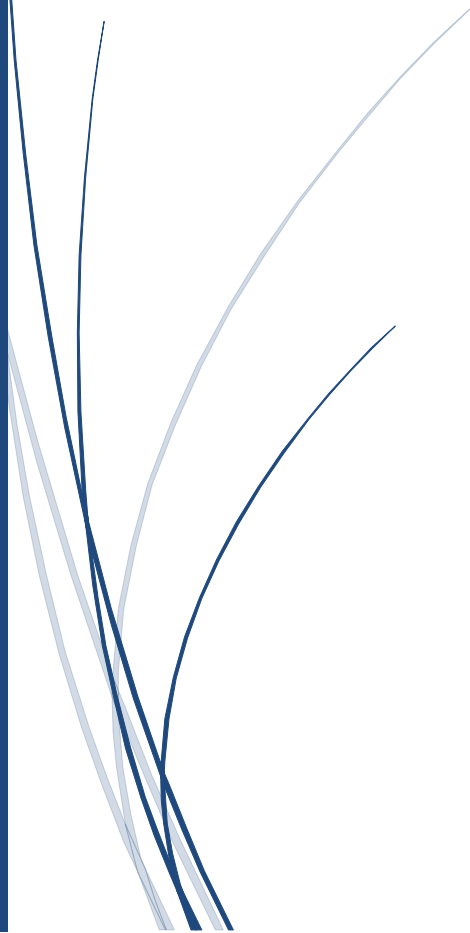




1 June 2023

**CONSULTATION ON THE ESTABLISHMENT OF AN  
INDEPENDENT GLOBAL SAFE SPORT ENTITY  
FINAL REPORT**



Interim Steering Group on the establishment of an  
Independent Global Safe Sport Entity

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This report is the result of a thorough and inclusive consultation process launched and funded by FIFA to consider the establishment of an Independent Global Multisport Safe Sport Entity. The report was approved by the Interim Steering Group, a consultative multi-stakeholder group with its members generously giving their time and expertise to identify challenges and possible solutions to interpersonal violence in sport.

FIFA wishes to thank the many outstanding experts involved in the consultation, in particular the survivors that helped the group focus on aiming at trauma-informed and victim-sensitive solutions.

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## Executive Summary

Sexual, emotional, and physical violence against athletes and other participants in sport is a widespread problem with a serious impact on the victims, sports, and society as a whole. Such violence, in particular sexual abuse, is serious and widespread

Confronted with an increase in the number and complexity of cases concerning sexual and other forms of violence, FIFA realised that the lack of access to trauma-informed investigators and to trusted support and care services for victims/survivors<sup>1</sup>, was an important obstacle to an efficient and victim-sensitive response to incidents of violence. Furthermore, it became obvious that most incidents were not reported because of lack of trust in the sport justice system, a system designed to deal with other integrity breaches, and because of the prevailing gaps in sports and justice systems at a local level. Other International Sport Federations (IFs) reported being confronted with the same situation.

In 2021, FIFA launched a thorough consultation process with critical stakeholders on the possible mission, scope and governance of an independent, global, multi-sport Entity that would adequately respond to cases falling within the jurisdiction of International Sport Federations. The process included the creation in 2022 of a multi-stakeholder Interim Steering Group, advice provided by around 40 experts through thematic expert groups, as well as engagement with survivors of abuse in sport through a dedicated, trauma-informed advisory group.

This report describes the process, its main findings and 25 of the high-level recommendations extracted from the discussions. Further insights can be found in its appendices.

Consensus was reached on the importance of setting up an independent, multisport, global entity focusing on a) the provision of support and care for victims/survivors and b) trauma-informed investigations of cases falling within the jurisdiction of the International Federations joining the Entity. Although the need for stronger safeguarding policies was identified, it was considered that efforts in this regard were being deployed by International Sport Federations, the IOC, and other organisations.

The Recommendations in this report cover critical areas such as:

- The principles and values that the new Entity should uphold;
- the commitments of IFs joining the Entity, including commitment to improve their safeguarding policies, to follow up to the Entity's recommendations and to fund it;
- the governance model (that should, in particular, guarantee independence, impartiality, transparency, and accountability);
- measures to provide adequate care support and to minimize the risk of further harm to the victims;
- criteria and elements for efficient, trauma-informed investigations;
- a funding model that ensures the sustainability of the Entity and follows a solidarity approach so that no IFs are financially prohibited from joining.

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<sup>1</sup> Writers of this report recognise that "victim" is the term most often used in criminal legal systems and "survivor" is a term most often used in support and advocacy areas. The terms are used indistinctively, acknowledging the importance of respecting the choice that each person with lived experience makes to identify themselves.

An independent international safe sport entity can only be viable with the backing of the IOC and a range of founding IFs. As it may be too soon for others to commit to both national and international solutions based on similar specialist models that have been adopted to tackle other crimes in sport, FIFA announced in April 2023 that it will focus its efforts on the creation of a dedicated solution to tackle abuse cases in football. FIFA remains open to the creation of a multisport entity in the future. In the meantime, it stressed its wish to continue to work together in solidarity with its members, confederations, expert stakeholders, the IOC, fellow IFs, and organisations globally that are committed to ending violence in sport.

## Introduction

Sexual, emotional, and physical violence against athletes and other participants in sport is a widespread problem with a serious impact on the victims, sports, and society as a whole. Such violence, in particular sexual abuse, is serious and widespread. More and more athletes denounce emotional abuse as being part of their “sport culture.”

- For the victims/survivors, the consequences of violence can be devastating and long lasting. Negative outcomes include injuries and impaired physical development, loss of self-esteem, poor academic and sporting performance, distorted body image, eating disorders, self-harm, depression, anxiety, and substance use disorders. In extreme cases, abuse can lead to death (including suicide). Very often, victims may be forced or compelled to stop practicing their sport.
- For sports organisations, violence may result in criminal and other sanctions, expose poor governance, seriously damage their reputation and lead to a loss of talent and income because of a lack of people’s trust in their ability and willingness to create a safe environment for all participants in sport.
- States that fail to address violence in sport are accountable for human rights violations that weaken the rule of law and result in huge individual, social and economic costs.

Despite the high prevalence exposed by research, violence in sport is largely underreported. Reasons include feelings of guilt, shame and fear of reprisals and other negative outcomes. Victims also lack access to or trust in reporting systems. Many victims having reported violence in sport denounce being exposed to threats and revictimization because of the absence of trauma-informed professionals and support.

Ending violence is a human rights imperative. International law requires public authorities to respect, promote and protect human rights, which also includes positive obligations to protect the rights of individuals from violations by non-State actors, such as sport organisations, by judicial and other means. Sport organisations also have an obligation to respect and protect human rights (especially children’s rights), meaning that they should avoid infringing on the human rights of others and should address adverse human rights impacts when they occur. They should also carry out human rights due diligence and provide for or cooperate in their remediation through legitimate processes.

Acting upon its commitment towards the protection of the human rights of all participants in sport and determined to protect the most vulnerable, FIFA launched an ambitious Safeguarding Programme (the FIFA Guardians) in July 2019. This was a first and critical step towards a broader safeguarding strategy to prevent and respond to abuse both in the context of FIFA’s operations (such as international competitions) and at national level through its 211 member associations.

Confronted with an increase in the number and complexity of cases concerning sexual and other forms of violence, FIFA realised that the lack of access to trauma-informed investigators and to trusted support and care services for victims/survivors, was an important obstacle to an efficient and victim-sensitive response to incidents of violence. Furthermore, it became obvious that most incidents were not reported because of lack of trust in a sport justice system designed to deal with other integrity

breaches and because of the prevailing gaps in sports and justice systems at a local level. Other International Sport Federations (IFs) reported being confronted with the same situation.

The idea of the creation on an independent, multi-sport and global safe sport Entity (the Entity) emerged as a possible response to the needs identified. To test this idea, and in the spirit of Principle 7.2 of the Basic Universal Principles of Good Governance within the Olympic movement<sup>2</sup>, FIFA launched a thorough, multi-stakeholder consultation process including a broad consultation with 230 participants and the setting up of an Interim Steering Group (ISG) with participation of key stakeholders (including victims/survivors) and eminent experts.

This report describes the consultation process and captures its outcome, focusing in particular on a number of key high-level recommendations from the ISG to the founders of the future Entity.

## **I. The Consultation Process**

### **A. A first, broad consultation**

In October 2020, FIFA commissioned a broad multi-stakeholder consultation to consider the establishment of an independent, specialist, multi-stakeholder, international safe sport entity. This first consultation took place over a 7-month period and involved both primary and secondary research methods. The aim of the consultation was to assess the feasibility, mission, mandate, and scope of operations needed by sports to appropriately investigate cases of abuse and to take action, and to provide care support to those affected. In total, over 230 individual stakeholder inputs were received into the Consultation Process.

Extensive research, analysis of existing institutional mechanisms, good practice, oral (conducted virtually due to the global COVID-19 pandemic) and written consultation was undertaken<sup>3</sup>. A Draft Report was circulated to all those involved in the Consultation Process in June 2021 to provide an opportunity for further detailed input. The consideration and integration of all proposed comments and revisions was made in July-August 2021, and the final report was published in November 2021.

The findings of this consultation were compelling with the [final report](#)<sup>4</sup> highlighting the imperative need to ensure an independent victim/survivor-sensitive approach with trusted and accessible

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<sup>2</sup> “Harmonious relations and constructive partnerships between sports organisations and governmental or non-governmental organisations should be encouraged in the interest of sport and in order to help sports organisations fulfil their mission, provided however that the principle of autonomy is fully respected and that the sports organisations do not associate themselves with any activity which would be at odds with the Olympic Charter. In particular, sports organisations and government authorities should work closely together and coordinate their actions, with mutual respect for each other’s jurisdiction and responsibilities, and without any undue interference, in order to: – contribute to the development of sport at their respective levels, – support and protect the athletes, and fight against doping and any form of manipulation, corruption in sport, and harassment, abuse or violence in sport, and – protect youth from crime through sport.”

<sup>3</sup> Participants included UN Agencies, inter-governmental and multi-lateral entities, governmental entities, International Sports Federations, international sports related organisations, survivors’ groups and individuals with lived experience of abuse in sport, human rights specialists and civil society organisations, security sector organisations and ombudspersons, child protection experts, national safe sport centres and sport integrity units, academics, investigative journalists, health professionals and independent experts. A conscious effort was made to ensure geographical representation and international as well as local stakeholders.

<sup>4</sup> The final report includes appendices with definitions, key applicable standards, and an extensive bibliography.

reporting mechanisms, expert case management, culturally sensitive investigations, and trauma-informed care support for those affected around the world. Furthermore, the report identified the urgent need to strengthen and to build trusted, expert national networks and frameworks to support both victims and sports organisations in dealing with such cases.

The International Olympic Committee (IOC) and International Sports Federations (IFs) have launched a range of initiatives to promote safeguarding. This includes the development of policies, training, procedures, and programmes to help prevent and to address abuse in sport when it occurs. However, this work is still at a relatively early stage and the expert national networks and multi-stakeholder systems required to ensure access to safe reporting and remedy in many parts of the world are yet to be established, may not be trusted, or simply do not currently work. Sports organisations, governments (statutory authorities including law enforcement, social services, child and other victims' protection systems), expert local NGOs, and other professionals will need to work together at a national and an international level to address violence in sport as these cases require specialist expertise and services that often fall beyond the capacities and competencies of sports alone.

The independence and impartiality of the Entity were considered as being fundamental to its success.

## **B. Deepening the engagement**

To further deepening the engagement with critical stakeholders, an Interim Steering Group for the Safe Sport Entity (ISG) was established in October 2022 with the mandate of proposing high level recommendations to the founders of the future entity.

It included representatives from international sports federations, inter-governmental entities, civil society organisations and experts in the fields of sport and human rights and children's rights, athletes' unions and alliances, independent ethics and integrity experts, and survivors of abuse in sport; all of whom committed to addressing violence in sport. The ISG was assisted by an Interim Secretariat.

The Interim Steering Group first met on 4 November 2022 and subsequently met on a further five occasions. The meetings were held virtually, with one in-person meeting which took place at the Home of FIFA, in Zurich, on 21 February 2023. The meeting notes documenting the proceedings of each meeting were circulated via email to all its members.

To allow for more in-depth discussions around critical issues, the ISG counted on the advice of four Groups of Experts on the following themes:

- Governance
- Intelligence and investigations
- Care support for victims
- Funding, partnerships, and service providers.

The Expert Groups adopted their own working methods, received, and integrated input from survivors and had the opportunity to compare notes at an all-experts meeting before finalising their reports. The Expert Groups' mandates, composition and reports are included in Appendix 2.



<b>INTERIM STEERING GROUP (ISG) COMPOSITION</b>		
<b>Name</b>	<b>Title</b>	<b>Organisation</b>
Joyce Cook (Chair)	Senior Advisor to the President's Office (Safe Sport Entity)	FIFA
Greg McKenna	Head of Biathlon Integrity Unit	International Biathlon Union
Sally Clark	Senior Legal Counsel - Integrity and Regulatory	International Cricket Council
Fanny Bellier	Safeguarding / Integrity and Education Manager	International Cycling Union
Mario Gallavotti	Senior Advisor to the President's Office	FIFA
Ashley Ehlert	Deputy Secretary General & Legal Director	International Ice Hockey Federation
Patricia St. Peter	Council Member	International Skating Union
Stuart Miller	Senior Executive Director, Integrity	International Tennis Federation
Dr Najat Maalla M'jid	UN Special Representative of the Secretary General on Violence Against Children	United Nations
Irena Guidikova	Head of the Children's Rights and Sport Values Department	Council of Europe
David Lega	MEP and Co-chair of Child Rights Working Group	European Parliament
Jonas Baer-Hoffmann	Secretary General	FiFPro
Andrea Florence	Director	Sports and Rights Alliance
Julie Ann Rivers-Cochran	Chief Executive	The Army of Survivors
Maud de Boer-Buquicchio	Independent Expert President of ECPAT International, Former UN rapporteur on the sale and sexual exploitation of children, former Deputy Secretary General of the Council of Europe CoE	Independent Expert
Kat Craig	Independent Expert	Athlead UK
Peter Nicholson	Independent Expert ICC Ethics Officer & Head of I&I, Athletics Integrity Unit	Independent Expert
<b>INTERIM SECRETARIAT</b>		
Elda Moreno	Lead consultant. Human Rights lawyer with expertise on sport policies, violence prevention and response, children's rights.	Independent expert

### **C. Survivors' engagement in the process**

From the outset, FIFA considered it critical to engage with survivors of violence in sport as their lived experience and acquired expertise could help to identify the current gaps very concretely, as well as the action needed to address them. Individual survivors and survivors-led organisations were first consulted in the context of the broad consultation. On 6 September 2022, a survivor-focused meeting was held, following which it was decided that the best way to create a safe and trauma-informed environment for survivors to engage in the next phase of the consultation process was through an organisation outside FIFA.

The Army of Survivors (TAOS) was then commissioned to create that space and act as the "nexus" between a group of survivors, an Ad-Hoc Survivors in Sport Advisory Group (ASAG), and the Interim Steering Group. The CEO of the Army of Survivors (Julie Ann Rivers-Cochran) was a member of the ISG and ensured the link with survivors, informing them of the works of the ISG and giving the ASAG the

opportunity to guide and influence its considerations. Survivors were financially compensated and offered access to counselling services if needed.

In November 2022, TAOS reached out to 12 athlete survivors and practitioners from around the world representing different sports and different experiences with abuse in sports and institutions. Participants were invited based on their lived experiences, their expertise and engagement in consultation processes on violence in sport. TAOS Team members assigned to this initiative included two trauma-informed crisis interventionists (Masters in Social Work) and two attorney advocates that all specialize in trauma and sexual abuse. The TAOS Team facilitated ASAG meetings and provided mental health first aid support throughout the project period, including meeting content that brought up ASAG-member trauma histories. Additional mental health support referrals were shared with ASAG members throughout the process. The ASAG included ten female identified participants and two male identified participants. Participants were from eight countries (Argentina, Australia, Brazil, France, Italy, Kenya, South Africa, and the United States) and had experienced abuse in one of the following sports: American football, Basketball, Football, Judo, Gymnastics, Swimming, Taekwondo and Tennis. The ASAG met five times across a six-month period.

The ASAG received all the documents circulated to ISG members prior to and after ISG meetings. They also received the draft reports from the four Expert Groups and provided very valuable input to their works. In addition to their on-going engagement with the ISG, ASAG prepared a report with key recommendations on how to integrate the voices of survivors in the future entity's governance and operations (attached as Appendix 1). Moreover, in order to capture the voices of other survivors, they circulated a survey that integrated the views of 31 respondents. Survivors' recommendations have also been integrated in this report.

In their report, ASAG and TAOS acknowledged FIFA's ground-breaking approach to engaging with survivors with lived experience of abuse in sport with the goal of survivors being at the center of all planning, decision making, implementation, and evaluation. They applauded the rich learnings of the process and celebrated the meaningful trauma-informed engagement as a critical first step in creating the systems that will interrupt and end abuse in sports around the world. They also welcomed the efforts to consult with and engage trauma-informed professionals, as well as paying survivors for their participation and expertise.

ASAG and TAOS noted that although well-intentioned, the work of the ISG lacked sufficient time and space for broader trauma-informed consultation and input from stakeholders. The timeline created some barriers in relationship development and offered limited time to process information gathered during meetings and via the survey and to review the final report. ASAG members also experienced barriers in accommodating meetings given the different time zones, different primary languages, and different levels of access to technology. Going forward, the ASAG recommends trauma-informed expertise in the design of these processes be given precedence. This would include ample time for feedback, less arbitrary and stringent timelines, and more inclusive and timely communications. ASAG also recommended trauma-informed training for all participants in the decision-making process and the provision of in-person/face-to-face meetings for members to build trust and strengthen collaboration.

The recommendations highlighted in Chapter II.B of this report integrate survivors' input and feedback. Some issues of particular concern for survivors have been highlighted in the report and a number of

survivors’ quotes have also been included to illustrate their views. At ASAG’s request, its report is attached and made publicly available for international review across sports, countries, and systems.

# I. CONSIDERATIONS AND RECOMMENDATIONS

## Introduction

All experts involved in the process worked under the following assumptions:

- a. Their guidance was sought to help the founders of the future Entity to decide the scope, mandate, governance, and other key features of the future Entity.
- b. They were invited to provide the founders with high level recommendations, with more in-depth analysis and discussions anticipated at a later stage.
- c. Survivors’ opinions would be sought and integrated in the outcome documents.
- d. The project timeframe aimed at registering the Entity in May 2023.
- e. The ISG, the Expert Groups and ASAG identified a number of challenges pertaining to the consultation process itself. These were:
  - 1) The timeline: the limited time available during meetings and for reviewing/preparing documents between meetings was a challenge given the complexity of issues at stake, and the full agendas of the participating experts.
  - 2) Unknown factors: Experts considered it difficult to advise while some aspects that they considered critical were still to be confirmed such as the number of IFs that would join the Entity and the available budget.
  - 3) Complexity of the issues to address: Some of the issues that were considered particularly complex included: the different ways in which the various IFs establish jurisdiction<sup>5</sup>, the interplay between sport disciplinary proceedings and the criminal (and other) justice systems at national level, the absence of benchmarks for care support, the absence of easily accessible mappings of services and resources at national level; the absence of networks of trauma-informed investigators.

## A. Key considerations

The ISG and ASAG started their work by discussing the scope and mandate of the future Safe Sport Entity. The discussions were based on several background documents prepared by the Secretariat, some of which (such as the Theory of change<sup>6</sup>), evolved to reflect the outcome of the exchanges.

### About the Scope

The ISG considered that the International Sports Federations joining the Entity would have to delegate the investigation of the cases falling under their jurisdiction and that the Entity would intervene only as a matter of last resort. Ideally, the Entity should only intervene when the systems at national level had either failed to act, or their response was considered inadequate by the victims/survivors or their representatives. Although this “subsidiarity principle approach” would reduce the number of cases

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<sup>5</sup> See Table of the seven participating IF codes and jurisdictions in Appendix 4

<sup>6</sup> The final version of the Theory of change is included as Appendix 3

falling within the future Entity's jurisdiction, the unpredictability of the amount and nature of cases that might reach the Entity remained a concern.

The ISG therefore discussed at length ways to minimize the risks of the Entity being overwhelmed and unable to respond promptly and adequately to the communications brought to its attention. Several options aiming at reducing the scope were considered, including limiting it to incidents of sexual violence only (versus including all forms of violence), to cases concerning children or to cases of a particularly serious or egregious nature. The possibility to adopt a phased approach starting by limiting the scope and then enlarging it, was also discussed.

The Expert Groups further discussed these issues and agreed on a number of recommendations highlighted under Chapter II.B. Members of the ASAG could not reach consensus on the scope, in particular, whether the Entity should prioritize children, but they highlighted the importance of taking into account the continuum of violence and of making sure that the Entity is resourced and prepared before it starts operating. They suggested that starting by a football-only Entity could be a way to better prepare the ground for a multi-sport entity.

Having considered the pros and cons of the various options, the ISG could not reach consensus on the best approach, although **many members were of the opinion that the Entity should aim at protecting all victims from all forms of violence and that particular attention should be paid to vulnerable victims/survivors (such as children)**. They all agreed that, for the Entity to be trusted, **it should be ready and able to deal with a potentially high volume of reports** in all parts of the world, while ensuring the safety of victims.

Another concern expressed repeatedly was what would the Entity do when approached by victims of violence in the context of sports that have not joined the Entity. The ISG agreed **that the Entity should respond to all communications and refer out of scope cases to services or systems which could help**.

### **On the mandate**

The consultation report and the members of the ISG confirmed that, in order to prevent and respond to violence in sport, important issues had to be addressed at both national and international level.

They included the absence/inadequacy of safeguarding policies, safe reporting mechanisms and duly trained professionals; the limited cooperation between statutory authorities and sport bodies; the lack of access to trauma-informed support for victims/survivors; and the harm inflicted on victims by investigations that neglect their rights and needs. The ISG considered that, while all those issues were connected and important, **the Entity should focus on two primary objectives: 1) support to victims/survivors; and 2) conducting investigations using independent and trauma-informed investigators and issuing sanctioning recommendations to participating IFs**. These significant gaps, at both national and international levels, were not considered to be adequately addressed by any Organisation at the moment, whilst most Organisations (including the IOC and the International Federations) were primarily focusing on safeguarding training and capacity building.

## B. Recommendations

This chapter includes 25 key high-level recommendations extracted from the considerations of the ISG, the Expert Groups and the ASAG (ad-hoc survivors' advisory group).

**Recommendation 1:** The Entity's **core focus** should be the investigation of cases within the jurisdiction of the IFs (as a measure of last resort) that have delegated this power to the Entity. The Entity should also aim at supporting the victims coming forward and to ensure that all its operations are victim-sensitive and trauma-informed.

**Recommendation 2:** The Entity's governance, mission and operations should comply with international **human rights standards** and apply the highest quality standards in the way it assesses risk, designs reporting systems, conducts investigations and engages with victims/survivors. **Key principles and values** include:

- Independence and impartiality, including being free of conflict of interest, having structural, operational and financial independence, and in-built firewalls between its various functions.
- Ethics and integrity.
- Transparency and accessibility.
- Legal certainty.
- Confidentiality, safety, and adherence to the Do No Harm principle.
- Meaningful, risk-informed, and trauma-informed consultation and engagement with victims/survivors.
- Gender- and child-sensitive approaches.
- Attention to diversity and vulnerable communities.

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*"This theme of a lack of trust continued where participants were asked about their perceptions of the current ability of sports to interrupt abuse and investigate. There was very little confidence in their sports' ability to respond to abuse in sport. 90% disagreed that their sport had the appropriate support resources for victims/survivors. 80% disagreed that their sport has the appropriate response to victims/survivors. And 80% disagreed that an individual will be treated fairly in an investigation about abuse in sport. Similarly, participants did not feel confident that a person that abuses will be held accountable. (Over 89.7% disagreed that the current systems would hold persons that abuse to account, and 79.3% disagreed that systems/institutions/organizations that cause harm will be held to account.)"*

*ASAG's Report*

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**Recommendation 3:** The Entity should use **internationally agreed definitions**, such as those included in UN treaties and other relevant texts. The relevance of regional treaties such as the Council of Europe Conventions on action against violence against women and domestic violence (the Istanbul Convention) and on the protection of children against sexual exploitation and sexual abuse (the

Lanzarote Convention) was also stressed, in particular, when they provide guidance on victims' rights and protection. Decisions, processes, and policies of the Entity should be informed by/based on scientific evidence, and best practices for trauma-informed investigation, and be informed by existing research.

**Recommendation 4:** Promote the establishment of an **International Safe Sport Code (focusing on interpersonal violence)** to be adopted by the whole Olympic Movement to harmonize safeguarding and ethics policies, rules, and regulations within sport organizations and among public authorities around the world.<sup>7</sup>

**Recommendation 5:** The Entity should continue to **centralise the voices of victims/survivors** throughout its creation and operations.

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*"There is a critical need for a central role for athlete-survivors in the Entity formation council/founding board. We recommend at least two seats on the founding board and continued communications and coordination with an athlete survivor advisory group. It is also important to include allies and supporters of survivors on the board, such as survivor/victims' advocates and human rights experts. Also a critical consideration is representation from the global north and south"*

*ASAG's report*

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**Recommendation 6:** The Entity should be very **clear on its mandate, scope, operations, and processes.**

**Recommendation 7:** The IFs joining the Entity should be invited to do so only if they are willing and able to **commit to supporting their national federations/member associations in building their domestic capacity** to implement appropriate safeguarding policies and practices and to implement

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*"ASAG recommends an articulated commitment to building an Entity that represents the diversity of athlete experiences. This includes attention to those countries facing multiple and intersecting vulnerabilities and lacking national structures of investigation and remedy. This needs to include recognition of particular minority groups, histories of oppression, people with a disability, and other factors that complicate vulnerability and access to resources."*

*ASAG's report*

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<sup>7</sup> This could be similar to the [World Anti-Doping Code](#) and the [Olympic Movement Code on the Prevention of Manipulation of Competitions](#) that are both included in the Olympic Charter article 43: "Compliance with the World Anti-Doping Code and the Olympic Movement Code on the Prevention of Manipulation of Competitions is mandatory for the whole Olympic Movement."

remedial (safeguarding) measures to address gaps identified by the entity. IF's membership should also be contingent on a **commitment to engage with global and regional efforts**, for example working with the IOC and national authorities to map legal and policy frameworks at local and national level, as well reporting obligations, practices and procedures and victim support services (including legal aid providers). Consideration should be given to the drafting of a Charter that partner IFs should commit to respect when joining the Entity.

**Recommendation 8:** The Entity should **seek to cooperate** with States authorities, intergovernmental organisations, service providers, survivors' groups, human rights organisations, trade unions and other key stakeholders when carrying on its mission. The Entity should not replace statutory systems and particular attention should be provided to the interplay between sport justice and the national justice systems, recognising that many abusers in sport use their power to exert improper influence over the criminal justice system.

**Recommendation 9:** The Entity's mission should also reinforce accountability and include some form of supervision, and/or **monitoring and evaluation of commitments** made by IFs when joining the Entity and of the measures taken to implement the entity's recommendations. An **annual report** should contain information about the type and number of cases, the profile of victims and perpetrators, how the Entity handled them, their outcome and follow-up, together with other forms of reporting associated with the entity's work, including its funding.

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*"By providing pressure on an international level, it makes it more difficult for the federations to self-preserve. We will never eradicate abuse in sport but the net is definitely closing in on the predators/abusers. I think it's important for the group to make the world a very small place with very few places to hide."*

*ASAG member*

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**Recommendation 10:** To secure the support and confidence of the international sport community and the victim-survivor community, these **stakeholders should be involved in the decision-making structures and processes of the Entity**. Engagement through partnerships with relevant stakeholders in politics, policy, advocacy, programming, and research should also aim at developing the Entity's outreach and capacity to engage with trusted service providers and experts at national level. The Entity should also establish minimum compliance standards for service providers with a system of annual monitoring.

**Recommendation 11:** Consider a **governance model including representatives from a constellation of assemblies/stakeholders** in the higher body or overarching governing body of the entity (a Council or Board). The Council/Board should be composed of a core group of individuals representing International Sport Federations (Olympic or Paralympic sport), survivors, unions, and other civil society representatives. Engagement with survivors could in addition take place through the setting up of a consultative body (similar to ASAG).

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*"[Any new Entity] must have transparency of process and organization - conflict of interest, governance demonstration, and charter/rights need to be clearly stated and accessible."*  
ASAG member

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**Recommendation 12:** The **Roles and Responsibilities of the Council/Board** should include the setting of the overarching strategy, policies, and priorities, identifying resources and ensuring fiduciary responsibility for the overall budget, agreeing on its own working methods and decision-making processes, set rules for the recruitment process of the Secretary General/CEO, and providing sufficient oversight. The Secretary General / CEO should be responsible for day-to-day operations and hiring staff (the Council should not have any day-do-day operational responsibility or get involved in operational policies of case management, investigation, etc.).

