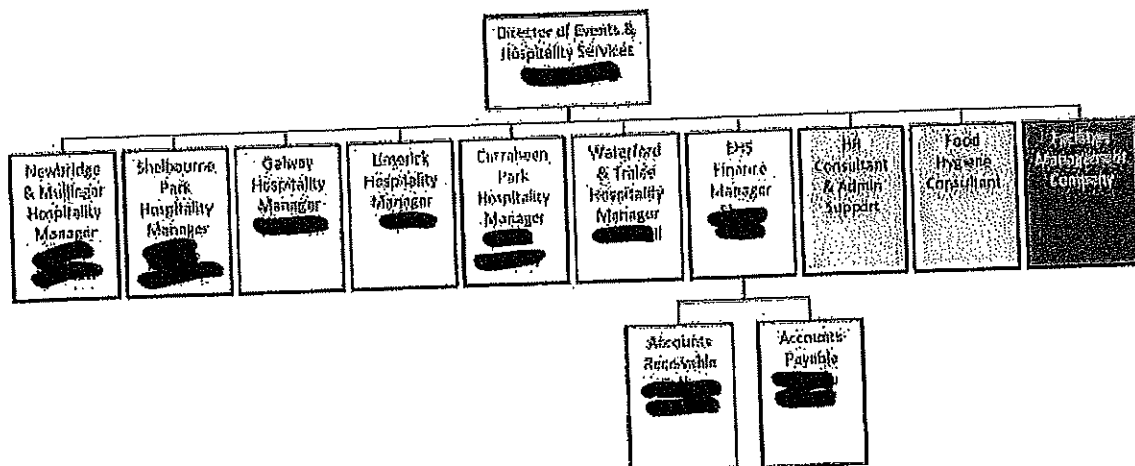
Director of Entertainment Hospitality & Service (EHS)

However, as discussed in the previous section, with the objective of consolidating the Sales and Marketing functions within the business, it is proposed that EHS would lose responsibility for the National Sales Centre in Thurles and also, for the [REDACTED] who no longer has a relationship with the NSC. [REDACTED] has moved on to trade shows and to international sales, which under the proposals, would be incorporated into the Sales & Marketing Department.



The only other change which is proposed in relation to EHS is that a Facilities Management Company be contracted to provide a 'one-stop-shop' facilities management solution with a single Account Manager dealing with EHS and a Supervisor for each stadium during racing events. The Supervisor would cover Health and Safety issues (slips & falls), Lift Problems, Blocked Toilets etc. during the course of racing events, leaving the catering and bar staff to focus on their jobs. This change also removes Supplier Invoices at a Stadium Level which facilitates the removal of the 'Finance Administrator' role at stadia.

