



# SAFEGUARDING IN SPORT

A Proposed Framework

Safe Sport Taskforce

December 2020

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# 1. Executive Summary

- 1.1 In the past 2 years, important strides have been made in the awareness of Safe Sport amongst the leadership and staff of Sport Singapore (“SportSG”), National Sport Associations (“NSAs”) and the key stakeholders in sport. Prior to 2018, there were no meaningful points of reference for inappropriate language, behaviour which bordered on, or were clearly abusive, much less written policies about safeguarding.
- 1.2 By leveraging on its authority and the conditions of funding with the NSAs, SportSG has taken seriously the calls of the International Olympic Council (“IOC”) to protect athletes from harassment and abuse and led Safe Sport efforts in Singapore through the Safe Sport Taskforce.
- 1.3 The Safe Sport Commission (“SS Commission”), an advisory body comprising of key government agencies and important stakeholders representing NSAs and athletes from the Olympic and Paralympic movement, has provided validation and gravitas to the work of the Safe Sport Taskforce.
- 1.4 Notwithstanding the work done, analysis of the current efforts reflects a limited impact on the sporting community. This paper explores and proposes how the existing Safe Sport framework should, and can, be extended.
- 1.5 The key elements of the proposed framework are:
  - a. a tiered participation programme, accessible to any organisation (“the Safe Sport Programme”);
  - b. development of community consulted unified code defining misconduct;
  - c. establishment of a case management service, including triaging, investigation and resolution;
  - d. accreditation through a Safe Sport safety mark for organisations;
  - e. re-positioning of the SS Commission to deliver the Safe Sport Programme; and
  - f. subject to a needs assessment, the establishment of an independent Safe Sport Tribunal.

A blueprint for the Safe Sport Programme is set out at the end of this Executive Summary at Page 4.
- 1.6 The depth of examination in this paper was imperative due to the complexities and nascency of the work in this area in Singapore.
- 1.7 For the converted, Section 6 will take one straight to the proposed framework. For the uninitiated, a chronological read is recommended.

**Safe Sport Taskforce, SportSG**

Azhar Yusof, Director, CoachSG

Lynnette Chng, Deputy Director, CoachSG  
Team Lead, Coach Industry Development

Wang Shao-Ing, Deputy Director, CoachSG  
Team Lead, Safe Sport Taskforce

Syahirah Latiff, Senior Executive, CoachSG  
Coach Industry Development

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## Navigating this Paper

The 3 parts of this paper track the analysis undertaken:

- WHY an enhanced framework is important and necessary (**PART I**)
- HOW other countries are addressing Safe Sport and learnings we can take (**PART II**)
- WHAT proposed framework for Singapore should look like (**PART III**)



## KEY TERMS

In this paper “sport” is used to encompass the entire sport and recreation system.

“Safe Sport” is defined by the International Olympic Committee (“IOC”) as an athletic environment that is respectful, equitable and free from all forms of harassment and abuse. Such acts cover not just acts of sexual harassment & abuse, but also include acts of psychological & physical abuse, harassment and neglect.<sup>1</sup>

“safeguarding” refers to actions taken to ensure that everyone feels safe in their environment, and is protected from harm, bullying, from people who could abuse, and from discrimination or harassment.<sup>2</sup>

“Participants” refer to athletes or persons engaged in the sporting activity.

“Persons Involved” refer to all persons who are involved in sport including Participants, parents, coaches, team managers, volunteers.

“Government Sporting Agency” is used to describe government bodies for sport such as Sport Singapore (“SportSG”), Sport NZ, Sport Australia.

“NSOs” and “NGBs” are used interchangeably to represent national sports organisations and/or national governing bodies according to their respective jurisdictions’ terms for them. In Singapore, we refer to some of these organisations as national sports associations (“NSAs”) for their sport as recognised by the respective international federations. Where we are referring generally to such bodies we have used “national governing bodies”.

“sporting organisation” refers to any type of organisation that is involved in sporting activities, e.g. associations, not-for-profit or community clubs, commercial academies and gyms.

<sup>1</sup> IOC Consensus Statement: harassment and abuse (non-accidental violence) in sport (2016)

<sup>2</sup> Commonwealth Secretariat, <https://thecommonwealth.org/health-risk-assessment-and-safeguarding-considerations>

## Summary - WHY > HOW > WHAT

### **WHY** an enhanced framework is important and necessary

- Although sport is generally thought of as a force for good, the evidence points to many risk factors within sporting environments that may turn sport into a negative and damaging activity for persons affected.
- There is a growing global urgency amongst international sports organisations and national governments which are mobilising to address the issues surrounding abuse and harassment in sport.
- Whilst such abuse and harassment does not appear to be widespread in Singapore, it is taking place and happens at all levels of sport. Instances of children and young persons affected by inappropriate behaviour, sometimes amounting to criminal conduct, is concerning.
- The Singapore sporting landscape is vibrant and diverse. There are a multitude of groups that engage in sporting instruction or organise sporting activity which makes a national strategy for Safe Sport a challenging one.
- New threats have emerged with the digitisation of communication channels which has changed the spaces and circumstances in which abuse and harassment have traditionally occurred.
- The impact of current strategies on the sporting community is limited. A more extensive framework is necessary to better support the wider sporting community and protect the Singapore sporting ecosystem.

### **HOW** other countries are addressing Safe Sport

- Globally, some countries are just beginning to come to grips with Safe Sport issues and others with more established systems for safeguarding have been re-examining their strategies.
- Independent reviews have flagged the limited capacity and capability within national governing bodies of sport generally to respond appropriately and investigate incidents of concern. Internal disciplinary processes also often raise conflict of interest issues.
- Government sporting agencies in developed sporting nations have different models and modes for delivering safeguarding frameworks within their own countries depending on their local laws and sporting landscapes.
- Common strategies across the countries are (1) Screening (2) Policymaking & Advocacy (3) Education and organizational Capability Development (4) Case Management (5) Alternative Dispute Resolution
- There is a growing movement towards codifying inappropriate behaviours in sport.
- An independent case management process is recommended by all the countries analysed as key feature of addressing Safe Sport concerns.

## WHAT a framework for Singapore should look like - A Blueprint of the Safe Sport Programme

Steps	Strategy	SS Programme Elements	Participation	Accreditation
ADOPTION	Policy Development & Advocacy	<p><u>Unified Code</u></p> <p>Incorporation of Unified Code into organisation’s code of practice &amp; all relevant documentation binding all Persons Involved</p> <p>Access to Organisational Safeguarding Policy Repository of specific safeguarding policies (e.g. best practice/ guidelines for interactions with children and vulnerable persons, social media use, body positive messaging).</p>	Supporters - Any sporting organisation	<p>Safe Sport “Ally” (Bronze)</p> <p>where Code is appropriately incorporated</p>
		<p>General - Safe Sport Training &amp; Certification of applicable individuals of members via online modules: for participants, administrators, parents and coaches.</p> <p>Specific – Training &amp; Certification for designated Safeguarding Officer (through blended learning and practical sessions) which comprises a First Responder Module and a Psychological First Aid Module</p> <p>Clear &amp; visible signposting for Participants and onboarding protocols for all Persons Involved</p> <p>Continual engagement through members’ safeguarding officer communities of practice, (with higher levels of engagements for High-Risk Sport)</p>	Affiliates - any sports organisation applicable NSAs, NGBs	<p>Safe Sport “Partner” (Silver)</p> <p>where designated standards are met.</p>
IMPLEMENTATION	Education & Capability Development	<p><u>Reporting &amp; Response</u></p> <p>Independent channel for receiving and triaging reports of concern</p> <p>Differentiation between Low-Level Concerns (LLCs) (i.e. poor practice) and potential Code breaches.</p> <p><u>Investigation</u></p> <p>Access to SSP for investigators for potential breaches</p> <p><u>Resolution</u></p> <p><i>Informal</i> – where appropriate, through advice and recommendation of Case Manager working with the designated Safeguarding Officer</p> <div style="border: 1px dashed gray; padding: 5px;"> <p><i>*subject to assessment</i></p> <p><i>Formal</i> - Mandatory application of Disciplinary Framework:</p> <ul style="list-style-type: none"> <li>▪ Minimum standards in procedures to ensure due process</li> <li>▪ Assessment of Seriousness and Sanctioning</li> <li>▪ Sanctions Matrix mapped to Code</li> </ul> <p>Delegation of hearing at first instance (where minimum standards cannot be met and independent adjudication is not possible) and/or delegation of appellate jurisdiction</p> </div>	Members - SportSG, applicable NSAs, NGBs	<p>Safe Sport “Champion” (Gold)</p> <p>where compliance in case management is delegated or achieved to a designated standard.</p>
		<p>Accreditation</p> <ul style="list-style-type: none"> <li>▪ Recognise organisations that meet the differing levels of Safeguarding protection</li> <li>▪ Licence use of designated SSP Mark in all marketing material</li> <li>▪ Surveillance &amp; monitoring through collaboration and information sharing with nominated Safeguarding Officers</li> </ul>		
DELEGATION	Case Management			
COMPLIANCE				