**Recommendation 13:** The Founders should set up a multi-stakeholder group (similar to the ISG) with the mandate of establishing the **criteria for the selection and nomination process for the Founding Council/Board members**, and to review applications and conduct vetting of applicants who meet the criteria. Criteria should aim at ensuring diversity and complementarity background and expertise, integrity, independence, and impartiality.

**Recommendation 14:** **Firewalls need to be built to protect and preserve independence of the various functions of the Entity.** This includes a firewall between governance and any investigations or case management, which is a day-to-day responsibility of the staff of the entity.

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*"There needs to be a powerful firewall/confidential protections for survivors, witnesses, and whistle-blowers between the investigation and the provision of care and support. The Entity must have a clear protective strategy to prevent conflicts of interest, guard against criminal threats and actions, and provide culturally-responsive and meaningful survivor/witness/whistle-blower safety planning."*  
ASAG's report

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**Recommendation 15:** When carrying out investigations, the Entity must ensure that **cases are developed to the appropriate national and international legal standards and that the means and methods of evidence collection satisfy the elements of the violations alleged.** As part of that approach, managing whistle-blower, witnesses' and victims'/survivors' testimony must be in accordance with 'best-practice' legal and trauma-informed procedures and practices. Specific measures should be taken to address the needs and rights of child victims. Some harmonisation of the applicable rules in each IF is recommended to avoid divergence in the interpretations of key concepts (such as the definition of violence) and in the application of sanctions.

**Recommendation 16:** **A robust triage system should be put in place.** Establishing the Entity's jurisdiction over a case may sometimes require preliminary investigations. The criteria to accept a case may evolve with time, but a narrow scope is recommended at the beginning. Once the triage team has



made an assessment on whether the Entity has jurisdiction, a senior Committee should review the assessment and decide. For cases that the Entity cannot investigate, the triage team should engage with the submitter for possible referral.

**Recommendation 17:** Information, evidence, intelligence, and data collected during the investigation should **aim at establishing the facts of the matters/cases, and also document any possible failures in the safeguarding, reporting and other systems**, so that (remedial) measures to address those failures can be proposed.

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*“For the investigations, the priority is to understand that the whole process feels like repeating the abuse. No matter how brave or strong you are as an athlete, constantly repeating the worst things will make you walk away--even when you are determined to protect other young players.”*  
ASAG Member

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**Recommendation 18:** The Entity’s “permanent” Investigation’s team must be supported by a **pool of vetted experts from various disciplines** (including child protection, gender issues, legal and health professionals) and sport-specific expertise. Diversity in gender, nationality, regions of the world represented, and linguistic skills should also guide the composition of the pool. Experts should have certified training on trauma-informed investigations which includes:

- Knowledge on causes, forms, and dynamics of violence in the context of sports, in particular gender-based violence and violence against children, symptoms of trauma as well as its impact on a person’s ability to safely and effectively engage with an investigation.
- Ability to assess and manage the impact that investigations may have on a person’s trauma, on a case-by-case basis and being in a position to refer the person to support services.
- Ability to adapt techniques and times to the survivor/victim needs, being transparent and realistic in advance of the limitations of what can be achieved; protecting confidentiality and allowing the informant to keep control over the information shared (unless a legal requirement imposes reporting).

**Recommendation 19:** **Safe recruitment and vetting procedures** should be part of the Entity’s and the partner IF’s safeguarding policies. To help to promote safe recruitment and sound vetting procedures in its own staff recruitment and in the hiring of service providers, the Entity should:

- Identify and use where possible criminal record systems, require “good conduct certificates” or “working with children certificates” and use national vetting capacity.
- Identify commercial vetting providers for best-practice services.
- Use of specialists to support recruitment.
- Deliver (virtual or physical) training to relevant staff and ensure that investigators and care support providers used by the entity are trauma-informed trained.
- Undertake basic due diligence (OSINT/Interview/CV checks).
- Require signed declarations of staff and those representing the Entity.

The Entity should foster cooperation across sports, with intergovernmental organisations (such as INTERPOL and EUROPOL) and with statutory authorities regarding human rights-compliant systems to share information on the outcome of disciplinary and criminal procedures following incidents of violence.

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*"ASAG members voiced concerns about how to track and maintain a database of bad actors that prevents them from participation in sports. It is recommended that a protocol for creating and maintaining a database on disciplinary actions be examined, and there be a review of how disciplinary registers in sport are working well and which are not. ASAG members voiced concerns about the need for investigative outcomes to be transparent and be communicated in a timely fashion with victims/survivors."*

*ASAG's report*

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**Recommendation 20:** The Entity should be **ready and able to receive reports directly** from victims/survivors/whistle-blowers and their representatives, as well as from sports bodies and as a measure of last resort. It must be able to respond in a safe, timely human rights-respecting and trauma-informed manner. Absolute **clarity about the Entity's powers and the reporting to the Entity system** are required. This includes:

- Clarity about the Entity's jurisdiction (sports and behaviours concerned, persons covered, possible statute of limitations...).
- Clarity about the Entity's obligations following applicable national and international law (in particular, possible obligation to report to/cooperate with statutory authorities).
- A clearly explained triage system (for instance, if priority is given to specific situations).
- how can persons safely approach the Entity and know their options (participate in an investigation, report anonymously, disengage...) and keep some control on the process.
- what kind of support the Entity can offer to the victims/survivors and other eligible persons (so that risks are assessed and expectations properly managed).
- information on the limitations of its powers in regard to sanctioning, and the limitations of what forms of remedy it can and can't offer so that victims/survivors can make an informed decision (with the support of independent and confidential advice) about whether to engage with the Entity's processes.
- for those cases for which the Entity has no jurisdiction, the possibility to refer to reliable support services/reporting mechanisms. Considerable quality assurance/due diligence is needed before onward referral to local reporting mechanisms/services.

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*"In poor countries we are not safe when you're reporting. And at the same time, they threaten us and even your parents. . . When someone reports there needs to be a way that person will be protected."* –

*ASAG Member*

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**Recommendation 21:** The Entity should **explicitly acknowledge and mitigate the significant risks associated with reporting**. Mitigation includes, for example, abiding by the highest standards of data protection and confidentiality concerning the reporting persons, the victims, and the circumstances of the case. It should mitigate any risk of leaks, in particular, to the media and to individuals/sports bodies that are the subject of investigations (tipping off).

**Recommendation 22:** **Care and support should be available at the point of reporting**, and not only to those who have agreed to engage with an investigation, or whose evidence is of material value. Support to victims and witnesses must be trauma-informed, gender- and child-sensitive. It must address the specific needs of persons in vulnerable situations and must be provided in a way that minimizes risks of secondary victimisation. **Benchmarks for package of care should be established** taking into account victims' needs, other stakeholders' responsibilities, clearly communicating the level of care support that can be provided from the outset, and the importance of ensuring the Entity's sustainability.

**Recommendation 23:** The Entity should **establish a network of adequate service providers** and trusted experts and accommodate contextual and geographical differences. The Entity should only refer where it is confident that capacity exists in those local partners. It should be willing and able to deal with cases where localised services are not available and may require culturally-sensitive care support from outside of the local area. When developing its capacity to support victims, the Entity should engage with key stakeholders and establish partnerships to benefit from work carried by others and to augment it and complement it.

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*"Athlete survivors need connections to confidential advocates to understand the processes as well as understand the choices and options. Confidential and independent consultation during the investigation process is essential to keeping survivors and witnesses aware of their rights and options, as well as being a trauma-informed principle of supporting meaningful choice for survivors. Comprehensive and independent investigations: Athlete survivors deserve fair and unbiased investigations. Independent investigation teams must be properly trained, adequately resourced, trauma-informed, and represent the diversity of experience and expertise across sports, countries, and cultures. The investigators must be free from both perceived and actual conflicts of interest. Further, there must be a safe and trauma-informed mechanism/way for persons to report conflicts of interest."*

*ASAG's report*

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**Recommendation 24:** The Entity should have the **capacity to deal with the cases**. The IFs should **commit to a funding model that ensures the sustainability** of the Entity and follows a **solidarity approach** to ensure that no IFs are financially prohibited from joining. Resources should be secured to sustain the efforts of the entity year-on-year and until such time as national systems are in place to address cases currently falling to IFs due to lack of capacity and competency at national levels. A forecast of the numbers of cases and their cost could be prepared taking as a reference the situation

in the concerned sports today. The first priority for funding should be the securing of financial commitments from a sufficient number of IFs (both summer and winter Olympic sports), and the sharing of resources and know-how through a multisport approach, with each committing for a minimum of, at least, 4 years.

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*"If sports governing bodies are the ones who failed to protect the athletes, the financial burden could be on them. Furthermore, try to look for funders that will allow a certain degree of independence (100% of independence is utopia) and that are aligned with the Entity's mission and its values"*  
*ASAG member*

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**Recommendation 25:** Two funding streams could be created by the entity, one to cover operational and programmatic costs and a separate fund for victim/survivor care and support. This could serve two purposes: to protect overarching revenues and to provide a firewall between the provision of care.

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*"The Entity must be sufficiently resourced to conduct trauma-informed investigations and deliver adequate care and support for the expected number of cases it takes on. The variables of complexity of cases, safety for survivors/witnesses/whistle-blowers, and the need for local and cultural expertise must be accounted for. The number of cases accepted must be comparable with the budget for a trauma-informed system. It is important that a realistic budget be created and shared with the international sports community more broadly to inspire trust that care and support can be resourced along with investigations."*  
*ASAG's report*

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## II. NEXT STEPS

### Key messages

The ISG members, ASAG and the experts involved in the various Expert Groups repeatedly stressed a number of messages that will determine the steps ahead:

- It was critical **for IFs to further strengthen safeguarding at national level, improving reporting mechanisms and responses including through trauma-informed approaches**, so that incidents are prevented and, when they occur, victims are adequately supported, investigations properly conducted, and issues promptly addressed.
- As more and more cases could not be adequately solved at national level, International Sports Federations were increasingly required to act as a measure of last resort whilst experiencing challenges in providing care support and conducting trauma-informed investigations. There was a **clear need for an independent multi-sport Entity focusing on victim care support and on trauma-informed investigation of violence-related cases falling within the jurisdiction of International Federations**.
- The Entity should **ideally benefit all participants in all sports** and cover all forms of violence (sexual, physical, and psychological). It was understood however that the Entity's scope would have to be limited to those sports joining the Entity and that the sport community should work towards a solidarity model to ensure that no IFs are financially prohibited from joining.
- The Entity should be **properly funded** to guarantee its sustainability, the adequacy of its responses and the quality of its services. The Entity should only open its doors when ready.
- The complexity of the issues linked to the various ways in which IFs Ethics Codes and regulations establish jurisdiction, and define violence and sanctions, called for the **development of a Safe Sport Code focusing on interpersonal violence**.

### **IOC's announcement on strengthening safeguarding at national level**

The IOC has been provided with regular updates on the progress of the ISG and its Expert Groups but decided not to take part in this process whilst undertaking a safe sport survey of 36 summer and winter Olympic IFs. The conclusions of this survey were presented to the IFs on 31 March 2023 at a conference in Lausanne that was also attended by the Association of Summer Olympic International Federations (ASOIF) and the Association of International Olympic Winter Sports Federations (AIOWF).

As part of its ongoing effort to promote athletes' safety, the IOC President announced the creation of a USD 10 million per Olympiad fund to strengthen the prevention and response to harassment and abuse in sport at the local level. In addition, a working group chaired by Executive Board member and Deputy Chair of the IOC's Gender Equality, Diversity and Inclusion Commission, HRH Prince Feisal Al Hussein is being set up with a 90 day mandate to consider the best approach to establish independent safeguarding systems and structures at the national level, which will ensure that resources are directed to where they are most needed to support athletes and build safeguarding capacity in sports organisations.

The IOC commitment to work together with IFs and NOCs to strengthen multisport frameworks and systems at national level is an important step in the sport movement's efforts to end violence in sport.

However, such systems will take time to develop globally, certainly in the short to medium term (estimated to take 10-15+ years based on the wider sector), whilst an increasing number of abuse cases are falling to IFs to investigate around the world (e.g., cases involving an abuse of power, lack of local capacity and expertise, gaps in existing sport and criminal justice systems).

Seven International Sports Federations (FIFA, IIHF, ICC, ITC, ISU, ICU, and IBU) joined forces with external stakeholders and experts to form the Interim Steering Group. FIFA and the IIHF have expressed their commitment to becoming founding partner sports of the new independent entity and would aim to provide the new entity with the mandate to investigate abuse cases and provide care support to victims. The other five IFs involved would consider agreements with the new entity that would enable them to use the specialist investigation and care support services of the entity on an ad-hoc basis but could not commit as founding partner sports at this time without the backing of the IOC.

### **Starting with football...**

FIFA is convinced of the need for a dedicated independent international multisport entity that would enable IFs to pool their resources and to provide impartial trauma-informed services and care support to victims and whistle-blowers that come forward. The new independent entity would build trust and help tackle impunity in sport around the world (as a measure of last resort and where local sports and justice systems and competencies are still lacking or not trusted).

An independent multisport global safe sport entity can only be viable with the backing of the IOC and a range of founding IFs. However, it may be too soon for others to commit to both national and international solutions based on similar specialist models that have been adopted to tackle other crimes in sport.

FIFA has pledged seed funding to establish the new international safe sport entity and has a duty to invest these funds accordingly and to move forward. Whilst embracing the solidarity of sport and the shared safeguarding efforts, FIFA's primary responsibility remains to its own game, and to ensuring that football is a safe and fun space for everyone around the world.

While continuing to build safeguarding capacity across FIFA's 211 member associations through the FIFA Guardians programme and helping to build national victim-sensitive frameworks and multi-stakeholder solutions everywhere, FIFA will now focus its efforts on the creation of a dedicated solution to tackle abuse cases in football. FIFA remains open to the creation of a multisport entity in the future. In the meantime, it has announced that it will continue to work together in solidarity with its members, confederations, expert stakeholders, the IOC, fellow IFs, and organisations globally that are committed to ending violence in sport.

The considered works and concluding reports of the Ad-hoc Survivors Advisory Group, the four Expert Groups, and the Interim Steering Group will provide a timely reference to sports bodies everywhere, and they will also inspire FIFA's next steps. It has also been agreed that these reports will be presented to the IOC working group to assist its deliberations and efforts.

## Appendices

1. Survivors' report
2. Expert groups reports
3. Theory of change
4. Table with notes on jurisdiction and codes of the seven participating IFs



# Appendix 1

Report by the Ad-hoc Survivors in  
Sport Advisory Group (ASAG)

ISG Report on the establishment of an  
Independent Global Safe Sport Entity  
1 JUNE 2023





## **AD-HOC ATHLETE SURVIVOR ADVISORY GROUP**

### **Report and Recommendations**

**May 2023**

#### **Executive Summary**

In response to the Fédération Internationale de Football Association (FIFA) consultation report on the landscape of sexual abuse in sports around the world, FIFA created an International Steering Group (ISG) to research the creation of an International Safe Sport Entity (Entity) with a survivor-centered framework. As part of this project, the Army of Survivors (TAOS) was contracted to support the work with trauma-informed expertise and to create and support a survivor and practitioner group, the Ad-hoc Survivor Advisory Group (ASAG), to provide and embed survivor voice within the formation research for the Entity. This Executive Summary outlines the learnings and recommendations of the ASAG for the creation of an Entity that includes survivor voice and seeks to be systemically trauma-informed. The full report that follows allows for deeper analysis and discussion of the recommendations.

#### **Recommendations**

From the ASAG work and the survey of athlete-survivors, the ASAG recommends that the Entity:

- Make the **ASAG Report and Recommendations public** and available for international review across sports, countries and systems.
- Have **articulated and systematic ways of embedding athlete-survivor voice and leadership** within the founding board of directors, continuation of an ASAG group or similar group, engaging diverse survivors, and athlete-survivor and practitioner representation on sub groups/committees/expert groups.
- Have a **limited and realistic scope** in regards to investigations and the levels of care and support provided.
- Have a commitment to a **trauma-informed process and design** through the formation and beyond, in all facets of the Entity.
- Have extensive **trauma-informed training and partnerships for expertise** in trauma-informed approaches.
- Have a commitment to **transparency and trust building**.
- Pay attention to **diversity and vulnerable communities**.
- Have a plan to provide **outreach and awareness building** around the Entity's role and resources.
- Incorporate **evidence-informed policies and practices** in the formation and operation of the Entity.

- Governance recommendations: The Entity should be **clear and transparent about the governance process** and organization, and the Entity should include **human rights reputations and human rights protections in the consideration of the country of incorporation/establishment**.
- Funding recommendations: the Entity should have **sufficient budget and resources to do both investigations and care and support** of survivors/witnesses/whistleblowers with trauma-informed strategies. It should also have **clear protections of conflicts in decision making** and influence from funding sources, such as governments and sports governing bodies.
- Care and support recommendations: the Entity should have a **strong firewall and safeguarded protections** between care/support and investigations; use trauma-informed service providers; and be **clear about the scope of care** and support that is trauma-informed and as comprehensive as possible.
- Intelligence and investigation recommendations: the Entity needs to **provide for access to confidential advocacy** and independent advice; provide **comprehensive and independent investigations**; explore **burden of proof options that shift the onus from survivors**; create a **realistic and trauma-informed timeline for opening doors** to cases/investigations; be clear about the **availability of redress and reparations**; be as **transparent as possible around findings** and bad actors; **spread awareness and build capacity for reporting**; discover and **research investigation strategies and systems**; be **clear about the relationship between Entity investigations and the Court of Arbitration for Sport (CAS)** and general appeals processes; and include a scope of investigations that **considers all types of abuse in sport**.
- Finally, this report provides specific recommendations for the ISG and FIFA for a future international single-sport Entity, as being considered during the writing of this report. Recommendations include:
  - Strict **attention to conflicts of interest** both actual and perceived.
  - **Document learnings and processes** as this will be another rich learning project from the international sport community and can perhaps support other sports in building more trauma-informed and robust investigation and care systems.
- The anonymous survivor-athlete survey was completed by **31 participants** and key feedback was aligned with the above recommendations, especially as to **transparency and trust building** through the formation and operations of an Entity.

In conclusion, the ASAG and TAOS applauds the rich learnings from this ISG project and infestation, and celebrates the meaningful trauma-informed engagement as a critical first step in creating the systems that will interrupt and end abuse in sports around the world.



**AD-HOC ATHLETE SURVIVOR ADVISORY GROUP**  
**Report and Recommendations**  
**May 2023**

**Overview**

In November 2020, the Fédération Internationale de Football Association (FIFA) commissioned a consultation process to better understand the landscape of sexual abuse in sports around the world and the expertise that would be required to appropriately address reports. The final report noted the need for the establishment of an International Safe Sport Entity (Entity) with a survivor-centered framework.

For safe sport entities to succeed, athletes and athlete survivors with lived experience of abuse in sport must be at the center of all planning, decision making, implementation, and evaluation. Therefore, athlete and athlete survivor voices must be embedded in the Entity at the start of its creation. FIFA expressed their interest and intention in creating an Entity that values and embeds the survivor voice during and throughout its creation and recognized the need for support in ensuring this happens in a trauma-informed way. The Army of Survivors (TAOS) was contracted to provide this support, specifically, by engaging athlete survivors and practitioners in a survivor-centered and trauma-informed way to inform the development and establishment of an International Safe Sport Entity.

TAOS led the formation of the Ad-hoc Athlete Survivor Advisory Group (ASAG) in November 2022 to provide feedback and guidance to the International Steering Group's (ISG) exploration of forming a multi-sport international Entity to address abuse in sport. The deadline for final feedback and report is May 2023.

**Methods**

In November 2022 TAOS reached out to 12 athlete survivors and practitioners from around the world representing different sports and different experiences with abuse in sports and institutions. Participants were invited based on their previous work with survivor spaces with FIFA and their expertise in issues around abuse in sport. TAOS created a FAQ document and commitment description for participants. Participants were also provided a stipend for their time and expertise. TAOS Team members assigned to this initiative included two trauma-informed crisis interventionists (Masters in Social Work) and two attorney advocates that all specialize in trauma and a sexual abuse. The TAOS Team facilitated ASAG meetings and provided mental health first aid support throughout the project period, including when meeting content brought up ASAG-member trauma histories. Additional mental health support referrals were shared ongoing for ASAG

members. The ASAG includes ten female identified participants and two male identified participants. Participants are from eight countries: Argentina, Australia, Brazil, France, Italy, Kenya, South Africa, and the United States. Athlete survivor participants identified as having experienced abuse in one of the following sports: American football, Basketball, Football, Judo, Gymnastics, Swimming, Taekwondo and Tennis.

The ASAG met five times in a six month period: December 12, 2022, January 23, 2023, March 13, 2023, April 3, 2023, and May 1, 2023. TAOS supported two identical meetings one in the AM and one in the PM of each day to accommodate international time zones, increasing participation.

The ASAG in partnership with TAOS created a 34 question survey for athlete-survivors on the formation of Entity to address abuse in sport. The survey was available in English, Brazilian Portuguese, French, and Spanish. ASAG participants sent the survey to their contacts within their individual networks and was not circulated publically. The survey was completed by 31 individuals. TAOS analyzed the results of the survey to include survivor voices in addition to the ASAG's in the final report. A summary of survey findings is included and the complete findings are available in Appendix A.

### ***Acknowledgments***

The ASAG and TAOS acknowledge that the process and project FIFA embarked on regarding engaging with athlete survivors with lived experience of abuse in sport with the goal of survivors being at the center of all planning, decision making, implementation, and evaluation, was a new endeavor and we applaud the intent and deliberate engagement of athletes with lived experiences and trauma-informed experts.

Further, the ASAG and TAOS approve and support FIFA's efforts to consult with and bring in trauma-informed professionals, as well as paying survivors for their participation and expertise.

ASAG has engaged in the creation of this report with the spirit of collaboration and with the desire to further the groundbreaking work done here to bring in athlete survivor voice and leadership on the initial level of development of an international Entity to address abuse in sports.

### ***Limitations***

Limitations for the creation of this report included a brief timeline which created some barriers in relationship development and offered limited time to process information gathered during meetings and via the survey. This was further hampered by the slow sharing of information from the ISG. The short timeline for gathering data to create a final report had impacts on the depth of review. Also, ASAG members experienced barriers for meeting such as different time zones, different primary languages, and different levels of access to technology.

*"I really do hope that by forming an international group of people to protect our athletes [it] will make it so much easier to put pressure on the systems that are in place but not being implemented. The Federations are very self aware and without a doubt protect themselves before they do the victims. By providing pressure on an international level, it makes it more difficult for the federations to self preserve. We will never eradicate abuse in sport but the net is definitely closing in on the predators/abusers. I think it's important for the group to make the world a very small place with very few places to hide." - ASAG member<sup>1</sup>*

### **General ASAG Feedback**

**Make ASAG Report and Recommendations public:** The ASAG strongly recommends that ISG and the Secretariat make the ASAG Report and Recommendations public. Many members of the ASAG would like to share this work with their countries and sports. Advocates and others working in ending abuse in sports could learn valuable best practices around embedding athlete-survivor voice and leadership from this report and its recommendations.

**Limited and realistic scope:** At the time of all consultations with survivors, the ASAG was asked to comment on a series of questions regarding a multisport Entity. In April, after all substantive discussions had concluded, ASAG learned that instead of launching a multi-sport Entity, FIFA intends to create an international Entity for abuse in the sport of football/soccer only. This was a central recommendation for the ASAG and other organizations committed to human rights in sports, and the ASAG strongly endorses this realistic scope and vision. ASAG considers this a wonderful example of how trauma-informed system development can happen through open channels of communication, dialogue about hard realities, and a concerted commitment to collaboration. To honor the opinions and input of survivors, and because of the practical implication of FIFA making this announcement after our consultations had largely concluded, this report will make recommendations based on the original brief for an international Entity, but will make note of specific recommendations for a single sport international Entity.

**Trauma-informed process and design:** As a general note, although well-intentioned, the ISG process lacked sufficient time and space for trauma-informed design and broader consultation and input from stakeholders. ASAG members note that the truncated timeframe made it difficult to gather in-depth feedback and hindered the ability for a diverse group of survivors to engage, build trust, and organize feedback. Going forward, the ASAG recommends trauma-informed expertise in the design of these processes be given precedence. This would include ample time for feedback, less arbitrary and stringent (often unmeetable) timelines, better and more inclusive language justice and access for

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<sup>1</sup> Centering survivor voice and leadership is critical to the work of the ASAG and TAOS. Accordingly, ASAG survivor quotes will be included throughout the report and denoted in italics.

non-English speakers, better communication and more timely communication (including advance scheduling, materials circulation, and agenda sharing from partner), as well as trauma-informed training for all participants in the development decision-making process. It would also be important to provide for in-person/face-to-face meetings for members to build trust and strengthen collaboration.

Trauma-informed training and expertise: We applaud the ISG's commitment to bringing survivor voice in a trauma-informed way and recommend further and future work continues to bring trauma-informed training and expertise to all processes employed for the development of the Entity, as well as within the operations and governance of the Entity once established. It is important to recognize that being and acting in a trauma-informed manner is not just a way of directly working with survivors of trauma, but is part of a systemic approach to organizational culture/work environment, governance, and decision-making. We encourage furthering this work with the Entity include multiple dose (more than one-time training or exposure to these strategies) as well as ongoing trauma-informed training, and extended partnerships with trauma-informed experts. It is also important to tailor training to the region/country where the Entity is acting. It would be helpful to engage with/learn from other international trauma-informed structures, like humanitarian actions/investigations.

Transparency and trust building: The idea of building a transparent and accessible Entity was a central and critical theme for the ASAG. From the beginning of meeting together, ASAG members built consensus around the need to be trustworthy and as transparent as possible in creating an international Entity. This can be achieved by providing clear documents on governance structure, notice of process and expectations around outcomes, and human rights-driven values and mission. It extends to clearly articulated definitions in the various facets of Entity work and proper forms of noticing/building public awareness around the structure, scope and definitions. Also it is important to include how whistleblowers and witnesses (not direct targets of abuse) can access the system and have rights.

*"[Any new Entity] must have transparency of process and organization - conflict of interest, governance demonstration, and charter/rights need to be clearly stated and accessible." - ASAG member*

*"Establishing consistent definitions for what behaviors are considered as abusive and then communicating how those definitions were arrived at is going to be essential." - ASAG member*

*"If a victim has a positive experience, others will come forward." - ASAG member*

*"Sharing our stories supersedes everything for building trust." - ASAG member*

Attention to diversity and vulnerable communities: ASAG recommends an articulated commitment to building an Entity that represents the diversity of athlete experiences. This includes attention to those countries facing multiple and intersecting vulnerabilities and lacking national structures of investigation and remedy. This needs to include recognition of particular minority groups, histories of oppression, people with a disability, and other factors that complicate vulnerability and access to resources.

Outreach and awareness building: ASAG members voiced concern about understanding/building awareness around the scope and availability of the Entity's role. Several ASAG members have suggested a multi-prong approach to outreach and awareness including local, country, and international outreach beyond sports officials. ASAG urges the new Entity to consider how they will spread awareness of the Entity for reporting (while being clear and transparent about the limitations of its scope), build capacity for reporting, and undertake an awareness campaign more generally about the Entity.

Evidence-informed policies and practices: ASAG members often highlighted the need for decisions, processes, and policies of the Entity to be informed by/based on scientific evidence, and best practices for trauma-informed investigation, and be informed by existing research.

### **Athlete Survivor Voice and Leadership**

Athlete survivor voice and experience needs to be central to the decision-making and development of an international Entity. We recommend the following to include diverse athlete-survivor voices.

Founding board: There is a critical need for a central role for athlete-survivors in the Entity formation council/founding board. We recommend at least two seats on the founding board and continued communications and coordination with an ad-hoc athlete survivor advisory group. It is also important to include allies and supporters of survivors on the board, such as survivor/victims advocates and human rights experts. Also a critical consideration is representation from the global north and south.

ASAG continuation: We recommend continuing on with the ASAG or other ad-hoc athlete survivor advisory group. The feedback from an ASAG-like group is needed to inform the set up, training parameters, and policies/protocols for the Entity.

Engagement of diverse survivor voices: The existing process for the ISG had limitations due to language access. Further work engaging survivor expertise needs to be properly resourced for translation and interpretation to engage beyond the English preferred/required organization of the ISG.

Survivor representation on the expert group formation committees: ASAG members felt that there should be survivor representation in each of the expert group formation committees. Not having survivors present on each of these committees was a barrier to creating trauma-informed processes within the expert groups and missed out on survivor-informed report creation in these critical areas.

*"I think you probably need a Survivor or Survivor group representative on all the expert groups. Some perspectives and experiences are only contained within this community and cannot be learnt. Specifically, the Care and Support, Governance, and Support Services areas. As a support service, I can share an in-depth understanding of what has gone right and wrong in the Australian investigative processes, as well as speak to the importance of why an independent Survivor Support Service detached from the investigation process is essential." - ASAG Member*

*"Survivors can participate in various ways. I believe the best literature so far that has looked into this particular topic is 'Effective engagement of survivors of harassment and abuse in sport in athlete safeguarding initiatives: a review and a conceptual framework.'" - ASAG Member*

### **Governance**

The ASAG endorses the victim/survivor/whistleblower care and support focus of the revised theory of change. This component is critical and must be included in whatever scope the Entity undertakes, as no investigatory function cannot be compliant with the "do no harm" principle unless victim/survivor/whistleblower trauma-informed care and support is in place.

