



Shangri La
Mayflower Way
Angmering
West Sussex
BN16 4AY

Minister for the Department of Digital Culture Media and Sport
Ministerial Support Team – 4th Floor
100 Parliament Street
London
SW1A 2BQ

Reference T2020/19008

12th November 2020

Dear Sir or Madam:

OFMAR Limited

3rd Annual Report to DDCMS on the Martial Arts Industry at 11th November 2020

We have been liaising with DDCMS since 2014 with a more recent positive response to our enquiries. We are both aware that the Martial Arts Industry is one of the last remaining unregulated industries in the United Kingdom with both CIMSPA and Sport England working toward introducing a greater degree of control.

Unfortunately our summary statistics and trend analysis shows a continued decline in underlying standards and the following of compliance guidelines amongst clubs, schools and instructors across the entire industry. OFMAR has upheld the belief for a considerable time that club operators in the UK should be centrally registered and approved to teach; and have developed the national portal at ofmar.org

Yours sincerely,

Adrian Hughes

Vice Chairman of OFMAR Limited

Website	www.ofmar.org
Email	enquiries.ofmar@gmail.com
Company No	10275290
Telephone	07504 824274

Summary Report on the Martial Arts Industry as at 11th November 2020

OFMAR has now completed its second operational year and has continued to cleanse, update and reconcile the data across the martial arts industry. Our published statistics show there are currently 10,808 registered schools, clubs and instructors operating from venues in the United Kingdom.

With more Schools electing to choose social media channels rather than traditional directory listing sites it is now difficult to establish whether new instructors are qualified or certified to teach to the public. OFMAR has the functionality to reconcile data from five input sources daily so we can track new schools onto the market within a day.

There is also no means at the moment to rate or score a clubs performance within or against any industry framework. OFMAR has now solved this problem.

It is important to determine whether a school is under an existing (or established instructor, club or organisation) or purely a genuine new school to the industry. OFMAR can help to ensure they get maximum exposure and meet operational standards straight from the word go. With Government Guidelines on Covid-19 stating that all clubs should report and be responsible to a National Governing Association, there are still 9,191 clubs that are currently unsupported by a NGA and therefore cannot be determined as fully Covid Secure.

OFMAR has made several 'salient wins' in the last year for the Martial Arts Industry since our last report to the Department of Digital, Culture Media and Sport. :

1. After a review of the official Martial Arts Styles recognised by OFMAR we have now expanded the insurance banding and minimum training age requirements for clubs. This is primarily based on child development, physiology and whether the martial art style uses weapons or not. OFMAR believes the use of 'live' weapons (whether bladed or blunt) should not be recommended to any practitioner under the age of 16 or unless they have reached a Dan grade where weapons can be taught by certified professional and appropriate weapons insurance in the student name can be secured.
2. OFMAR has formally recognised 413 Associations that control the 74 recognised styles. At an average of 5.58 associations per style this is something that we would like to see reduced so we can ensure that Associations are implementing minimum standard requirements for their member clubs. We would also like to see more of the clubs publishing who they are responsible for and to whom in the public domain.

Although Government Guidance notes indicate that Associations should be National Governing Bodies or Associations, the OFMAR records show that currently only 1,617 or 14.92% of clubs nationally actually report they are linked to a NGA. We are sure that very few of the 413 Associations have satisfactorily implemented the 'Return to Play' Protocols and we are confident that this is being used as a tool to endorse and approve the reopening of clubs to teach. This is significant in that 245 of those registered associations only represent one club or instructor. There needs to be a mechanism to ensure that the governance compliance is standardised for these institutions across the board to ensure they meet the NGA requirements.

3. OFMAR is now able to review records to determine whether instructors have changed Styles; or are falsely advertising styles they are neither qualified to teach, or progress students in. Many Instructors are now teaching Mixed Martial Arts in addition to their main styles without prior notification. Many Kung Fu Schools are now rebranding as Kickboxing to remain open as long as possible lockdowns.
4. OFMAR has now implemented a Top20 clubs, Style Statistics and 'Percentile Split of the performing clubs. With the rollout of the generic scoring now available for all clubs, we are able to reflect in a live environment how a club operates against a generic benchmark rated with impartiality and irrespective of style they teach .
5. OFMAR has now identified a number of flagged warnings which have been classified under a traffic light system – Green for low risk, Amber for potential risk to students and Red for moderate risk to students. There are now 35 categories of flag code that are possibly implemented. Schools are banded according to their highest rating. In 2019 we introduced a 'Possible Security Breach – Bad Admin Practice' Code to cover GDPR breaches where personal data was being released through social media identifying Minors possibly without their consent. Alongside cult recruitment, poisons, firebreathing, weight training for toddlers and choking for Minors, we believed this constituted a fairly serious breach.