HARMONISATION    EMPOWERMENT    ACCESSIBILITY    RESPECT



# WHY

an enhanced framework is important and necessary

PART I

## 2. Background on Safe Sport

### Safe Sport – A Global Effort

- 2.1 At the time of writing, the International Gymnastics Federation had just held a conference to discuss the development of new rules of conduct in response to the allegations of abusive coaching methods in elite programmes across the world. National governing bodies in Australia, New Zealand, Britain and Netherlands are facing a reckoning by a global movement initiated by its own athletes. The sport of gymnastics in Singapore is certainly not immune with athletes bringing attention to similar issues.<sup>3</sup>
- 2.2 That gymnastics is still struggling to get to grips with these issues four years after Larry Nassar’s infamous indictment for sexual abuse, is a cautionary tale for everyone involved with the administration and management of sport.
- 2.3 It would be foolhardy to think that such abuses are confined to the peculiarities of gymnastics or that they are limited to athletes in a highly competitive environment. The evidence shows that abuse and harassment take many forms, happen at all levels of sport and that there is no correlation between abuse and any particular sport type or clothing cover when participating.<sup>4</sup>
- 2.4 The rise in disclosure of Safe Sport incidents internationally has highlighted the vulnerability of participants within the sporting environment to inappropriate behaviours. This is not to say that poor practice and/or misconduct was less rampant before. Today, the ease of borderless communication and shifting attitudes away from unquestioning submission to authority have brought these incidences to light. This in turn, has triggered a global response by sport governing bodies and other interest groups to strengthen safeguarding frameworks and policies to protect Participants in sport at all levels.
- 2.5 At the recent Commonwealth Sport Ministerial Forum on 23 July 2020, amongst other points of consensus, “the zero tolerance for violence, harassment, abuse or discrimination, with a particular focus on children and groups in a situation of vulnerability” was recognised as one of the central pillars of the Sustainable Development Goals.<sup>5</sup>
- 2.6 In October 2020, the IOC redoubled its efforts by launching a Safe Sport digital education and awareness campaign and announced the establishment of an International Safeguarding Officer in Sport Certificate.

### Role of Government Sporting Agencies

- 2.7 The central issue facing Government Sporting Agencies today in relation to Safe Sport is a complex one. Legislated authority aside, there are the labyrinthine organisational structures to navigate, issues pertaining to jurisdiction within the national governing bodies and complicated relationships with members and/or participants which need to be considered.
- 2.8 Government Sporting Agencies in developed sporting nations such as the USA, Australia, Canada and New Zealand are re-examining their roles in relation to national governing bodies and reviewing their current

<sup>3</sup> “Pressured to lose weight, S’pore gymnasts call for change in sport’s culture of body shaming, abuse” The Straits Times, 10 December 2020

<sup>4</sup> *Athletic environments can create opportunities for abuse*, American Academy of Paediatrics, 28 February 2018

<sup>5</sup> Forum Statement, Commonwealth Ministerial Forum on Sport and COVID-19, CSMF (20) 5.3



governing structures on sport integrity to address the need for a framework which will suit their communities in the area of safeguarding.<sup>6</sup>

- 2.9 As COVID-19 continues to ravage the sports industry and threaten the survival of leagues, tournaments, and national governing bodies worldwide, shrinking budgets may lead to the erosion of safeguarding resources and protections. The role that Government Sporting Agencies play in supporting Safe Sport efforts becomes even more critical.

### Why Safe Sport is important to SportSG

Inappropriate behaviour in the community affects enjoyment and participation in sport at all levels. If left unaddressed by the sporting fraternity and our governing institutions, will:

- compromise the safety and well-being of affected persons which can have lifelong impact or worse, cause life threatening situations. This is especially grave when those concerned are minors, the vulnerable or persons with disabilities in our community
- allow fractures to develop within the community when disputes are not managed well, or at all, by the organisations responsible. This often results in disclosures through other channels which opens the issues up to the court of public opinion in which factions may emerge
- create a culture of permissibility, whether real or perceived, and the manifestation of negative habits and norms within sport overtime which may culminate into disciplinary issues or crimes
- result in disillusionment by concerned parties of the systems in place to protect them and hold persons responsible which may lead to departure from those communities or sport altogether
- damage the trust, goodwill and confidence people have in the integrity of sport in Singapore and by extension the image of SportSG as the Government Sporting Agency

### Safe Sport Incidents in Singapore

- 2.10 The Safe Sport incidents which have been surfaced locally on social media, reported in the press, disclosed and/or reported to the SportSG, demonstrate that inappropriate behaviour (and in some instances, conduct amounting to criminal behaviour) takes place at all levels of sport and physical activity in Singapore. Some of examples are set out at **Annex 1 – Incidents Reported in the Press**

- 2.11 Whilst the coach-athlete incidents which resulted in criminal convictions receive some of the greatest attention in the local press, incidents of varying seriousness have been perpetrated by all Persons Involved in sport against other individuals in the sporting ecosystem, some examples include:

- Coach – Athlete (Adult, Young Person, and/or Minor)
- Medical Staff – Athlete

<sup>6</sup> Section 6: Context in Other Jurisdictions, *Complaints Management and/or Dispute Resolution Service for NZ Sport: Feasibility Study (9 September 2020)*; Simpson Grierson report for NZ Sport

- Technical Official – Technical Official
- Athlete – Athlete

2.12 No studies have been done on the prevalence of such behaviour within our sporting community.<sup>7</sup> Although they do not appear to be widespread based on current knowledge, it is disquieting that it is taking place.

### Environmental Risk Factors in Sport

Although sport is generally thought of as a force for good, the evidence points to the many risk factors within a sporting environment that can easily turn sport into a negative and damaging activity for persons affected.

These include:

- trust and power imbalance in favour of persons perceived and regarded to be persons of knowledge or authority in an environment that is generally perceived as safe
- children and young persons participating in a high performance and/or highly competitive environment where there is a heavy emphasis on winning
- lack of oversight and/or checks on poor organisational culture that tolerate poor practices
- little and/or lack of knowledge and requirements for organisational safeguarding policies and training amongst sport coaching and instruction with differing accreditations
- little and/or lack of awareness, and in turn demand from sport participants for such qualifications when engaging instructional services.

### New Threats

2.13 It is also important to recognise that the face of harassment and abuse has evolved with the digitisation of communication. Physical boundaries no longer need to be breached for someone to be affected by inappropriate behaviours. Instant messaging and social media applications allow for all Persons Involved to communicate in more personal ways outside of physical spaces which has led to a general increase in:

- sexual harassment, particularly in the digital space. The prevalence of such activity has been reflected in the new criminal laws which came into effect on 1 January 2020 targeting online sexual abuse, including voyeurism, upskirting and unsolicited intimate images, or “cyber flashing”<sup>8</sup>
- abusive child sexual material online. This was highlighted by the Internet Watch Foundation which found that Singapore hosted 12% of nearly 2,000 pages containing images of child abuse across Asia. The Singapore Children’s Society had also called attention to a spate of microblogs publishing

<sup>7</sup> A recommendation has been made to conduct a prevalence study. (See Recommendation 9 in Section 5)

<sup>8</sup> Criminal Law Reform Act 2019 (“CLRA”)

pornographic content involving children and youth in Singapore in its 2018 paper on Key Recommendations for Legislation against Child Sexual Abuse Material<sup>9</sup>

- online cyberbullying or harassment. The innate social environment around sport exposes Participants to intimidation by team members, opposition players, coaches, and can include hurtful or inappropriate comments or bullying behaviour surrounding body image or sporting performance.