Transparency of governance process and organization: Transparency is a central tenet of trauma-informed approaches. Transparency builds trust and sets appropriate and realistic expectations. It is critical that the new Entity is founded on a comprehensive but accessible charter/rights that are readily available to the public, that processes for complaints against the Entity be clearly articulated, that the process for appeals of any decision are clear, and how and when findings will be circulated/shared.

Country of incorporation/establishment: The human rights reputations and histories of countries must be considered in the analysis around the country of incorporation. There should also be review and analysis of the country's legal criminal and civil systems, and other systems of accountability. It is critical that the country's reputation for anti-corruption, understanding of gender-based violence, good governance, accessible and transparent operations, sophisticated whistleblowing procedures, comprehensive data protection mechanisms, and accessibility in terms of language all be considered when analyzing countries of incorporation. Further, it is critical that the country selected does not have close ties to the sports bodies and organizations, as to be free from conflicts of interest that can arise from government pressure. In the consideration of the country of incorporation, the privacy and protections laws of the country need to protect victims/survivors and not only protect persons who cause harm/perpetrators.



## **Funding**

Budget and resource: The Entity must be sufficiently resourced to conduct trauma-informed investigations and deliver adequate care and support for the expected number of cases it takes on. The variables of complexity of cases, safety for survivors/witnesses/whistleblowers, and the need for local and cultural expertise must be accounted for. The number of cases accepted must be comparable with the budget for a trauma-informed system. It is important that a realistic budget be created and shared with the international sports community more broadly to inspire trust that care and support can be resourced along with investigations.

Decision making: The Entity development and establishment should be made by founding members who have International Federations in sports that agree to the Entity's jurisdiction. To preserve independence and build trust, sports bodies' involvement in the central governance structures should be minimal. In particular, the board must demonstrate adequate independence and avoid any perception of sports bodies seeking to assert influence over the entity. Only those entities that have conclusively submitted to the entity's jurisdiction should have any role in the organization.

*"If sports governing bodies are the ones who failed to protect the athletes, the financial burden could be on them. Furthermore, try to look for funders that will allow a certain degree of independence (100% of independence is utopia) and that are aligned with the Entity's mission and its values - when institutions are in positions of power. For example with FIFA set up bodies, it's very likely that the power dynamics and imbalance of power if not checked well will influence the governance as well as funding. It's very awkward when we expect an institution like the one we are setting up is not assured of funding in the long-term. This lack of funding causes the organization to fail in its mandate to hold institutions that they may need funding from to account- like FIFA." - ASAG Member*

## **Care and Support**

Firewall and safeguarded protections between care/support and investigations: It is critical that there be strong firewall protections between the provision of care/support and investigations. Having confidential and legally protected spaces for communication increases candor and participation for survivors of abuse. This is a central part of many ethics and advocacy systems, such as the Violence Against Women Act in the United States, and World Health Organisation, and the United Nations.<sup>2</sup>

Trauma-informed service providers: The Entity should take trauma-informed service provision and care/support partnerships seriously. Any support for survivors needs to be

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<sup>2</sup> <https://www.un.org/en/ethics/>; <https://www.who.int/about/ethics>

trauma-informed in principle and conducted by experienced practitioners unlinked to the entity. Organizations and partnerships for referrals need to be vetted and reviewed in a systematic way regarding their trauma-informed approaches and expertise, as well as what existing local supports are in place.

Define the parameters of care and support: The Entity should take into account the feedback and input from athlete survivors (both the findings from the ASAG and the survey results) on what constitutes care and support. These should be defined and examined in context and communicated with the clearly articulated needs of survivors themselves.

Scope of care and support: Survivors of trauma and abuse face a myriad of impacts throughout their life span. Such may include the need for ongoing mental health support/counseling/services; access to basic necessities such as food and shelter; and, support around employment and livelihood. Comprehensive support and care would make considerations and provide resourced services for this wide range of needs. Supporting survivors in this context is complex and includes others who might be impacted, such as family members, witnesses and whistleblowers. Care and support concerns must also consider safety planning for dangerous and sometimes life threatening situations.

*"In poor countries we are not safe when you're reporting. And at the same time they threaten us and even your parents. . . When someone reports there needs to be a way that person will be protected." - ASAG Member*

### **Intelligence and Investigations**

*"For the investigations, the priority is to understand that the whole process feels like repeating the abuse. No matter how brave or strong you are as an athlete, constantly repeating the worst things will make you walk away--even when you are determined to protect other young players." - ASAG Member*

Relationship between the investigative branch and the care and support branch: There needs to be a powerful firewall/confidential protections for survivors, witnesses, and whistleblowers between the investigation and the provision of care and support. The Entity must have a clear protective strategy to prevent conflicts of interest, guard against criminal threats and actions, and provide culturally-responsive and meaningful survivor/witness/whistleblower safety planning. For example, several members voiced the need for trauma-informed case management. Members discussed how this needs to be isolated and separate from the investigating arm of the Entity to prevent conflicts of interest. In general, there were concerns about the same Entity handling support/case management for survivors as well as the investigation--because of actual conflicts of interests and pressures.

Access to confidential advocacy and independent advice: Athlete survivors need connections to confidential advocates to understand the processes as well as understand

the choices and options. Confidential and independent consultation during the investigation process is essential to keeping survivors and witnesses aware of their rights and options, as well as being a trauma-informed principle of supporting meaningful choice for survivors.

Comprehensive and independent investigations: Athlete survivors deserve fair and unbiased investigations. Independent investigation teams must be properly trained,<sup>3</sup> adequately resourced, trauma-informed, and represent the diversity of experience and expertise across sports, countries, and cultures. The investigators must be free from both perceived and actual conflicts of interest. Further, there must be a safe and trauma-informed mechanism/way for persons to report conflicts of interest.

Burden of proof and onus of making a case: ASAG suggests examining other forms of shifting the burden of proof from survivors to institutions and systems that are complicit in the abuse. Some ideas around this include a focus on institutional accountability, such as whether an organization knew or should have known about the abuse, and further protections and requirements for bad actors to have to demonstrate their responses/reactions where appropriate.

Timeline for opening doors to cases/investigations: A realistic and trauma-informed timeline should be established from the opening of the Entity doors to the taking of cases. In consultation with trauma-informed experts, the Entity should be afforded at least a year to staff and train the Entity, as well as establish clear protocols and policies.

Redress and reparations: Aligned with trauma-informed principles, being clear about the availability of redress and reparations from the outcomes of an investigation are very important for establishing trust and accountability.

Transparency around findings and bad actors: ASAG members voiced concerns about how to track and maintain a database of bad actors that prevents them from participation in sports. It is recommended that a protocol for creating and maintaining a database on disciplinary actions be examined, and there be a review of how disciplinary registers in sport are working well and which are not. ASAG members voiced concerns about the need for investigative outcomes to be transparent and be communicated in a timely fashion with victims/survivors.

Spread awareness and build capacity for reporting: The Entity must develop a plan in the first year to spread awareness and build the capacity for individuals and organizations to report to the Entity and to access care and support. This would include partnership

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<sup>3</sup> *The training should be conducted by criminal investigations specialists, police forces specialised in child sexual abuse cases that have successful track records. A huge effort in capacity building in case management and proper investigative procedures will be needed. - ASAG member*

development with the Entity and sports federations, teams, coaches/personnel, and importantly, athletes and their families.

Discover and research in investigation strategies and systems: It is recommended that there is some level of international research around the best practices for investigations. This included the need to look at human rights approaches around investigations and accountability.

Interaction with the Court of Arbitration for Sport (CAS): It is important that the Entity's relationship with other oversight structures such as the Court of Arbitration for Sport (CAS) be clearly described and publicly noticed. It is important for survivors to be able to understand when CAS or other systems of appeal could come into play. Unless there are significant trauma-informed reforms to CAS, the Entity must explore other options for arbitration. Other appeals or arbitrations processes need to be trauma-informed, diverse, and representative of the communities and cultures where cases are being appealed. Some of these concerns connected to the burden of proof in these investigations and whether the decisions of the Entity will be able to be overturned by CAS. It is difficult to determine the best practice/recommendation given the unknowns, but the ASAG wanted to raise these issues for consideration.

Scope of investigations: ASAG strongly recommends the Entity address all forms of abuse in sport, not just sexual abuse. Members cited the intersectionality of abuse and how important it was to not exclude forms of abuse, but to instead consider the continuum of abuse, including how less severe behavior can escalate.

### **Special Considerations for a Single Sport/Football International Entity**

Due to the change in scope announced by FIFA in April 2023, ASAG makes the following recommendations around the formation of a football single sport international Entity to address abuse in sport:

Strict attention to conflicts of interest: As a single sport Entity, there are even more actual and perceived conflicts of interest for FIFA. As the primary funder, it will be important to set strong firewalls and protections between the Entity and FIFA so that the Entity is not seen as an extension of FIFA. This needs to include critical looks at governance and funding structures. As stated previously, it is critical that the Entity not be perceived as an extension of the sports governing body and not have FIFA representation.

Need to document learnings: A single sport international Entity will be creating something new. This process should be well documented with the intention to share learnings with other sports and international organizations. There will be rich learnings and experiences to support increasing efforts to address and prevent abuse in sport. Documentation considerations should include ways to review and provide feedback on the process during establishment and beyond, as well as comparisons and the review of other successes and failings.

## **Summary of Feedback from Survivor Survey**

TAOS and the ASAG created an anonymous survey for survivor athletes on the idea of creating an international Entity for abuse in sports. 31 surveys were collected through an online survey. The survey was available in four languages, English, Spanish, French, and Brazilian Portuguese. The survey included 25 multiple choice or "check all that apply" questions and 8 open ended questions. It was circulated through the survivor networks of ASAG members through direct invitations to survivor-athletes and practitioners in ASAG members' professional networks. Survey participants were given a brief overview of the ISG project to explore creation of an international safe sport entity on abuse in sports.<sup>4</sup>

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<sup>4</sup> The survey contained the following introductory information: "This survey is anonymous. That means that we will not be able to connect answers with any particular individual, unless you include detail that identifies you."

### Survey context and goals:

Currently, FIFA (the Fédération Internationale de Football Association) and other International Sport Federations are considering the creation of a potential Global Safe Sport Entity ("the entity"). This entity is still under consideration, and there is no guarantee that it will be created. However, the sports federations want to provide victims/survivors of abuse in sport with a chance to provide their input at this early stage. As part of this process, our organisation, The Army of Survivors, has been consulting with survivors of abuse in sport. This survey is an attempt to broaden survivors/victims' consultations.

In this survey "abuse in sports" includes sexual, physical, and emotional abuse (which includes harassment, bullying and assaults) experienced by athletes\*, athletes' friends and families, referees/officials, and other persons that participate in sports (both children and adults). In many cases this is when the harm is caused by coaches, doctors/healthcare providers in sport, administrators of sports, peers, institutions/organisations/schools, and others.

In this survey, athletes means both sport participants at the recreational/club-level as well as high-performance/elite athletes.

The goals of this survey are to gather anonymous survivors feedback about :

How sports are responding to victims/survivors.

How sports could better support victims/survivors.

How sports (individuals and institutions/systems) can be held accountable.

How an independent agency could effectively complement sports bodies to provide support and remedy to victims and survivors.

### Terms of Participation:

Your participation is completely voluntary and strictly confidential. We are seeking honest and direct feedback to share with those considering whether to set up the entity. Feel free to skip any questions that you don't feel comfortable answering. The survey will take approximately 15/20 minutes.

### Data Storage/ Access:

We will use your responses to create a summary of the views of all participants. This report will be shared to the entity formation group. We will not share any of your individual answers that could make you identifiable.

Over 48% of participants were athletes in football/soccer, with the next largest groups being gymnastics (16.1%) and basketball (16.1%). Athletes from fifteen countries participated. 14 participants were from recreational sports, 14 from state/regional sports, 13 from national/international representation, and 11 from professional sports. Only 10% of athletes identified as para athletes. The majority of participants identified as female (86.7%) and participated in the womens' divisions of sports (76.7%).

80% of participants identified as a victim/survivor of abuse in sports, with over 79% reporting emotional abuse, 44.8% reporting institutional abuse, and 41.4% reporting sexual abuse. 60% had made a report about abuse in sports and 75.8% had participated in an investigation either as a witness or as a complainant.

The top three most important traits identified for an international sports Entity were: (1) transparency (83.3%), (2) survivor/victim voice (83.3%), and (3) independence of the Entity (73.3%) .

Participants's top three most important members of the governing board were athlete representatives and unions (24 participants selected), experts in supporting victims (24 participants selected), and victims/survivors of abuse (22 participants selected). In a follow up question about how to set up a board, participants identified strong support for victims/survivors to have between two to four votes in a governing board.

In investigations, the top qualities identified were (1) Independent from the individuals and/or sports bodies who committed, condoned or covered up abuse, (2) transparency in expectations and process, (3) being trauma-informed, (4) good communication and updates, and (5) centering the experience of survivors.

Common themes emerged around the challenges for the Entity to carry out investigations of abuse centered around capacity and building trust with communities and victims/survivors.

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**Survey Topic and Assistance:**

We do not expect that taking part in the survey will cause you any distress, however some questions ask about sensitive and personal experiences. It is your choice if you would like to skip any of these questions. It is also your choice not to take part in the project or to cease participation at any time.

If you do experience any distress or would like to find out options for further support, you will be provided with contact details and information about support options at the end of the survey. Any queries about your participation in this project can also be directed to Emily Austin, [emily@pivotadvocacy.com](mailto:emily@pivotadvocacy.com)

Thank you for taking the time to provide your voice and expertise.

*"[There are] [v]ested interests and corrupt practices from authorities that have money thus either scaring the victims, coercing the victims to drop cases through other means of settlement." - Survey participant*

*"[The challenge is] [t]he amount of corruption and dishonesty the abusers engage in. The legal forces such as policy taking bribes and their lack of timeliness." - Survey participant*

This theme of a lack of trust continued where participants were asked about their perceptions of the current ability of sports to interrupt abuse and investigate. There was very little confidence in their sports' ability to respond to abuse in sport. 90% disagreed that their sport had the appropriate support resources for victims/survivors. 80% disagreed that their sport has the appropriate response to victims/survivors. And 80% disagreed that an individual will be treated fairly in an investigation about abuse in sport. Similarly, participants did not feel confident that a person that abuses will be held accountable. (Over 89.7% disagreed that the current systems would hold persons that abuse to account, and 79.3% disagreed that systems/institutions/organizations that cause harm will be held to account.) Trust was the top identified challenge for supporting victims/survivors in all sports. (93.3% saw this as a major challenge, and 73.3% saw resources/funding for survivors/victims as a major challenge.)

The top identified things needed for victims/survivors to feel supported were tied to connections to mental and emotional supports and trauma-informed investigations. (Each having been selected 93.3% of the time.) For more details from the survey, see Appendix A.

### **Additions to Survivor Feedback**

ASAG and TAOS recognize the challenges in engagement for survivors and acknowledge that different survivors were able to engage at different levels during the process due to the complexities and timeframe of the ISG project. In many ways, these limitations prevented the ability to build consensus around several issues. In the creation of this report, ASAG members were able to add additional feedback and recommendations shared below. There was insufficient time to develop consensus, however we are including these suggestions here to support survivor voice and leadership.

- ASAG was split as to whether a scope focused on one particular age group or all age groups would be best.
- Recommendation that the care/support branch has as a mechanism to provide feedback to the investigation branch when investigations are not conducted in a trauma-informed way and are re-traumatizing victims/survivors.

### **Conclusion**

Including survivors' voices in this ISG planning process is a very positive step in the right direction in building a truly trauma-informed system. ASAG members and TAOS applaud the ISG and FIFA in creating a safer space for survivor engagement and resourcing trauma-informed expertise. Much was learned from including these critical perspectives.

ASAG members and TAOS hope that ongoing, direct, and meaningful engagement of victim-survivors will continue in the further establishment and development of the Entity, and that victim-survivors engagement will be embedded within the Entity governance and operation. This is critical to guarantee a transparent, trusted, and authentic International Safe Sport Entity driven by ethics of care.

**Appendix A:**  
Athlete-Survivor Survey Results  
n = 31

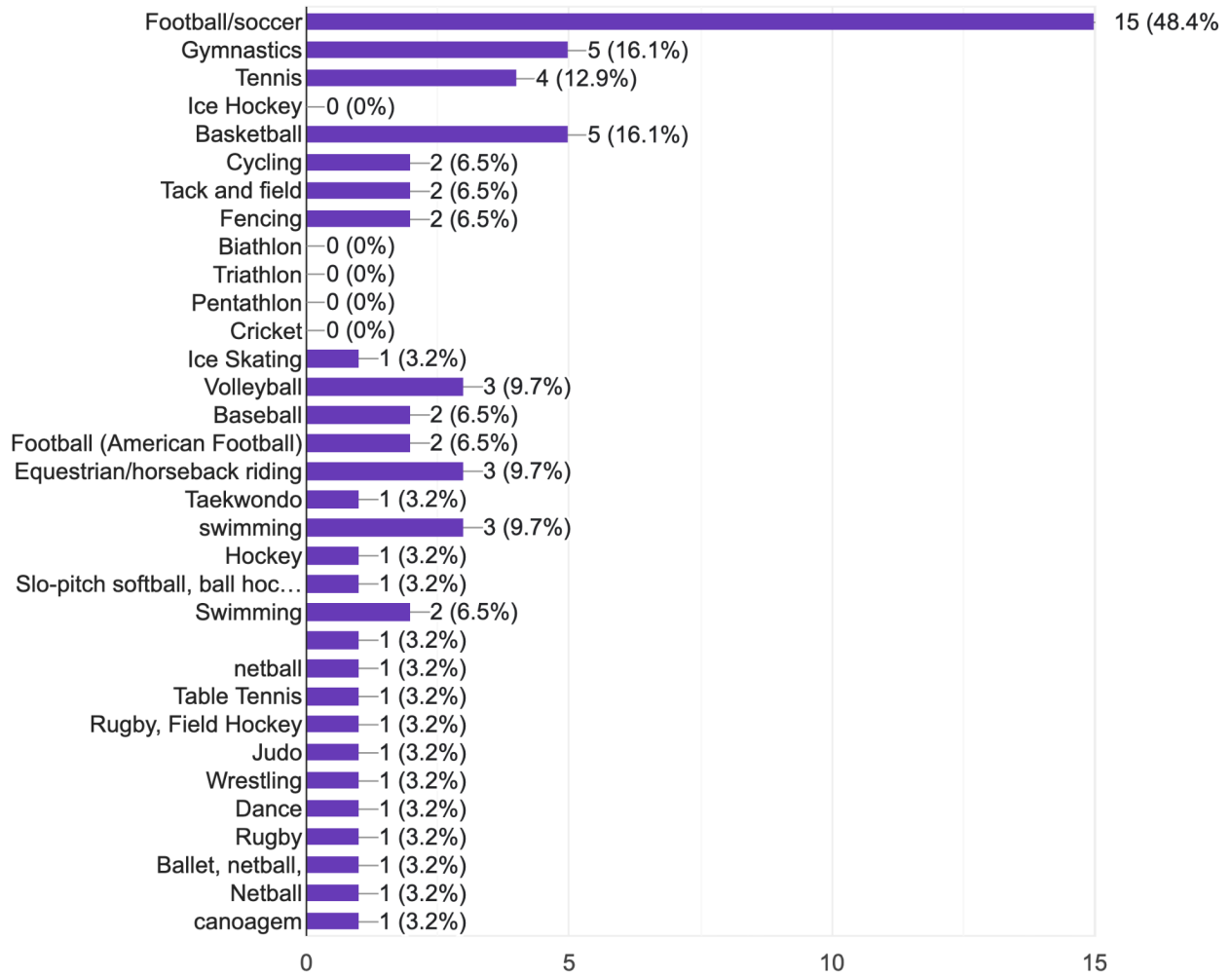
Informed Consent: Do you consent to take part in this anonymous survey and allow your response to be used to inform the possible creation of a Global Safe Sport Entity?  
31 responses





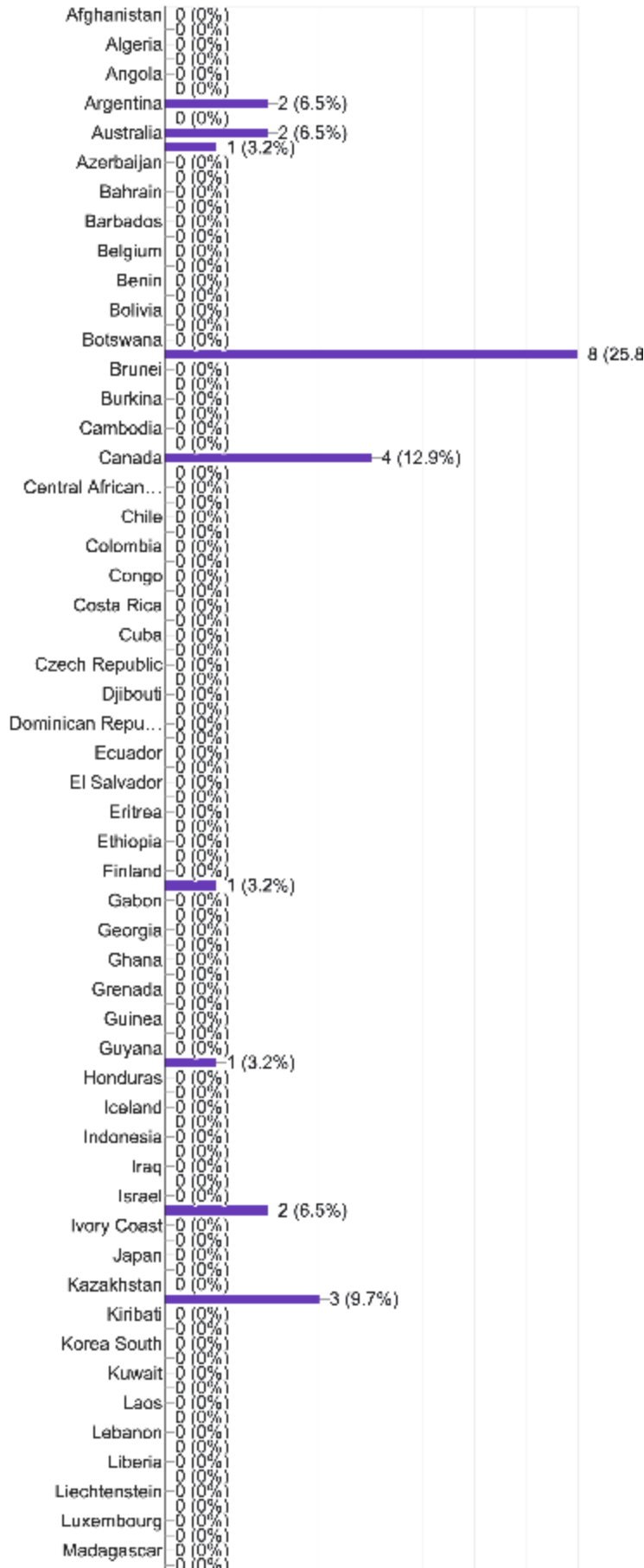
What sport(s) do you participate in or have you participated in? (Select all that apply)

31 responses



What countries do you feel you did or have represented or participated in sports within? (Select all that apply)

11 responses



### What is/was your level of participation? (Check all that apply)

31 responses



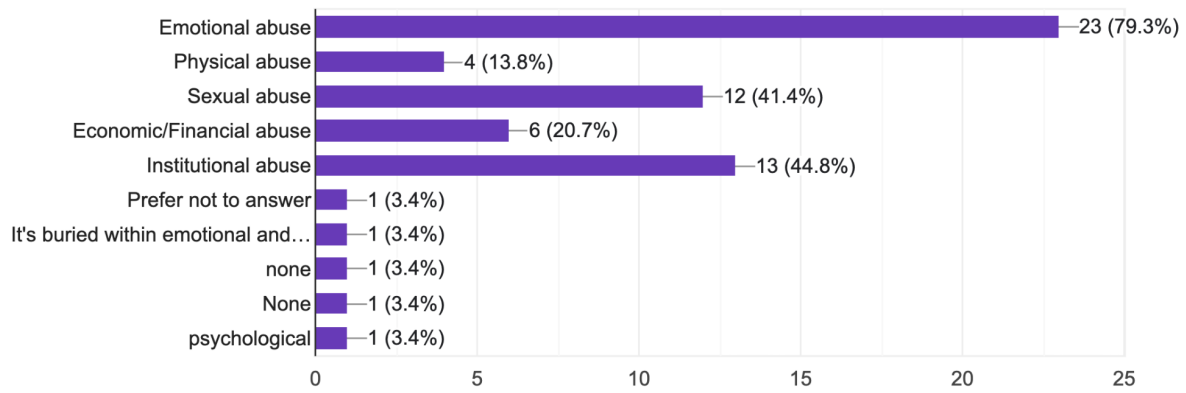
### Do you identify as a victim/survivor of abuse in sport? (In other words, have you been the target of or subject to abuse, harassment, bullying, or assaults in connection with your participation in sport?)

30 responses



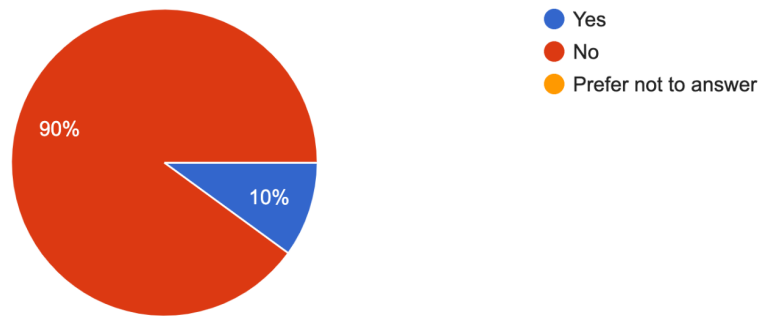
### What types of abuse did you experience? (Check all that apply)

29 responses



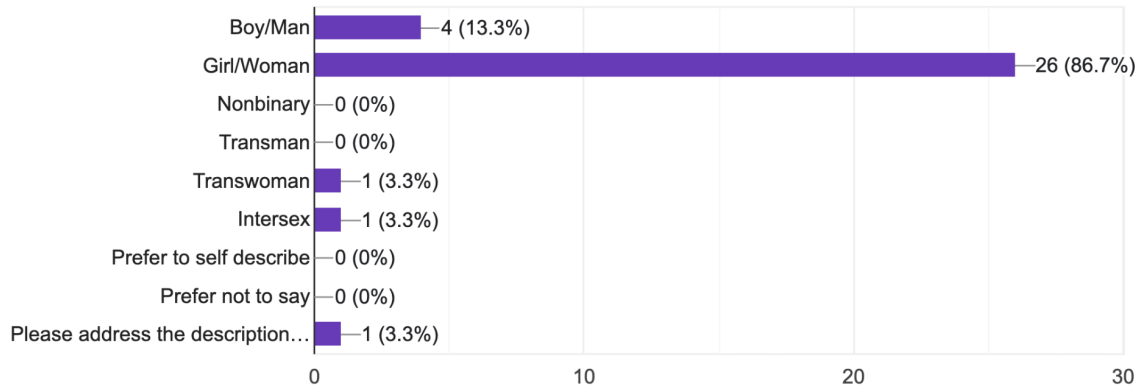
### Do or have you compete(d)/participate(d) as a para athlete?

30 responses



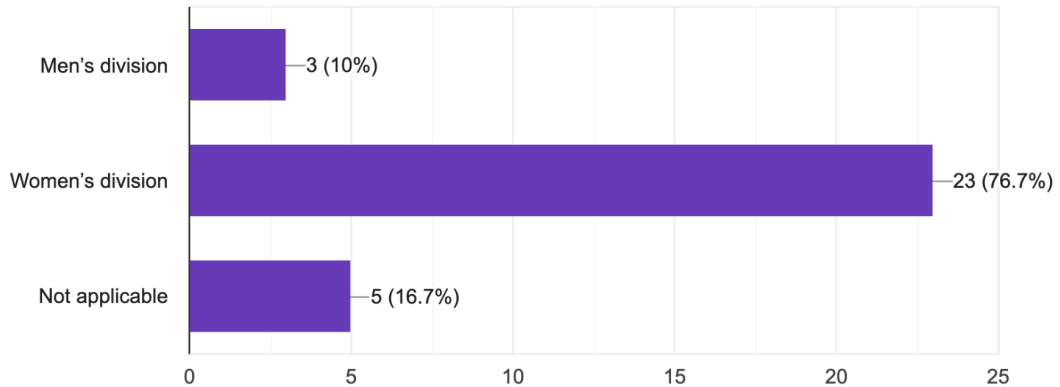
### How would you describe your gender?