OFMAR has extended the error codes in the last year to include those clubs who teach below or outside the minimum age requirements (695), i.e Krav Maga weapons use to under 10s, Non compliance with GDPR protocols, Bad admin practices, structural failures and non covid 19 Secure venues.

With 650,000 students training in martial arts each week it is imperative that we ensure clubs operate correctly.

6. OFMAR has expanded its dataset to include by venue analysis. This is so that we can set out instructors who teach at educational or academic sites, village halls, community centres, sports centres, gyms or from private venues or student homes. Obviously CIMSPA and Sport England can to an extent can control sports related premises, but other venues cannot be controlled or regulated over to the same degree.
7. In Appendix B we include the OFMAR guidance to DCMS regarding the governance of the Martial Arts Industry. There are several prominent issues that OFMAR needs to raise over the next few months, namely recovering from Covid, the UK leaving the EU (and subsequent loss of governance and approval of non-UK Associations) and the triennial review of the GDPR Procedures due on 25th May 2021.
8. OFMAR now hold all 10,808 schools on its live system portal and this is back reconciled to the industry Master List. It is entirely possible to publish this data to instantly create a 'check a trade' facility for all instructors in the UK for Martial Arts. Releasing of this information would allow instructors to actively get involved in moving toward a state of governance and regulation, and again they can use their individually assigned unique industry identifier in obtaining services and working to improve their rating. On this basis Sport England and Insurance companies can verify UK Clubs and Instructors in a centralised place. There would be a cost in releasing the entire dataset but the benefit would be a huge boost to those instructors

who have actually made sure they are compliant. By overlapping the OFMAR system with the Insurance Industry instructors can prove they are compliant and provide certification to each venue that they are registered and insured to teach each year.

9. Appendix C includes a letter to the Prime Minister regarding the effect of Covid on the Martial Arts industry. Obviously the Chancellor has offered a level of support through the SEISS Grant payments, CBILS and business bounce back loans schemes. There does need to a mechanism considered if clubs are to reopen properly and supported in the right way going forward from December 2020. OFMAR suggested the Emergency Relief Payment (reduced by the OFMAR Score for the club) to support those schools looking to rebuild after Covid-19.

OFMAR believes that if the Government wishes to support or assist the martial arts industry then this should be made available and non discriminatory to all clubs. We are not saying this is a 'one off grant handout' but believe clubs should prove they are worthy to receive the grant by properly registering and approving their services.

10. OFMAR has been in discussion with the UK Accreditation Service to assess whether the scoring mechanism for schools could be used as a body certification and approval award for clubs to operate in the industry. UKAS have reviewed the specification and believe there are grounds to review the process. With the UK leaving Europe it is imperative that the UK puts in place a standard governance for all Schools, Clubs and Instructors across the UK to meet and prove they adhere to the teaching protocols.
11. OFMAR is currently investing in its back office administration to create a 'straight through process' for creating certificates, approving instructors and schools, undertaking renewals and approval documents straight from and to the Master List.

This system is currently being developed and tested alongside the live data, however one of the shortfalls that OFMAR has is that it is not endorsed or supported by a national organisation or at a national level.

OFMAR has now fully reconciled the Martial Arts Industry and continues to strive toward excellence in its reporting functionality. We have achieved a lot in the six years developing this system and are much better placed to deliver a service package that works.

Following from our report last year the attached Appendix A details the Statistics to 11th November 2020 across the last 2 year period . We are now able to provide trend analysis figures to help support the Martial Arts Industry.

APPENDIX A



From 1st September 2018 to 11th November 2020

		<i>11th November 2020</i>	<i>% Change</i>
Records	Total Records within OFMAR	16935	9.3%
	Unique Schools within OFMAR	10808	5.0%
Styles	Styles Recognised by OFMAR	74	2.8%
	Styles Supported by NGB (Sport England)	3	-70.0%
	Clubs Reporting an NGB Alignment	470	11.4%
Associations	Associations Covering Martial Art Styles	413	3.0%
	Average Associations per Style	5.58	0.2%
	Clubs Reporting Insurance	314	9.4%
	%Total Reporting Insurance	2.91%	4.3%
Regional Split	England	9359	4.5%
	Scotland	797	7.4%
	Wales	404	7.4%
	Northern Ireland	225	16.0%
	Southern Ireland	8	33.3%
	Isle of Wight	11	10.0%
	Isle of Man	3	0.0%
	Jersey	1	0.0%
Flagged Issues	Green	111	4.7%
	Amber	3494	67.2%
	Red	266	8.1%
	Total Flags	3871	58.5%
	Total % All Schools	35.82%	50.7%
	NGB (Sport England Flags)	251	36.4%
	% Sport England Schools	53.40%	22.5%