2.14 As part of the latest criminal law reform, an “exploitative relationship” is now presumed in sexual offences where the accused person is in a position of authority, specifically including sports instruction.<sup>10</sup> Whilst this is a welcome move, young persons in sporting environments interact with not just coaches but other adults who are in positions of authority. These interactions may now also take place outside the confines of designated activity periods such as training or competitions.

2.15 Singapore has one of the highest social media penetration rates in the world with as high as 90% of youths aged 15 to 19 using social networking sites such as Facebook, Twitter or Instagram.<sup>11</sup> For a connected and tech-savvy citizenry, risks of such exposure to not just sexual harassment or exploitation but other forms of harassment and psychological abuse for young persons, are high.

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<sup>9</sup> *Key Recommendations for Legislation against Child Sexual Abuse Material*. Singapore Children’s Society (2018)

<sup>10</sup> Section 377CA of the Penal Code

<sup>11</sup> Youth.sg: The State of Youth in Singapore 2018 <https://www.nyc.gov.sg/en/initiatives/resources/national-youth-survey/> (accessed 23 December 2019)

## 3. Current processes for dealing with Safe Sport matters

### Singapore Sporting Landscape

- 3.1 Singapore’s sporting landscape is a vibrant and diverse one and interactions within sport participants vary according to several factors which influence its subcultures and methods of instruction:
  - ontology of disciplines (e.g. artistic, accuracy, invasion, speed, distance)
  - individual or team sport
  - levels of participation vary from recreational, competitive (participation in local or overseas competitions), elite (representing the national team)
  - mode of participation (e.g. commercial sporting instruction, community organised sport through clubs or societies, NSA organised trainings)
  
- 3.2 There are a multitude of organisations, groups and/or the individuals that coordinate and marshal resources to facilitate participation in sport. Each of them contributes to the well-being and happiness of Singaporeans. The activities they organise and help administer in the form of competitions (social or competitive), trainings, lessons and/or classes keeps Singaporeans active, better connected to their communities and helps with the development of stronger bond with people of different backgrounds.<sup>12</sup>
  
- 3.3 These organisations, groups and individuals are not just stakeholders in our sporting environment but also play a key role in being the gatekeepers for the nature and quality of interactions between all Persons Involved (“Gatekeepers”) through the rules and expectations they set.

#### Gatekeepers of Singapore Sport

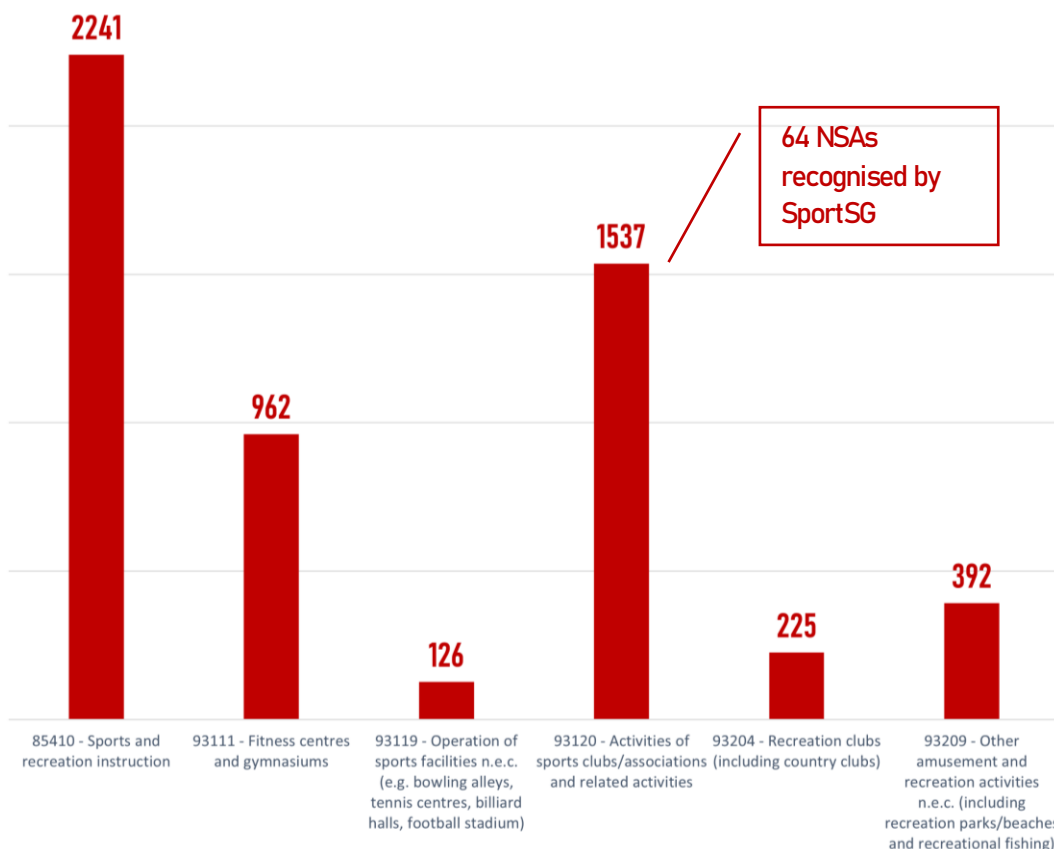
The governance structures associated with the organisation of activities are varied across the sport ecosystem:

- SportSG assets (including ActiveSG Academies & Clubs, SportCares, Active Health)
- Schools (Ministry of Education & private educational institutes) and Institutes of Higher Learning
- National Sports Associations (“NSAs”) and national governing bodies (“NGBs”)
- registered societies engaged in sport and recreation (which may or may not be affiliated with NSAs/NFs)
- community sport (e.g. through the People’s Association)
- commercial entities (e.g. sport academies for children, fitness gymnasiums & studios)
- self-organised sports groups (which are not registered under the Registry of Societies or members of NSAs/NFs)
- individual sport coaching/instruction services (e.g. swim coaches, physical trainers, studio-based programme instructors)

<sup>12</sup> *Together, making Singapore Home*, Ms Grace Fu, Minister for Culture, Community and Youth at the Committee of Supply Debate 2019

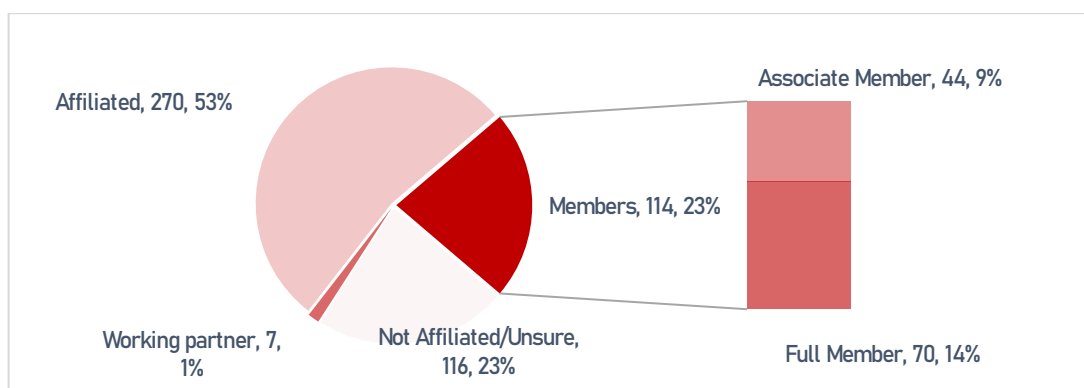
- 3.3 A web of memberships, affiliations, agreements, regulations and contractual arrangements tie many of the Gatekeepers to each other and some within international institutional structures. (e.g. national governing bodies affiliated with International Federations or National Olympic Councils).
- 3.4 However, within the Gatekeepers, there are also large groups and individuals who provide services and/or facilities for sporting instruction on a commercial basis. Recent data shows over 5,700 sport related entities, 2,241 of which are classified as providing “Sports and Recreation Instruction” under the Singapore Standard Industrial Classification Code (“SSIC”). Many of these entities are not subject to any regulation and/or affiliation to NSAs or any other sporting federations.

ENTITIES ENGAGED IN SPORTING ACTIVITY BY SSIC CODE



Distilled by SportSG, Sport Industry team from SSIC Codes provided by Ministry of Trade & Industry (2020)

NSA RELATED ENTITIES



Distilled by SportSG, Sport Industry team and represents an approximation of the number of NSA related entities.