Proposed Organisation Structure: EHS

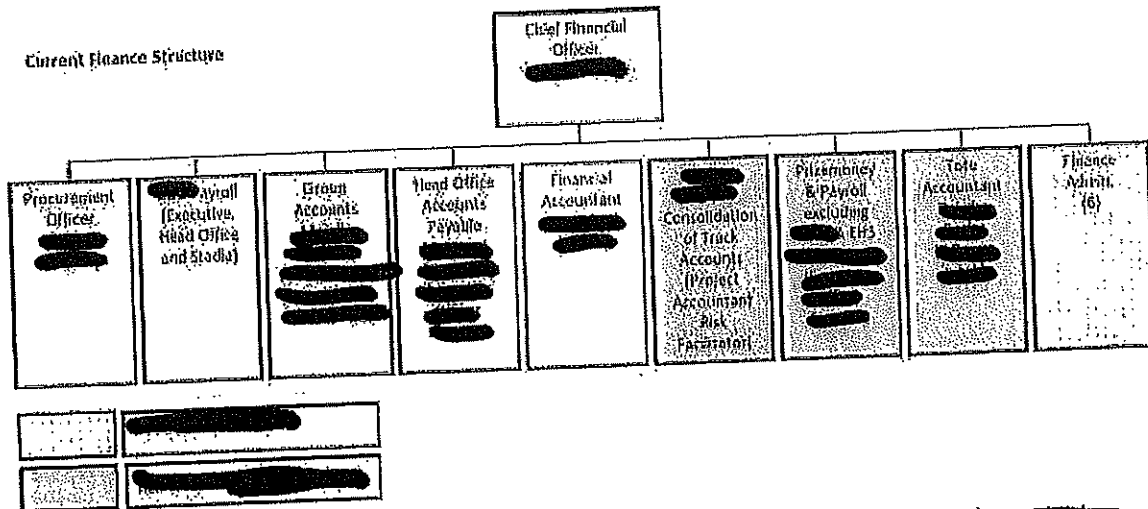


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Finance

The proposed restructuring of the Finance function sees the separation of the function into a Group & Industry level function and a commercial-level function. Under this approach, and as discussed in relation to the formation of [REDACTED] the positions shown in [REDACTED] the organisation chart below would be [REDACTED].

Current Finance Structure



With respect to [REDACTED]

- Move from Accounts by Stadia to Centralized accounts while maintaining reporting capability by stadia
- Eliminate Cash from the racing activities of stadia:
 - Charges for Qualifying Trials eliminated within a Contract Breeding/Licenses
 - Eliminate private Trials
 - Eliminate Race Entry fees as they would not make sense where Attendance Fees are to be paid
 - Eliminate Re-Qualifying Trial Payments (dog not raced in 42 days) by deducting the cost of the trials from Appearance fees
 - Establish 2 Facilities Management Contracts, one with EHS and the other with the Racing Department and eliminate all Supplier Invoices at a Stadium Level
- Complete the roll-out of Great Plains for the Finance Function

As the finance function in Head Office will be simplified through a reduction in workload following the elimination of the stadia finance functions, the creation of two Facilities Management Contracts, completion of the full roll-out of Great Plains and the reassignment of Track Accounts, Prizemoney and Tote to the Racing Department, the number of [REDACTED] currently employed at [REDACTED] [REDACTED] [REDACTED]

