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FAO HM Senior Coroner Martin Fleming  
Sent By Email and Unsigned

Dear Sir

## INQUEST TOUCHING THE DEATH OF ARCHIE CAMPBELL BRUCE

### Introduction

We act on behalf of the Rugby Football League (“RFL”).

We write following the conclusion of the above inquest, and to respond to the report to prevent future deaths (“the report”), dated 18 April 2024, addressed to the RFL.

This report sets out a number of concerns raised by HM Senior Coroner, Martin Fleming (“the Coroner”) as a consequence of evidence heard at the above inquest, and following his review of submissions received from the interested persons at the conclusion of the inquest proceedings.

The concerns raised by the Coroner are as follows:

- 1. I have noted that the Welfare Policy and Standards provides provision for Clubs outside the Super League to apply for a dispensation primarily on the basis of resources.*

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2. *I would ask that consideration be given to the appropriateness of amending this provision so that there is not a relaxation of the rules in clubs outside the Super League, given that it is clubs outside the Super League where young players start off their careers, and given their immaturity are more likely to benefit from education and a defined Code of Conduct.*
3. *RFL to consider the appropriateness of overarching guidance, education and training with respect to the code of conduct without dispensations, with regard to the use of both illicit drugs and misuse of prescription drugs, in order to ensure consistency of application of education throughout all tiers of the sport.*

This letter sets out the RFL's response to the Coroner's concerns. Please note, the policies, procedures, guidance and training information referred to in this response are those exclusively focussing on the professional game of rugby league. There are different standards and expectations in relation to the amateur and grass roots game.

## **Background**

The inquest touching the death of Archie Campbell Bruce was heard before the Coroner at Bradford Coroners Court on 17 January 2024. During the inquest proceedings, the Coroner heard that Archie was a promising young rugby league player who played his debut match for Batley Bulldogs against Toulouse Olympique on 17 August 2019. After socialising with his teammates and others after the match, Archie was tragically found deceased in his hotel room the following morning.

During the inquest the Coroner heard evidence from a number of the Batley Bulldogs players and staff via agreed, written statements. The Coroner also heard oral evidence from Dr Faisal Ali, DC Lorna Ratcliffe, and Mr Kevin Nicholas. Mr Nicholas is the Chairman of Batley Bulldogs and was in attendance at the match against Toulouse, and present for part of the social activities post-match. Mr Nicholas gave evidence regarding the changes which had been made at the club as a consequence of Archie's death. No witnesses from the RFL were required to give evidence at the inquest. Further, prior to the inquest, neither the Coroner nor any of the interested persons had requested to be provided with any information from the RFL.

In concluding the inquest proceedings, the Coroner invited both Batley Bulldogs, and the RFL to provide written representations to assist him in considering whether to make a report to prevent future deaths.

Written submissions were duly sent to the Coroner, on behalf of the RFL, on 30 January 2024. It seems there may have been some confusion regarding the role of the RFL, and the application of its policies, procedures and guidance which were sent to the Coroner with the RFL's previous submissions. In response to the report, we respectfully reiterate some of the points made within these earlier submissions.

## **The RFL**

The RFL is the national governing body for Rugby League in the United Kingdom. It governs, regulates and develops the sport of Rugby League. The RFL currently employs approximately 100 people on a full-time basis across a range of departments which include development, participation, operations and legal, match officials, finance and HR.

The departments within the RFL include the Professional Game Delivery Team (“PGDT”), which consists of 6 employees and is responsible for overall delivery of competitions within the Professional Game. The PGDT is overseen by the Head of Delivery of Professional Game Competitions.

The PGDT is responsible for the compilation and management of all fixtures and results across Tier 1-3 Competitions and management of on-field/off-field disciplinary and misconduct functions, depending on the league concerned. The PGDT oversees Professional Game player registrations (scholarship to open age), coaches and club staff. Additionally, the PGDT leads on accreditation for coaching, insurance and clubs.

## **Batley Bulldogs and Toulouse Olympique**

Batley Bulldogs is an English rugby league club based in Batley, West Yorkshire. The club currently play in the RFL Championship.

The RFL Championship is the second tier of rugby league, sitting one competition below the Super League.

The league consists of 14 teams, with promotion to the Super League via a playoff, and relegation to League One.