APPENDIX B

Part B – OFMAR Response to the Government Guidelines

OFMAR has spent several years compiling forensic data regarding each active Martial art School and Club that operates within the boundaries of the United Kingdom. In summary these are as follows:

10,808	Active Schools Clubs operate across the UK from venues:
1,617	Schools and Clubs aligned with a Governing Association
9,191	Schools and Clubs are not reporting a Governing Association alignment
413	Associations cover the 74 OFMAR officially recognised Martial Art Styles. This is an average of 5.58 Associations to each Style.
3	Martial art styles are recognised as National Sports by Sport England. This leaves 61 Martial Art Styles currently unsupported or unrecognised by Sport England that operate uncontrolled and unregulated in Martial Arts. According to DCMS funding has been removed for all nationally supported Sports except for Boxing, Taekwondo and Judo Funding has been reduced for Aikido, Capoeira, Kung Fu, Tang Soo Do, Wushu, Kickboxing, Karate, Tai Chi, Kendo, Ju Jitsu and Wing Chun
3,871	Active Schools Clubs have a compliance or warning flag in place against their operation. This represents a 35.82% of total clubs and schools in the Industry. Amongst Sport England Approved Schools and clubs the percentage of Schools reporting a conduct flag is 53.40%
33%	Schools in the Industry operate at a performance level greater than 64%. Across The Industry the mean average is 59% this is split into five performance bands similar to the CQC rating for hospitals and care homes. OFMAR holds and applies 48 potential warning flags or codes against schools operation and applies a standard generic scoring matrix against each school to rate their performance against a benchmark-scoring algorithm.
2.91%	Active Schools and Clubs are reporting Insurance Coverage. Whether this coverage is adequate for the Styles being taught, or appropriate for the age limitations and parameters of the styles has yet to be determined. OFMAR has identified the following issues with UK Martial Art Clubs: <ul style="list-style-type: none">• Clubs teaching students without consideration toward minimum age eligibilities or requirements of that particular style, i.e.:• Live Weapons tuition is being given to students under the age of 16 years old in styles that do not ordinarily or necessarily need to teach weapons such as Kung Fu or Karate.• Some instructors change styles without necessarily having related certification or qualification.• Insurance is not being brokered correctly with commission farming being undertaken and hedging risk exceptionally common amongst established organisations that do not offer 'best' or optimal rate to member clubs or allowing other firms to competitively quote for services.• The biggest infringement amongst clubs is mixed age groups/ family training or combined classes where students of various age bandings train together. 2,475 clubs suffer from this flagged warning code

Managing and Assessing Risk

Businesses need to assess the risks to their workers, volunteers and customers and consider the risks they face and do everything practicably possible to minimise them, recognising that they cannot completely eliminate the risk of covid-19.

It is of utmost importance that every business and associated sports club and/or organisation is wholly committed to preventing the spread of Covid-19 amongst its membership. Its spread cannot be eliminated if people behave and follow the guidelines then it can be minimised as much as possible

Businesses should consider security implications of any decisions and control measures intended to be put in place, as any new measures could present new or altered security risks that require mitigation.

A Risk Assessment is about identifying sensible measures to control the risk in your workplace and environment. If you have fewer than five employees, or are self-employed you do not have to write anything down, but your risk assessment will help you decide whether you have done everything you need to.

Failing to complete a risk assessment (which takes into account Covid-19) could constitute a breach of health and safety law. The actions the **enforcing authority** can take include the provision of specific advice through to issuing enforcement notices to secure improvements. Serious breaches and failures to comply could constitute a criminal offence with serious fines and possible imprisonment of up to two years.

There are currently three Agencies capable and responsible for Martial Arts in the United Kingdom, which in their own terms could be considered an enforcing authority.

Sport England / UK Sport / TeamGB

Responsible for Coaching and Safeguarding and a basic level evaluation of Schools. The Safeguarding Code is not a BSI / ISO Recognised Standard and has not been approved or accredited via UKAS or BEIS so is a notional applied standard. Sport England have confirmed that only random 'spot checks' are performed against schools that are registered for the safeguarding code with no requirement for yearly publishing, verification or renewal of the information and the qualification and continued development of its member instructors.

Chartered Institute of Management Sport and Physical Activity [CIMSPA]

Responsible for venue management and qualification of instructors under CIMSPA/ REPS but lacks the education, information depth scope and knowledge and experience to effectively recommend and implement regulatory measures in or for Martial Arts. Operates more as a feasibility and analysis body rather than a facilitator of effective policy.