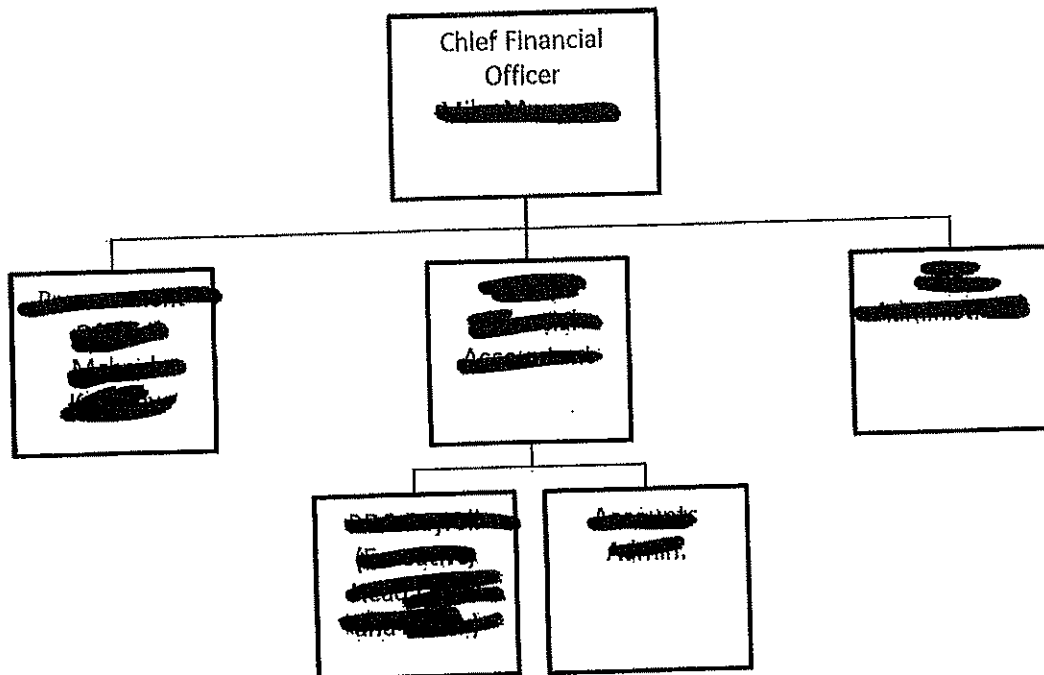
Changing the Group Finance Role

Through the establishment of the three profit centres of: EHS, Racing and Sales & Marketing, the Head Office Finance function would operate at a Group and Industry level, which would allow it to focus much more on the performance of the business units as opposed to accounting for how money was spent.

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HR Administrator

Traditionally the organisation has not been very strong in [REDACTED] and this needs to be improved, which is why it is proposed that [REDACTED] be created, reporting into the CFO.

Proposed Organisation Structure: Finance



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Director of Veterinary and Regulation

Locating a Regulatory Function within the same commercial entity which it is charged with regulating is clearly a conflict of interest.

Embracing this reality, PRL has chosen to focus on improving upon the current situation by:

- Separating the regulatory functions of the ICC from IGB
- Separating the resulting Racing Regulatory Function from the Commercial Function as far as that is possible

Racing Regulator

The ICC currently maintains the Irish Greyhound Stud Book which includes Greyhounds for Coursing as well as Racing Dogs. During the 7 years, 2009 to 2017, an average of 2,952 Litters per year were registered with the ICC out of which 440 litters (15%) were for coursing. The charges imposed by the ICC on all greyhounds include:

- Registration of greyhounds at stud
- Registration of Matings
- Registration of a Litter
- Naming and Microchipping
- Registering Change of Ownership:
- Registering a Partnership/Company Name/Syndicate
- Registration of a Prefix
- Registration of Agents
- Registration of Assumed Names
- Administration Charges
- Additional fees not referred to in the rules

Note: A full list of charges are presented on the ICC Web Site.

Aside from the physical tasks of recording the markings of a dog, microchipping and tattooing, it would appear that all of the above services could be offered free of charge online. Indeed, it is questionable whether charging for recording the markings of a dog, microchipping and tattooing makes any sense, because all dogs used for racing are legally required to have these tasks performed, and ultimately, in order for the industry to be sustainable, compensation to the stakeholders must come from the public purse. It would appear to be a case of 'taking with one hand while giving with the other' with non-value-adding administrative charges in between.

While the levying of charges on Owners and Breeders of Racing Greyhounds is clearly an important component of the funding model of the ICC, it has a detrimental financial impact on the Racing Industry.

Perhaps more important than the negative financial impact, are the Animal Welfare Issues which results from the disconnect between the ICC System and the RMS System operated by the IGB. Each year, between 4,000 and 5,000 Pups are unaccounted for in the gap between these two systems..

In light of the above arguments, the proposed restructuring assumes that an Irish Greyhound Racing Stud Book will be established and will become the responsibility of IGB.

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Keeper of the Irish Greyhound Racing Stud Book

Mirroring the current structure of the ICC, it is proposed that a new position be created within [REDACTED] [REDACTED] which would become the [REDACTED] [REDACTED]. In addition to the functions currently carried out by the Secretary of the ICC, the person in this position would be responsible for regulating the number of Dogs which are being bred for racing with the objective of avoiding welfare issues caused by an oversupply of pups.

Under the proposal put forward by PRL, Litters could not be registered and dogs would not be allowed to race without a Breeding License being applied for and approved. As discussed in relation to the proposed position of [REDACTED] [REDACTED], the Dog Pool would be defined for each Stadium [REDACTED] in the case of IGB and by the individual stadium owners, in the case of Private Tracks. Based on the demand indicated for the individual Dog Pools, the Regulator would raise Licenses which approved Breeders could apply for.