The Championship consists of both full time professional clubs and also semi-professional clubs. Batley Bulldogs is a semi-professional club. To clarify earlier submissions made on behalf of the RFL, a full time professional club is one that is made up exclusively of full time professional players and staff. A semi-professional club will include some full time professional players, but will also include part time players and staff. The ratio of full time professional players to part time players is club dependant.

Toulouse Olympique is a full time professional club which also plays in the RFL Championship. Each team in the RFL Championship plays each other twice, once at home and once away. At the time of Archie’s tragic death, Batley Bulldogs had travelled to Toulouse to play its away fixture.

The game between Batley Bulldogs and Toulouse Olympique was a regular fixture in the RFL Championship calendar.

## **Overseas Travel - Code of Conduct for Squads**

When playing overseas fixtures, the RFL expects all Players and Club Officials to act as ambassadors for their Club, and for the game of rugby league.

The RFL have an Overseas Travel Code of Conduct for Squads which has previously been provided to the Coroner. This code of conduct requires that all Players and Club Officials comply with a number of expected standards, including (amongst others):

- Players are to be courteous to hotel staff, coach drivers and airport/airline staff at all times;
- Drinking to excess is prohibited and all Players must be made aware in advance of the Club's disciplinary procedures to which they will be subject should they disregard this instruction; and
- The Club should appoint a senior person to take responsibility for both enforcing these rules and to handle any incident of misbehaviour. This person should be the Head Coach, Chief Executive or a Club Director.

The Overseas Travel Code of Conduct applies to all clubs in the professional game, without exception, and regardless of the number of full time professional players a club may have.

As previously confirmed, anyone found to be involved in unacceptable behaviour whilst playing abroad may find themselves being charged with off field misconduct which would result in possible sanctions ranging from a fine, education to suspension.

## **Player Welfare Policy**

The RFL treats the welfare of all players as a paramount concern. The RFL's vision is to deliver the best player welfare and education programme in British sport.

The RFL works closely with rugby league clubs to deliver a Player Welfare Policy. The Player Welfare Policy in place at the time of Archie's tragic death has previously been provided to the Coroner.

The aim of the Player Welfare Policy is to ensure that players:

- Can play to the best of their abilities unhampered by off field concerns;
- Are proud advocates of rugby league and act as good role models and spokesmen for the sport;
- Understand the responsibilities of life in the public spotlight as professional sports people;
- Have good life skills, show respect to all and make wise decisions; and
- Develop mental resilience and understand how to look after their mental health and avoid addiction.

The Player Welfare Policy is comprehensive and includes standards and expectations in relation to both alcohol, and social and prescription drugs.

In relation to club cultures, the Player Welfare Policy states that clubs should ensure that the environment does not include a drinking or gambling culture. The club should put in place suitable protections and alternatives for players with alcohol or other addictions, particularly on club bonding trips. Each club must have an alcohol and gambling policy which is supportive of this approach.

All clubs should have a Player Welfare Manager who is responsible for looking out for the signs of excessive drinking amongst players.

Player Welfare Managers are also responsible for driving the RFL's Social and Non-Prescribed Prescription Drug Policy within their clubs.

The Coroner is correct to note that the Player Welfare Policy includes a provision for clubs outside the Super League to apply for a dispensation from its application, primarily on the basis of resources. All clubs playing in the Super League are full time professional clubs. Clubs in the Championship, and League 1 will include both full time, and part time professional clubs. The reason the provision applies therefore, is to allow clubs with very few full time professional players (perhaps even as little as one professional player) to apply for a dispensation from some of the requirements of the Player Welfare Policy. This is primarily on account of resources.

It should be noted however, that there are limits to when a dispensation would be granted. This decision would be taken by the RFL Board, and would be based on the merits and facts of each case.

The RFL has previously provided a copy of its Social and Non-Prescribed Prescription Drugs Policy (the Policy), details of which are set out again below for convenience. An application for dispensation from compliance with the Policy has never been received by the RFL, and if it were to be received, would not be granted.