30 responses



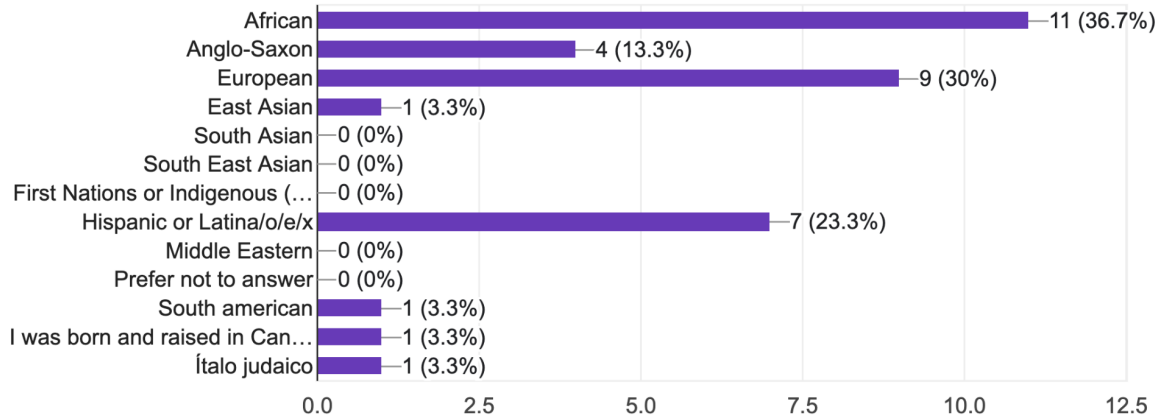
### If your sport is segregated by sex, do or have you compete(d) in a "male/men's" or "female/women's" division?

30 responses



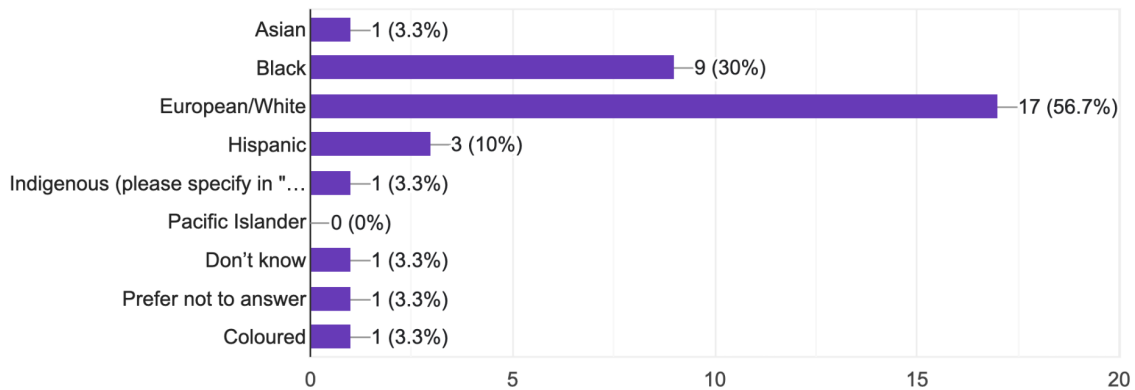
What is your cultural background? Choose all that apply.

30 responses



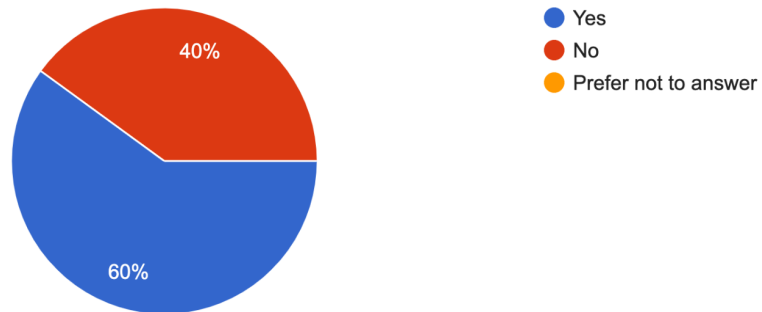
What is your racial origin/lineage?\* What race would you identify yourself as? Check all that apply.

30 responses



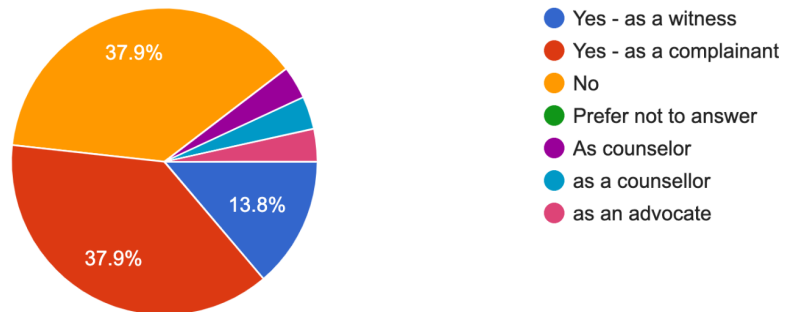
### Have you reported abuse in sports to an official/sports authority/legal system?

30 responses



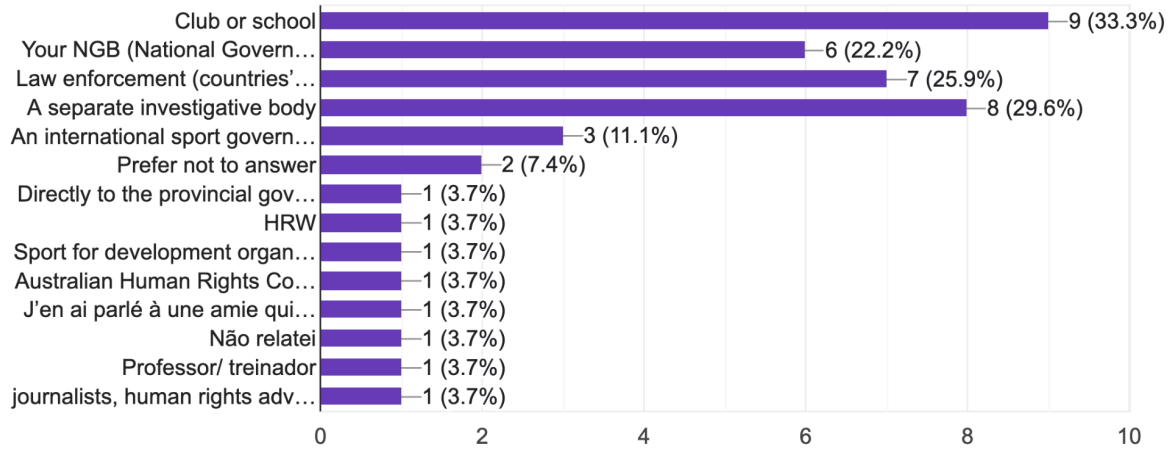
### Have you participated in an investigation of abuse in sports?

29 responses



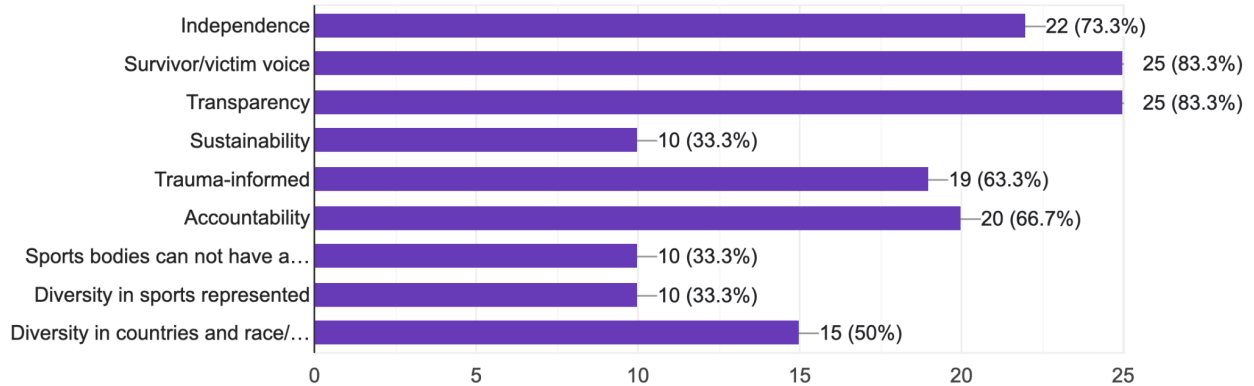
### Did you report through any of the following (Check all that apply)

27 responses



### What are the most important traits for an international sports entity? (Check your top five choices)

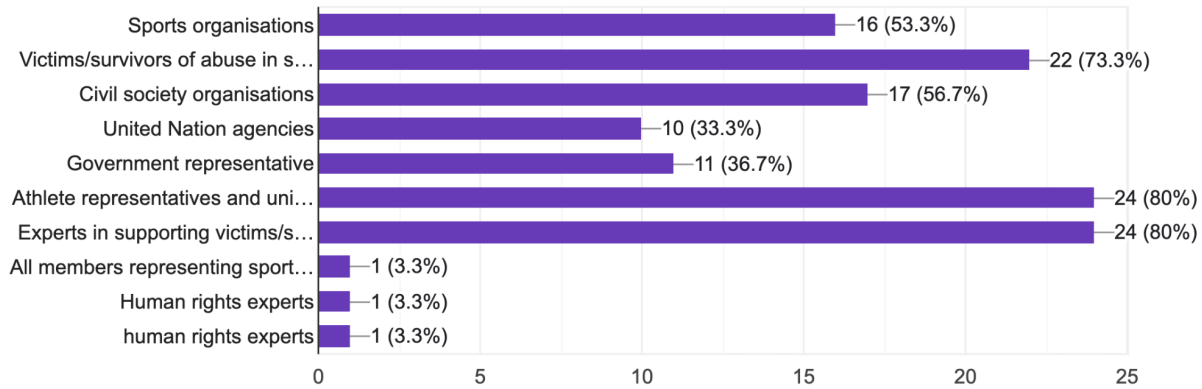
30 responses





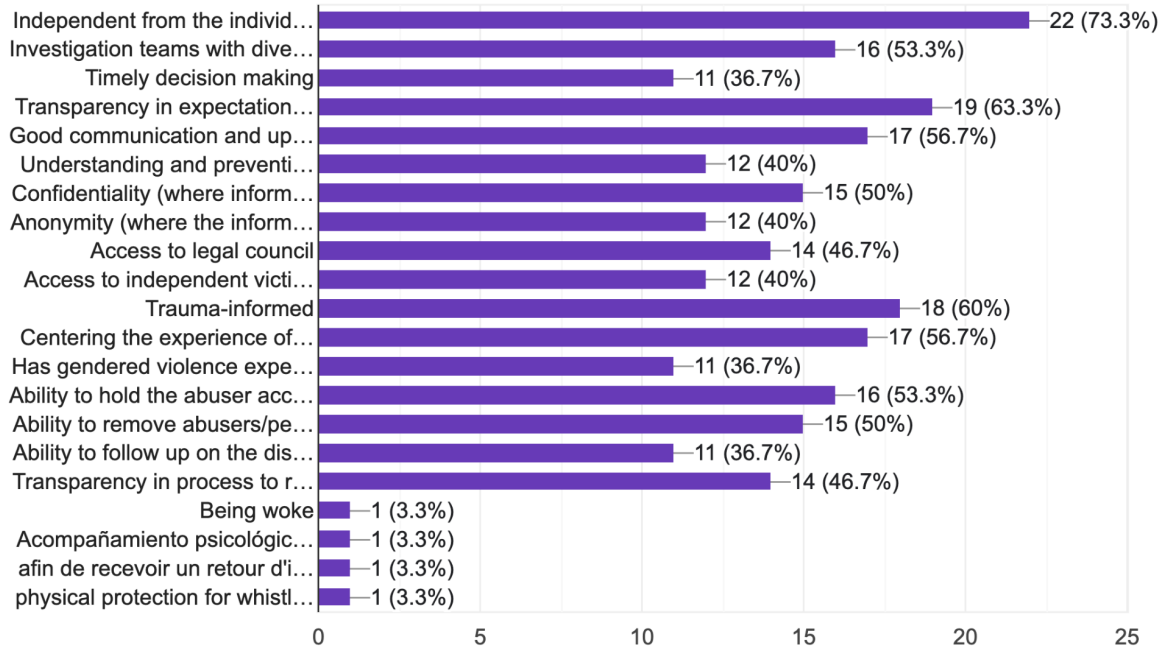
### The governing board should be composed of: (check all that apply)

30 responses



### What are the top five qualities of a good investigation for a case of abuse in sports? (Select your top 5 most important)

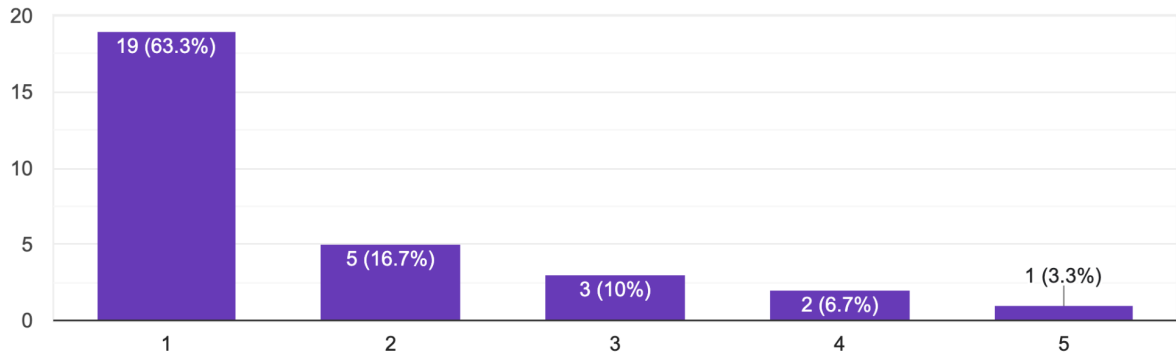
30 responses



The following charts represent questions asked on a Likert scale to determine the participants' perspectives about their sports' responses. 1 = Strongly disagree, 2 = Disagree, 3 - Neither disagree nor agree, 4 = Agree, 5 = Strongly agree.

My sport(s) have the appropriate response for victims/survivors of abuse in sport.

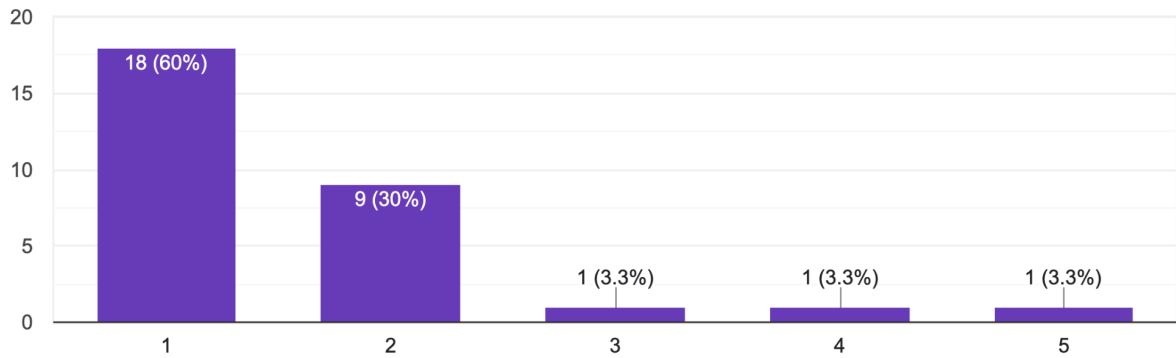
30 responses



1 = Strongly disagree, 2 = Disagree, 3 - Neither disagree nor agree, 4 = Agree, 5 = Strongly agree.

My sport(s) have the appropriate support resources for victims/survivors of abuse in sport.

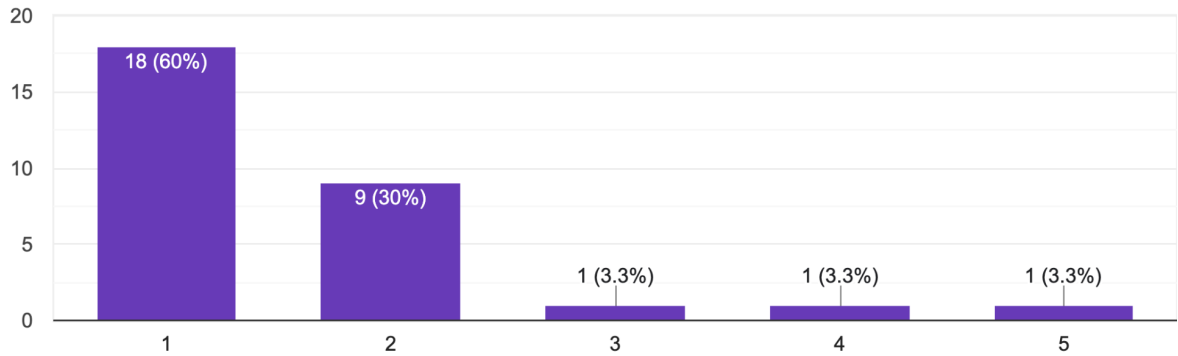
30 responses



1 = Strongly disagree, 2 = Disagree, 3 - Neither disagree nor agree, 4 = Agree, 5 = Strongly agree.

My sport(s) have the appropriate support resources for victims/survivors of abuse in sport.

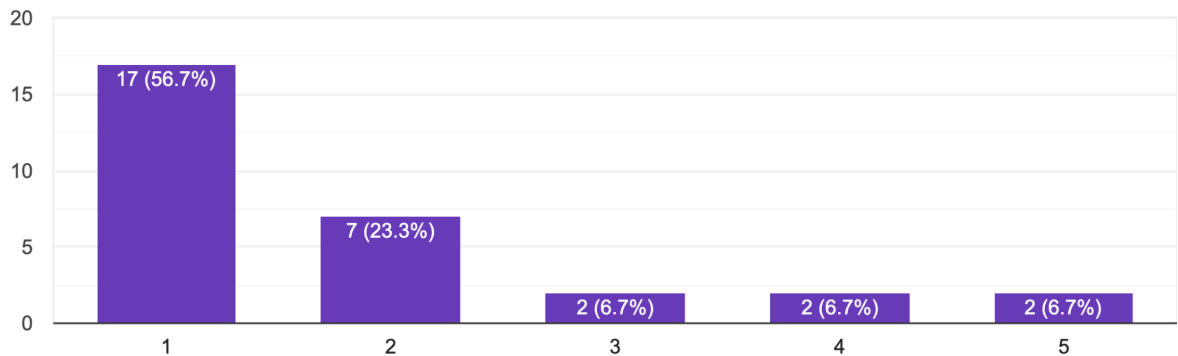
30 responses



1 = Strongly disagree, 2 = Disagree, 3 - Neither disagree nor agree, 4 = Agree, 5 = Strongly agree.

I know that an individual will be treated fairly in an investigation about abuse in sport.

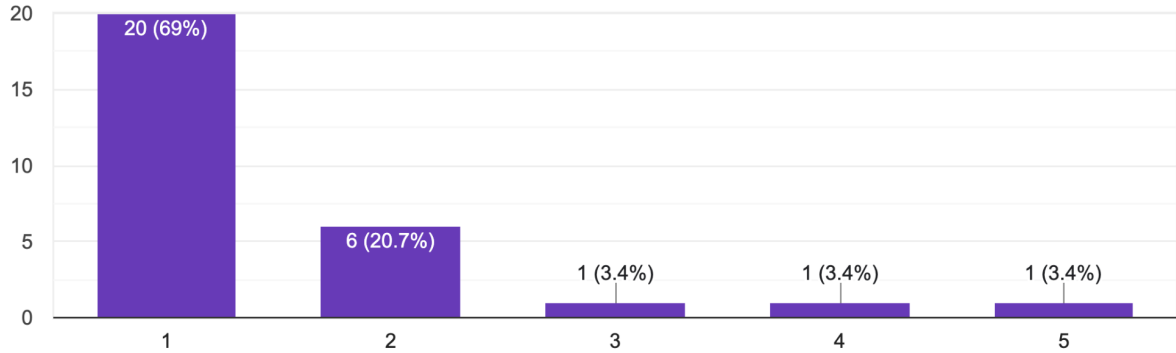
30 responses



1 = Strongly disagree, 2 = Disagree, 3 - Neither disagree nor agree, 4 = Agree, 5 = Strongly agree.

I have confidence that a person who causes harm/perpetrator of abuse will be held accountable by the current systems for reporting abuse in sport.

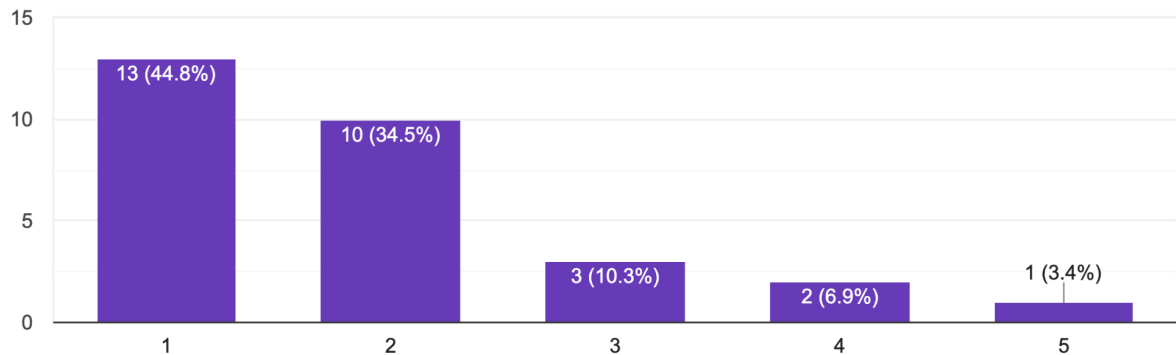
29 responses



1 = Strongly disagree, 2 = Disagree, 3 - Neither disagree nor agree, 4 = Agree, 5 = Strongly agree.

I have confidence that systems/institutions/organisations that cause harm will be held accountable by the current systems for reporting abuse in sport.

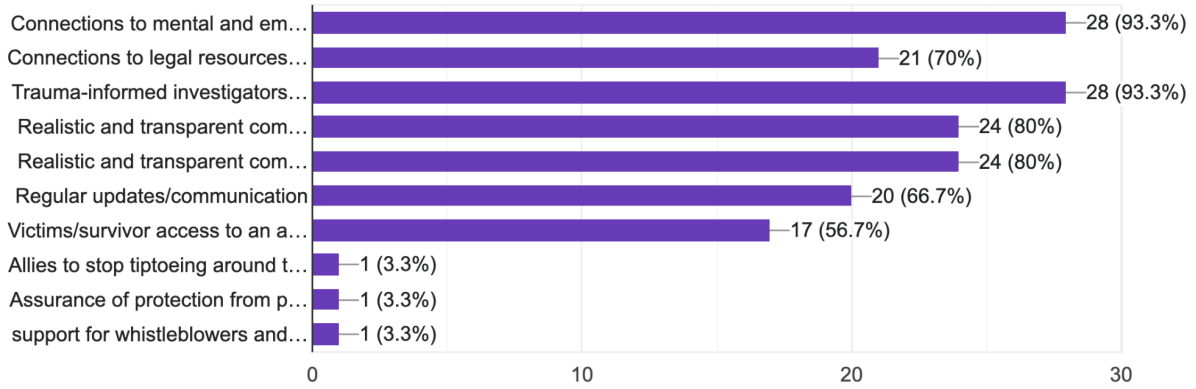
29 responses



1 = Strongly disagree, 2 = Disagree, 3 - Neither disagree nor agree, 4 = Agree, 5 = Strongly agree.

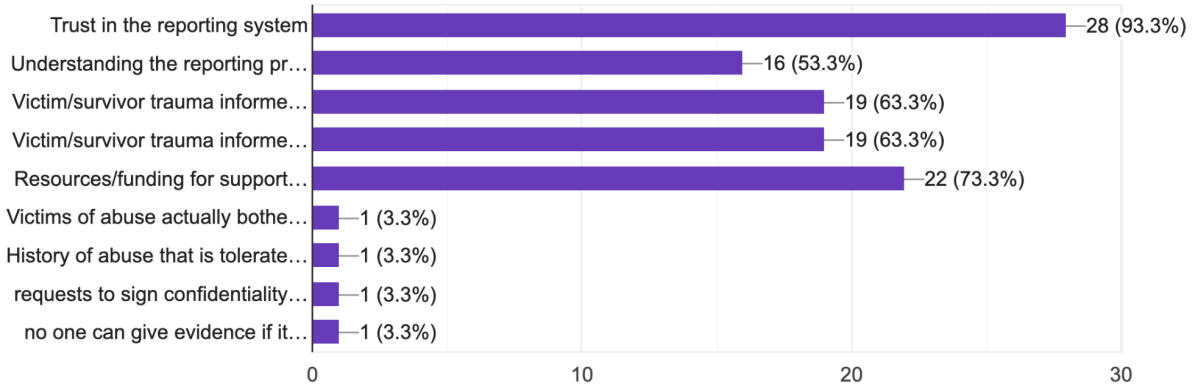
For a victim/survivor to be supported the following need to happen: (check all that apply)

30 responses



What major challenges do you see in supporting victims/survivors of abuse in all sports? (Check all that apply)

30 responses



If you reported abuse to a sports entity, was there any support you needed and didn't get?

27 responses





# Appendix 2

## Expert Groups Reports

ISG Report on the establishment of an  
Independent Global Safe Sport Entity  
1 JUNE 2023

## INTERIM GOVERNANCE OF THE INTERNATIONAL SAFE SPORT ENTITY

### EXPERT GROUP ON GOVERNANCE REPORT

26 April 2023

#### Mandate

The Expert Groups will support the work of the Interim Steering Group (ISG) by:

1. Identifying the high-level needs, opportunities, and risks around key issues.
2. Presenting a brief analysis of the issue(s) at stake with recommendations and guidance on key priorities to be considered prior to the entity's establishment.

The expert group on governance's mandate is:

To consider the governance structure of the new safe sport entity and:

- suggest **the key principles and values** that should guide the entity.
- propose at least **two alternative solutions for the governance structure of the new entity**.
- propose the **selection process for the appointment of the founding board**.

#### Composition

Expert Group members are appointed based on their individual and combined expertise as well as their capacity to help deliver their Group's respective mandate. The following members were appointed to the Governance Expert Group:

- Jonas Baer-Hoffman, General Secretary, FIFPRO
- Ashley Ehlert, Deputy Secretary General and Legal Director, International Ice Hockey Federation (IIHF)
- Andrea Florence, Director, Sport and Rights Alliance
- Mario Gallavotti, Senior Advisor to the President's Office, FIFA
- Irena Guidikova, Head of Children's Rights and Sport Values, Council of Europe
- Katie Hanna, Senior Project Manager, North America, Centre for Sport and Human Rights
- Sophie Kwasny, Executive Secretary of the European Partial Agreement on Sport (EPAS), Council of Europe
- Daniel Rietiker, Senior lawyer at the European Court of Human Rights, Part-time lecturer at Lausanne University
- Pat St. Peter, Council Member, International Skating Union



## Working Methods

The Expert Group designated Katie Hanna as team leader, met three times within a 30-day period (10 February, 24 February, 9 March), considered a number of guiding questions and agreed on the final report on 22 March 2023. A revised report was submitted 26 April 2023 after the Governance Expert Group reviewed feedback from the ASAG, and then met on 24 April to amend the report with ASAG feedback.

## INTRODUCTION

Pending confirmation by the Interim Steering Group, these recommendations are based on the assumption that the entity is focused on two primary objectives: 1) support to victims/survivors; and 2) conducting investigations using independent and trauma-informed investigators and issuing sanctioning recommendations to participating IFs.<sup>1</sup> Recommendations are included to fulfil the mandate, and additional governance recommendations for future consideration are included in the conclusion. The group identified existing challenges that impact governance and scoping and are not yet known, including identifying the budget, fundraising model, and sustainability of the organisation.

The World Players Association, The Army of Survivors, and the Sport & Rights Alliance (2022) published a guide on the key principles of safe sport entities. These principles include: human rights-based; survivor-centered; independency and accountability; safety and accessibility; meaningful stakeholder engagement, and effective remedy.

At the root of a successful safe sport entity is athlete trust. “The entity must be trusted” was a resounding theme in each of the Governance Expert Group’s meetings. Being trusted also means being able to deal with a potentially high volume of reports in all parts of the world, while ensuring the safety of victims. Additional principles highlighted by members included: ethical, transparent, free of demonstrated conflict of interest, and having structural, operational and financial independence, and having the power to work effectively, resisting pressure from sport and outside the entity.

The entity must be impartial, abide by internationally recognized human rights principles<sup>2</sup>, and be guided by the principle of the best interest of the victims/survivors, in particular, if applicable, the rights of children. The entity must be fully accessible, with reporting and all resources available in different languages, formats, and able to communicate with victims/survivors (whistleblowers) in an appropriate, trauma informed and, if applicable, child-friendly way. Access to the entity must be easy and effective, without any serious obstacles, including financial barriers. And it must be clear to communities which cases the entity will accept---i.e., from which sports, which regions, severity level of a case, and whether there is a limitations period for accepting a case.