OFMAR Ltd

Dedicated to putting in place a generic operating standard for Martial Art Instructors to establish a 'check a trade' system. In 2017 OFMAR changed focus to create a centralised register and compliance listing for all active schools in the UK due to pressure from the industry Insurers and Instructors across the various dojo-listing platforms. Now has a forensic history of UK Martial Art for clubs that have listed their dojos since 2001.

In 2018 OFMAR set up and incepted the Institute of Professional Martial Art Instructors who reviewed the existing Styles and restricted down to an officially recognised 74 Styles. Also investigated and suggested a rebanding of the insurance brackets for the styles based on specialisation, qualification requirements, instructor position and relevant grade, minimum age eligibility, weapons tuition, physiology and human development for each specific style.

In 2018 OFMAR set up the Martial Art Conduct Authority with the objective to be the Oversight Council for approving and licensing Martial Art Schools and Instructors to operate in the UK. This includes administering the UKAS Recognition as the Awarding Certification Body (which has been accepted for review) and ensure that all clubs and schools are centrally registered and approved to teach Martial arts. The dataset owned by MACA is 3x stronger than any data held from any ceding UK GDPR Compliant dojo-listing site. This information is updated and fully reconciled quarterly and has the ability to handle up to 100 Million clubs in the UK. It is vitally important to ring fence new schools and clubs onto the market.

The main issue is that there is no Governing Association or Regulatory Body that operates to align or check Martial Arts Schools or industry participation. This has been a constant issue that OFMAR has raised for almost a decade with Sport England and DCMS. It is time that Governance for Martial Arts was centralised and an element of regulation and compliance introduced to ensure the industry works toward a better unified standard.

There is a three-stage solution toward clearing community sports clubs and organisations for the reopening of the Martial Arts Industry, but the question is whether this can be achieved before 1st January 2021, when the UK officially leaves the European Union.

1. Setting up a Governing Council

Without an Enforcement Authority acting on behalf of all Martial Art clubs then no Risk Assessment for any Association or Club Compliance protocol can be signed off. There is no point trying to make clubs comply with guidelines, when they will continue to operate to the limitations of the law without an agency to bring them back into line.

In terms of closeness Sport England may have better Association coverage; but even now they only represent the Associations and Organisations that have already undergone the evaluation process and been approved as National Governing Bodies for those Martial Sports they support. There are 9, 000 clubs unsupported by an Association, 64 Martial Sports that remain unrecognised by Sport England and 400+ Associations that remain currently unverified against compliance protocols at 13th August 2020. The Government allowed these clubs to reopen without a requirement to produce verified documents.

OFMAR/ MACA can at least handle the active schools in the UK and has already built its useable portal to handle every club. OFMAR has already contacted The Government with a suggested recovery plan for supporting Martial Arts Reopening.

However the Government would need to support and back this entity. OFMAR still requires around £2M to complete and process UKAS accreditation work to put the licensing, certification body and check a trade portal together. Although the website build has been done, recruitment would need to be undertaken and an operating budget agreed for the Governing Council to administer and oversee the approval scheme for Martial Arts.

If OFMAR were recognised by DCMS and the Government as the Certification and Awarding Body for Martial Art Schools then inserting a requirement for participating schools to provide their Risk Assessment as an additional document for the compliance screening process to formally licence the School or Club for operation. This runs alongside the existing proposal to DCMS for an Industry Support Emergency Relief Payment ERP for Schools and clubs impacted by the Coronavirus lockdown and having to rebuild from scratch.

2. Verification and Approval of National Governing Bodies, Associations and Organisations

Verification of Associations is different to that of active clubs. Sport England already has a number of Associations that it recognises as NGB's for Martial Sports. Although DCMS have restricted the available funding exclusively to Boxing, Taekwondo and Judo.

Overall there are 413 Associations covering all styles of Martial Art. Of those associations 245 represent themselves (and therefore global protocols may not be legally in place), 113 represent between 2 and 5 member clubs (protocols may be in place, but not legally binding or enforceable); and 55 represent more than 5 member clubs (probably have more established protocols and operating requirements for their member clubs).

Association just seem to be a marketing tool that is used to give some clubs and schools a rubber-stamp credence to operate without making their instructors responsible or culpable for maintaining and implementing standards. It s time those Associations proved they have the documents in place to operate; and the clout to manage and be responsible for the schools and clubs with whom they are aligned.

For example there are 176 Governing Associations for the 11 derivative styles of Karate, which represents 2900+ Schools in the UK. Each Association will have to be consulted and incorporated into the new Karate NGB (which already exists in the form of National Association of Karate and Martial Art Schools; as the insurer NAKMAS)

There are a number of Associations that are not registered in the UK but run as overseas entities or management companies (and consultancies) that do not have National Association or Organisation Level recognition. Many of these companies are not focussed on Style regulation or compliance but on fee generation and club promotion not the quality or safety of the actual Martial Arts being taught or delivered.