- 3.5 Whilst this makes for a lively sport sector, it also presents challenges in implementing Safe Sport strategies across the different groups. A graphical representation of the relationships between different organisations is set out at **Annex 2 – Singapore Sporting Landscape**

## SPORTSG

- 3.6 The Singapore Sports Council (rebranded SportSG) was established by the Singapore Sports Council Act (“SSCA”) in 1973 to support the sport sector through the provision of investment, guidance and the development of policies.
- 3.7 In the performance of its functions under the Part 3 of the SSCA, SportSG, may amongst other things:
- advise on the planning, promotion and standards of physical education
  - enter into such contracts as the Council considers necessary for the discharge of its functions
  - appoint committees and delegate to such committees such of its functions as the Council may determine
  - make grants or contributions to any person or sports organisation subject to such conditions as it thinks fit
- 3.8 Save for coaches registered on the National Registry of Coaches and SportSG assets, SportSG is therefore not a regulatory body or enforcement agency and does not have jurisdiction to investigate alleged wrongdoing within sports organisations. This has in turn informed the Safe Sport Taskforce’s work to date.

## National Registry of Coaches (“NROC”)

- 3.9 The NROC was launched in 2003 to raise the standard and professionalism of sports coaching in Singapore so that coaches meet certain qualifications and standards. Some 5,000 active coaches covering 83 sports are on the NROC. Apart from technical certifications, NROC Coaches commit to abide by the NROC Coach’s Code of Ethics and may face disciplinary actions by SportSG for breaches.
- 3.10 In terms what being a NROC registered coach means in the sporting ecosystem:
- as a rule, the Ministry of Education (“MOE”) requires that all external coaches engaged by schools for physical sport co-curricular activities should be NROC registered coaches
  - only NROC registered swimming coaches are permitted to engage in coaching at SportSG swimming facilities)
  - SportSG programmes conducted by ActiveSG academies and clubs and SportCares only utilise NROC registered coaches
- 3.11 The advent of COVID-19 and its resultant impact on sport activity has provided some insights on the sport & recreation instruction. Based on the data from coaches who registered to lead large outdoor classes of up to 50 pax during the recent Resumption of Sport and Physical Exercise & Activity measures, only 3.6% of the 4,009 instructors who applied indicated that they are NROC registered coaches.<sup>13</sup>

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<sup>13</sup> Data from SportSG, Industry Development in November 2020

3.12 Whilst these numbers reflect only a small number of all sport instruction in Singapore, the data tells us that NROC registered coaches form only a portion of a larger group in the sporting ecosystem. Accountability of these other coaches is therefore outside the purview of the NROC.

### Safe Sport Efforts 2018-2020

3.13 Since the formation of the Safe Sport Taskforce (“SSTF”), efforts have been focused on 4 strategies through the NROC, NSAs and SportSG assets:

Strategies	Channels	Initiatives
<b>Awareness</b>	NROC, NSAs, SportSG	<ul style="list-style-type: none"> <li>Publicity &amp; Education</li> <li>Focus Group Discussions with Coaches, Athletes and NSAs</li> <li>Safe Sport Workshops for Coaches and NSAs</li> <li>Integration of Safe Sport Modules into Formal Coach Education Courses</li> <li>Safe Sport Forum</li> <li>Formation of Safe Sport Commission</li> </ul>
<b>Prevention</b>	SportSG, NSAs	<ul style="list-style-type: none"> <li>Safe Sport Policies for Sport Organisations</li> <li>Commitment Statement, Safeguarding Officer</li> <li>Recruitment Policy</li> <li>Responding Process</li> <li>Learning Best Practices</li> </ul>
<b>Incident Management</b>	SportSG, NSAs	<ul style="list-style-type: none"> <li>Safe Sport reporting channel launched</li> <li>Safe Sport Reporting Protocol for SEA Games 2019</li> <li>Generic Safe Sport Reporting Protocol for NSAs</li> <li>Incident Report Form</li> <li>Safeguarding Officers trained in being first responders</li> </ul>
<b>Disciplinary Process</b>	NROC	<ul style="list-style-type: none"> <li>Revised NROC Disciplinary Framework</li> <li>Partner relevant authorities</li> <li>Sanctions Matrix</li> <li>Publish list of suspended/terminated/debarred coaches</li> </ul>

3.14 As of December 2020, 59 of the 64 NSAs have signed a commitment statements to implement Safeguarding policies within their organisations and 146 Safeguarding Officers have been trained across the NSAs and SportSG to act as first responders for reports of concern within their organisations.

<b>% NSAs with Commitment Statements</b>	<b>Trained Safeguarding Officers</b>	<b>% Safeguarding Officers from NSAs [84]</b>	<b>% Safeguarding Officers From SportSG [41]</b>	<b>% Others [23]</b>
<b>82%</b>	<b>146</b>	<b>57%</b>	<b>28%</b>	<b>15%</b>

3.15 In September 2020, an internal review on the adequacy of the Safe Sport initiatives based on the existing mechanisms was conducted in September 2020 and eight 8 recommendations were made by a review committee (“2020 Review”).

3.16 The purpose of the following SWOT analysis is not to go over the same ground as the 2020 Review but to use the findings to inform the design of a Safe Sport framework for Singapore.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>▪ SS Commission expertise and collaboration with key government agencies</li> <li>▪ awareness of Safe Sport has already been established through engaged with the 64 NSAs</li> <li>▪ more than 80% of NSAs have a trained safeguarding officers in place to act as first responders</li> <li>▪ CoachSG’s existing training infrastructure and the suite of Safe Sport modules under SportSG-ED are powerful tools for monitoring and evaluation</li> </ul>	<ul style="list-style-type: none"> <li>▪ lack of safeguarding protections, culture and consciousness in the general population</li> <li>▪ terms of engagement on Safe Sport initiatives though funding arrangements present barriers to evaluation, monitoring and quality assurance</li> <li>▪ impact of initiatives on the sport ecosystem is limited as:                             <ul style="list-style-type: none"> <li>- jurisdiction of the NSAs vary widely in terms of membership structures</li> <li>- only government funded sport organisations</li> <li>- accountability is confined to NROC coaches</li> </ul> </li> <li>▪ NSA independence, capacity and capabilities in relation to:                             <ul style="list-style-type: none"> <li>- responding to reports of concern</li> <li>- case management</li> </ul> </li> <li>▪ current SSTF capacity and capability</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>▪ global urgency and desire by all organisations in sport to act</li> <li>▪ resources and learnings from established sporting nations</li> <li>▪ existing structure in the SS Commission to pivot to a quasi-independent body</li> <li>▪ a Safeguarding Officer Network which can be leveraged as important touch points within the NSAs</li> <li>▪ Singapore’s geographical size means we may execute strategies without jurisdictional barriers faced by other countries</li> </ul>	<ul style="list-style-type: none"> <li>▪ lack of safeguarding obligations for the increasing number of commercial sport instruction services</li> <li>▪ increasing trends in cyber related harassment and sexual crimes</li> <li>▪ lack of independent channels and differentiation between disclosure and reporting resulting in an increase in public disclosure</li> <li>▪ consistency in complaints handling and disciplinary outcomes</li> </ul>

A detailed breakdown of the above SWOT analysis and the Review 2020 Recommendations is set out at [Annex 3 – SWOT Analysis & 2020 Review Recommendations](#)

3.17 The work that has been undertaken thus far has been important in setting the foundations for a more extensive framework to reach the other Gatekeepers and participants of the wider sporting community.

3.18 In designing such a framework, a cross-jurisdictional analysis of the strategies other Government Sporting Agencies was undertaken. These learnings and takeaways are set out in the next Section.





# HOW

other countries are addressing Safe Sport and learnings we can take

**PART II**

## 4. Other Jurisdictions – An Overview

4.1 At the outset, it is important to recognise that Safe Sport is but one of several Integrity issues which may arise in sport. Whilst the list below is not exhaustive, sporting disputes may generally be categorised as:

Integrity Issues	Other Types of Issues
<ul style="list-style-type: none"> <li>▪ Match Fixing</li> <li>▪ Wagering</li> <li>▪ Corruption</li> <li>▪ Anti-doping</li> <li>▪ Safe Sport</li> </ul>	<ul style="list-style-type: none"> <li>▪ Funding</li> <li>▪ Adherence to Policies (e.g. Selection, Carding)</li> <li>▪ Employment</li> <li>▪ Sponsorship</li> </ul>

4.2 Current and publicly available knowledge of more developed Safe Sport frameworks outside of Singapore point to the leading sporting nations Australia, Canada, New Zealand, United Kingdom and the United States of America.