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<sup>1</sup> The Governance Expert Group discussed the scoping of the entity, which is the mandate of the ISG. This group recommended updates to the visual chart to clarify the scope of the entity.

<sup>2</sup> *FIFA’s Human Rights Policy to be used for implementation purposes.*

## I. GOVERNANCE STRUCTURE

### a. Key considerations

This group identified that a traditional board structure is not the best fit for this entity, and that a different structure is required to truly establish trust with athletes and all stakeholders. For this reason, we do not recommend a traditional board of directors. Instead, we recommend one governance model with two alternative recommendations regarding the timing of how and when the governance model is implemented. The first recommendation (A), which is the recommended approach by this Expert Group, is to develop a phased-in approach of the Council and Assemblies (listed in detail below); and the second recommendation (B) would include building out the Council and Assembly structures now before the new entity is registered, which this group does not recommend, due to concerns regarding resources and timeframes.

We propose a more innovative approach, that includes a constellation of Assemblies of representatives (“Assembly Groups”), with a higher body (Council) coordinating them.

### b. Alternative A: Council (Phased-in Approach) with Staggered Terms

This innovative approach is modelled off of the [International Criminal Court](#). The higher body or overarching governing body of the entity is the **Council**, with the Founding Council being composed of a core group of seven individuals representing each of the following Assembly Groups:

Founding Council of 7 members with the following composition:

- i. 2 - IF representatives (FIFA and one additional IF from an Olympic or Paralympic sport)<sup>3</sup>
- ii. 2 – survivor representatives (at least one from ASAG)<sup>4</sup>
- iii. 1 – athlete representative
- iv. 1 – union representative
- v. 1 - civil society organisation representative

The ISG should set the criteria, application and nomination process for the **Founding Council** members and identify an independent group that will review applications and conduct vetting of applicants who meet the criteria. The majority of the ISG would then vote to approve and appoint Founding Council members. The one exception includes those ISG members who are representing IFs and are not part of the entity, as they would recuse themselves from voting for representatives on the Founding Council.

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<sup>3</sup> The individual coming from an IF will serve independently as an expert in the Olympic and Paralympic Movement, and not specifically representing an IF for the Founding Council. IFs that are not part of the entity cannot have influence over Council appointments.

<sup>4</sup> We agree that continuation with ASAG is vitally important.

The Founding Council will be appointed to staggered terms (one or two-year terms).<sup>5</sup> The Founding Council is responsible for creating the Assembly group structure, criteria, processes, vetting of individuals on the Assemblies and long-term sustainable structure; keeping in mind at a later stage in the entity that children should be included as an Assembly Group, once capacity is built and necessary protocols and safeguards are established to include their participation. Once the entity becomes operational, it will expand to create the Assemblies, with the ultimate governance structure to include Assembly Groups of IFs, survivors, athletes, unions, and civil society organisations, with representatives from each Assembly going through a nomination and election process within the Assemblies and those elected persons from the Assemblies serving on the entity's Council. Representation by those from the Global South, those working with children, LGBTQ focus, persons with disabilities, representatives from Indigenous communities, and other Equity-Deserving Groups should be appointed to the Council. While the Founding Council will include seven representatives, as they establish the Assembly Group structure it is possible that the Council could expand beyond seven members (i.e. two survivors, two athletes, etc.), maintaining an odd number for the Council. The decision on the number of Council representatives will need to be made by the Founding Council.

#### **Roles and Responsibilities of the Founding Council**

- Set scope of organisational priorities for investigations based on resources, severity of cases (but not determining operational implementation)
- Identify and establish the structure for the Assemblies
- Identify sustainability model with IF Assembly, given new IFs will join the entity in the future
- Agree on procedures of decision making, assurance that certain decisions are not taken without some super-majority/blocking minority

#### **Roles and Responsibilities of the Founding Council and Council**

- State the mission and objectives of the organisation
- Set overarching policies (not day-to-day operational policies)
- Provide sufficient oversight
- Identify the resources that are needed for the organisation, not the people specifically, but the general resources
- Set rules for the hiring and appointment process of the Secretary General / CEO, and provide oversight of the Secretary General / CEO, setting competency requirements for role
  - The Secretary General / CEO is responsible for day-to-day operations and hiring staff
  - The Council will not have any day-to-day operational responsibility (including operational policies of case management, investigation, etc.) as this is the

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<sup>5</sup> We support the idea of compensating Founding Council members (i.e. per diem for onsite) and recommend that compensation be defined and looked at equitably between members.

responsibility of the staff, under the supervision of the Secretary General / CEO

- Fiduciary responsibility for the overall budget

### **Firewall Protections to protect and preserve independence**

- Group strongly recommends technology firewall and different physical locations (separation) for the survivor care/support and the investigations departments, but that both departments report into the Secretary General / CEO
- There must be a firewall between governance and any investigations or case management of the organisation, which is a day-to-day responsibility of the staff of the entity.

### **Criteria for Council & Assembly**

- IF office holders or paid staff and contractors shall not serve on the Council during and up to two years after the period beginning on the date on which they cease to hold said positions (Empowering Olympic, Paralympic and Amateur Athletes Act, 2020; U.S. Government Accountability Office, 2022)
- IF representatives cannot be more than eight years removed from involvement with the sport they represent
- The Council, its leadership and the administration of the entity must embody certain diversity principles, including notably representation of the global south and/or other Equity-Deserving Groups (if feasible) (What Works Toolkit, 2022)
- Consult with the ASAG and ask for their recommendations on governance structure of survivors and athletes (Mountjoy et. al., 2022)
  - Is it part of this assembly structure?
  - Is it separated out athletes and survivors, or is it the same group?
- Sponsors should not be on the Council; however the group recommends developing a strategy for sponsor engagement, i.e. communications regarding sanctions, etc.

#### **c. Alternative B: Assemblies of Representatives and Council**

In this recommendation, the Council and Assemblies are set-up from the inception of the new entity. The group has concerns regarding the resource capacity and time required to implement all processes at this early stage of the organisation and does not recommend this option.

#### **d. Recommendations**

The Expert Group on Governance recommends Alternative A.

### III. APPOINTMENT OF COUNCIL MEMBERS

#### a. Key considerations

See above considerations listed under Alternative A.

#### b. Recommendations

See above considerations listed under Alternative A.

### CONCLUSIONS

Below are additional governance areas we identified that were not within this expert group's mandate but are key governance considerations for this entity.

- IF (International Federation) criteria for inclusion in the entity (i.e. minimum requirements / MOU terms):
  - Annual Membership Fee for participation
  - Minimum Standards for IF participation and commitments from each participating IF (including submission to the investigative authority of the entity)
  - Code of Conduct
  - Athlete Safeguarding Policy, including minimum training
  - Communicate proactively to athletes, including through the entity's reporting portal, grievance mechanism to athletes, and making it accessible in different languages and platforms (hotlines, websites)
  - Annual Review (*Athlete Safety Audits*, n.d.)
  - Commitment to implement and enforce protective measures (including temporary measures) and the sanction recommended by the entity
  - Commitment to implement policy and governance changes, as recommended by the entity as part of the report
  - Expectations of IFs
  - Governance for IFs requesting service delivery
- Arbitrations (CAS and other bodies)
- Governance regarding funding model
- Governance regarding scope of entity, severity of cases pending final determinations from the ISG, and guidance for staff on operationalizing case acceptance and/or referrals with existing mechanisms (human rights bodies) and national institutions (country-specific safe sport entities, criminal and civil cases, and victim protection mechanisms)
- Survivor Support Fund & Governance of such fund<sup>6</sup>

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<sup>6</sup> We recommend ASAG's feedback when exploring the development and governance of a Survivor Support Fund: "Seems unrealistic that entities will not face financial barriers. These impacts/barriers must be considered and resourced with transparency.

○ Realistically there are financial barriers in all enterprises. . .How would we triage this - is this a trust fund? What values are applied to access the trust fund? If we state that financial support is available for those who meet a means-based test, for instance, I feel that's a more realistic statement and lowers expectations to something more realistic".

- Commitment to exploring a Public-facing disciplinary database (*Centralized Disciplinary Database*, n.d.)

**ANNEX: References (list and links to documents, case studies or any other useful information)**

Athleten Deutschland e.V. (2022, February 7). *Voice – Protection – Opportunity - Athleten Deutschland e.V.* Athleten Deutschland e.V. - Gemeinsam Stark. <https://athleten-deutschland.org/en/english/>

AthletesCAN (2020). *The Future of Athlete Representation within Governance Structures of National Sport Organizations*. [https://athletescan.ca/wp-content/uploads/2021/12/the\\_future\\_of\\_athlete\\_representation\\_in\\_canadavf-en3.pdf](https://athletescan.ca/wp-content/uploads/2021/12/the_future_of_athlete_representation_in_canadavf-en3.pdf)

*Athlete Safety Audits | U.S. Center for SafeSport*. (n.d.). <https://uscenterforsafesport.org/audit-reports/>

Beutler, I. (2021). Final Report of the Consultation Process to Consider the Creation of an International Safe Sport Entity. <https://digitalhub.fifa.com/m/26007b081f56ec2e/original/FINAL-REPORT-OF-THE-CONSULTATION-PROCESS-TO-CONSIDER-THE-CREATION-OF-AN-INTERNATIONAL-SAFE-SPORT-ENTITY.pdf>.

Centralized Disciplinary Database | *U.S. Center for SafeSport*. (n.d.). <https://uscenterforsafesport.org/response-and-resolution/centralized-disciplinary-database>.

Empowering Olympic, Paralympic, and Amateur Athletes Act of 2020, Public Law No: 116-189 (2020). <https://www.congress.gov/bill/116th-congress/senate-bill/2330>.

The Fédération Internationale de Football Association (n.d.). *FIFA Governance Regulations*.

Mountjoy, M., Vertommen, T., Denhollander, R., Kennedy, S., & Majoor, R. (2022). Effective engagement of survivors of harassment and abuse in sport in athlete safeguarding initiatives: a review and a conceptual framework. *British Journal of Sports Medicine*, 56(4), 232–238. <https://doi.org/10.1136/bjsports-2021-104625>

Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017, Public Law No: 115-126 (2018). <https://www.congress.gov/bill/115th-congress/senate-bill/534>.

U.S. Government Accountability Office (2022, June 29). *Amateur Athlete Safety: Certification Related to the Independence of the U.S. Center for SafeSport for Fiscal Year 2021*. <https://www.gao.gov/products/gao-22-105572>

USOPC (2020). USOPC Bylaws. <https://www.teamusa.org/Footer/Legal/Governance-Documents>

What Works Toolkit (2022). *Why is the Goal of the 50 – 30 Challenge Important for You and for Organizations Across Canada?* <https://whatworkstoolkit.elementor.cloud/what-is-the-50-30-challenge/>

World Anti-Doping Agency (12 April 2021). *WADA Governance Regulations*.

World Anti-Doping Agency (n.d.). *Working Group on the Review of WADA Governance Reforms: Final Report*.

World Players Association, The Army of Survivors and the Sport & Rights Alliance. (2022). *Establishing Effective Safe Sport Entities*. <https://sportandrightsalliance.org/tackling-abuse-in-sport-the-right-way-new-guidance-on-establishing-effective-safe-sport-entities/>.

## TOWARDS AN INTERNATIONAL SAFE SPORT ENTITY

### EXPERT GROUP ON CARE SUPPORT

#### REPORT

5 April 2023

### Mandate

The Expert Groups will support the work of the Interim Steering Group (ISG) by:

1. Identifying the high-level needs, opportunities, and risks around key issues.
2. Presenting a brief analysis of the issue(s) at stake with recommendations and guidance on key priorities to be considered prior to the entity's establishment.

The **mandate** of the expert group on care support ("the Group") is to consider the essential services of the new entity in relation to the protection and support of victims and witnesses of violence in sport:

1. **Reporting Mechanism/s:**
  - a. **Mapping** of existing Reporting Mechanisms for victims of violence: **identify methodology and key parameters.**
  - b. **Database:** Determine **value, risks, and opportunities** of hosting a Database of Reporting Mechanisms, and of it being easily accessible.
2. **Reporting to the Safe Sport Entity:** Key issues and requirements that should be considered.
3. **Access to Remedy:** Consider and **recommend priorities concerning remedy**, reflecting on the key findings of the work currently being undertaken by the remedy group of the Centre for Sports and Human Rights.
4. **Support to victims and witnesses: Identify key needs and gaps** and recommend priority action for the entity to efficiently address them.

### Working Methods

The Group designated Kat Craig as team leader and met during two separate online meetings. The first was an introductory meeting, after which members were asked to share their expertise in writing on specific questions. Based on this input, a 3.5-hour online workshop was designed and conducted. The aim of the workshop was to extract top-line collective recommendations, where possible, and identify unresolved questions where no consensus was achieved. The final report was approved by the group on 5 April 2023.



## Composition

Expert Group members are appointed based on their individual and combined expertise as well as their capacity to help deliver their Group’s respective mandate.

<b>CARE SUPPORT TO VICTIMS/SURVIVORS</b>		
	<b>NAME</b>	<b>TITLE</b>
1	Gary BYE	Safeguarding Manager, International Tennis Federation (ITF)
2	Sally CLARK	Senior Legal Counsel - Integrity & Regulatory, International Cricket Council (ICC)
3	Joyce COOK	Senior Advisor to the President’s Office (Safe Sport Entity), FIFA
4	Kat CRAIG	CEO of Athlead, sport and social impact consultant, human rights lawyer
5	Christa JAKOBSSON Caterina BOLOGNESE (back up)	Policy Advisor, Gender Equality Division, Council of Europe Head of Gender Equality Division, Council of Europe
6	Alexandra MARTINS  Georgia DIMITROPOULOU (back up)	Coordinator, UNODC Global Programme to End Violence against Children at United Nations  Crime Prevention and Criminal Justice Officer, United Nations Office on Drugs and Crime (UNODC)
7	Sally PROUDLOVE  Liz TWYFORD (back-up)	Child Safeguarding Policy Specialist, UNICEF  Sports Programmes Specialist at UNICEF UK
8	Daniela SIMONETTI	Journalist, writer, and founder of Change The Game
9	Minky Worden	Director of Global Initiatives, Human Rights Watch

# 1. INTRODUCTION

## Challenges and limitations

From the outset, the Group identified a series of challenges that have limited its ability to conclusively advise on its designated mandate. These challenges include:

- Lack of clarity about the entity's scope<sup>1</sup>, jurisdiction<sup>2</sup>, membership, resources and sustainability
- Lack of clarity about the entity's interoperability with national and international sport and criminal justice mechanisms
- Timeframe of the consultation period
- Complexity of the issues within the group's mandate
- Intersection with the mandate of other Expert Groups
- The absence of representatives of the Ad-hoc Survivors' Advisory Group (ASAG) in the Expert Group<sup>3</sup>

## Approach

Given the time constraints, the Group agreed it would focus on key high-level recommendations. The Group discussions were guided by four key questions:

- a) How can the Entity help to establish a data base of reporting mechanisms to increase their visibility, accessibility and trust (in particular to victims), and identify possible gaps?
- b) What are the key issues the Entity should consider when deciding on its triage system?
- c) What priority action should the entity take to foster access to remedy?
- d) What are the gaps in victim's support that the entity should address as a matter of priority?

Appendix I contains the mapping of needs, opportunities, and risks identified by the experts relating to each of these key questions. The Group first sought to identify areas of clear consensus. It then identified issues/concerns on which consensus could not be reached.

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<sup>1</sup> Following the consensus reached at the ISG meeting in February, the experts worked under the assumption that the **Entity's main missions would be: 1) to investigate cases** falling within the jurisdiction of the Sports joining the Entity (following a subsidiarity principle) and **2) to provide support to victims** of inter-personal violence (both children and adults).

<sup>2</sup> The assumption is also that **the Entity's jurisdiction** will be established by delegation of the IFs joining the Entity. The Entity will have the power to investigate cases as a measure of last resort and recommend sanctions and measures which should then be accepted and implemented by the IFs.

<sup>3</sup> ASAG was established to provide survivors with a trauma-informed and safe space to engage in the process towards the creation of the Entity. This engagement is facilitated by The Army of Survivors, who holds a seat in the Interim Steering Group (ISG). While individual survivors are not members of the Experts' Groups, they were consulted on their mandates, received the draft reports and have been encouraged to comment. The Army of Survivors receives all relevant documents, participates in the all-expert groups meeting and can bring survivors' voices to the ISG at any point in time.

## 2. CROSS-CUTTING RECOMMENDATIONS

When considering the various issues within its mandate, the Group identified a number of Cross-cutting recommendations.

**Recommendation 1:** The Group agreed that the Entity's governance, mission and operations should comply with international human rights standards and apply the highest quality standards in the way it assesses risk, designs reporting systems, conducts investigations and engages with victims/survivors. Key principles and values include:

- Independence, transparency and legal certainty
- Confidentiality, safety and adherence to the Do No Harm principle
- Meaningful, risk-informed and trauma-informed consultation and engagement with victims/survivors
- A gender- and child-sensitive approach, recognising that any entity dealing with children must ensure that the rights and interests of children inform the systems' design and its responses.<sup>4</sup>

**Recommendation 2:** The Entity should use internationally agreed definitions, such as those included in UN treaties and other relevant texts<sup>5</sup>. The relevance of regional treaties such as the Council of Europe Convention on action against violence against women and domestic violence (the Istanbul Convention) was also stressed, in particular when they provide guidance on victims' rights and protection. Consideration should be given to the drafting of a Code that partner IFs should commit to respect when joining the Entity.

**Recommendation 3:** The Entity should continue to centralise the voices of victims/survivors throughout its creation and operations.

**Recommendation 4:** The Entity should be very clear on its mandate, scope, operations and processes. One of the greatest risks for the Entity relates to the definition of its scope. If the scope is ill-defined and the entity is overwhelmed, it will not meet expectations and fail. No accessible data on the prevalence/volume of cases and average cost in each case in terms of care and investigations was available to the group. The unpredictability of the amount and complexity of future cases is also a parameter to take into account. There are however ways in which the scope can be narrowed, each with pros and cons. Properly defining the scope is an absolute priority as so many other matters flow from this. The scope could also evolve over time, as it is the case in most international jurisdictions. In the absence of any indication of resource and membership the Group was not able to comment about how that scope should be limited but supported the ISG's agreed initial focus on (a) investigations and (b) victim/survivor care. This was because these functions require independence from IFs. Unless considerable and sustainable resource is available the Entity's scope should be limited to this.

**Recommendation 5:** The Entity should seek to cooperate with States authorities, intergovernmental organisations, service providers, survivors' groups, human rights organisations, trade unions and other

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<sup>4</sup> It is recommended that the Entity follows international standards on child and gender sensitive counselling and reporting mechanisms.

<sup>5</sup> Such as the Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power or the UN model law of the Justice in Matters involving Child Victims and Witnesses of Crime

key stakeholders when carrying on its mission. The Entity should not replace statutory systems and particular attention should be provided to the interplay between sport justice and the national justice systems, recognising that many abusers in sport use their power to exert improper influence over the criminal justice system.

**Recommendation 6:** The IFs should commit to a funding model that ensures the sustainability of the Entity year-on-year, considering the significant resources required to provide the high-quality services and support needed.

**Recommendation 7:** The IFs joining the Entity should be invited to do so only if they are willing and able to commit to supporting their national federations/member associations in building their domestic capacity to implement appropriate safeguarding policies and practices. IF's membership should also be contingent on a commitment to engage with global and regional efforts, for example working with the IOC and national authorities to map legal and policy frameworks at local and national level, as well reporting obligations, practices and procedures and victim support services (including legal aid providers)<sup>6</sup>.

### 3. REPORTING MECHANISMS OUTSIDE OF THE SAFE SPORT ENTITY

#### a. Reporting mechanisms at national level: key considerations

The experts agreed, that, ideally, cases would be properly and promptly managed at national level. This would require national federations to implement safeguarding policies and put in place the necessary reporting mechanisms so that violence can be remedied and incidents diligently managed at national level. It would also require cooperation with national authorities and service providers to ensure that sport applies the relevant legislation (concerning mandatory reporting, for instance), facilitates the work of statutory authorities and can refer victims and cases to the relevant trusted services.

In practice, however, the Group noted that many national federations struggle financially, and that many statutory authorities may not have the capacity, expertise and willingness to engage. Further, support services may be ill-equipped or non-existent. The Group discussed the potential role of the Entity in this context. There was no clear consensus regarding the Entity's possible role in the strengthening of reporting mechanisms at national level and the establishment of a data base to increase their visibility, accessibility and trust (in particular to victims). While all agreed that this would be beneficial, the Group was unable to agree whether this was (a) a priority for the Entity and (b) whether this work needed to be conducted by an independent body, as this could be appropriately conducted by IFs themselves.

There was consensus around the challenges in this work and that NF's certainly would benefit from assistance. However, no consensus was reached regarding the role of the Entity in this regard, especially when it remains unclear which additional IFs will join the Entity and noting the earlier recommendation regarding scope. Therefore, the Group could only agree that any IFs joining **must commit to building capacity** in their NFs so as not to unduly burden the Entity.

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<sup>6</sup> Prioritising high-risk geographies was also discussed, as well as what happens to victims and survivors who fall outside the scope of the entity's remit, but no consensus was reached in this regard.

## **b. Recommendations/key priorities**

**Recommendation 8:** The Entity should actively **encourage cooperation between the sport justice system and other criminal, civil or administrative justice systems at national and international level with the aim of strengthening the existing systems.** It is recommended to promote a set of guiding principles to make those systems work together in the interest of justice and duly protecting victims/survivors. While the Entity will have to focus on issues within the jurisdiction of partner sports, it should operate in a spirit of solidarity and seek to promote a culture of safe sport engaging with the whole sport community.

## **4. REPORTING TO THE SAFE SPORT ENTITY**

### **a. Establishing a safe and efficient triage system: key considerations**

The Group was mindful of the significant risks and challenges associated with reporting and referrals to organisations and mechanisms outside of the entity (including risks regarding the specific needs and vulnerabilities of children) but reached consensus that **the Entity should be able to receive reports directly from victims, survivors and their representatives as well as referrals from sports bodies.** It was stressed that all reports should be processed through a clear and efficient triage system and that the Entity should comply with existing reporting obligations to the relevant statutory authorities when in place and the measures required to ensure confidentiality, etc.

Again, concerns around the Entity's scope and resources featured prominently: to gain the trust and assert its credibility, the Entity must have and **maintain the capacity to provide a high quality service**, properly dealing with the communications received and engaging with victims/survivors in a trauma-informed way which is child and gender sensitive. The process for reporting into the entity, what kind of communications will be accepted (online platform, phone, email, and other approaches to whistleblowing) and ensuring that victims and survivors are aware of the reporting processes are of paramount importance. This has resource requirements implications in terms of staffing levels, practical deployment of staff, availability of expertise in several disciplines, knowledge of languages and context, capacity to work in different time zones and to urgently respond to crisis reporting.

There was no consensus on how to handle the challenges around reports pertaining to sports that had not submitted to the Entity's jurisdiction, because of the complications around referrals and triaging. In particular, the Group discussed how any referral of reports that did not fall within the scope of the Entity to external entities would have to be prefaced by extensive due diligence efforts to ensure the referred organisation was safe and fit-for-purpose. The Group also agreed that the Entity shouldn't open doors until it has a responsible answer to the question of what to do with reports that are outside the scope.

The experts expressed concern about the **risks attached to reporting.** Victims, witnesses and whistleblowers reporting cases may face risks ranging from harassment to actual, and sometimes fatal, physical violence. Encouraging reporting, in particular if there is a risk of the victim's identity being known, can expose victims to serious harm. The Group also noted that victims/whistle-blowers approaching sports reporting systems may not necessarily wish to become a party to a

process/investigation. Those reporting must have a clear idea of how the information will be used and how can they seek support if need be. A **trauma and risk informed approach** which is gender and child-sensitive should be deployed by the Entity, to support the victims and minimize the risk of secondary victimisation.

The provision of **care support at the point of contact with the Entity** was also discussed. The Group agreed that access to care and support should not be contingent on individual complainants having to prove that their case has evidential merit because care and support often needs to be provided before evidence can be safely gathered. Moreover, it may not be possible to safely determine whether a case is within the Entity's scope without care and support being provided and preliminary investigations carried out. The financial and other implications of such an approach must be carefully considered, as they may put at risk the Entity's sustainability.

The Group **did not have time to define 'adequate' standard of care**, or the "minimum viable product" in terms of victim care, especially given the widely varying conditions at national level. The Group considered whether a minimum/adequate standard could include reliable information on the services available in each region, in terms of legal aid, clinical care, and emergency logistical care. Consensus was reached that it should not refer to any external organisations or services unless due diligence had been conducted and adequate capacity had been determined.

The Group noted that victims/whistle-blowers may want to approach the Entity to report a situation without necessarily being ready to become a party to a process/investigation. This kind of report, even when done anonymously, may help the Entity to uncover a systemic failure and protect victims that otherwise would be exposed to important risks if their names were known. Those reporting to the Entity must have a clear idea of what the Entity will do with the information and how can they seek support if need be. Linked to this is the question of whether reports received can or should be shared with the concerned international federation. A **trauma and risk informed approach** which is gender and child-sensitive can help to maximise the Entity's capacity to support the victims and minimize the risk of secondary victimisation.

Most victims/survivors reporting cases are driven by the wish to improve systems, prevent further abuse and protect other potential or actual victims. The outcome of the Entity's reporting system must serve those purposes, which implies looking at **how the Entity's authority is going to be imposed or accepted** by the concerned IFs, for instance when requested to implement the recommended sanctions and measures.

The Group also noted that considerations/recommendations pertaining to reporting should dovetail with considerations/recommendations pertaining to investigations, and thus the two Expert Groups' recommendations should be considered side-by-side.

## **b. Recommendations/key priorities**

**Recommendation 9:** The Entity should be ready and able to receive reports directly from victims/survivors/whistleblowers and their representatives, as well as from sports bodies and as a measure of last resort. It must be able to respond in a safe, timely human rights-respecting and trauma-informed manner.

**Recommendation 10:** Greater clarity about the functioning of the reporting to the Entity system is required before more detailed recommendations can be made. This includes:

- a. Clarity about the Entity’s jurisdiction (sports and behaviours concerned, persons covered, possible statute of limitations...);
- b. clarity about the Entity’s obligations following applicable national and international law (in particular, possible obligation to report to/cooperate with statutory authorities);
- c. a clearly explained triage system (for instance, if priority is given to specific situations);
- d. how can persons safely approach the Entity and know their options (participate in an investigation, report anonymously, disengage...) and keep some control on the process;
- e. what kind of support the Entity can offer to the victims/survivors and other eligible persons (so that risks are assessed and expectations properly managed);
- f. for those cases for which the Entity has no jurisdiction, the possibility to refer to reliable support services/reporting mechanisms. Considerable quality assurance/due diligence is needed before onward referral to local reporting mechanisms/services.

**Recommendation 11:** The Entity should explicitly acknowledge and mitigate the significant risks associated with reporting. Mitigation includes, for example, abiding by the highest standards of **data protection and confidentiality** concerning the reporting persons, the victims and the circumstances of the case. It should mitigate any risk of leaks, in particular to the media and to individuals/sports bodies that are the subject of investigations (tipping off).

**Recommendation 12:** The Entity must determine, before opening its doors, what it **can and can’t offer itself in terms of care and support**, and consider and define what is meant by “adequate” care. The Entity should be able to offer care support at point of contact and criteria to do so should be defined.

**Recommendation 13:** The Entity should maintain (anonymised) records of cases that were reported but that fall outside of its jurisdiction for inclusion on its annual reports and further action if adequate/possible.

**Recommendation 14:** Membership of the Entity should require IFs to **commit to implement the sanctions and measures** recommended by the Entity. They should also take measures to guarantee that the national federations concerned take the recommended measures as well. The Entity should develop the **capacity to monitor the IFs commitments** when joining the Entity, including how recommended sanctions and measures have been implemented.<sup>7</sup>

**Recommendation 15:** The Entity should **publish an annual independent report** of the cases reported, referred and investigated, the profile of victims and perpetrators, the support provided, recommended sanctions and remedial measures, as well as whether the relevant IFs acted on those recommendations. This will serve to build transparency and trust and will also provide informative data and an effective legacy resource.

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<sup>7</sup> One IF expressed concerns about this recommendation as it could be an obstacle to some IFs joining the Entity. In this IF’s opinion, IFs should be encouraged, but not obliged to implement recommended sanctions.

## 5. ACCESS TO REMEDY

### a. Identifying priorities: key considerations

In discussing access to remedy, the Group acknowledged that defining “remedy” poses some challenges given that the entity can only recommend, and not enforce, sanctions. The Entity should be clear and transparent about the limitations of its powers in this regard. The Group furthermore noted that the interpretation of the “remedy” concept may differ from case to case and depend on the victim. For instance, remedies and reparations for children will very much relate to the individual child’s best interest, specific rights (such as the right to family life or to education) and needs (such as return to place of residence or child friendly counselling and support). Victims and survivors are not a homogenous group and thus will have different interests and priorities. In some cases a victim/survivor may want care and support as the “remedy” but is not seeking a disciplinary sanction or does not (yet) want an investigation. Clarity about the kind of remedy that the Entity can offer and/or recommend is also critical for this reason.