The Martial Art Governing Council should recognise all Associations correctly in order to cover their member clubs and those Associations be approved to conduct business within the UK Boundaries.

“Each employer or organisation should consider their own specific circumstances”

It is imperative at this sensitive time that all Associations and Organisations that represent martial art clubs, schools and instructors have a standardised approach to applying [and implementing correct procedures and] protocols across their member schools in order to prevent the spread of the covid-19 infection and to ensure that their treatment and reaction to any cases that occur is equitable, impartial and standard.

For this reason OFMAR suggests that Associations are granted an 'awarding status' by the Governing Council so that they can advise and approve their member schools that the framework is in place to reopen and support that affiliate school.

Clubs that operate under the auspices of a controlling or governing Association or Organisation are obliged to apply the rules and regulations of those governing Associations. It is possible that risk claims may not be settled or schools could be disenfranchised and club's civilly liable for infringing standards.

Without stringent checks being performed by an Association there is no means to determine whether a club, style or school adheres to legislative compliance procedures; or indeed is certified and licensed to operate.

Associations should be applying the Covid-19 Response from the Government Guidelines not just at their discretion but also according to the law as defined by the guidelines.

Clubs, Schools and Individual Instructors who are not aligned or affiliated members of a Recognised Association or Organisation should not and cannot be cleared to recommence or restart martial arts teaching and training until they can show they comply with the guideline requirements.

It should be mandatory for each Governing Association or Organisation to provide and confirm the following:

- **Association Name**
- **Contact name and contact details**
- Styles taught, Approved and recognised by that Governing Association
- The Individual responsible for the approval and verification of each style within that Association with certified relevant qualification, proof of rank and experience in that style. This includes any International Approval or granted powers conferred to a UK Association by an overseas affiliated or awarding Organisation.

An Association that does not have a 5th Dan Verifier cannot be an awarded controlling Association status for that Style.

With a high number of Instructors switching styles they teach to fit with the Covid-19 fitness trend. This means that potentially these instructors are unqualified and uncertified to teach some styles.

- Any Endorsements or penalty held against any specific active member club or school affiliated under the Association or Organisation. This includes GDPR Breaches, Teaching or structural or operational infringements, blacklisting, security and identity issues, protection breaches as well as notified accidents, welfare and incidents held on the Association's files.
- Is the Association Sport England recognised as an Olympic Funded NGB; a Non Funded NGB or a normal non supported Association
- Details of the Underlying Association Insurer with Contact Information and copies of the Insurance Certificate, Policy Terms and Conditions.
- Copy of Association Operating Oversight Manual covering all the existing policies and compliance protocols; the Covid-19 response Association Risk Assessment and the Action plan covering the reopening of their own member schools.
- Syllabus Provided (for all formally recognised styles of Martial Art)
- Total Number of Schools or Clubs the Association Represents
- Total Number of Students Association or Organisation currently manages.

Each Association will be granted a Clearance certificate they can register on their websites and provide to their member clubs as proof they have been cleared.

Evaluated Activities

Martial Art Approved Activities with consideration toward the 2m social distancing government guidelines, for the indoor or outdoor training environment.

- Warm Up and Stretching
- Stances and Stance work drills
- Basic Technique Tuition
- Basic Technique Reps practice
- Positions
- Kata Hyung or Patterns Practice
- Speed or Combination Training
- Fitness / X –Train or Circuits *
- Equipment based training *

*Consideration toward After-use cleaning must be factored into any Risk Assessment.

Martial Art Activities currently discouraged as this may contravene the contact definition of the 2m social distancing government guidelines from being applied in full.

- Escapes and Evasions
- Chokes and Choking
- Locks
- Takedowns
- Throws
- Counters and Defences Against
- Grappling and Restraint
- Knife Defence (either offensive or defensive)
- Gun Defence
- Pad Work, Shields, Bag
- Defence / Sparring / Contact Bouts/ Milling
- Any Other Weapons Drills
- Car Jacking Exercises
- Miscellaneous / Extraneous Drills where distance cannot be maintained.

Styles and Banding

It is the duty of Associations to review the operation and conduct of their member schools and ensure they are operating correctly.

Every Club should complete a Risk Assessment, which should be provided to their Governing Association or to the Governing Council to review their procedures and processes and establish whether they can reopen. The enforcing Authority has not been conferred any power by the Government to act for the Martial Arts Industry. Because Martial Arts does not have a Governing Council, Regulatory Council or Conduct Authority there is no established body that can either approve or stop martial art clubs and schools from reopening regardless of whether they comply with the Government Guidelines or not.