4.3 Each of the Government Sporting Agencies in abovenamed countries has in the last four years commissioned and published independent reviews and/or reports with respect to their existing frameworks on sport integrity issues. Whilst the SSTF is currently in conversation with our counterparts to understand their systems more thoroughly, we have (happily) had the benefit of the insights of these detailed reviews for the initial desktop exercise and some broad observations can be made.

4.4 In the analysis of the various frameworks, it has been clear that there is no singular approach. However, we have distilled the common elements into these five areas (S.P.E.C.A)

**S.** Screening - legal obligations to safeguard children

**P.** Policy & Advocacy (“Policy”) - development & promotion of safeguarding policy and best practices

**E.** Education & Capacity Development (“Education”) - developing and providing access to training and learning tools for sports organisations

**C.** Case Management – responding, investigating, and resolving where Safe Sport breaches arise

**A.** Alternate Dispute Resolution – mediation or arbitration if disputes emerge from Safe Sport disciplinary proceedings.

4.5 We have started with Screening as it provides a good background to the depth and evolution of safeguarding practices in the countries examined.

4.6 After the examination of each element (S.P.E.C.A), a brief description of the landscape and recent developments of each Australia, Canada, New Zealand, United Kingdom and the United States of America is provided to give full whole picture of the experience of the respective countries.

## S. Screening as a Pre-Requisite for Safeguarding of Children

- 4.7 In many of these jurisdictions, legislation not only criminalises inappropriate acts against children but places a legal requirement on entities and organisations which have interactions with children and/or vulnerable groups to implement safeguarding policies & protocols.
- 4.8 Screening for the suitability of persons who interact with children generally is mandated by federal, territorial and/or provincial laws as part of the pre-employment process. In some jurisdictions, this applies even in non-instructional interactions with children (e.g. drivers, volunteers etc). These screening services are provided by specialist agencies set up to execute the screening processes and maintain records under child protection laws.
- 4.9 The screening procedures highlighted are more extensive than police checks for criminal histories. For example, in Australia, a Working With Children Check (WWCCs)<sup>14</sup> draws together information from various sources but may include a primary focus on certain types of offences (e.g. sexual offences). In general, WWCCs give consideration to:
- convictions – whether they are considered spent or were committed by a juvenile
  - apprehended violence orders and other orders, prohibitions or reporting obligations
  - charges (i.e. where a conviction has not been recorded because, for example, a proceeding has not been heard or finalised by a court, or where charges have been dismissed or withdrawn)
  - relevant allegations or police investigations involving the individual
  - relevant employment proceedings and disciplinary information from professional organisations (e.g. organisations associated with teachers, child-care service providers, foster carers and health practitioners)

Country	Legislation	Remarks on Sport Related Checks
AUS	Multiple state legislation relating to child protection	Each of the 8 states within Australia has made legal provisions for adults working with children through pre-employment screening and/or WWCCs  In New South Wales, a WWCC is a prerequisite for anyone involved in child-related work – paid and voluntary.
CAN	Multiple provincial legislation relating to child protection <sup>15</sup>	Each of the 12 provinces has legislation regarding the quality and delivery of child protection services.  A National Screening System has been in place since 1994 to screen prospective volunteers and employees who wish to work with children in positions of authority. It includes the use of criminal record checks conducted by the Canadian Police.
NZ	Children's Action Plan & Vulnerable Children Act 2014 <sup>16</sup>	Each club or organisation can decide which roles should be Police Vetted. The Act requires children's services providers and/or contractors that are funded by the state are required to have child protection policies.  Sport NZ advises that best practice standards go beyond the legal requirement and recommend that any person who has regular contact with children, such as a coach, manager, or supervisor or volunteer, someone who drives children to activities and events, and anyone responsible for overnight trips should be checked.

<sup>14</sup> Each state in Australia runs their own WWCC with their own procedure and requirements  
<sup>15</sup> Provincial & territorial child protection legislation and policy 2018 – [Government of Canada](#)  
<sup>16</sup> Children's Action Plan & Vulnerable Children Act 2014 - Ministry of Justice

<p><b>UK</b></p>	<p>Children Act 1989, 2004</p> <p>Safeguarding Vulnerable Groups Act 2006</p>	<p>Disclosure &amp; Barring Service with a differentiated checking levels for organisations to refer and check suitable people working with children or adults receiving a certain type of care.</p> <p>There is specific guidance on DBS Checking in Sport,<sup>17</sup> which includes checking for volunteers, drivers and coaches.</p> <p>Legal duty placed upon local authorities and their partners to co-operate in safeguarding and promoting the wellbeing of children and young people.</p>
<p><b>USA</b></p>	<p>State specific legislation</p>	<p>As of January 7, 2020, 10 state statutes have mandated background checks of non-school associated activities for volunteers of youth sports and athletics.</p> <p>The requirements include sex offender registry checks, criminal history records or reports, fingerprinting, certifications, or other requirements associated with volunteers, coaches, participants and/or employees.</p>

A more detailed breakdown of screenings systems across these countries is set out at **Annex 4 – Screening**

- 4.10 In these jurisdictions, safeguarding protocols, policies, and the general consciousness of safeguarding is therefore deeply embedded in the organisations and/or communities which work with and deal with not just children, but youths and vulnerable persons. Consequently, Safe Sport policy implementation for adults which is specific to sporting activity has naturally been built upon these existing safeguarding structures.
- 4.11 In Singapore, the Children & Young Persons Act sets out offences against children and young persons and makes provision for young offenders, but it does not impose any statutory obligations on organisations outside of child education (e.g. Ministry of Education schools and/or childcare centres licensed under the Early Childhood Development Centres Act 2017<sup>18</sup>) to do any background checks and/or have safeguarding policies in place for organisations that conduct sporting activities with children.
- 4.12 The Singapore Police Force (“SPF”) operates a Certificate of Clearance (“COC”) service for non-Singaporeans who have documentary proof which states that a COC is required by the foreign government authority or institution for overseas purposes such as migration, adoption, overseas employment or further education. However, SPF does not regard this as one of their core services but have made this service available as a form of international cooperation since other countries provide similar documents.<sup>19</sup>
- 4.13 Whilst pre-employment screening such as criminal records screening, interviews and reference checks is listed as a preventative measure by the IOC, the research also indicates that there should be other risk assessment procedures, such as Code of Conduct.<sup>20</sup>
- 4.14 Until this screening is legislated for in Singapore, each organisation develops its own policies with respect to the suitability of individuals. Currently, coaches who are applying to join /renew their membership in the NROC are required to declare any records of past criminal convictions and disciplinary records. Additionally, they are required to notify SportSG within 24 hours if they are involved with any investigations with the relevant authorities (including the SPF).
- 4.15 For these reasons, we have excluded Screening from the Key Takeaways and Recommendations in Section 5 but would propose further exploration for a background check in the future.

<sup>17</sup> *DBS Checks in Sport – Working with Children*, Disclosure & Barring Service, UK Government

<sup>18</sup> ECDA only requires the licensee holder and key office holders to be screened

<sup>19</sup> Certificate of Clearance, <https://eservices.police.gov.sg/content/policehubhome/homepage/certificate-of-clearance-hub.html>

<sup>20</sup> IOC Toolkit for safeguarding athletes from harassment and abuse in sport. Page 92

## P.E Policy & Education

4.16 In the jurisdictions examined, Safe Sport is overseen by a variety of government agencies, quasi-governmental agencies and/or independent bodies which deal with integrity issues:

Country	Body	Type	Scope	Universal Code	Policy	Education	Case Management
AUS	Sport Integrity Australia (2019) - Play by the Rules	Govt	All integrity issues	×	✓	✓	×
		Quasi govt	Child Safe Sport				
CAN	Canadian Centre of Ethics	Independent Non-Profit	All integrity issues	In process	✓	✓	×*
NZ	Sport NZ	Govt	All integrity issues (new 2019)	×	✓	✓	×
UK	Sport England	Govt	Child Safe Sport (target group children & young persons up to 25)	×	✓	✓	×
	Child Protection in Sport Unit	Quasi govt					
USA	US Centre of Safe Sport (2017)	Independent	Only Safe Sport matters	✓	✓	✓	✓

\* a helpline exists for Safe Sport matters where support is rendered to assist the individuals affected

4.17 In the UK and in Australia, P & E is provided by standalone quasi government entities. Play by the Rules in Australia and the Child Protection in Sport Unit in the UK were both established in 2001 and act as the main bodies in safeguarding for children in sport.