The Group noted that, in the **absence of an International Sport Code focusing on inter-personal violence**, it is left to the varying Codes and Rules adopted by the various IFs to establish jurisdiction, to define the prohibited behaviour and the applicable sanctions, and to establish the disciplinary procedure in case of breaches to the Code/Rules. As the Entity’s powers (to investigate a case and propose sanctions) would be delegated by the IFs, this could bring the Entity to apply different rules/propose different sanctions depending on the Sport concerned.

### b. Recommendations/key priorities

**Recommendation 16:** The Entity should be clear and transparent about the limitations of its powers in regard to sanctioning, and the limitations of what forms of remedy it can and can’t offer so that victims/survivors can make an informed decision (with the support of independent and confidential advice) about whether to engage with the Entity’s processes.

**Recommendation 17:** The IFs joining the Entity should commit to a proactive reflection and consultation process to agree how they may ensure access to remedies to the victims/survivors of an established breach of the Codes/rules both at national and international level.

**Recommendation 18:** The Entity should monitor compliance with this commitment and request that partner IFs have specific mandates to ensure that national federations fulfil their obligations and have set up and operate appropriate measures and mechanisms, implementing safeguarding policies that include appropriate and effective reporting procedures.

## 6. SUPPORT TO VICTIMS AND WITNESSES

### a. Identifying priorities: key considerations

From an opportunities and risks perspective, the Group considered how **victim support feeds into (a) effective remedy and (b) sports’ governing responsibilities**. The Group noted that without the



evidence of victims/survivors/whistleblowers, IFs cannot fulfil their duties. However, giving such evidence often risks further harm including the loss of sport.

Furthermore, consideration was given to what steps need to be taken to **establish a network of adequate service providers and trusted experts** and whether the Entity can accommodate contextual and geographical differences. The Entity should for instance be prepared to deal with cases where localised services are not available, and may require culturally-sensitive care support from outside of the local area. The Entity needs to be clear in relation to who is responsible for ongoing support, and indeed the wider support needs of family and dependents, providing **trauma-informed, child and gender-sensitive services**.

On a practical level, there is a need to understand the type of contractual relationships that will be put in place between the Entity and the local care and support providers. In particular, the capacity of the local provider needs to be taken into account, and its ability to mobilise at scale at short notice in order for the Entity to deliver its care support function and in cooperation with statutory authorities. It is irresponsible to refer to an organisation when it does not have adequate capacity. In view of time constraints, the Group could not answer to a number of questions, including how concretely the Entity could ensure due diligence when identifying service providers, what standards are providers held to and what kind of framework should be set up, and what should be the benchmarks for a package of care.

The Group also agreed on the importance of the Entity defining its commitment **to engage with survivors globally** to learn lessons about existing failings in the system and how the centralising of survivor voices can be maintained as a priority of the Entity.

## **b. Recommendations/key priorities**

**Recommendation 19:** Care and support should be available at the point of reporting, and not only to those who have agreed to engage with an investigation, or whose evidence is of material value.

**Recommendation 20:** The Entity should **establish a network of adequate service providers and trusted experts** and accommodate contextual and geographical differences. The Entity should only refer where it is confident that capacity exists in those local partners.

**Recommendation 21:** The Entity should be willing and able to deal with cases where localised services are not available and may require culturally-sensitive care support from outside of the local area.

**Recommendation 22:** The Entity needs to be clear in relation to who is responsible for ongoing support, and indeed the wider support needs of family and dependents, providing **trauma-informed, child and gender-sensitive services**.

**Recommendation 23:** Support to victims and witnesses must be trauma-informed, gender and child-sensitive. It must address the specific needs of persons in vulnerable situations and must be provided in a way that minimizes risks of secondary victimisation. **Benchmarks for package of care should be established** taking into account victims' needs, other stakeholders' responsibilities and the importance of ensuring the Entity's sustainability.

**Recommendation 24:** When developing its capacity to support victims, the Entity should engage with key stakeholders and establish partnerships to benefit from work carried by others and to augment it and complement it.

## 7. POINTS OF TENSION

During the discussions, several areas emerged for which the Group couldn't reach consensus. These are the following:

- **Role of the Entity in mapping** jurisdiction issues, applicable laws (in particular reporting obligations and mechanisms), services and resources available at national level. While most experts agreed on the importance on having this information, there was no consensus about whether this should be a priority for the Entity. The Group agreed that this information would be beneficial to efficiently cooperate with the relevant national authorities and to safely refer victims/survivors to available services, but there was no consensus on whether this should fall within the scope of the Entity, versus this being the responsibility of IFs and NFs. In light of the fact that the Group had no indication of the resources to be made available to the Entity, it was not possible to determine whether such mapping should be prioritised over the functions where there was consensus. Following the announcement by the IOC of their intention to support this kind of mapping at national level, a possibility would be to recommend the Entity to cooperate with the IOC in this respect.
- **Prioritising high-risk geographies.** Linked to the issue above, the experts also discussed the possibility to recommend prioritising countries or contexts, in particular where the access to justice and services is very limited or non-existent. No consensus was reached on this point.
- **Out of scope cases.** The Group couldn't agree on what the Entity should or could do when approached by victims/ survivors who fall outside the scope of the Entity's remit, in particular in cases where the IFs had not submitted to the Entity's jurisdiction and/or there was no safe or effective referral route to alternative remedy mechanisms.
- **Commitment to implement recommended sanctions and measures:** Most experts agreed that commitment to implement the recommended sanctions and measures was needed for the Entity to be credible and the system trusted. One IF expressed concerns as IFs may find it challenging to accept this and such a requirement could deter IFs from joining.

**ANNEX I**  
**NEEDS/GAPS, OPPORTUNITIES AND RISKS**

**I. REPORTING MECHANISMS**

**Creating a database: needs/gaps, risks and opportunities**

<b>Needs/Gaps</b>	<ul style="list-style-type: none"><li>• Provide safe, trauma-informed and survivor-centred reporting route while ensuring that the survivors have control over the reporting process</li><li>• More reporting options should be considered (online format, via direct phone communication, email, and whistleblowing)</li><li>• International Federations (IFs) need to be aware of reports, in their sport, received by the Entity unless allegations reveal a conflict of interest, or the informant requests non-disclosure/anonymity</li><li>• Triage/screening of reports needs to be consistent with thresholds that the Entity will investigate or refer out to Statutory Authorities, or back to IFs/NAs</li><li>• Practical deployment of staff, languages, time zones, and urgent response to crisis reporting are required</li><li>• Mapping of all reporting mechanisms should be in place and support/guidance available, with clear distinction between helplines, and formal reporting procedures</li><li>• Access to quality legal aid should be ensured and a network of providers at national level established</li><li>• Reporting mechanisms that are internal for sport associations must be aligned with and work alongside statutory mechanisms and procedures, especially for acts that are crimes and are prosecuted under national laws</li><li>• Develop and disseminate information and material (also in web, social media, flyers, posters, in person events, public awareness campaigns, etc), addressing athletes and parents, and sport personnel, on the forms of violence in sport, what type of behaviours are not allowed, where and how to seek further advice and share concerns, where and how to report, and what are the steps and possible outcomes of reporting procedures, how reporting persons will be protected and supported, etc.</li></ul>
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<b>Risks</b>	<ul style="list-style-type: none"> <li>• The entity refers people to inadequate reporting mechanisms that increases their risk and vulnerability</li> <li>• If the entity creates parallel procedures and mechanisms that are not aligned with national mechanisms and procedures, and is not working closely with competent authorities with the aim to enhance their capacity, it can: <ol style="list-style-type: none"> <li>1. Undermine access to justice for victims (if criminal justice/competent authorities are not engaged)</li> <li>2. Provide an alibi to national sport federations and national competent authorities and “allow” them to step back their efforts, instead of taking up their accountability and responsibility to act, by simply referring all cases to the entity, that in long term will not be able to deliver and will also undermine national protection systems.</li> </ol> </li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Is there an opportunity to work with organizations such as Child Helpline International to develop a quality assurance framework?</li> <li>• SSE could elaborate guidance on the relationship of investigations by sports associations and by the SSE on the one hand, and domestic legal proceedings (criminal, civil, administrative) on the other hand. Guiding principles include maximizing access to effective remedies and removing the burdens from victims/survivors</li> <li>• Invest in prevention and to this end help to ensure that sports associations develop enforceable standards of practice and behaviour or codes of conduct that promote gender equality, empower, also through sport-based interventions, child and young athletes, raise awareness on rights of athletes (including child and women rights), etc</li> <li>• Take measures, and communicate those to athletes/potential victims, to ensure that reporting will not have a negative impact on the professional careers of the athletes and to help prevent retaliation that can include exclusion from games, blocking of contracts, sponsorships, etc.</li> </ul>

## II. REPORTING TO THE SAFE SPORT ENTITY

### Triage system - Needs/gaps, risks and opportunities

<b>Needs/Gaps</b>	The entity must find ways to ensure that its creation is not used by national and international federations as an excuse to abdicate responsibility for this work
<b>Risks</b>	<ul style="list-style-type: none"> <li>• Greatest risk is that the scope is ill-defined and the entity is overwhelmed and fails</li> </ul>

	<ul style="list-style-type: none"> <li>• Becoming aware of cases that fall outside of scope with nowhere to refer them</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Develop national and regional responses, roles based on local needs and capacities; perhaps setting criteria for priority areas where there is a clear lack of local capacity to provide a response; in this case to be effective the objective should be not only to address cases of abuse but to build local capacity of competent authorities and sport organizations to prevent and address such cases?</li> <li>• The Entity is given a status recognized internationally which empowers it not only to investigate but also to gather and disseminate intelligence across international sport that prevents harm</li> <li>• IFs/NGBs report 'low level' concerns / local investigations / sanctions / suspensions to the Entity, this may help others to carry out authorized checks through the Entity.</li> <li>• Standardisation of training and sanctioning criteria</li> </ul>

### III. ACCESS TO REMEDY

**Access to remedy: needs/gaps, risks and opportunities**

<b>Needs/Gaps</b>	<ul style="list-style-type: none"> <li>• Clarity on the scope of the entity to either recommend or issue sanctions. Is it a sanction making body? Do IFs have to comply with these sanctions or recommendations? How are these sanctions aligned/ linked to criminal justice proceedings and court decisions?</li> </ul>
<b>Risks</b>	<ul style="list-style-type: none"> <li>• Judicially or Sports regulatory the case cannot be pursued to remedy</li> <li>• Accused person faces no sanction or safeguards and returns to sport where victim continues participation</li> <li>• Sports remedy maybe higher priority for the victim but cannot be reached due to protracted investigation or criminal process</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Opportunity for engagement with survivors globally on what is wrong with current systems and how these can be improved is unprecedented</li> <li>• Opportunity for the entity to refer cases to national authorities/jurisdictions and regularly follow-up (potentially supporting due diligence and effective legal remedies)</li> </ul>

	<ul style="list-style-type: none"> <li>• Victims can have a voice from the outset when they report.</li> </ul>
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#### IV. SUPPORT TO VICTIMS AND WITNESSES

##### Victim support: needs/gaps, risks and opportunities

<b>Needs/Gaps</b>	<ul style="list-style-type: none"> <li>▪ Defining the nature, scope and quality of the care and support that the entity will offer</li> <li>▪ There will be limits to what the entity can provide at a local level from a central position as well as in terms of the resources available to the entity for initial support</li> <li>▪ Consideration of language, culture and legislation. In some geographies there will be no obvious locally available care and support. In others, support is locally dependent on resources and impacted by cultural norms</li> <li>▪ Navigating the wider impact and support requirements – victim, family, witnesses, etc. as well as who is responsible for ongoing support (IF/NGB/Entity/statutory authorities/local services)</li> </ul>
<b>Risks</b>	<ul style="list-style-type: none"> <li>▪ Limited local capacity and lack of adequate local care and support organizations that meet quality assurance criteria, limited ability in certain contexts to provide a rapid and adequate response and ensure proper monitoring and evaluation.</li> <li>▪ Risk of raising expectations around level of support that can be provided or unable or fail to provide adequate support and protection to victims, or endanger victims and their families.</li> <li>▪ Failure to ensure that reporting will not have a negative impact on the professional careers of the athletes, and to help prevent retaliation that can include exclusion from games, blocking of contracts, sponsorships, etc</li> <li>▪ The risk is losing credibility by not being active enough or providing timely communication updates to victims, families &amp; witnesses. Lack of communication between departments of the entity</li> <li>▪ Victim support overlooked by investigations team, and any counselling may damage investigation process if not coordinated. Victim/witness interference may undermine the investigation process. Managing risk to victim and wider sport community from initial stages</li> </ul>

<b>Opportunities</b>	<ul style="list-style-type: none"> <li>▪ To create a ‘best practice’ system that fully supports victims from reporting through to remedy by providing the resources and flexibility to adapt to each case</li> <li>▪ Set up networks of individual experts and service providers, selection process should be based on clear criteria, professionals’ requirements, and screening. Explore possible use/ linkages/ or build on experience related to UN trust funds such as the United Nations Voluntary Trust Fund for Victims of Trafficking, administered by UNODC that includes a network of service providers on victims support, mainly CSOs that fulfil certain criteria and have undergone screening and are supported through training and funding</li> <li>▪ Consider establishing regional teams and a pool of experts since the needs, capacities and resources vary significantly between regions and countries; this approach can also ensure better understanding of local, national, regional social norms and culture but also national laws, actors, and procedures</li> <li>▪ Consider developing and delivering induction training modules for staff and experts engaged and regular/ongoing specialized training, ideally in person and, when possible, joint training with staff from competent national authorities and sport federations to build sustainable local capacity.</li> </ul>
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## **ANNEX II: ASAG FEEDBACK ON CARE SUPPORT**

### **CARE & SUPPORT Top Level Comments:**

- The ASAG endorses the victim/survivor/whistleblower care and support focus of the revised \*theory of change. This component is critical and must be included in whatever scope the entity undertakes, as no investigatory function can be compliant with the “do no harm” principle unless victim/survivor/whistleblower trauma-informed care and support is in place.
- The ASAG recommends lifelong care and support be made available to athlete survivors and whistleblowers.
- Mapping: The ASAG had a difficult time commenting on mapping b/c it was not yet clear on exactly what that may look like. Having a clear understanding on the vision of mapping would be helpful for them to weigh in beyond how they already have. Those concerned with mapping as they understood it were the resources and time taken from direct survivor care and support, especially when mapping has already been conducted, and continues to be, by trusted organizations.
- Funding level is critical when it comes to care and support.
- Firewall/outside organization is needed to offer care and support athlete survivors/whistleblowers and identify exactly what that looks like, how long it lasts, etc.

- Importance of being transparent on the level of services and support, and the qualifications for such support.
- Importance of evaluation tools—support for evaluation tools that provides insight into the latest evidence on effective care.
- Continue to center the voices of survivors and athlete-survivors throughout the creation of the Entity, especially when evaluating and enhancing the care and support division of the Entity. This can look like a continued resources ASAG mechanism, survey feedback, interviews, listening sessions, and other forms of survivor outreach.
- Needed ASAG voice and feedback in the Care and Support Expert Group and for all expert groups and subject matters. Only one survivor was asked to participate in one expert group.
- Survivor compensation: Right to compensation for the destruction of their career for making a report/participating in an investigation about abuse in sports.
- What form of redress and reparation will be made available for survivors?
- Clear articulation of what care and support can offer and what cannot be offered—necessary for trust building and setting appropriate expectations for those involved.
- Need for the cross connection of baseline principles within care and support, human rights principles.
  - Harmonisation of baseline principles required in all reporting systems across the world.
  - Need to ascertain what care and support services already exist to avoid duplication.



## TOWARDS AN INTERNATIONAL SAFE SPORT ENTITY

### EXPERT GROUP ON INTELLIGENCE AND INVESTIGATIONS

#### REPORT

24 March 2023

#### Mandate

The Expert Groups will support the work of the Interim Steering Group (ISG) by:

1. Identifying the high-level specialised needs, opportunities, and risks around key issues.
2. Identifying key priorities for implementation prior to the entity's establishment.
3. Presenting analysis of the issue(s) at stake with recommendations on implementation.

The expert group on Intelligence and Investigation's mandate was to consider the key Intelligence and Investigations services and operational requirements of the new safe sport entity. It was to:

1. Identify and recommend criteria, methodology and risks for developing a **Global Network of Investigations personnel** composed of trusted, trauma-informed investigators, analysts, and other skilled experts in each region, and where possible each country, including developing reliable recruitment and vetting procedures.
2. Identify and recommend key strategic requirements, parameters, and criteria for **conducting investigations** in varied operational scenarios, environments and jurisdictions; for developing and managing a **Case Triage System**; and, for developing an Intelligence and Investigation **Case Management System**.
3. Identify the **training requirements and standard operating procedures** for I&I persons working in any capacity on behalf of the new safe sport entity.
4. Consider and recommend key partners and service providers to assist in the development of **national safeguarding multi-sport, multi-stakeholder frameworks** in each country (including sports organisations, public authorities (such as law enforcement, child protection and social services), professional networks, expert NGOs, etc.

#### Working Methods

The Expert Group designated Peter Nicholson as team leader, met three times, considered a number of guiding questions and agreed on the final report on 24 March 2023.

### Composition

Expert Group members were appointed based on their individual and combined expertise as well as their capacity to help deliver their Group’s respective mandate.

<b>INTELLIGENCE AND INVESTIGATIONS</b>		
	<b>NAME</b>	<b>TITLE</b>
1	Georgia DIMITROPOULOU Sven PFEIFFER (back-up)	Crime Prevention and Criminal Justice Officer, United Nations Office on Drugs and Crime (UNODC) Crime Prevention and Criminal Justice Officer (UNODC)
2	Penny HART	Retired Canadian Law Enforcement officer with investigation and interviewing expertise, including trauma-informed approaches
3	Greg MCKENNA	Head of Biathlon Integrity Unit, International Biathlon Union (IBU)
4	Alex MCLIN	Director, Gymnastics Ethics Foundation; Attorney and CAS Arbitrator; Former CEO, International Federation of Equestrian Sports (FEI)
5	Petya NESTOROVA	Executive Secretary of the Council of Europe Convention on action against trafficking in human beings
6	Peter NICHOLSON	Head of Intelligence and Investigations at the Athletics Integrity Unit, Ethics Officer for the International Cricket Council (ICC)
7	Carlos SCHNEIDER	Director Judicial Bodies, FIFA
8	Valdecy URQUIZA	Commissioner at the Brazilian Federal Police
9	Roy VERMEER	Legal Director, FIFPRO
10	Arthur WHITEHEAD	International Liaison Officer, UK Liaison Bureau, UK National Crime Agency

### INTRODUCTION

The group agreed that, in view of the difficulties that International Sport Federations (hereafter, IFs) are facing when managing interpersonal violence cases under their jurisdiction, the Entity’s core function should be the provision of an intelligence and investigation service, as this was a gap that no other Organisation was in a position to fill. While the creation of integrity units in many sports was to be welcomed, the experts noted that systems designed to deal with anti-corruption, doping or competitions manipulations faced challenges when confronted with inter-personal violence cases and with more general human rights issues and often lacking the knowledge, expertise and processes / mechanisms to respond effectively. In particular, sport bodies need to improve the way in which they safeguard and protect their athletes, and also engage with victim/survivors, particularly in providing them with the necessary protection and support. The entity should therefore have promoting access to justice and providing support to victims as part of its mission.

The members highlighted the difficulties of making recommendations while some important parameters were still unknown: the expected budget of the Entity, its scope, and how sports would use it (eg: by delegating investigations to the Entity for all cases, or only on a case-by-case basis, or for intelligence sharing or for training). They also saw many links with the other expert groups’ mandates.

Work was approached under the assumption that the Entity would focus mainly on Investigation of cases that would fall within the jurisdiction of IFs, with funding sports delegating this power to the Entity and committing to apply the proposed sanctions and measures. Following the group's mandate, and in view of the time constraints, the members decided to focus on high level recommendations, while acknowledging that an in-depth identification of the various critical organisational elements was needed to quickly establish a 'best-practices' Investigations capability.

This report presents the key issues considered, the conclusions reached and a number of recommendations. It also includes a number of open questions or issues raised that either were not discussed or for which agreement could not be reached.

## II. INTELLIGENCE AND INVESTIGATIONS

### A. Intervening in cases: key considerations

It is critical for the Entity to establish a triage system with capacity, breadth and depth to manage the anticipated flow of information and complaints, to identify from the incoming flow those that will be cases, and those that would not fall within the jurisdiction of the entity. An effective system for ensuring that non-jurisdictional matters are passed on to other appropriate entities is a key requirement of the triage system.

Experts also raised the importance of adopting specific measures to ensure adequate protection and support of child victims and witnesses in the intelligence and investigations following relevant international standards<sup>8</sup>.

Clear criteria for the Triage System assessments are needed, although there should be some flexibility in applicability. Some analysis and investigation work may be needed before the Entity accepts jurisdiction for a case. Some criteria may allow an immediate conclusion that a case is not within the Entity's jurisdiction (eg: if it concerns a sport which has not delegated this power to the Entity), and other criteria (eg: jurisdiction, gravity, scale, violations, victims age, impact, statutory authorities' position) may need investigation before concluding whether it's within the Entity's remit. Linked to this, "politically-motivated" cases will require identification and management, while avoiding wrongful assumptions on the likelihood of false allegations, ensuring swift and proper investigation of all reported cases and setting up procedural safeguards for alleged offenders. A particularly important consideration will be to take into account victims' needs and risks in all assessments.

International Sport Federations have different approaches to jurisdiction, different definitions of violence, different powers of investigation, and the severity of sanctions foreseen for the same offence may vary. This represents a complication for the Entity, as it will have managed expectations of victims and perpetrators, depending on the sport they are involved in. A need for harmonisation may emerge, and international human rights and OIC standards should guide this effort.

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<sup>8</sup> Such as the UN model law of the Justice in Matters involving Child Victims and Witnesses of Crime

As most International Federations use Court of Arbitration for Sport (CAS) arbitrage system, the Entity must ensure cases are developed to the appropriate legal standards and that the means and methods of evidence collection satisfy the elements of the violations alleged. As part of that approach, managing witnesses' and victim/survivors' testimony must be in accordance with 'best-practice' legal and trauma-informed procedures and practices.

Ordinarily, cases should be best handled at national level, by trained, trauma-informed experts who understand the language and know the country, its legal framework and the support services available. IFs joining the Entity must commit to strengthen their national federations' capacity to effectively manage the cases respecting all relevant national and international standards.

The Entity must have mechanisms and approaches to deal with cases a) in countries with poor rule of law, high levels of risk, and a lack of support available to the victims, and/or b) where a country and/or national federation may be unwilling or unable to conduct investigations, e.g. when the leadership of the national federation is allegedly involved in the abuse, or favoured, protected federation members or others.

## **B. Intervening in cases: Recommendations**

- 1) The Entity's core focus should be the investigation of cases within the jurisdiction of the IFs that have delegated this power to the Entity. The Entity should also aim at supporting the victims coming forward and to ensure that all its operations are victim-sensitive and trauma-informed.
- 2) The Entity's governance should guarantee the independence of its investigatory functions, with a firewall protecting them from any undue interference.
- 3) Sports delegating investigations to the Entity should commit to implement safeguarding policies, to strengthen prevention measures, and enhance their capacity to deal with failures of safeguarding at national level, including by mapping applicable legislation, reporting and victim support systems and trauma-informed experts and investigators with context and language knowledge.
- 4) The Entity should operate within the applicable national legal framework and seek to cooperate with the relevant national statutory authorities. It should:
  - a. Elaborate guidance on the co-existence of the sports regulatory frameworks and the national legal codes and criminal justice system;
  - b. Develop and work to risk assessments (eg: for the security and safety of the victim/survivors and for their involvement and empowerment);
  - c. Develop information-sharing protocols or procedures so that necessary information is shared, where appropriate, safely and confidentially with relevant authorities (e.g. national criminal justice institutions), particularly where national investigations and

prosecutions, risk management and coordinated safety and support to victims/survivors are required.

- 5) The Entity should also operate according to international human rights and other relevant standards. It must ensure cases are developed to the appropriate national and international legal standards and that the means and methods of evidence collection satisfy the elements of the violations alleged. As part of that approach, managing whistleblower, witnesses and victim/survivors testimony must be in accordance with 'best-practice' legal and trauma-informed procedures and practices and develop. Specific measures should be taken to address the needs and rights of child victims.
- 6) Some harmonisation of the applicable rules in each IF is recommended to avoid divergence in the interpretations of key concepts (such as the definition of violence) and in the application of sanctions.
- 7) A triage system should be put in place. Establishing the Entity's jurisdiction over a case may sometimes require preliminary investigations. The criteria may evolve with the time and a narrow scope is recommended at the beginning. Once the triage team has made an assessment on whether the Entity has jurisdiction, a senior Committee should review the assessment and decide. For cases that the Entity cannot investigate, the triage team will engage with the submitter for possible referral.
- 8) The Entity should have the capacity to investigate the cases. A forecast of the amount of cases and their cost could be prepared taking as a reference the situation in the concerned sports today. Resources should be secured to sustain the efforts for a minimum of years.
- 9) To build trust and credibility, it is imperative to work with a diverse group of highly qualified experts trained in trauma-informed investigations, case development and victims/survivor engagement, applying protocols that reduce the risk of secondary victimization and re-victimization.
- 10) Information, evidence, intelligence and data collected during the investigation should aim at establishing the facts of the matters/cases, and also documenting any possible failures in the safeguarding, reporting and other systems, so that measures to address those failures can be proposed.
- 11) The Entity's mission should also include some form of supervision, and/or monitoring and evaluation of commitments made by IFs when joining the Entity and the implementation of the measures taken by an organisation relating to the entity's recommendations.
- 12) Some degree of transparency is needed to build trust and maintain the credibility of the Entity and its role towards accountability. An annual report should contain information about the type and amount of cases, the profile of victims and perpetrators, how the

Entity handled them, their outcome and follow-up, together with other forms of reporting associated with the entity's work, including its funding.

## C. ESTABLISHING A GLOBAL NETWORK OF INVESTIGATORS

### A. Criteria and methodology: key considerations

To perform its mission, the Entity must be able to count on a strong and diverse network of vetted experts with complementary expertise on investigation, intelligence and analysis techniques, gender issues, child protection, trauma, law, sports and other relevant disciplines. Due to the unpredictability of the cases which may arise in any country and at any time, it is important to establish a system that guarantees an easy and quick access to expertise. These experts must be more than a pool of individuals operating in isolation where possible; they must also be able to work within interdisciplinary teams, count on others' support and advice and actively contribute to knowledge building.

### B. Recommendations

- 13) The Entity's "permanent" Investigation's team must be supported by a pool of vetted experts from various disciplines (including child protection, gender issues, legal and health professionals) and sport-specific expertise. Diversity in gender, nationality, regions of the world represented, and linguistic skills should also guide the composition of the pool.
- 14) Experts should have certified training on trauma-informed investigations which includes:
  - a. knowledge on causes, forms and dynamics of violence in the context of sports, in particular gender-based violence and violence against children, symptoms of trauma as well as its impact on a person's ability to safely and effectively engage with an investigation;
  - b. ability to assess and manage the impact that investigations may have on a person's trauma, on a case-by-case basis and being in a position to refer the person to support services;
  - c. ability to adapt techniques and times to the survivor/victim needs, being transparent and realistic in advance of the limitations of what can be achieved; protecting confidentiality and allowing the informant to keep control over the information shared (unless a legal requirement imposes reporting).
- 15) IFs and their national federations should help identify experts with the required qualifications, which could be done in partnership with reliable organisations and institutions.

- 16) A robust vetting process should be put in place. Criteria should include a certified training with elements to be determined. Clear guidance to avoid actual or perceived conflicts of interest should also be provided. Compliance with requirements should be regularly monitored.
- 17) Consideration should be given to establishing a “rapid response roster”, maybe with experts on a retainer basis.
- 18) The pool of experts should be facilitated by a staff member and information shared through a protected electronic platform. Regular meetings should be organised for sharing of best practices and lessons learned.

### III. SAFE RECRUITMENT AND VETTING PROCEDURES

#### A. Key considerations

Currently, there are few vetting options that exist to establish before recruiting a person, whether he/she has been found guilty and sanctioned (by sport) or sentenced (by a national authority) in a case of violence inflicted to another person, or for another relevant crime. Similarly, access to relevant on-line arenas that are cause for concern is not often in the open-source domain. At a national level, some countries deliver “good conduct certificates” or allow recruiters’ access to criminal records. Some countries extend this possibility to all kinds of offences and others limit it to some offences (such as sexual violence) or to recruitment in some professions (such as education or security-related jobs).