In fact, it should be noted that the RFL has not received any applications for dispensation (on any grounds) from any club currently playing within the professional game (incorporating tier 1 through to tier 3). Bearing this in mind, and acknowledging the Coroner's concerns, the RFL are of the view the provision to allow clubs to apply for a dispensation from the Player Welfare Policy is in fact no longer necessary. The RFL are therefore considering removing this provision from the latest draft of the Player Welfare Policy and Standards.

## **Drug Misuse in Rugby League**

As the Coroner is aware, the RFL works closely with UK Anti-Doping ("UKAD") to achieve and champion clean sport across both the professional and community game. Rugby League, as with all sports, is governed by the World Anti-Doping Agency ("WADA"), and every participant is subject to the RFL's Anti-Doping Rules.

The RFL is committed to the principles of clean sport to uphold and preserve the integrity of the game, to safeguard the physical and mental health of Players, and to ensure that all Players have the opportunity of competing equally.

To underpin its commitment to the principles of clean sport the RFL aims to educate and inform Players about the dangers of drugs and the consequences of taking drugs.

At the time of Archie's death, the 2015 Anti-Doping Code was in effect. This code was updated in 2021.

As at the time of Archie's death, a Player would be committing an Anti-Doping Rule Violation if:

- A prohibited substance and/or prohibited method is found in his bodily specimen;
- He were to use or attempt to use a prohibited substance;
- He avoids or refuses to undertake a drug test;
- He fails to provide his whereabouts for out of competition testing, or gives inaccurate whereabouts details leading to a missed test;
- He tampers, or attempts to tamper with any part of the doping control process;
- He possesses a prohibited substance;
- He administers or attempts to administer a prohibited substance, or assist, encourage aid, abet, or cover up an anti-doping rule offence;
- He traffics a prohibited substance;
- Is complicit in an anti-doping rule break committed by another Player; or
- Associates with a person, for example a coach or Doctor, who is serving a suspension for a doping offence.

To support Players in accessing relevant anti-doping information, the RFL prepared a "Anti-Doping Booklet. A copy of this booklet has previously been provided.

The RFL also has a Social and Non-Prescribed Prescription Drug Policy, as referred to above. A copy of the Policy which was in place at the time of Archie's death has previously been provided to the Coroner.

The Policy aims to achieve a number of objectives, including:

- To prevent players from causing long or short term damage to their health/mental wellbeing through misuse of illegal or non-prescribed substances;
- To ensure that players can be offered appropriate treatment before misuse and/or addiction jeopardises their careers;
- To protect other players who may be put at risk by players who train or play under the influence of social or non-prescribed prescription drugs; and
- To protect the reputation and integrity of the game.

To meet these objectives the RFL adopts an integrated approach which is intended to educate, deter, and rehabilitate those involved with the misuse of social and non-prescribed prescription drugs.

From time to time the RFL will provide workshops to help educate players on the RFL's Policy. The RFL also encourages Clubs to remind its players of the RFL policy on an annual basis.

The RFL abides by the UK Anti-Doping Rules and works with the UK Anti-Doping Agency to ensure compliance with the WADA Code. Testing is generally completed at random and decided by UKAD.

In terms of rehabilitation, welfare and/or disciplinary procedures, the Policy adopts a three violation procedure, as follows:

- First violation - following a first violation of the Policy players will be required to attend an initial case review with the RFL and the clubs Doctor/Player Welfare Manager. Following the review the player will be required to attend an assessment with a representative of the RFL's Counselling and Addiction Service. Subject to compliance with the assessment/counselling, there will be no further action.
- Second violation - following a second violation for social drugs clubs will be able to take such internal disciplinary action as they consider necessary including dismissal and/or fines. In the case of a second violation for non-prescribed prescription drugs, the process as set out under the first violation will be followed, but clubs can take additional disciplinary action including fines, and a written warning, but not including dismissal.
- Third violation - for social drugs the process is the same as set out for the second violation. In the case of a third violation for a non-prescribed prescription drug a club can take disciplinary action including a fine and or written warning, but not including dismissal.

For any subsequent violations a club may take disciplinary action and/or dismiss the player.

Players are encouraged to self-declare in the event they have used social or non-prescribed prescription drugs. Where a player approaches the RFL or an appropriate member of club staff and self-declares that he has used a social or non-prescribed prescription drug prior to screening being carried out, the process set out under the first violation will be followed, but it will not be recorded as a first violation.