4.18 New Zealand have passed on the setting up of a separate independent entity in order not to duplicate functions (e.g. Drug Free NZ) that already exist in their systems. After an extensive 2-year consultation and review process, in October 2020, Sport NZ launched their new integrity framework through an online repository of policies with safeguarding information focused on four areas for Safeguarding – organisational culture, member protection, child safeguarding and anti-discrimination.<sup>21</sup>

4.19 Here, a distinction should be made between having a safeguarding policy and a code. A policy enumerates the principles and approach of an organisation which may include procedures on best practices (e.g. communicating with athletes, body positive messaging etc.). A code lists, comprehensively, behaviours that would constitute a breach of Safe Sport. Naturally, each sport and/or organisation will have a different safeguarding policies and procedures (e.g. it might be completely acceptable for a male adult to be shirtless around the pool facility, but less so if one were running a children’s gymnasium).

4.20 Until recently, only the US had codified a list of “prohibited conduct”. In 2020, Canada developed a draft Universal Code of Conduct to Prevent and Address Maltreatment in Sport preferring to use the term “maltreatment”.<sup>22</sup>

<sup>21</sup> Integrity Framework, Sport New Zealand, [Sport NZ](#)

<sup>22</sup> Sport Information Resource Centre Canada, [SIRCA](#)

## C. Case Management

- 4.21 We have used case management to refer to the process of:
- Responding – receiving reports of concern and responding appropriately to persons of concern
  - Investigating – the fact-finding process for potential breaches of policy/code
  - Resolving – A breach of policy and/or code, is one that usually results in a disciplinary process. These are handled “in-house” by the organisation or body which has authority by virtue of the policy or code.
- 4.22 The national governing bodies of each sport are independent and have the mandate of their sport (i.e. International Federations) to regulate the sport in their respective jurisdictions. Each national governing body is responsible for enforcing their own rules and regulations. They do so by adopting their own process and procedures, including a system by which disputes arising in sport are resolved and thereby exercise a disciplinary function over those they govern. As such, case management is by and large managed by individual national governing body.
- 4.23 However, it is evident that systemic issues continue to be highlighted across different national governing bodies. Independent reviews commissioned by various sport<sup>23</sup> point to some common themes:
- the lack or little in the way of safeguarding policy formulation, adoption and/or implementation
  - accountability of leadership within organisations with little or no independent oversight
  - institutional structures that present barriers to reporting
  - weak case management in respect of managing complaints, a response & resolution processes and enforcement due to limited capabilities, time and resources to deal with complaints, particularly where a high percentage of an organisation’s workforce are volunteers
  - limited authority outside of the sport’s/organisation’s jurisdiction thus impacting enforceability
- 4.24 It is important to bear in mind that a person who has been affected by a Safe Sport breach is not party to the disciplinary proceedings. He/she may appear and give testimony as evidence of the breach but has no locus standi in the disciplinary proceedings and the subsequent appeal. The importance of the independence of the disciplinary process is explained in more detail in the Key Takeaways in Section 6.
- 4.25 Where Government Sporting Agencies have tried to assist in the area of case management, is to provide guidance and recommendations on best practices and guidelines (e.g. Child Protection in Sport Unit in the UK provides extensive resources on receiving reports, investigation processes and disciplinary process recommendations). Regionally, the National Olympic Committee of Sri Lanka launched a Sexual Harassment and Abuse Prevention Programme in 2020, establishing an independent Complaints Commission to handle Safe Sport complaints.<sup>24</sup>
- 4.26 The one jurisdiction which has taken the most interventionist approach is United States which has “one-stop shop” for all safeguarding matters (with a particular focus on sexual misconduct) from policy, education, training, case management to resolution at the first instance. This has been done so through the force of the law – Safe Sport Authorisation Act, which requires Olympic and Paralympic movement NSOs to recognise the jurisdiction of the U.S. Center for Safe Sport (UCSS) and defer case management (and by extension disciplinary action) to UCSS.

<sup>23</sup> *Lawn Tennis Association Independent Review (2019), Report to USA Gymnastics on Proposed Policy and Procedural changes for the Protection of Young Athletes (2017), Independent Review into NZ Football (2018), Independent Review of Cycling New Zealand High Performance Programme (2018), NZ Hockey Review (2019)*

<sup>24</sup> Sexual Harassment and Abuse Prevention, National Olympic Committee of Sri Lanka, [SHAP](#)



### United States – The One Stop Shop

The **US Center for Safe Sport** (“USCSS”) is designated by the United States Congress as the official independent national Safe Sport organization for all sport within the US Olympic & Paralympic Movement and was originally chartered by the United States Olympic (“USOC”) and Paralympic Committee. USCSS is funded by the Congress, USOC and the national governing bodies.

The Safe Sport Authorization Act passed in 2017 requires Olympic governing bodies and amateur sports organizations to report sex-abuse allegations immediately to local or federal law enforcement, or a child-welfare agency.

In response to the USA Gymnastics scandal, the Protecting Young Victims from Sexual Abuse and Safe Sport Authorisation Act of 2018 expanded existing mandated youth abuse reporting laws and required abuse awareness training for youth sports organizations, regardless of NSO affiliation. It also mandated reporting of any form of abuse, whether it is sexual, physical, mental or any other type of abuse.

The USCSS promulgated a SafeSport Code that is mandatorily adopted by the NSOs and binds all participants, subjecting them to discipline for Code violations.

The Code sets out a list of Prohibited Conduct and the USCSS has:

- exclusive jurisdiction to investigate and resolve allegations in matter of sexual misconduct, Child abuse and other inappropriate conduct, including inappropriate physical contact and exposure to sexual content and imagery.
- discretionary jurisdiction with respect to, emotional and physical misconduct (including stalking, bullying behaviours, hazing, and harassment). The NSO takes primary responsibility for policy violations specific to each NSOs safeguarding policies.

USCSS provides training and education resources, responds and investigates breaches of the Code. Their investigative staff includes retired law enforcement agents, former prosecutors, former public defenders, a former federal administrative law judge, and child protective services investigators.

The USCSS determines if there is breach and imposes a sanction which all NSOs are required to enforce. The Respondent may request for arbitration if he/she wishes to appeal against the USCSS’s decision.

When it opened its Denver headquarters in 2017, it had a projected operating budget of about \$5 million per year. But sexual abuse allegations across several Olympic sports have dominated headlines since then and as of February 2020, in addition to conducting training for 520,000 individuals, USCSS has received almost 5,000 reports and sanctioned 627 individuals.<sup>25</sup>

Given its focus on stopping the abuse, the mission of USCSS has received widespread support. However, it has suffered from underfunding and some criticisms have been levelled at the limited amount of publicly available information about investigations resulting in accusations of a lack of due process afforded to accused individuals.<sup>26</sup>

<sup>25</sup> “Athlete Safety and the Integrity of U.S. Sport”, CEO, U.S. Center for SafeSport, Congressional Hearing before the U.S. Senate Committee on Commerce, Science, and Transportation, 5 February 2020

<sup>26</sup> 3 years on, Center for Safe Sport Faces Controversy, Pulitzer Center, 22 April 2020

## A. Alternative Dispute Resolution (“ADR”)

- 4.27 For the purposes of examining ADR services in the context of Safe Sport, we have excluded the American ADR system in this sub-section as the US Center for Safe Sport assumes jurisdiction in the first instance.
- 4.28 Most of the jurisdictions offer mediation and/or arbitration service through a sport specific dispute resolution centre (“SSDRC”) to deal with a variety of disputes including contractual disputes, athlete carding, team selection and sport governance matters.
- 4.29 Apart from anti-doping cases in which the tribunals are designated, the SSDRC jurisdictions across the countries are mixed. The Canadian model requires the internal dispute process to be exhausted before submission to the Sport Dispute Resolution Centre of Canada (so in a case concerning Safe Sport, a national governing body’s disciplinary process would had to have taken place first and/or an appeal, if necessary). On the other hand, the National Sport Tribunal of Australia established in 2019 for a 2-year pilot period, may hear cases at first instance but always only with the agreement of both parties (it has issued 2 arbitration decisions as of December 2020)
- 4.30 Submission to the SSDRCs below must be by agreement between the disputing parties and only the UK model allows for non-affiliates of governing bodies to apply for ADR services:

	Body	Established by	Scope	Criteria	Jurisdiction*	Remarks
AUS	National Sports Tribunal	Govt (2-year pilot)	All disputes	NSOs	Agreement of both parties	mediation, conciliation, case appraisal only arbitration in exceptional cases
CAN	Sport Dispute Resolution Centre of Canada (2003)	Govt	All disputes	NGBs (available to non-NGBs at higher cost)	Agreement of both parties + only when parties have exhausted internal dispute resolution	Designated anti-doping tribunal
NZ	Sports Tribunal of New Zealand (2003)	Sport & Recreation New Zealand (Crown entity)	All disputes	HPSNZ (high performance athletes) or Membership of NGB/Community Clubs	Agreement of both parties Appeal jurisdiction from NSO Decisions	Rendered 128 decision to date. 86% on antidoping & selection
UK	Sport Solutions UK	Non-Profit Private service	All disputes Also offers investigation services	All levels	Agreement of both parties	Mostly high performance and national level disputes

- 4.31 The costs to both parties who agree to the use of SSDRCs vary across the countries with different cost sharing models. In the UK, even though any party may utilise the ADR services of the Sport Solutions UK, the fees are generally felt to be prohibitive for community sport.



4.32 The Australian National Sports Tribunal fees start relatively lower from AUD \$500.00 for filing fees, but ADR services are not available to recreational organisations who are not members of the national governing body or where the disputes do not arise under the rules of the national governing body.

4.33 To cite the *Simpson Grierson* feasibility study for Sport NZ:

*“... it is clear that the systems in these Jurisdictions [Australia, Canada and UK] are still very much a ‘work in progress’. For example, despite all of the recent reforms in dispute resolution services for sport in Canada, a further review is being undertaken.”<sup>27</sup>*

4.34 An analysis of the takeaways in respect of Singapore is set out in Section 5.

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<sup>27</sup> Ibid. Simpson Grierson. Pg. 41

## Other Jurisdictions – Summary & Recent Developments

- 4.35 Since the rising prominence of Safe Sport, some jurisdictions have recognised that there needs to be different mechanism to deal with these issues. Recent developments in these countries point to the complexities of implementing an appropriate framework for each of their communities:



### CANADA – Exploring a Universal Code & Case Management Mechanism

By the late 1990s Canada had produced one of the most progressive examples in the world of a policy to deal with harassment and abuse in sport in response to an abuse scandal in Ice Hockey, which is a major sport in Canada.

**Sport Canada’s** funding regulations required all national sport organizations (NSOs) in receipt of federal funding to have a policy to: (a) deal appropriately with incidents of harassment and abuse; (b) have designated arm’s length trained harassment officers with whom athletes and/or their parents and others could raise queries, and to whom they could address complaints without fear of reprisal from coaches or other sport officials; and (c) report annually their compliance with the policy in order to receive that funding.

Some 20 years later, research by **Center for Sport Policy Studies at University of Toronto (CSPS)** indicates that many NSOs have encountered difficulties in implementing the policy and that, in many cases, the policy is no longer being enforced. During 2013-2015 Sport Canada had never withheld funding to an NSO for failing to have a harassment policy or an arm’s length harassment officer. Additionally, 6 out of 42 NSOs did not have a policy that could be found and none had an independent harassment officer with arm’s length. Difficulties extended to different definitions of sexual abuse and harassment varied between NSOs and other forms of abuse were rarely mentioned (neglect, physical and psychological abuse etc.). The 2018 revelations about abuse in Alpine Canada and Gymnastics Canada reinforced these research findings.<sup>28</sup>

In February 2019, a CBC News and Sports investigation revealed at least 222 coaches involved in amateur sports in Canada over 20 years have been convicted of sex offences involving over 600 victims under 18. The investigation renewed calls for a review of systems as despite efforts to implement safe sport policies arising from a high-profile coach sex abuse case in the late 1990s experts said organisations still struggled to implement effective rules.<sup>29</sup>

**AthleteCAN** and the **Canadian Center of Ethics for Sport** have actively called for a revision in Canada’s current policies and for an independent Pan-Canadian body to be established and responsible for all aspects of Safe Sport including but not limited to policy; education and training; investigation and adjudication; support and compensation.<sup>30</sup> However, the establishment of an independent body has received strong push back from the NSOs. Provincial and territorial jurisdiction also presented barriers to the same.

In response, the Canadian government set up the **Universal Code of Conduct to Prevent and Address Maltreatment in Sport Leadership Group (“UCCMS”)** in 2019 comprising of athletes and representatives of national sporting organisations, multi-service organisations, and the Canadian Olympic and Paralympic Sport Institute Network to develop a universal code.

In July 2020, UCCMS announced the appointment of an independent arbitration group to develop a mechanism to protect participants in the sport and a national code of conduct to prevent maltreatment in sport in Canada (“McLaren Review”).<sup>31</sup>

<sup>28</sup> *Revising Canada’s Policies On Harassment And Abuse In Sport: A Position Paper And Recommendations*, [CSPS](#), August 2018

<sup>29</sup> *Sex Offences against Minors: Investigation Reveals more than 200 Canadian Coaches convicted in the last 20 years*. [Canadian Broadcasting Association](#), 10 February 2019

<sup>30</sup> *The struggle for safe sport in Canada: one step forward, two steps back*, [Play the Game](#), 25 October 2019;

<sup>31</sup> *McLaren Global Sport Solutions appointed to analyse safe sport models in Canada*, [Inside the games](#), , 16 July 2020



## UNITED KINGDOM – Sports Ombudsman and Duty of Care Charter Recommended

The United Kingdom has the least interventionist approach of all the jurisdictions as they have an extensive infrastructure supporting amateur sports clubs and NSOs.

Club Matters is **Sport England’s** one-stop shop supporting sports clubs, groups and/or organisations with resources for marketing, finance and management. Club Matters also runs an accreditation scheme, Clubmark, distinguishing high quality community sports clubs with higher standards of welfare, equity, coaching and management. There are more than 14,000 Clubmark accredited clubs across over 50 different sports. “Duty of Care and Welfare” is one of the four key areas that a club needs to develop in order to be accredited:

- the club ensures that all activities take place in a safe environment that comply with legal requirements
- the club has child & adult at risk Safeguarding Policy that meets statutory requirements
- there are clear systems to report, respond to and manage safeguarding concerns or allegations of poor practice or abuse that arise
- coaches, volunteers, instructors, club activators and club welfare officers receive an induction which includes information about safeguarding responsibilities, policy and procedures, and are appropriately trained in Safeguarding and Child Protection

On the national governing body end, 320 NSOs are represented by the **Sports & Recreation Alliance** which functions like a trade association offering a range of services including the establishment of a panel of law firms to provide legal services to national governing bodies of sport and recreation.

Since 2001, the **Child Protection in Sport Unit** (2001) (a partnership between Sport England, Sport Northern Ireland and Sport Wales) has played the main role of providing resources and guidance on policies, structures and training for safeguarding children in sport within community groups.

In 2017, amidst a spate of bullying allegations against coaches, mounting concern over the use of medication, and the effects of head injuries in some sports, as well as the child sex abuse scandal in football, an independent *Duty of Care Report* commissioned by the UK government, recommended that a Duty of Care Charter and a Sports Ombudsman be created to hold national governing bodies to account for the duty of care they provide.<sup>32</sup>

In July 2020, a bill was put before the British parliament to include Sports Coaches as persons in a position of trust in the Sex Abuse Act 2003.<sup>33</sup>

Of late, scandal has rocked British Gymnastics with an independent review commissioned by UK Sport and Sport England in 2020. Over 200 gymnasts registered complaints to a joint British Athletics Commission and National Society for the Prevention of Cruelty to Children helpline and the national governing body is facing a potential legal action by several ex-Olympians for the alleged physical and emotional abuse. Events have forced the retirement of the British Gymnastics CEO.<sup>34</sup>

<sup>32</sup> *Duty of Care in Sport, Independent Report to Government*, Baroness Tanni Grey-Thompson DBE, DL (2017)

<sup>33</sup> Motion for leave to bring in a Bill (Standing Order No. 23), [Theyworkforyou](#), 17 July 2020

<sup>34</sup> *Under-fire British Gymnastics CEO Jane Allen announces retirement amid allegations of abuse and bullying in the sport*, ITV News, 13 October 2020



## AUSTRALIA – Recently established Sports Integrity body and Tribunal

Most of Australia’s sporting controversies in the recent decade surround the illegal use of supplements and match fixing. The most explosive of which was the time of ball tampering incident by Australia’s national cricket team during three-day test against South Africa. More recently, a groping scandal between players and caught on video has engulfed Australia’s Football League which has forced the league to seek advice from Australia’s Sex Discrimination Commissioner.