The following page details the minimum age banding requirements for the 74 officially recognised styles of Martial Art in the United Kingdom. Please note that these Martial Arts should be insured at the correct insurance banding and ensure that clubs and schools are not taking students below the minimum training age eligibility requirements.

Children should not be taught weapons before age 16 and could raise a warning flag against a school.

<u>STYLE</u>	<u>Ins Grp</u>	<u>Min Age</u>		<u>STYLE</u>	<u>Ins Grp</u>	<u>Min Age</u>
AIKIJUTSU	B	8 yrs		KUK SOOL WON	E	5 yrs
AIKIDO	B	8 yrs		KUNG FU	E	3 yrs
AMERICAN KENPO	B	3 yrs		KYOKUSHIN KARATE	B	5 yrs
ARNIS	E	16 yrs		KYUDO	E	10 yrs
BAGUA	E	16 yrs		MMA	E	8 yrs
BARTITSU	E	16 yrs		MUAY THAI	E	5 yrs
BJJ	E	5 yrs		NINJUTSU	E	8 yrs
BOXING	B	5 yrs		PENCAK SILAT	E	16 yrs
CAPOEIRA	B	5yrs		QI KWAN DO	C	3 yrs
CHI COMBAT	C	3 yrs		SAMBO	E	10 yrs
CHOI KWANG DO	C	3 yrs		SANG MOO	C	5 yrs
ESKRIMA	E	16 yrs		SAVATE	C	5 yrs
FILIPINO MARTIAL ARTS	E	16 yrs		SELF DEFENCE	E	10 yrs
FITNESS	A	10 yrs		SHITO RYU KARATE	E	5 yrs
FREESTYLE	E	3 yrs		SHORIN RYU KARATE	B	5 yrs
GOJU RYU KARATE	B	5yrs		SHORINJI KEMPO	B	5 yrs
HAPKIDO	E	5yrs		SHOTOKAN KARATE	B	3 yrs
HEMA	E	16 yrs		SHUKOKAI KARATE	E	5 yrs
IAI BATTO DO	E	16 yrs		SILAT	E	16 yrs
IAIDO	E	16 yrs		SOO BAHK DO	C	3 yrs
JADO KUIN DO	C	3 yrs		SOOYANG DO	C	3 yrs
JEET KUNE DO	E	3 yrs		SPORT KARATE	B	5 yrs
JU JITSU	E	5 yrs		STAV	E	10 yrs
JUDO	B	5 yrs		SYSTEMA	E	16 yrs
KALI	E	16 yrs		TAI CHI	E	3 yrs
KAPAP	D	10 yrs		TAIJUTSU	E	3 yrs
KARATE	B	3 yrs		TANG SOO DO	E	8 yrs
KARATE – Y G M	B	3 yrs		TANG SOU DAO	C	5 yrs
KEMPO	E	5 yrs		TETSUDO	E	5 yrs
KENDO	E	16 yrs		THAI BOXING	E	3yrs
KENPO	E	5 yrs		TAEKWONDO	B	5 yrs
KEYSI	E	16 yrs		VALE TUDO	B	10 yrs
KICKBOXING	B	5 yrs		WADO RYU KARATE	E	5 yrs
KOBUDO	E	16 yrs		WASHINKAI KARATE	B	5 yrs
KOBUJITSU	B	10 yrs		WEAPONS	E	16 yrs
KOREAN KARATE	B	3 yrs		WING CHUN	E	3 yrs
KRAV MAGA	E	10 yrs		WUSHU	E	3 yrs

*** Where styles teach weapons as part of their syllabus, minimum age eligibility is 16 yrs**

3. Accredit, Recognise and Approve Clubs, Schools and Instructors at a National Level.

ALL CLUBS, SCHOOLS, INSTRUCTORS SHOULD BE REGISTERED ON THE OFMAR.ORG NATIONAL PORTAL

This is to ensure the following information is correctly held and recorded in a central point so that OFMAR can provide a clearance and approval Certificate for that Club, School or Instructor operating their services from a specific venue. A copy of this certification can be given to their venue hirer for compliance purposes; or held on the clubs records for compliance check or possible review by the Health and Safety Executive.

The purpose of the grass-roots club registration is to ensure that contact information and numbers are readily available in a central location for Test and Trace purposes.