For the purpose of the above, a non-prescribed prescription drug is defined as a prescription drug for which the player cannot provide evidence of a prescription. For the purpose of the policy in place at the time of Archie's death, Tramadol was considered to be a non-prescribed prescription drug, not a social drug.

Cocaine is classed as a social drug. Its use would never be condoned by the RFL either during, or outside of the playing season.

Tramadol has been on the World Anti-Doping Agency (WADA) Monitoring Program for several years and data gathered through this programme has indicated significant use of the substance in a number of sports.

Tramadol misuse is of concern because of the risks of physical dependence, opiate addiction and overdose. As a consequence, Tramadol was prohibited in-competition when the 2024 WADA Prohibited List came into effect on 1 January 2024.

## **Mandatory Training**

For the Professional Game (encompassing Men's and Women's first teams, reserves and academy) Clubs are expected to assist with the delivery of mandated education. Clubs are given a set time frame for each player, support staff and those persons subject to the Operation Rules to complete a set of online modules.

This year the RFL changed things slightly and required Clubs to complete the modules 2 months ahead of the season starting. If a new player joined, the Club was to ask for that player to be invited to complete the training by providing their name and email address.

The modules are hosted on the RFL's "Our Learning Zone" (the RFL's education site, hosted on the HIVE platform). This year the RFL have covered topics including: Anti-Doping, Concussion, Gambling and Equality, Diversity and Inclusivity. These were identified by the RFL as critical modules to deliver to the Professional Game.

Should players not have completed the modules they are stood down from playing until each module is completed. The RFL took this action for the first time this year to ensure Clubs bought into the education piece and understood its importance.

The online modules have run in 'education week' format for 3 years (Covid prompted a real need to host modules online to supplement face to face delivery - which during covid was via Teams/Skype).



Prior to the online modules, face to face delivery was provided to Clubs and was mandated, alongside documentation provided with support from Clubs Player Welfare Managers on various topics. The Anti-Doping sessions were provided by UKAD accredited educators to Clubs, other aspects of education have been delivered by Welfare Managers or other external providers.

The RFL will review mandatory training requirements each year, and in the event of a significant issue being identified.

## **Conclusion**

As set out above, the RFL has comprehensive policies and procedures in place which it expects clubs to adhere to. Clubs are responsible for applying and adhering to the RFL codes of conduct, player welfare policies and drug policies.

In summary, the RFL do not believe that its current policies, procedures and training information are deficient, or indeed would contribute in any way to a death occurring in similar circumstances to the sad death of Archie Bruce. Notwithstanding this, the RFL have carefully considered the Coroner's concerns, and will give further consideration to removing the provision allowing clubs to apply for a dispensation from the requirements of the Player Welfare Policy and Standards - despite no club seeking to rely upon this provision.

The RFL has already introduced changes to its policies and procedures since Archie's death as a consequence of its annual review process. In addition, the RFL will be reviewing its Overseas Code of Conduct with specific reference to player behaviour and how it can safeguard more impressionable younger/less experienced Players. This will take place this year in accordance with its regulatory review process. It is not right that it is clubs outside the Super League where young players commence their careers. The majority of professional players are scouted by the academies of Super League Clubs, who are all required to adhere to the RFL policies and procedures.

Many other players who make their way into the professional game come through the England Community Lions programme. This is a centrally run programme that provides playing opportunities for those who do not make scholarship at 15. The RFL provides touring and playing opportunities to these players and as part of the work undertaken with these players, the RFL undertakes education on a number of topics including good life choices, drugs, alcohol and welfare.

The RFL are satisfied that it currently provides appropriate guidance, education and training with respect to the code of conduct, with regard to the use of both illicit drugs and misuse of prescription drugs. In the event the Player Welfare Policy is amended to remove the provision to allow a club to apply for a dispensation from the requirements of the Player Welfare Policy, ongoing training will of course reflect these changes.

We trust the above information adequately address the concerns raised by the Coroner. Finally, the RFL would like to once again pass its sincere condolences to the friends and

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family of Archie Bruce. It is evident that Archie was a very talented young rugby league player who had a very bright future ahead of him.

Yours sincerely

[REDACTED]

Legal Director  
for Kennedys