In some countries, this form of vetting is an obligation in the recruitment of persons in contact with children. Although more and more countries are extending vetting to recruitment of staff and volunteers working with children, the current situation does not allow sport to rely on such systems in many countries. Typically, a recruiter in country A would check records in country A, but not elsewhere. Even more difficult is to access to records on sanctions imposed by disciplinary sport bodies.

Most organizations use the services of commercial companies for ‘background’ checks. While some such companies claim to run criminal convictions checks, that likely only extends to open sex-offender registries and open-source research. A number of initiatives and programmes have been launched to address this issue in sports (such as INTERPOL Soteria Project), but also in the humanitarian sector.

#### B. Recommendations

Safe recruitment and vetting procedures should be part of the Entity’s and the partner IF’s safeguarding policies. To help to promote safe recruitment and sound vetting procedures, the Entity should:

- 19) Identify and use where possible criminal record systems in selected countries;
- 20) Identify and use national vetting capacity in reliable countries;

- 21) Identify commercial vetting providers for best-practice services;
- 22) Require proof of vetting from staff where it has been relevant to previous work;
- 23) Require 'good conduct certificates' and 'working with children certificates';
- 24) Deliver (virtual or physical) training to relevant staff;
- 25) Undertake some basic due diligence (OSINT/Interview/CV checks);
- 26) Require signed declarations of staff and those representing the Entity;
- 27) Use of specialists to support recruitment;
- 28) Explore cooperation across sports concerning sanctions in the context of disciplinary procedures;
- 29) Engage with EUROPOL, INTERPOL, others to share intelligence for integrity checks.

## CONCLUSIONS

The group stressed the need to start as soon as possible in the establishment of the I&I function, especially in the development and sustaining of a global network of vetted and trained experts that can be quickly mobilised. Protecting the independence of a best-practices intelligence and investigation capability is key, as is having the capacity to manage a variable influx of cases through the creation of a Case Triage Management System with a series of criteria for its effective assessment of the cases and matters. Investigations will focus on evidence collection for case development, and in any failures in the system so that recommendations can be made for sanctions and measures to remedy the failures. IFs should commit to applying the recommended measures.

IFs joining the Entity should commit to stronger safeguarding policies, and require the strengthening of the National federations' systems, particularly in effective dealing with complaints and dealing with victims in a trauma-informed way. Ensuring co-operation with the relevant national statutory authorities is necessary because of the criminal behaviour often being evident. For transparency, the Entity should communicate at least once a year on the cases handled, their outcome and the follow up provided to recommendations, but with due regard to the victim/survivor interest and data protection issues. The Entity should also engage with sports and relevant national and international stakeholders to ensure safe recruitment and vetting of those working within, or with the Entity.



## TOWARDS AN INTERNATIONAL SAFE SPORT ENTITY

### EXPERT GROUP ON FUNDING, PARTNERSHIPS AND SERVICE PROVIDERS

#### REPORT

24 March 2023

#### MANDATE OF EXPERT GROUP

To consider potential funding streams, and key partnership opportunities for the new safe sport entity.

1. Propose at least two funding models to support the new entity and its various work streams (beyond the initial seed funding being pledged by FIFA) by the partner International Sports Federations (IFs) (e.g. annual solidarity fees, case-by-case fees, etc.), by philanthropists, by funding bodies, by sponsors, etc.
2. Partnerships and Implementing Partners:
  - a. Identify opportunities to promote partnerships between sports, governments, and other stakeholders at international level to build the capacity needed to prevent and respond to violence and to promote accountability.
  - b. Recommend key criteria and partnership/service provider framework requirements for sports, governmental entities, multilateral organisations, civil society, academic institutions, individual experts, media, private companies, etc.

#### Composition:

<b>FUNDING, PARTNERSHIPS AND SERVICE PROVIDERS</b>		
	<b>NAME</b>	<b>TITLE</b>
1	Joyce COOK	Senior Advisor to the President's Office (Safe Sport Entity), FIFA
2	Camila GARCIA	Vice-President, FIFPRO; Director and Founder of Chilean Women Players Association
3	Mike HARTILL	Professor of the Sociology of Sport, Edge Hill University, Centre for Child Protection & Safeguarding in Sport (CPSS)
4	Sophie KWASNY Francine HETHERINGTON-RAVENEY (back-up)	Executive Secretary of the European Partial Agreement on Sport (EPAS) Deputy Executive Secretary of the European Partial Agreement on Sport (EPAS)
5	Joseph STROUD (In Good Faith Foundation)	Chief Operating Officer, In Good Faith Foundation
6	Dorothy ROZGA	Independent Expert on the Rights of the Child

## WORKING METHODS

Members of the Expert Group were Joyce Cook, Camila Garcia, Mike Hartill, Sophie Kwasny, Dorothy Rozga and Joseph Stroud. Co-Team Leaders of the Group were Mike Hartill and Dorothy Rozga. Technical and logistical support were provided by Elda Moreno and Mary O'Brien of SSE's Interim Secretariat.

Two broad questions oriented the discussion:

1. What funding opportunities and mechanisms should be explored to acknowledge both the differing resources available to the founding and future partner sports (IFs), and the Entity's contribution to the protection of human rights?
2. How can the Entity meaningfully and safely engage with service providers and other partners to create synergies and multiply impact?

The Group met online four times: a general discussion on 1<sup>st</sup> February; a meeting on funding on 17<sup>th</sup> February; a meeting on partnership on 24<sup>th</sup> February; and a review meeting on 20<sup>th</sup> March. A Discussion Paper, as well as a Table with input from members on the two questions mentioned above guided the meetings on the 17<sup>th</sup> and 24<sup>th</sup>.

In preparing this report, the Expert Group on Funding, Partnerships and Service Providers was guided by:

- the 23<sup>rd</sup> January 2023 Concept Note the Global SSE with proposes the establishment of an independent, trusted, impartial and specialist international organisation with a mission "*to ensure safe sport for all by promoting the prevention of violence, protecting and supporting victims/survivors of abuse in sport, and by fighting impunity*";
- the 27<sup>th</sup> February version of the Global SSE Theory of Change, which defines the entity's interventions in four broad areas: promotion of standards and policies; capacity building related to investigations and victim/survivor support; joint actions through the promotion of multi-stakeholder cooperation; and the creation of a global body to investigate cases and recommend sanctions, and remedial measures.
- the proposal made during the 21<sup>st</sup> February meeting of the Interim Steering Committee that "*the case investigations and victim support should be the primary focus of the entity, and the other services above the firewall should only be relevant insofar as they are necessary for the purpose of these two functions.*"

In addressing its mandate, the Expert Group took note of the current position in a range of critical elements:

- 1 International federation (FIFA) has pledged seed funding to set up the entity and in-kind services (e.g., IT infrastructure and security) with office premises offered by a potential host country;
- 1 International federation (IF) has so far confirmed its intention to join FIFA as a founding sport and to share associated running costs;
- The other 5 IFs involved (members of the Interim Steering Group) have advised that they would mostly likely join as 'associated sports' based on an annual and case-by-case fees to access to the specialist services of the entity;
- The position of the IOC in relation to the proposed SSE is undefined;

- The scale of service provision is global and has not been quantified, however, it is understood that the services provided, particularly those of investigation and arbitration, will *only* be undertaken on behalf of IFs as a measure of last resort;
- The entity will be registered in May 2023 with ‘doors open’ at the end of 2023.

This Report is split into two sections, *Funding* and *Partnerships*. However, it is recognised there are overlaps between these areas.

## I. FUNDING

### Key criteria

- Must be sustainable
- Must be consistent with organizational values, mission, and policies

### Anticipated annual operating costs

There is no direct equivalent but WADA and the US Center for Safe Sport provide potential comparators:

[WADA Annual Report](#) (2021: employed 153 people of 59 nationalities)

Revenue: \$42.2m (IOC \$19.1m, Public Authorities \$20.4m)

Expenditure: \$38.5m (\$20m salaries/personnel)

[US Center for Safe Sport Annual Report](#) (2021) (90 staff)

2021: 3708 reports, 2868 resolved

Revenue: \$24.5m (82% USOPC, 13.6% grants, 4.4% fees for service, 0.5% other)

Expenditure: \$21.4m (49% Response & Resolution (has exclusive jurisdiction), 22% General & Admin., 22% Education & Outreach, 6% Audit & Compliance, 0.6% Fundraising)

### Potential funding/income types

1. Payment for services
2. Grants to cover core operational and programme costs
3. In-kind support

### Potential services provided by SSE

1. **Universal services**
  - a. Online resources
2. **Bespoke priority services**
  - a. Investigation and arbitration
  - b. Victim/Survivor support
3. **Other bespoke services**
  - a. Specialist advice
  - b. Risk assessment/evaluation
  - c. Training/Capacity Development

### Service access options for IFs

1. **Annual membership**
  - a. provides immediate access to suite of services
  - b. case-by-case costing for investigations

## 2. Ad hoc access

- a. services costed according to need

## Potential Sources of Funding and Support

### 1. Primary sources:

- a. International Federations of sport (IFs)
- b. International Olympic Committee (undefined at this time)

It is anticipated that initially, IFs will finance all operational and programmatic costs, including specialist advice, risk assessments and evaluations, triage system, case management, victim/survivor care support, training/capacity development, investigations, and arbitration.

### 2. Secondary sources:

- a. National Governments (Note: in addition to financial support, in-kind support may be given, e.g. hosting the Office of the SSE, convening/hosting conferences)
- b. Inter-governmental regional entities that have some responsibility for sport, such as:
  - i. regional bodies: EU, CoE, European Partial Agreement on Sport (EPAS), African Union Sports Council
  - ii. NGOs: [ENGSO \(ENGSO Youth\)](#),  
(Note: in addition to financial support, in-kind support may be given, e.g. hosting the Office of the SSE, convening/hosting conferences)
- c. Foundations/Philanthropists with interest in sport  
*Examples: Nike Foundation; DICK'S Sporting Goods Foundation; Oak Foundation* which has Child Sexual Abuse as one of its major areas of support with some focus on [sport](#); [Rieschel's recent donation of \\$10](#) million to USOPC's mental health programme;
- d. High net worth athletes  
Some wealthy athletes have given large sums to charities or have their own foundations. Note that their support is mostly related to children. (See examples here: [list one](#), [list two](#))
- e. Sponsors and the corporate sector (unlikely in the immediate term)

Criteria will need to be established and due diligence taken before funding is accepted from a donor. While some criteria would be common to all donors, such as adherence to human and child rights principles and standards, others would be specific to particular categories of donors.

### 3. In-kind sources:

Where objectives align or partially align, organizations may benefit from collaboration/partnership and be able to offer in-kind support such as access to networks, expertise, investigations, interviewers, technical assistance on national legislation, event coordination, event space, staff secondment.

Such organizations might include the following:

- a) Sports entities:

- i. national safeguarding/child protection in sport entities (e.g., [Child Protection in Sport Unit](#) (UK); [Play by the Rules](#) (Australia); US Center for Safe Sport)
  - ii. national governing bodies (esp. those representing wealthier national sports) e.g., [FA](#), [RFU](#) & [EWCB](#) (UK); [USA Football](#) / NFL, [USA Basketball](#) / NBA (US); [Hockey Canada](#) / [NHL](#) (Canada); [ARL](#), [CA](#) (Aus); [NZR](#) (New Zealand) ...
  - iii. commercial sport clubs and sports stadia
  - iv. National Olympic Committees
  - v. Athlete Unions
  - vi. Survivor-focused entities within sport entities, e.g., the Sport England [Safeguarding Advisory Panel](#); the (England) Football Association's Survivor Support and Safeguarding Advisory Group
  - vii. Independent survivor-led, sport-focused entities e.g., [The Offside Trust](#) (UK), [Safe4Athletes](#) (US)
  - viii. Independent and/or commercial entities with relevant/aligned aims, e.g., [Respect in Sport](#), Safe Sport International.
- b) Child abuse prevention/child protection entities (non-sport):
- i. international: e.g., [ECPAT](#) (sexual exploitation), [Child Helpline International](#), International Society for Prevention of Child Abuse & Neglect ([ISPCAN](#)), Sexual Violence Research Initiative ([SVRI](#)), International Centre for Missing & Exploited Children ([ICMEC](#)), Council of Europe [Pool of International Experts on Safe Sport](#)
  - ii. national: e.g., UK: [NSPCC](#) (child protection), [NWG Network](#) (child exploitation), [Centre for Expertise on Child Sexual Abuse](#)
- c) Law firms: international law firms that offer pro bono services:
- i. e.g., [Sport Resolutions](#) (UK) operates globally and provides various services to assist national and international sport organisations 'with disputes and concerns of a safeguarding nature'
- d) INTERPOL
- e) Criminal Justice organisations (e.g. [International Justice Mission](#))
- f) Academia
- g) National Human Rights Commissions, Ombudspersons

## Recommendations

1. The first priority for funding should be the securing of financial commitments from a greater number of IFs (both summer and winter Olympic sports), and the sharing of resources and know-how through a multisport approach (beyond those currently committed), with each committing for a minimum of, at least, 4 years.
2. A solidarity funding model should also be considered to ensure that no IFs are financially prohibited from joining.
3. It is imperative to take forward discussions with the IOC regarding its position on the SSE, its endorsement, and its possible financial support.
4. To obtain funds beyond those provided by sport organisations, the SSE should consider professional fund-raising expertise in due course.

5. Two funding streams could be created by the entity, one to cover operational and programmatic costs and a separate fund for victim/survivor care and support. This could serve two purposes: to protect overarching revenues and to provide a firewall between the provision of care.
6. To manage expectations, the SSE should regularly communicate to stakeholders the funding it has available and how this determines the quantity/level of services it can realistically provide. This could be achieved through an independent annual report.
7. It is critical that victims who come forward are advised clearly of the processes and the care support that will be provided (and any limits of that).
8. Criteria should be set for funding/sponsorship of the SSE. This could be guided by the criteria adopted by other organisations or entities. For example: ITA voluntary funding criteria <https://ita.sport/uploads/2021/08/2020.06.30.-ITA-Voluntary-Fund-Policy-WEB.pdf>

## II. PARTNERSHIPS AND SERVICE PROVIDERS

Partnerships are imperative for the SSE to deliver on its mandate ‘to ensure safe sport for all’ and its core remit of supporting victims/survivors and enhancing international, regional and national capacities to prevent and respond to abuse in sport.

The draft Concept Note of 23<sup>rd</sup> January proposes three types of partnerships:

- **Partner International Sports Federations (IFs)** who commit to the Entity’s mission and vision and mandate the Entity to provide support.
- **Entities and organisations that agree to contribute their expertise, knowledge, and networks** to the various Expert Groups, the development of global networks, and capacity building. These include intergovernmental organisations, safe sport and child protection NGOs, survivors’ groups, athletes’ unions, etc.
- **Entities and organisations that may act as implementing partners** at the international and local level. An Implementing Partner is an organisation or individual to whom the new Entity will entrust the delivery of services specified in a signed document, along with the assumption of responsibility and accountability for the effective use of resources and the delivery of outputs (e.g. care and safe refuge support, case management support, trauma-informed investigators and lawyers, etc.).

### Services

It is anticipated that investigation and support to victims and survivors will be the priority services of the SSE. Other services would be required and could be obtained through partnerships or by contracting for services. These include:

- Legal services
- Reporting
- Education/training/capacity development
- Research

Collaborations with a range of partners could be forged related to advocacy, awareness raising, prevention, research, training, and capacity development that contribute toward the achievement of SSE’s mandate. This collaboration would not necessarily require formal partnerships or service agreements, rather these collaborations could be based on memorandums of understanding.

Amongst these partners could be UN agencies and entities, academic institutions, international and regional and national human/child rights and protection organisations, media.

If victims/survivors of non-member IFs approach the entity, it could exercise its duty of care by referring them to competent authorities for services. This would require a process to identify and establish lines of collaboration with such authorities. There are a series of challenges with this approach, particularly if the victims/survivors do not receive quality support from the authorities to which they are referred.

### **Possible partners**

In addition to those mentioned above (in *Funding*), other possible partners include international and national governing bodies and the Olympic Movement (i.e., International Olympic Committee, Association of Summer Olympic International Federations ([ASOIF](#)), Association of International Olympic Winter Sports Federations ([AIOWF](#)), International Sports Federations, and National Olympic Committees), regional, pan-national bodies; government entities; intergovernmental entities (regional and international); bi-lateral and multi-lateral organisations; youth organisations; UN entities; human rights entities, international and national non-governmental organisations; civil society organisations, academic institutions; individual experts; media; law firms; private companies; sponsors, ...

The Concept Note and Theory of Change refer to a global mapping exercise to identify the partnerships that would need to be developed by the entity at international, regional, and national levels.

### **Partnership Models**

Entities and organisations that contribute their expertise, knowledge and other support (e.g. research, advocacy, awareness raising) should adhere to human and child rights standards and principles.

Global entities that have established partnership models provide examples of how the SSE might approach partnership.

#### **[WeProtect Global Alliance](#)**

Established in 2014, the WPGA brings together partners from across the world in a multi-stakeholder and multi-sectoral response to child sexual exploitation and abuse **online**. Partners include 100 national governments, 65 companies, 86 civil society organisations and 9 intergovernmental organisations.

**Membership:** There are no 'financial or legal commitments attached to joining the Alliance' but it states the *benefits* and *criteria* of membership and also the *commitments* attached to members (see Appendix Two).

A number of the members of WPGA's board of trustees are from donors that provide it with financial and in-kind support.

#### **[Global Alliance to End Violence Against Children](#)**

The End Violence Partnership is a public-private partnership launched by the UN Secretary-General in 2016 to accelerate progress towards Sustainable Development Goal 16.2: ending all forms of violence against children.

The Partnership works with a coalition of 750+ organisations including governments, UN agencies, research institutions, international NGOs, foundations, local CSOs, private sector groups and faith networks.

It *connects* and *convenes* partners to raise awareness, catalyse leadership commitments, mobilise new resources, promote evidence-based solutions, and support those working to end all forms of violence, abuse and neglect of children.

**Membership:** is limited to organisations and those interested in applying for membership must be committed to ending violence against children, in accordance with the [Partnership's vision, mission and principles](#).

## ECPAT

ECPAT's mandate is to end the sexual *exploitation* of children.

[Membership](#) with ECPAT is limited to civil society with the global network currently consisting of 124 non-governmental organisations across 104 countries, from large national coalitions to small grass-roots initiatives.

The growth of its membership was not inspired by a quick expansion strategy. Rather growth took place through a 30-year process of strategic engagement with like-minded organisations, joining hands on research, advocacy and campaigning efforts and forging collaborations on national, regional and global levels. Some of those collaborations eventually evolved into network membership.

In this spirit, ECPAT membership is by **invitation only**. Membership application processes are solely initiated based upon recommendations of the Credentials Committee, the dedicated body of the ECPAT Board of Trustees dealing with membership issues. Donors do not serve on the Board.

## **Charters of cooperation / MOUs**

A multilateral Charter of Cooperation (or similar arrangement) could be established for organisations to commit to a joint set of agreed principles.

These principles would underpin the work the SSE is trying to achieve and would work as a pledge for each respective organisation and their connection to the Entity (service providers, sporting bodies, survivor networks, etc.)

## **Criteria for service providers/implementing partners**

Minimum compliance/operating standards required (to be defined)

Annual checks/reporting/monitoring

## **International Sports Codes**

The World Anti-Doping Code (2021, p.13) explicitly states the 'fundamental rationale' for the Code:

*The spirit of sport is expressed in how we play true. Doping is fundamentally contrary to the spirit of sport.*

Abuse of or violence against athletes is (at least) equally contrary to the 'spirit of sport'<sup>9</sup>. Therefore, consideration should be given to the creation of an International Safe Sport (and Prevention of Violence in Sport) Code for the whole Olympic Movement.

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<sup>9</sup> Health; Ethics, fair play and honesty; Athletes' rights; Excellence in performance; Character and Education; Fun and Joy; Teamwork; Dedication and Commitment; Respect for rules and laws; Respect for self and other Participants; Courage; Community and Solidarity (World Anti-Doping Code 2021, p.13).



An International Safe Sport (and Prevention of Violence) Code, adopted by the whole Olympic Movement, would help to harmonize safeguarding and ethics policies, rules, and regulations within sport organizations and among public authorities around the world.

This would be similar to the [World Anti-Doping Code](#) and the [Olympic Movement Code on the Prevention of Manipulation of Competitions](#) (see Appendix One) that are both included in the Olympic Charter *article 43*:

*Compliance with the World Anti-Doping Code and the Olympic Movement Code on the Prevention of Manipulation of Competitions is mandatory for the whole Olympic Movement.*

### **Potential routes to developing partnerships/networks**

- a) Leverage pre-existing relationships within the Interim Steering Group and Expert Groups to connect with organisations and expand upon stakeholders.
- b) Reach out to existing entities promoting safe sport at national, regional and international levels.
- c) Convene international forum to discuss and work toward consensus among a wide range of potential partners.
- d) Recruit political champions and supportive governments.

### **Key considerations**

#### **1. SSE governance must be representative of international (sport) community**

The entity must have the support and confidence of the international sport community (administrative and competitor) and the victim-survivor community (athlete survivors). This will be achieved through appropriate representation within decision-making structures and processes of entity.

*Example: WADA*

WADA's 38-member Foundation Board (Board) is its highest decision-making body. It is composed equally of representatives from the Olympic Movement and Public Authorities. Four seats are dedicated to athletes representing the Sports Movement and all Members are appointed by their respective constituency groups. In 2021, approximately one-third (13/38) of the Board was made up of active or former international-level athletes. (2021 Annual Report, p.14).

#### **2. Investigations must be separate ('firewalled') from wider body of SSE**

Investigations must be wholly independent and transparent.

### **Potential criteria for SSE**

An ethical organizational culture ensuring that all staff perform their functions consistent with the highest standards of integrity as required by the Charter of the United Nations.

UN ethics <https://www.un.org/en/ethics/>

See also WADA's Guiding Values (Appendix One), [Governance Regulations](#), and [Independent Ethics Board](#)

## Recommendations

1. Undertake a desk-based mapping exercise of national situations to give an overview of the international status quo re safeguarding in sport (see Appendix Three for example)
2. Convene meeting with political leaders to understand perspective of all key stakeholders and take steps towards a consensus on actions/interventions to be taken
3. Identify key stakeholders in politics, policy, advocacy, programming, and research
4. Appoint a Partnership Officer or similar to initiate and develop high-level relations with national, regional and international bodies
5. Develop service provider list for each country
6. Establish minimum compliance standards for service providers with system of annual monitoring
7. Establish an International Safe Sport (and Prevention of Violence) Code to be adopted by the whole Olympic Movement to harmonize safeguarding and ethics policies, rules, and regulations within sport organizations and among public authorities around the world.

### ANNEX 1

The **World Anti-Doping Code** is the core document that harmonizes anti-doping policies, rules, and regulations within sport organizations and among public authorities around the world. It works in conjunction with [eight International Standards](#) which aim to foster consistency among anti-doping organizations in various areas.

These Standards are:

- The International Standard for Testing and Investigations (ISTI)
- The International Standard for Laboratories (ISL)
- The International Standard for Therapeutic Use Exemptions (ISTUE)
- The International Standard for the Prohibited List (The List)
- The International Standard for the Protection of Privacy and Personal Information (ISPPPI)
- The International Standard for Code Compliance by Signatories (ISCCS)
- The International Standard for Education (ISE)
- The International Standard for Results Management (ISRM)

The Code was never designed to be a document that stood still. As anti-doping developed, so would the ideas that would form rules, regulations, and policies in the future. Following the experience gained in the application of the 2004 Code, WADA initiated consultation processes in 2006, 2011 and 2017 to review the Code. These review processes were fully collaborative processes that involved the whole anti-doping community, all of whom sought an enhanced Code that would benefit athletes around the world.

#### [Olympic Movement Code on the Prevention of the Manipulation of Competitions](#)

- a. Acknowledging the danger to sports integrity from the manipulation of sports competitions, all sports organisations, in particular the International Olympic Committee, all International

Federations, National Olympic Committees and their respective members at the Continental, Regional and National level and IOC recognised organisations (hereinafter, 'Sports Organisations'), restate their commitment to safeguarding the integrity of sport, including the protection of clean athletes and competitions as stated in Olympic Agenda 2020;

- b. Due to the complex nature of this threat, Sports Organisations recognise that they cannot tackle this threat alone, and hence cooperation with public authorities, in particular law enforcement and sports betting entities, is crucial.
- c. The purpose of this Code is to provide all Sports Organisations and their members with harmonised regulations to protect all competitions from the risk of manipulation. This Code establishes regulations that are in compliance with the Council of Europe Convention on the Manipulation of Sports Competitions 1, in particular Article 7. This does not prevent Sports Organisations from having more stringent regulations in place.
- d. In the framework of its jurisdiction as determined by Rule 2.8 of the Olympic Charter, the IOC establishes the present Olympic Movement Code on the Prevention of the Manipulation of Competitions, hereinafter the Code.

Sports Organisations bound by the Olympic Charter and the IOC Code of Ethics declare their commitment to support the integrity of sport and fight against the manipulation of competitions by adhering to the standards set out in this Code and by requiring their members to do likewise. Sports Organisations are committed to take all appropriate steps within their powers to incorporate this Code by reference, or to implement regulations consistent with or more stringent than this Code.

## **ANNEX 2**

### **WEPROTECT GLOBAL ALLIANCE [MEMBERSHIP](#)**

#### **Benefits of membership**

There are no financial or legal commitments attached to joining the Alliance, but should you join, you will benefit from:

- Membership of the Alliance community and access to a diverse network of experts and key influencers across government, law enforcement, industry and civil society
- An opportunity to inform and direct the global strategy to tackle online child sexual exploitation
- The opportunity to affirm a high-profile commitment to ending online child sexual abuse and exploitation, including through the use of the WeProtect Global Alliance brand
- Attendance at Alliance Summits and other high-profile events, providing an opportunity to hear and learn from keynote speakers and global experts
- The sharing of information, experiences and best practise of tackling CSEA online via an Alliance member online portal (currently under development)
- Access to expert insight, analysis and advice
- Ability to bid for funding from the Fund to End Violence Against Children to fund capacity building projects aimed at tackling CSEA online

## **Membership criteria**

### **Members of the Alliance must be one of the following:**

- A member state of the United Nations
- An international organisation i.e. an organisation established by a treaty or other instrument governed by international law and possessing its own legal personality
- A regional organisation i.e. an international organisation with a specific geographic focus
- A civil society organisation with a child protection focus and registered as such with appropriate local authorities
- A technology company that manufactures hardware, creates software, facilitates the use of specialised technology (e.g. social media or internet security tools), use of a platform business model or provides telecommunications services, such as mobile phone or broadband services
- A financial institution which could be exploited by offenders for the purpose of commercial child sexual exploitation.
- Operating at a national and/or international level.

### **All new members must:**

- Endorse the WeProtect Global Alliance membership commitments and progress their implementation.
- Not partake in any activity which could negatively impact upon the reputation of the WeProtect Global Alliance or adversely affect the ability of the Alliance to conduct its activities.

## **Member commitments**

### **WeProtect Global Alliance members will:**

- Appoint a senior and working level point of contact, within first month of joining
- Once a year, members must update point of contact information.
- Make a public statement to announce membership of the Alliance within first year of joining.
- Participate in Alliance events, including Global Summits.
- Register for the Protectors' Portal within first month of joining. Members are expected to actively engage in the Protectors' Portal to share good practice, knowledge and learnings with other members.
- Use their resources, networks and influence to drive forward the collective global response to child sexual exploitation and abuse online.
- Identify and progress their role in implementing the Model National Response and Global Strategic Response frameworks as part of their strategies and action plans to combat child sexual exploitation and abuse online.

- Contribute to Global Threat Assessments and other knowledge gathering exercises to share their progress at least once every two years.
- Provide information to the Alliance on progress and activities on implementing the commitments on a biennial basis.
- Ensure genuine participation of victims/survivors and children during the development of policy, programme, tools and/or legislation.
- Sign and ratify the Council of Europe Lanzarote Convention [for government members] or implement similar legislation.

### ANNEX 3

#### Example of scoping exercise to establish global picture

Some countries have led the way in safeguarding in sport over the past two decades. These countries, via their central sport agencies – including specialist safeguarding/integrity/welfare bodies/units (e.g. the Child Protection in Sport Unit (UK), the US Center for Safe Sport) - would be potential key allies in building a consensus *within* the global sport community and present operational models for other nations to consider.

Although support for national reforms may fall beyond the mandate of the SSE, its knowledge base and partnerships may support such efforts. For example, with the support of the CoE, [child safeguarding in sport roadmaps](#) are being developed.

It would be beneficial for the SSE to have an understanding of areas of relative strength and to build a register of key contacts. Below, is a quick overview or snapshot of the situation in the UK. This is not comprehensive or systematic but helps to illustrate the sort of information that might be collated and mapped across national contexts.