- Style and Supervising Instructor contact and venue information
- Style related information, data gathering and information
- Any MACA Endorsements or warning flags held against the specific club or school can be resolved and sorted out before reopening can be agreed.
- Which Governing UK Association Controls the Club or School, along with their relevant contact information and insurer details in case of litigation following Covid-19 infection.
- Details of the Underlying Insurer with Contact Information
- Certification of Instructor Rank and banding according to IPMAI based on the specialisation and style parameters to determine Instructor recognition level. Also declaration of linked instructors and those insured to teach or volunteer under the Clubs profile.
- Syllabus provided (for all formally recognised styles of Martial Art) run from the club.
- Confirmation of any Instructor Certification for:

DBS Enhanced Check

Child Safety and safeguarding Certification

Provision of Protection Policy Compliance Checks [Vulnerable Persons]

First Aid Certification

Completion of Training in the Prevention of Covid-19

Completion of the Mental Health Wellbeing and Awareness Course – Covid-19

Completion and filing of the Club's Covid-19 Risk Assessment by Supervising Instructor and action Plan for reopening.

In accordance with the OFMAR Protocols this pinpoints a specific club under a specific style or instructor at a specific venue and OFMAR can therefore provide a clearance compliance certificate for that club at that specific venue and this should be provided to any venue landlord as proof that the Community Sports Martial Art Clubs has been industry cleared.

A club could potentially reopen if they have completed the Risk Assessment; the required training courses and completed and implemented satisfactory contingency procedural routines to reopen then ultimately permission for a club to reopen or restart should rest at the discretion and acceptance of their venue with the clubs or schools proposals.

APPENDIX C

OFMAR LETTER TO PRIME MINISTER DATED 6TH JULY 2020

The Rt Hon Mr B Johnson
10 Downing Street
London
SW1A 2AA

6th July 2020

Dear Mr Johnson,

RE: The Easement of Lockdown Requirements for the Recommencement for Sporting Activities

I refer to my letters and correspondences of March, April and May to yourself, CIMSPA and DDCMS which to date remain unanswered.

The Outbreak of Covid-19 has affected many sectors and industries. OFMAR wrote to advise the Government in March and April that Sports Clubs; especially in the Martial Arts Industry (for whom we operate) would be greatly affected by a Lockdown and, as we predicted many clubs have had to ensure 4 months loss of income, club closure or a redirecting their skills to survive and contribute to the national effort of controlling the spread of the Covid-19 infection.

We have heard nothing of any emergency or financial support that could be made available for national clubs or instructors and we advised in March the bailout cost would be around £10M per month for the Martial Art Industry alone to cover the cost of continued insurances, rentals, qualifications and continued compliance that many Instructors have to pay or have in place in order to restart or continue their businesses after lockdown. Many clubs have had to 'furlough' their students until they have permission and an indoor premises to restart teaching or training.

Now I fully support the actions taken by the Government which have undoubtedly reduced the critical spread of covid-19 potentially saving hundreds of thousands of lives from being impacted by the virus.

OFMAR has considered the easement of lockdown requirements on Martial Arts and the best way this could be administered and implemented. There are over **400** Governing Associations (both nationally funded NGBs through Sport England, and non funded NGBs) operating in the UK representing **10,808** active clubs and approximately **650,000** active students at March 2020.

We have already stated that 66% of those clubs under the newly implemented OFMAR Generic Scoring Matrix fall below an acceptable operating standard of 64%. These statistics are available on quarterly production from the OFMAR Website, with the next full extract due in August 2020.

OFMAR has already published phase I & II guidelines for Covid-19 and has now completed the design requirements for the easement of lockdown which includes the risk assessment, PPE requirements, Controls and Measures, acceptable drills and exercises, training indemnity forms, class coverage questionnaires and standard compliance checklists for all Associations and Clubs to restart training.

As you may be aware the UK Accreditation Service are interested in reviewing the OFMAR process for the purpose of awarding 'Certification Body status for the Martial Art Industry'. If successful this would mean every Martial Arts club would have to be OFMAR registered. We just need to raise the capital to cover the cost for UKAS Approval and drafting the BSI/ISO Industry Standard. To date neither Sport England, the Lottery, CIMSPA or DCMS have offered to financially support or back this idea. UKAS and BSI have confirmed there is no approved or recognised standard or Certification Body in Place for Martial Arts. OFMAR wants to change this so that the industry is run under stricter guidance.

OFMAR believes that only the Associations should be permitted or allowed to verify affiliate and member schools to recommence or restart training. This can only be done if the Associations alone provide and register key information so that they can handle the reopening of member schools. OFMAR has a complied a detailed checklist for the standard requirements that every Association should have in order to ratify themselves as compliant and ensure that their affiliate instructors have completed necessary training.

OFMAR believes that any club or instructor that does not have Association backing or control should not be cleared or allowed to restart or recommence training unless they can prove they operate to the same permission levels as a Governing Association. This can be done through the OFMAR process already existing in place.