Stud Dogs & Brood Bitches

When applying for a License, the Breeder would have to select the Stud Dog and the Brood Bitch, both of which would have to be registered with the Regulator having met with minimum Breeding Indices established by the Regulator in order to maximize the number of pups making it through to obtaining Qualifying Times and racing for an extended career.

Domestic Breeding Licenses

Pups born under a Domestic Breeding License for Racing Pups, could not be used for coursing and could not be exported without authorisation from the Regulator. Approved Breeders would apply online for advertised licences for the breeding of individual litters, indicating the Breeding Stock to be used. Once an application was accepted the licence would be activated and a License Number would be uploaded to the RMS. Thereafter the selected Breeder would upload Mating details and would register pups born, by, at the latest, two weeks of age. Thereafter, any deaths which occurred would be uploaded within a stipulated number of days and the Agent Code through which the body of the greyhound was disposed would be identified.

Under the License the Breeder would be required to breed, rear and school the pups and to take them through to the Qualifying Trials stipulated in the License, at the designated stadium. Any changes to the terms of the license would have to be notified to and approved by the Keeper.

Once a Litter of Pups is ready for Qualifying Trials, the Breeder would apply online for the Qualifying Trial/Trials stipulated in the License. Both [REDACTED] [REDACTED] for the nominated stadium would be notified and the Track Manager would then schedule the Trial/Trials for a particular date/dates.

Where the Owner wished to sell one or more of the Pups, the Trials would double as a Sales event, with on-line bidding for Pups being opened as soon as the results and the footage of the trials are uploaded to the IGB Website; together with information on the Breeding and Pedigree of the Pups.

Contract Breeding

In the event of Licenses not being taken up by Breeders by the expiry date of the offer, [REDACTED] [REDACTED] would raise a Breeding Contract with a Breeder in the name of IGB and would offer the Pups for sale at official trials in the nominated stadium.

Exports

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Any individual who agrees to comply with the terms of the Export License would be free to engage in exports under an Export Breeding License. The resulting pups would not be allowed to enter the Irish Dog Pool without the authorisation of the Regulator and not until such time as the requirement arose to fill a Dog Pool space. Export Licenses would ensure that a market price would be paid for each dog exported and would also ensure that the lower performing pups, and pups failing to achieve qualifying times, would not become a burden on the Irish Dog Pool. Unless compromised from a health perspective, all pups bred under an Export Licence would have to be exported. In the event of a Pup's health being compromised it would have to be inspected and certified by a Veterinary Surgeon.