#### England and Wales (UK):

##### National Framework for Safeguarding/Child Protection

- The Home Office has a [Minister for Safeguarding](#).
- Statutory [guidance](#) on safeguarding children is published by Department for Education; provides detailed [guidance](#) for education and other settings.
- 58 Local Authorities have a statutory duty for safeguarding children, for investigation of reports, collection of data on child abuse which is [published annually](#).
- The Ministry of Justice distributes funding for frontline services for victims/survivors of sexual and domestic violence each year under its [VAWG](#) (Violence Against Women and Girls) strategy and supports a range of [services](#) that offer support for victims of sexual violence.
- The [Victims Commissioner](#) for England and Wales is an independent post and dedicated to promoting the interests of victims and witnesses.

##### Frontline (non-sport) services for victims/survivors

- A range of child protection/child-focused charities exist, e.g., [Barnardos](#), [NSPCC](#)
  - The NSPCC (National Society for the Prevention of Cruelty to Children) is the only children’s charity with statutory powers. It also operates the Child Protection in Sport Unit.
- Child exploitation: [NWG Network](#) (who also employ a sport officer)
- Sexual violence services: public sector via the [National Health Service](#), plus charity sector, e.g., [The Survivors Trust](#) and [Male Survivors Partnership](#).

- Domestic abuse: e.g., [24 hr telephone helpline](#) by Refuge
- Mental health: e.g., [The Mental Health Foundation](#), [MIND](#), [Young Minds](#)

### Safeguarding in Sport

- Funding for sport in the UK comes mainly from National Lottery funds. [Sport England](#) (a quasi-governmental agency) currently distribute £250 million annually to develop grassroots sport. [UK Sport](#) distribute a similar amount for Olympic sports/high-performance sport. National governing bodies (NGBs) are autonomous bodies responsible for governing their own sports. Centrally funded sports must meet national safeguarding in sport standards.
- Sport England (and to a lesser extent [UK Sport](#)) has led on safeguarding in English sport since 2001 when it established the *Child Protection in Sport Unit (CPSU)* and the [national standards](#) for safeguarding in sport that all funded NGBs must achieve and maintain.
- Sport England established a [survivor panel](#) in 2019.
- Various independent inquiries have investigated specific sports following allegations of abuse (see [Sport Resolutions](#)).
- Recently (following the Whyte Review into abuse in gymnastics) Sport England has re-stated its commitment to safe sport via one of its five strategic 'Big Issues' - '[Positive experiences for children and young people](#)' by:
 

“Putting an even stronger spotlight on safeguarding, so children and young people feel and are safe when being active, and parents are confident it’s a safe choice with the welfare of their children paramount.”
- In January 2023, Sport England and UK Sport published [19 commitments](#) 'designed to support improve safeguarding and wellbeing for everyone involved in sport'.
  - This includes: a *Safeguarding Case Management Programme* (in partnership with Sport Resolutions UK) to help sporting organisations access expert support in relation to safeguarding concerns; ensuring sporting organisations engage with individuals and groups with lived experience of abuse in sport; and funding a national network of local and regional welfare officers to work with NGBs.
- As safeguarding in sport in the UK now over 20 years old, there is significant experience within individual NGBs. Some of the larger sports commit substantial resources to this area and have dedicated units/teams.
- The [FA](#) stands alone in terms of the scale of its commitment (and probably experience) and it also has an established survivor panel set up in the wake of the [Sheldon Review](#) (2021), an independent investigation into child sexual abuse in football.



# Appendix 3

## Theory of Change



**GLOBAL SAFE SPORT ENTITY**

**A THEORY OF CHANGE**

24 March 2023



**PROBLEM**

What are the issues and what needs to change?

**BARRIERS**

What's between the problem and the solution?

**INTERVENTIONS**

What must be done to overcome the obstacles identified?

**OUTPUTS**

What are the "products" of our interventions?

**OUTCOMES**

What have we achieved? How has it improved the situation?

**IMPACT**

The vision and the long term goal we want to achieve



## PROBLEM

1. Sexual, physical and emotional violence against athletes and other participants in sport is a widespread problem with a serious impact on the victims/survivors, sports, and society as a whole \*
2. Victims lack trust in the sport justice system
3. International Sport Federations (IFs) face challenges when managing cases where state institutions fail to act, and when the national systems required to ensure access to safe reporting and remedy and victims support do not exist, may not be trusted, or don't yet work
4. Limited vetting and knowledge sharing between different sports and other stakeholders (to prevent perpetrators from moving from one sport and / or one region to another).

## BARRIERS

1. Shortcomings in sport and state systems
2. Underreporting and systems not designed for human rights violations in sport
3. Lack of expertise, training and resources invested in trauma-informed investigations and absence of a holistic approach to victims' / survivors' support
4. Lack of cooperation between sports bodies, statutory authorities, and other stakeholders, complex jurisdictional issues, absence of a clear distribution of responsibilities, limited knowledge sharing.

\* Violence is understood as described in international standards. Includes interpersonal sexual, emotional and physical violence but can also include neglect.

## BARRIERS

1. Shortcomings in systems
2. Underreporting
3. Lack of expertise and resources
4. Lack of cooperation, complex jurisdictional issues

## INTERVENTIONS

1. **STANDARDS AND POLICIES:** inclusion of human rights considerations and objectives in sports governance and operations
2. **CAPACITY:** Promote the strengthening of capacity at national and international level on trauma-informed investigations and support to victims / survivors
3. **JOINT ACTION:** Promote multi-stakeholder cooperation at both national and international level
4. **SYSTEMS:** Enhance victims / survivors' access to independent and efficient reporting systems, including by the **creation of an independent global body to investigate cases\* on behalf of International Sports Federations (IFs) and to recommend sanctions and measures.**

\*The scope would include all forms of violence concerning children and adults, with a clearly established system to prioritize and handle cases concerning children or when the Entity's intervention must be considered as urgent.

## INTERVENTIONS

1. STANDARDS AND POLICIES
2. CAPACITY
3. JOINT ACTION
4. SYSTEMS

## OUTPUTS

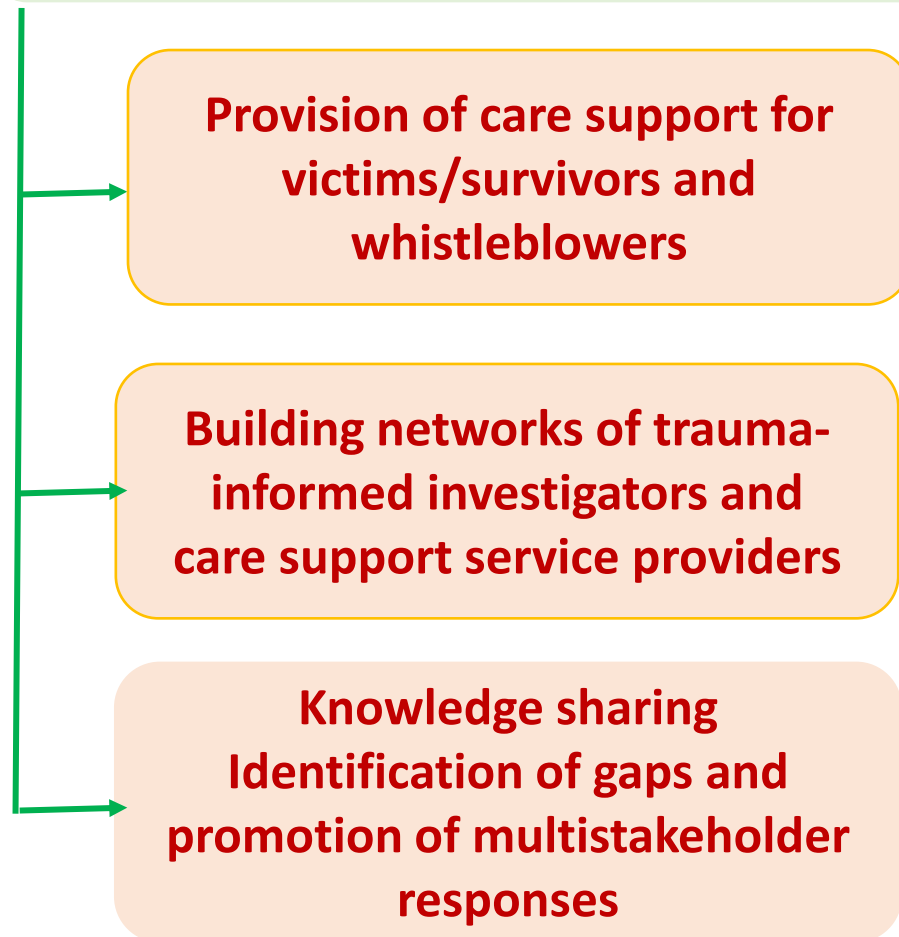
1. To join the Entity or use its services, sports (IFs) must **embed human rights in their governance and operations and accept accountability for respecting standards outlined in the Entity's statutes**
2. The creation **of an independent body with the mandate, expertise and capacity to intervene in case management** by supporting victims, investigating cases, and recommending sanctions and measures to IFs
3. **Partnerships** with research and training institutions, governments and civil society
4. **Survivors' voices** integrated in the Entity's governance and operations
5. **Global networks** of trusted support services, trauma-informed investigators, care support, etc.
6. **Multistakeholder engagement** to identify gaps, to transfer knowledge and to trigger action .
7. For cases falling beyond its jurisdiction, the Entity will **signpost** to trusted support services and competent bodies.

## OUTCOMES

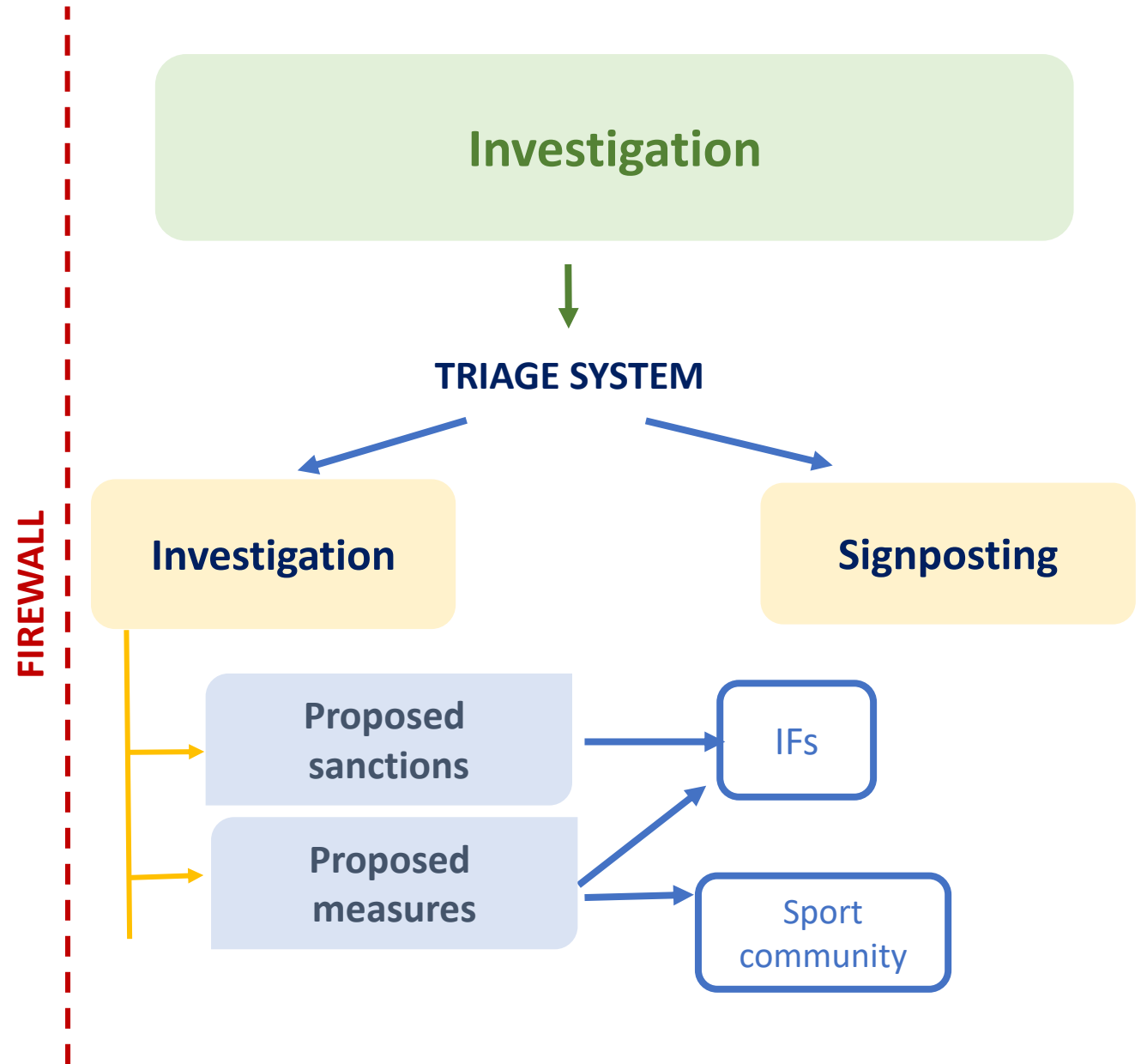
1. Ownership of the human rights and safeguarding agenda **reduces the risk of violence and impunity**
2. **Access of victims/survivors to safe reporting and to care support** is improved
3. **Victims trust a global independent body that signposts and intervenes in cases** after a clearly explained triage system
4. **Availability of experts trained on trauma-informed engagement** with victims/survivors
5. **IFs concerned implement the sanctions and other measures** recommended by the Entity to improve their systems.
6. Analysis of the shortcomings exposed in the cases is used to **improve the Entity's and IFs' programmes, strategies, policies and case management.**
7. **Enhanced coordination amongst key stakeholders at national and international level** augments their respective efforts and results in synergies

# GLOBAL SAFE SPORT ENTITY

## Care support to victims/survivors



## Investigation





# Appendix 4

Table with notes on jurisdiction and codes of the seven participating IFs

**APPENDIX 4- Mapping of jurisdiction of IFs in relation to safeguarding infringements**

	FIFA (Football)	IBU (Biathlon)	ICC (Cricket)	IIHF (Ice Hockey)	ISU (Ice Skating)	ITF (Tennis)	UCI (Cycling)
<b>Applicable regulations</b>	<a href="#">FIFA Code of Ethics</a> (FCE, 2023 edition) <a href="#">Safeguarding and Anti-Discrimination Code of Conduct</a> (only for FIFA competitions)	<a href="#">IBU Integrity Code</a> <a href="#">IBU Safeguarding Policy</a> <a href="#">CAS Code of Sports-related Arbitration</a>	<a href="#">ICC Safeguarding Regulations</a> (only for ICC Events)	<a href="#">IIHF Abuse and Harassment Code</a> <a href="#">IIHF Disciplinary Code</a>	<a href="#">ISU Athlete Safeguarding Policy</a> <a href="#">ISU Code of Ethics</a> (only for ISU Events) <a href="#">ISU Disciplinary Rules of Procedure</a>	<a href="#">ITF Adult Safeguarding Policy</a> <a href="#">ITF Children Safeguarding Policy</a> <a href="#">ITF Safeguarding and Case Management Procedures</a>	<a href="#">UCI Code of Ethics</a>
<b>Competent bodies</b>	<b>FIFA Ethics Committee (EC)</b> formed of <b>Investigatory Chamber</b> (investigations) and <b>Adjudicatory Chamber</b> (decision making)	<b>Biathlon Integrity Unit</b> (investigation and charging) <b>Disciplinary Tribunal appointed by the CAS Ordinary Division</b> (hearing and decision making)	<b>ICC and ICC General Counsel</b> (investigation and charges) <b>Safeguarding Panel</b> (hearing and decision making)	<b>Safeguarding Officer, IIHF Office and IIHF Ethics Body</b> (reporting and investigation) <b>IIHF Disciplinary Board</b> (decision making)	<b>ISU Ombudsperson for Harassment and Abuse</b> (reporting and investigation); <b>Disciplinary Commission (DC)</b> (decision making)	<b>ITF Safeguarding Team / Manager</b> (investigation and charging); <b>ITF Internal Adjudication Panel</b> (hearing and decision making)	<b>UCI Ethics Commission</b>
<b>Independence</b>	EC proceedings are conducted independently.  Members of Ethics Committee cannot belong to other FIFA body/committee or have any other function in football other than member of judicial body.  They are elected by FIFA Congress and subject to eligibility checks prior to election/re-election.	Biathlon Integrity Unit is part of the IBU but operationally independent.  Disciplinary Tribunal is appointed by the CAS Ordinary Division, and made up of independent arbitrators on CAS list.	Safeguarding Group is established by ICC, its Chairman is appointed by ICC, the other members appointed by the Chairman. Chairman also appoints the 3 members of a Safeguarding Panel (which can include him/herself) and of an Appeal Panel.	Nature/membership of IIHF Ethics Board is not mentioned.  IIHF Disciplinary Board members are elected by Congress, vetted by external auditors (completely independent, not bound by instruction and not accountable to anyone for their decisions).	ISU Ombudsperson for Harassment and Abuse is designated by ISU, position currently held by Ms Christine Cardis, ISU Anti-Doping Director.  ISU Disciplinary Commission is an independent body elected by the Congress, whose members cannot hold any other ISU/ISU Member office.	ITF Internal Adjudication Panel is a standing committee of the Board of Directors of ITF, whose members are nominated by the Board.	Ethics Commission - members fully independent from UCI, continental confederations, national federations, and any other cycling stakeholders, appointed by the UCI Congress, on the proposal of the Management Committee.
<b>Personal scope of application</b>	<ul style="list-style-type: none"> <li>Football players</li> <li>Agents</li> <li>officials (including board/committee members, referees, coaches, trainers and others responsible for technical/medical/administrative matters within FIFA, the confederations or the member associations)</li> <li>All accredited individuals for FIFA competitions</li> </ul>	<ul style="list-style-type: none"> <li>IBU Officials/Members</li> <li>officeholders and staff of NF Members</li> <li>members of organising committees of Biathlon competitions</li> <li>persons bidding to host/hosting a Congress/International Competition</li> <li>participants in Biathlon competitions</li> </ul>	<ul style="list-style-type: none"> <li>Participants to an ICC Event (cricketers, staff, etc.)</li> <li>Persons involved in the organisation/administration of an ICC Event in official capacity on behalf of or engaged directly/indirectly by ICC/National Cricket Federation/ICC Event organising committee</li> </ul>	<ul style="list-style-type: none"> <li>IIHF Member National Associations and staff</li> <li>IIHF governing bodies</li> <li>IIHF representatives in any IIHF Competition/Event or in any IIHF governing institution/committee/Board</li> <li>Organizing Committees of IIHF competitions and staff</li> <li>IIHF Officials/Referees</li> <li>IIHF National leagues/clubs/teams and their staff (managers, players, coaches, referees, other)</li> </ul>	All persons involved with the ISU in any capacity, participating in any ISU Event or activity (including officials, employees, volunteers, skaters, coaches, doctors, team leaders, etc.)	<ul style="list-style-type: none"> <li>Any person who competes, coaches, officiates, works at, or participates in a tennis ITF event or activity;</li> <li>Persons attending/ employed at an ITF Regional Training Centre;</li> <li>members of an ITF Touring Team</li> <li>ITF employees/consultants and contractors/volunteers</li> <li>Holders of an ITF/ITF-recognised Officiating or Coaching certification</li> <li>accredited persons to ITF Tournaments/Events/activities</li> </ul>	<ul style="list-style-type: none"> <li>Officials (UCI/national federation/continental confederations)</li> <li>License-holders (including riders, agents, staff, officials, etc.)</li> <li>Entities (teams, organisers of events, affiliated national federations and continental confederations)</li> <li>UCI and UCI World Cycling Centre staff and consultants</li> <li>UCI event organisers</li> </ul>



Statutes of limitation	No limitation period for prosecution of offences relating to threats, the promise advantages, coercion and all forms of sexual abuse, harassment, and exploitation.	No information available	No information available	Limitation period of 2 years from the date of discovery of the infringement, and generally 10 years from the date of the violation (regardless of the date of discovery).	Limitation period of one year of learning of the facts or events which constitute a disciplinary or ethical offence	No information available	10 years limitation period for prosecution of all infringements in Code of Ethics.
Prohibited conduct	All forms of physical or mental abuse/harassment, threats, promise of advantages, coercion and all forms of sexual abuse, harassment and exploitation, all other hostile acts intended to isolate, ostracise or harm the dignity of a person	Any form of harassment or abuse of any person, whether of a physical, mental or sexual nature; anything (act or omission) that harms or risks harming the physical and/or mental well-being and/or safety of anyone involved in the sport of Biathlon, including in particular children and young adults.	Conduct that directly or indirectly harms and/or poses a risk of harm to the physical and/or mental welfare and/or safety of one or more persons engaged in activities in connection with an ICC Event.	Harassment and abuse, which includes psychological and physical abuse, racism and discrimination, sexual abuse and harassment, neglect.	All forms of harassment and abuse (sexual, physical or psychological), occurring in isolation or in combination, consisting of a one-off incident or a series of incidents, committed in person or online, and in particular from any abuse of authority.	Poor practice (behaviour falling below the required standards) and various categories of abuse (deliberate maltreatment, failure to act in the appropriate manner that protects all participants in tennis). Cases are categorized by severity as Level One (no sanction but remedial action), Level Two or Level Three (requiring intervention from Police or Statutory Authorities )	Protection of physical and mental integrity – Sexual harassment and abuse (art. 6.4 and Appendix 1 of the Code of Ethics) which includes psychological, physical, and sexual abuse, sexual harassment and neglect
Competence during IF competitions	<p>In accordance with Safeguarding and Anti-Discrimination Code of Conduct for all accredited persons.</p> <p>Depending on other rules and regulations by which the accredited individual may be bound (e.g. FCE), failure to abide by the Code of Conduct may also result in the commencement of proceedings by the relevant football governing body (EC).</p>	BIU: to determine cases in relation to violations of the IBU Integrity Code; to make charges and present them before the Disciplinary Tribunal; to pursue/defend any application/appeal arising in relation to such proceedings Disciplinary Tribunal: to hear and determine the case in accordance with the IBU Integrity Code and the CAS Code	<p>Investigation conducted by ICC or with the assistance/by other person(s), such as an independent safeguarding expert.</p> <p>ICC General Counsel: Provisionally suspend (if necessary) and charge the person suspected of a Prohibited Conduct, refer the case to the Safeguarding Group/Panel.</p> <p>Safeguarding Panel: hear and determine/decide the case</p>	For all abuse and harassment decisions inside of IIHF Competitions. During an IIHF Competition, the Disciplinary Board may delegate some investigatory or adjudicatory actions to a Championship Disciplinary Panel/Directorate	<p>Competence of ISU during all stages of an ISU Event or activity. Ombudsperson for Harassment and Abuse: to determine whether a report of abuse/harassment warrants follow-up and recommend referral to the Disciplinary Commission (and/or local authorities).</p> <p>Disciplinary Commission: all charges and complaints referred by any ISU authority (in particular, the ISU Ombudsperson for Harassment and Abuse) or party against any alleged offender accused of a disciplinary or ethical offence.</p>	Shared jurisdiction with Regional Associations/National Associations. Where the latter have their own safeguarding policies and procedures, they should initiate and lead investigations into allegations of poor practice or abuse of children and adults (cooperating with ITF Safeguarding Team). ITF may support the RA/NA investigation in specific cases. The most serious safeguarding cases (Level Three) are referred to Police and Statutory Authorities, and the ITF Safeguarding Manager would liaise with them (directly or through the relevant RA/NA) throughout the respective proceedings.	To investigate and render decisions in relation to breaches of the Code of Ethics

<p><b>Competence outside IF competitions</b></p>	<p>Exclusive competence of Ethics Committee if conduct was:</p> <ul style="list-style-type: none"> <li>• committed by FIFA elected, appointed or assigned person;</li> <li>• related to their duties; or</li> <li>• related to FIFA funds.</li> </ul> <p>Subsidiary competence, if:</p> <ul style="list-style-type: none"> <li>• conduct not falling under competence of any MA or confederation;</li> <li>• the relevant confederation/MA agrees to confer such competence on FIFA; or</li> <li>• no formal investigation has been initiated by the competent confederation/MA within 90 days (from when the matter became known to FIFA)</li> </ul>	<p>No separation between in-competition and outside competition jurisdiction</p>	<p>No Jurisdiction</p>	<p>For all abuse and harassment decisions outside of IIHF Competitions, if the Member National Association does not have a procedure in place.</p>	<p>No competence for national, internal ISU Member matters which do not occur on site during the period of an ISU Event or activity, i.e. during the period from the arrival at the respective location until departure</p>	<p>No separation between in-competition and outside competition jurisdiction</p>	<p>No separation between in-competition and outside competition jurisdiction</p>
<p><b>Reporting mechanism</b></p>	<p>Outside competitions: by email to the Ethics Committee Secretariat, via the reporting platform for all FIFA compliance/disciplinary/ethics violations (run by external provider, possibility to report anonymously);</p> <p>In-competition: <a href="#">by phone, email, online form or in person, to the FIFA Safeguarding and child protection department / staff</a></p>	<p><a href="#">Integrity Hotline</a> by a third-party provider, with dedicated email, phone number and <a href="#">platform</a></p>	<p>Dedicated ICC safeguarding email and phone number (indicated in the Safeguarding Regulations), in addition to any reporting process for a specific ICC event</p>	<p><a href="#">Confidential IIHF email-address and telephone hotline, as well as an Incident Report Form</a> (annex to the Abuse and Harassment Code). Reporting dealt by Safeguarding Officer if during a competition, and by the IIHF Office if outside competition.</p>	<p>Reporting in writing or verbally to: ISU Representative for the ISU Event, ISU Event Manager, Chair of the ISU Medical Commission, an <a href="#">ISU Athletes Commission member</a> (if Skater is involved in the incident) or to <a href="#">ISU Ombudsperson for Harassment and Abuse</a> (all other persons will have to transmit the report to the Ombudsperson).</p>	<p><a href="#">Online Incident Reporting Form on the ITF website</a>. Dedicated email, telephone, SMS contacts of ITF Safeguarding team (who can be contacted in person at ITF events). <a href="#">Other contacts for confidential helplines on the ITF website</a>.</p>	<p><a href="#">UCI reporting platform</a> (managed by UCI, possibility to report anonymously)</p>
<p><b>Participation of victims in proceedings</b></p>	<p>Only the accused are considered parties to the ethics proceedings. However, victims of sexual abuse or harassment who are bound by the FCE have the right to appeal against the decision of (the adjudicatory chamber of) the Ethics Committee. In this respect, they are provided with the respective decision, the final report of the investigatory chamber, and any document or evidence produced by the parties before the adjudicatory chamber.</p>	<p>No information available</p>	<p>No information available</p>	<p>No information available</p>	<p>Any Complainant or other participant in ISU activities having a personal legitimate interest, if such interest may be directly affected by the proceedings or by the Decision to be rendered by the DC, may request the DC to be admitted as a Party. The DC shall decide on such request and such decision shall be final.</p>	<p>No information available</p>	<p>Only the persons who are alleged to have committed a violation of the provisions of the Code and against whom proceedings have been initiated shall be considered as parties before the Ethics Commission. However, the decision issued by the Commission can also be appealed by any person who is not a party to the proceedings but is directly affected by the decision and has a legitimate</p>

							interest in being entitled to appeal.
Provisional sanctions	Provisional suspension/ban from taking part in any football related activity imposed by the Adjudicatory Chamber of the Ethics Committee until final decision is taken (no maximum duration ).  During FIFA competitions, suspension of accreditation based on Safeguarding and Anti-Discrimination Code of Conduct	Provisional suspension imposed by BIU, no maximum duration.	Provisional suspension imposed by ICC General Counsel, no maximum duration.	Yes, imposed by the IIHF Office, no maximum duration.	Disciplinary Commission may order provisional measures, no further details available	Provisional suspensions imposed either by ITF Internal Adjudication Panel or by the ITF Safeguarding Manager (only in urgent cases), no maximum duration.	Yes, provisional sanctions (suspension/ban) imposed by President of Ethics Commission or Chairman of Panel, maximum duration of 6 months.
	To CAS, against decision of Ethics Committee.	To CAS Appeals Divisions, against decision of Disciplinary Tribunal	To the Safeguarding Appeal Panel. No appeal to CAS possible.	To CAS, against decision of the Disciplinary Board	To CAS, against decision of the Disciplinary Commission	To the Independent Tribunal (in accordance with the ITF Regulations), against decision of the ITF Internal Adjudication Panel	To CAS, against decision of the Ethics Commission
Appeal							
Care support for victims	<a href="#">FIFA's minimum Package of Care</a> provides appropriate assistance and support to victims and survivors of sexual exploitation / abuse whose cases come under the scope of the FIFA Code of Ethics.	The IBU Safeguarding policy recommends that (irrespective of the action taken or not taken against the accused in furtherance of a report or complaint), appropriate steps should be taken to provide necessary support to the victim / complainant, and also (to) the possible teammates / colleagues affected by the allegation of the Forbidden Conduct or a Bad Practice.	No information available	No information available	No information available	<a href="#">Signposting to player care and support services</a> on the ITF website	No information available