OFMAR has also drafted renewal advices and questionnaires, club compliance checklists in order to be registered along with indemnity forms, class questionnaires, registers and safety checklists, Track and Trace incorporation to allow recommencement of their Sporting Activities and adoption of proper protocols

A solution should solve as many problems as it can at an optimal cost. This is something that OFMAR has been working toward since 2013. We still believe in Quality Safe Martial Arts – that schools, clubs and instructors should be providing an excellent level of service (given that tuition fees range from £4-£40 per hour per student across the UK).

OFMAR already has an active dataset list for the 10,808 registered Instructors in the UK – ready to publish (this will take 10 working days to release so could be done for all clubs for a 1st August 2020 rollout). This would grant a years ‘free membership’ within the OFMAR Portal. Every active club in the UK would be listed with an attached OFMAR Benchmark rating. The public can see how each club in their area performs against the OFMAR benchmark - in a ‘Check a Trade style’ rating system for martial art clubs across the scope of the UK.

If Sport England, CIMSPA or DCMS were looking to finance a sports recovery package for Martial Arts then any emergency relief payment could be made in line with the OFMAR score band. Clubs would flock to be endorsed and backed to maximise any potential emergency relief payment, all of which could be done through a specifically defined and determined process administered via OFMAR.

Instructors themselves would have to ratify and certify their documents with OFMAR which could then step into the formal role as the Certification Body for Martial Arts and set the industry participant level.

We already have the software and platform built over the last 5 years, and monitor the industry participation of Clubs, Schools and Instructors and prepare club and industry performance statistics.

1. Centralised Registration

OFMAR suggests that every club or instructor could be offered or granted a free years membership of OFMAR if they choose to verify and activate their club on the national OFMAR Club platform. At present only clubs who opened after the initial easement of lockdown procedures (from 1st June 2020) onwards are represented and granted a free years membership. OFMAR thinks this could be extended to all 10,808 clubs.

Cost of a year’s publication: £1,300,000

2. An Emergency Relief Payment for Clubs Affected within the Industry

For those clubs who have faced lockdown OFMAR thinks that a emergency relief payment (ERP) could be available. This is limited to 4months lockdown (April 20 – July20) at £1000 per supervising chief instructor per month. This is so that Supervising Chief Instructors who run 8 -10 clubs a week from different venues only receive one ERP. This means that any ERP can be scaled back by that clubs

average weighted OFMAR score %. There are 9,200 registered single instructors in the UK with an industry average banding score of 59%

Total Estimated Cost:	£43,232,000 (£4000 Maximum ERP x 10,808 Active Clubs)
Average Banding % Score	59%
Cost of this:	£25,518,000

3. National Level Recognition, Accreditation and Approval

OFMAR has been working to set in place a requirement for Martial Arts Instructors to be registered and approved nationally since 2013 - especially as 60% weekly attendees are children (390,000 children). There should be a requirement that Instructors (And Associations) are registered and approved at a central level so they meet requirements and implement style related procedures in accordance with determined industry guidelines.

Cost of UKAS Accreditation	£2,000,000
Cost of BSI/ISO Approval	£2,000,000

Even a £31M allocated Emergency Relief Payment would cover the majority of costs for OFMAR to support and set in place a national register, a recognition, accreditation and approval mechanism for the entire UK Martial Arts Industry. It puts the incentive and emphasis on the Martial Arts Instructors and Associations to make their Schools, Clubs and Organisations efficient and compliant with procedures and processes, which is evidently lacking today. This payment is still a third of what Scotland has pledged to support its Theatre Industry.

4. Set a Precedent for the Future

This means that qualification for the emergency relief payment would set the precedent for excellence across the Industry for many years to come. Instructors that are not registered would not be eligible for any emergency relief payment under the OFMAR System; and they would have 12 months to become registered potentially encompassing and enrolling the entire industry in a year.

The Department of Digital Culture Media and Sport has already instructed that sports funding has been removed from any non Olympic 'Martial' Sports which should have saved a considerable sum this year. An Emergency Relief Payment now would allow us to ringfence all industry participants; unite them under one standard operating code and banner, strive toward excellence the quality and level of service they provide; and support them all throughout this difficult time to ensure they can restart on the right footing. Maybe a contribution toward this payment could be made from the DCMS Allocated budget.

Obviously OFMAR can be ready for 1st August 2020 roll-out across the entire industry so action on a decision and response is of the utmost importance. I look forward to your suggestions in due course.

Yours sincerely

Adrian Hughes
Chairman OFMAR Ltd

cc: Rt Hon Mr R Sunak: The Chancellor of the Exchequer
cc: Rt Hon Mr A Sharma: Secretary for State for Business Energy and Industrial Strategy
cc: Rt Hon Mr O Dowden: Department of Digital Culture Media and Sport