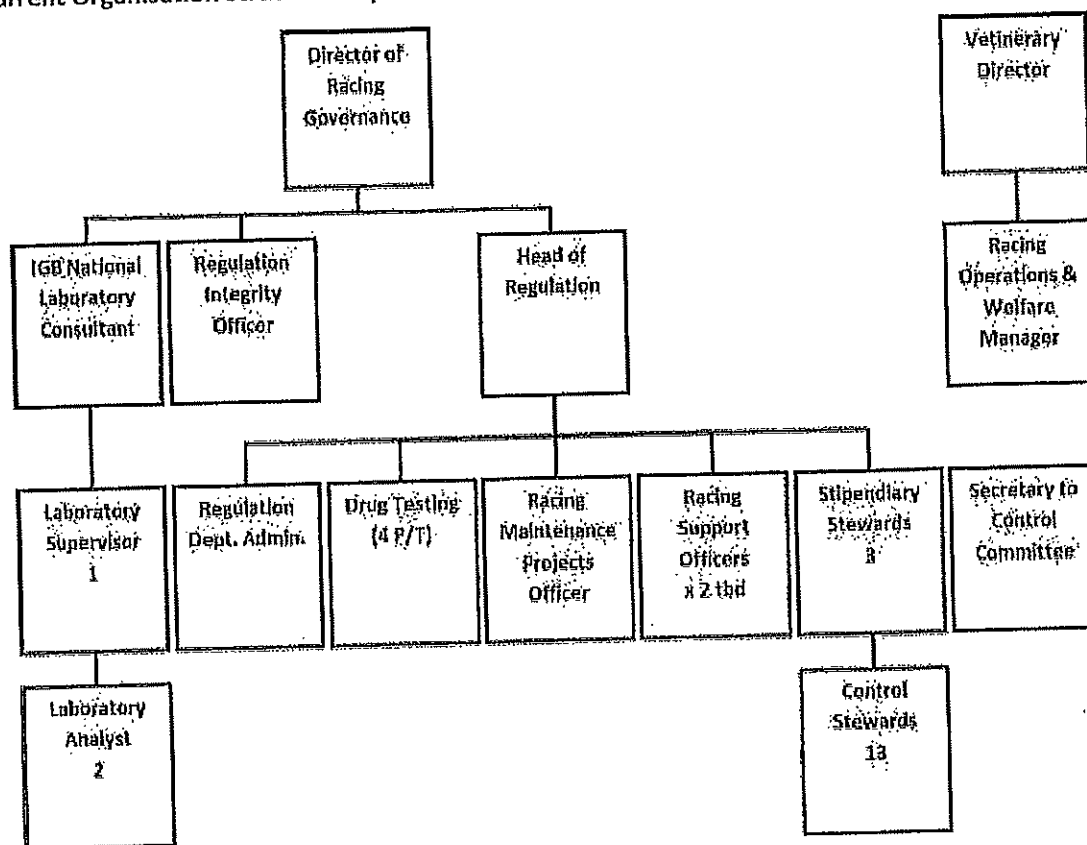
Inter-Dog-Pool Transfers

An owner would be permitted to transfer a Dog from one Dog Pool to another so long as there are spaces available and a stipulated fee was paid.

Racing at Various Tracks

While the default track for the racing of a Dog would be the one to which the dog is assigned, dogs would be allowed to run at any track, provided they have signalled their availability and the space is available. That would be a decision for [REDACTED]

Current Organisation Structure Departments of Racing Governance and Department of Veterinary



Veterinary Director & Racing Governance Director

The position of 'Veterinary Director' has only been recently created and the new Director has just one report at the present time which is the Racing Operations & Welfare Manager. While the position is seen as being of critical importance to the Board in order to bring a greater focus to Welfare, it is a very limited and high-cost brief for a Director-level appointment.

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On the other hand, assuming that at least the main recommendations of this report are implemented, the number of Racing Pups produced each year should be reduced to a small fraction of the current level. Just how big the reduction is will depend largely on the Impact on Exports when the below-cost-selling of dogs to the UK comes to an end. For the seven years commencing 2009, the number of Racing Pups registered averaged 15,076. That figure could be reduced to somewhere in the region of 1,000 Pups, without impacting on the number of races run at tracks, which would dramatically impact on the workload in both the Department of Racing Governance and Department of Veterinary. [REDACTED]

Laboratory

In the organisation chart presented above, the Laboratory is shown as reporting to the IGB National Laboratory Consultant. It could also be shown as reporting to the Head of Regulation. Both of the structures are partially correct, but the more accurate picture is that neither of these positions supervise the Laboratory Function, but do become involved from a technical perspective and on an individual case basis as the need arises. While the option of outsourcing the laboratory function to a Commercial Laboratory together with the equipment and machines specific to IGB was rejected at a Board level, it is suggested that, while it may not be seen as being possible at this point in time, that it should not be ruled out as part of a longer-term strategy.

Running a Laboratory is not core to IGB. It does not need to perform the tests; it just needs the tests to be performed, and that could be done by a Commercial Laboratory. In the opinion of PRL, who presses the buttons to mechanically perform the tests is not of critical importance. Who interprets the results does require specific expertise and that expertise could be retained while the testing function is outsourced. The fact of the matter is that as the Dog Pool is greatly reduced, stability is brought to the Dog Pool and testing becomes much more targeted based on target times, the number of tests being performed by the Laboratory should be reduced to a fraction of what they are today. [REDACTED]

Control Stewards & Veterinary Services

During Racing Events, the standard crew includes a Veterinary Surgeon and a Control Steward. Under the PRL proposal the Veterinary Surgeon would double as a Control Steward and his/her services would be contracted with a local Veterinary Practice which would be sufficiently large so as to be in a position to rotate the Vet on duty. Were these recommendations to be implemented it would not only result in a more arm's length control at Race Tracks, [REDACTED]

Control Stewards

There are currently 13 Control Stewards on the Payroll. As the Dog Pool is 'right-sized' by using Domestic Breeding Licenses to meet the needs of the Racing Dog Pool and no more; and as Export Licenses result in Pups being sold at a Market Value and not below cost as is currently the case, the workload of the Control Stewards should be greatly reduced. [REDACTED]

Stipendiary Stewards

There are currently 3 Stipendiary Stewards in IGB. Given the proposed shrinking of the Dog Pool, a greater degree of stability in the Dog Pool as dogs run for a number of years as opposed to a number of months and targeted drugs testing of dogs based on predicted times, the number of Stipendiary Stewards could be reduced. [REDACTED]

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Regulation and Greyhound

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Part Time Drugs Testing

With the reduction in the size of the Dog Pool, increased stability and more targeted testing, it is suggested that [REDACTED] would not be required.

Racing Support Officers

These positions were authorised to substitute for Racing Managers who were having difficulties in taking holidays and time off, but they were never filled. With the proposed centralising of Greyhound Grading by a team of [REDACTED]

[REDACTED]

Between the creation of the Tracks Manager position and the posed Facilities Management Contractor servicing the tracks, [REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] prepare cases for the Control Committee and License Trainers and Kennel Hands and perform the other functions [REDACTED]
However, the workload relating to each of these functions will be greatly diminished as the Dog Pool is reduced. For this reason it is suggested that [REDACTED]
the remaining functions be transferred to the proposed new position: [REDACTED]

Regulation Department Administration

This title of this position should be updated to [REDACTED]
Administration', and the remit of the position should be expanded to include a supporting role to the [REDACTED]

Racing Operations & Welfare Manager

Under the proposed restructuring this position would relinquish responsibility for the rehoming of dogs to the Dog Welfare Manager in [REDACTED], which would leave the Racing Operations & Welfare Manager with more time to focus on improving welfare standards among Owners, Breeders and Trainers.

Secretary to Control Committee & Control Committee

Under the current structure the Secretary to the Control Committee reports to the Head of Regulation. In the future, it is proposed that the Secretary report directly to the Committee making it more independent of the IGB Organisation thereby projecting an image of greater transparency.

Diagram 1

Diagram 2

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 Communications Officer

In terms of communications functions there are two categories which need to be provided for by the organisation. One is an internal function which should be handled by 'Digital Media and Marketing', involving the promotion of the sector, the promotion of special events, 'good news' stories which enhance public perception of both IGB and the wider industry among other non-controversial issues.

The second category involves significant and complex issues with the potential to result in controversy and/or crises for the organisation and/or, for the industry at large. It is suggested that such issues are best handled by external PR Services Providers and should be selected on an issue-by-issue basis, depending on their areas of expertise. These issues could include Animal Welfare, Performance Enhancing Drugs, Organisational Changes, Strategic Goals, among others. It is understood that a panel of PR Services Providers is already in place.

In the event of both categories of communications being handled along the lines suggested above,
 [REDACTED]

Section 5

Organisational Skills & Competencies

During the initial phase of the analysis, the set-up work required to undertake an evaluation of skills and competencies ██████████ of the organisation was completed. However, as the focus of the assignment changed towards a holistic analysis of the industry, and the extent of the organisational changes which would be required became clear, the evaluation was put on hold.

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