The **Sport Integrity Australia (SIA)** was formed in 2019 following the recommendations of The Review of Australia’s Sports Integrity Arrangements which was commissioned by the Turnbull Government in response to the growing global threat to the integrity of sport. A substantial part of the 2018 review covered match fixing, wagering and antidoping with Safe Sport being acknowledged as a threat.<sup>35</sup>

In respect of Safe Sport matters, SIA relies on an existing organisation **Play by the Rules**, a collaboration in 2001 between Sport Australia, Australian Human Rights Commission, all state and territory departments of sport and recreation, anti-discrimination and human rights agencies, for its advocacy work on discrimination, harassment and child protection in sport.

In a more extensive look at Safe Sport, in December 2017, the **Royal Commission into Institutional Responses to Child Sexual Abuse** presented a final report to the Governor-General, detailing the culmination of a five-year inquiry into institutional responses to child sexual abuse and related matters devoting an entire volume dealing with sexual abuse in sports & recreation. It made several recommendations including:

- establishing a child safety advisory committee for the sport and recreation sector within National Office for Child Safety
- expanding and funding Play by the Rules to develop resources – in partnership with the National Office for Child Safety – that are relevant to the broader sport and recreation sector.
- state and territory oversight bodies that implement the Child Safe Standards should establish access for the sport and recreation sector
- improving institutional responding and reporting by providing sport and recreation institutions with training, education and guidance on how to identify, report, handle and investigate reportable allegations and convictions

On 22 September 2020, alongside the **Australian Human Rights Commission** independent review of the culture and practices in gymnastics in Australia, Gymnastics Australia partnered with Sport Integrity Australia and the **National Sports Tribunal**, to establish an independent Supplementary Complaints Management channel for the handling of all individual complaints related to misconduct, bullying, abuse, sexual harassment and assault toward athletes until 10 January 2021.

<sup>35</sup> *The Review of Australia’s Sports Integrity Arrangements* (2018), [Department Of Health](#), Australia Government



## NEW ZEALAND – Renewed Integrity Framework and Independent Complaints Management Service & Ombudsman recommended

Like Australia, a big focus of sport integrity initiatives in New Zealand has been targeted at match-fixing, anti-doping and corruption in the past. Governance for sporting organisations has also been a long-standing area of work for Sport NZ with the publication of the 3<sup>rd</sup> edition to the Nine Steps to Effective Governance.<sup>36</sup>

In 2018, Sport NZ undertook a public consultation on sport integrity, seeking the views of a wide range of organisations and individuals involved in sport. Public’s views were sought on broad themes of sport integrity such as member protection, integrity issues in children’s sport, institutional arrangements for whistleblowing, anti-doping, corruption and match-fixing.

In 2019, Sport NZ released an analysis and summary of submissions, and made a total of 22 recommendations designed to address key issues identified.<sup>37</sup>

Sport NZ launched their new integrity framework in August 2020 separating the framework into two core aspects (1) regulatory framework (anti-doping, match-fixing and corruption) and (2) safeguarding (organisational culture, child safeguarding, anti-discrimination and member safeguarding). The new policy repository boasts no fewer than 30 types of safeguarding policies for sporting organisations.

The law firm Simpson Grierson was commissioned to conduct a feasibility study on a Complaints Management and/or Dispute resolution service for NZ Sport. The report published in September 2020 recommended a

- Sport & Recreation Mediation Service for a 2 year trial period
- Appoint a Sport Ombudsman

A working group has been appointed to look into the execution of these recommendations.

After serious allegations of psychological and physical abuse were reported in the press in August 2020<sup>38</sup>, pressure mounted on Gymnastics New Zealand by coaches, parents, athletes, human rights experts and the Sports Minister to establish an independent process into handling alleged abuse uncovered.

A complaints process in conjunction with Sport NZ was put in place to respond, assess, investigate and take appropriate action on complaints via the Sport NZ – Interim Complaints Mechanism (ICM) and the Gymnastics NZ – SafeSport mechanism. Some public criticism has arisen about the process including several leading voices in the athlete welfare space pushing for the establishment of an independent sports integrity watchdog.<sup>39</sup>

<sup>36</sup> Nine Steps to effective governance, [Sport NZ](#)

<sup>37</sup> Sport Integrity Review, [Sport NZ](#)

<sup>38</sup> *An insidious culture - New Zealand gymnastics rocked by allegations of psychological and physical abuse*, [stuff.co.nz](#), August 2020

<sup>39</sup> *Gymnastics abuse cases heighten calls for independent sports integrity commissioner*, [stuff.co.nz](#) August 2020

## 5. Key Takeaways and Recommendations

### General Sport Integrity Frameworks

- 5.1 The examples of the other jurisdictions should be taken in context. The structures set up to deal with other sport integrity issues (Anti-Doping, Wagering, Match Fixing, Corruption) faced by these countries like Australia, Canada and New Zealand may be attributed in part to more developed sports sectors with a multitude of professional sport leagues and sports betting services. The global sports market reached \$388 billion in 2020 with spectator sports accounting a large portion of that value and commercial interests have created all sorts of integrity issues for professional sport.<sup>40</sup>
- 5.2 Safe Sport issues are inappropriate acts *against persons* and are distinct and distinguishable from other sport integrity issues which mostly centre offences *against the spirit of sport*. This distinction becomes more evident when viewed through the lens of the affected party in the resolution process (*see Case Management – Resolution below*).
- 5.3 No single framework is a silver bullet to addressing the Safe Sport concerns and breaches as there are a constellation of different factors to be considered for each jurisdiction (current legislative structures, organisations, sporting culture). For Canada and Australia, provincial and territorial jurisdictions and sheer geographical coverage have been major considerations to their strategies to-date. Although appearing the most decentralised, UK has one of the most extensive systems for supporting NSOs (e.g. Sports & Recreation Alliance) and community sport with safeguarding resources available to any type of sporting club and/or body (e.g. Club Matters by Sport England).

### Policy & Education

- 5.4 Most of the countries analysed have had a historical focus on safeguarding children in sport and have seen the pressing need to extend similar safeguarding policies to adult Participants through member protection policies (NZ, AUS). Specific organisational policies are continuing to evolve with trends emerging in body shaming, online harassment and cyberbullying. New Zealand’s new safeguarding repository portal sets out at least 30 specific policies for organisations in the area of children and member participation.
- 5.5 Understanding the “hotspots” within our sporting landscape is critical to our efforts to better support local organisations and help inform priorities going forward. As the authority on sport in Singapore, SportSG should have a list of safeguarding policies which cover the most pressing areas for safeguarding concerns in the community.

**Recommendation 9:** Undertake an assessment of the prevalence of harassment and abuse and “hotspots” within the current eco-system from both the NSA and Participants’ perspectives.

**Recommendation 10:** Establish a policy team to strengthen policy research and/or collaboration with experts to develop specific policies and/or guidelines to better support sport organisations.

- 5.6 Despite the strong foundations of legislation mandating child safeguarding policies and screening protocols and networks of advocacy groups, abuse is still taking place within the most evolved sport integrity systems. In Singapore, the lack of such systems contributes to the general lack of awareness or prioritisation of

<sup>40</sup> Global Sports Market - By Type (Participatory Sports, Spectator Sports), By Revenue (Media Rights, Sponsorship, Merchandising And Tickets), And By Region, Opportunities And Strategies – [Global Forecast To 2030](#)

safeguarding policies. This further emphasizes the need for a unified reference for the Singapore sporting community that describes all forms of abuse and harassment in sport similar to the US Safe Sport Code and Canada’s Universal Code of Conduct to Prevent Maltreatment in Sport.

**Recommendation 11:** Develop a code which describes all forms of abuse and harassment in sport.

5.7 More details on the development of such a Code is discussed at Section 6.

## Case Management

5.8 The Canadian experience shows that screening and tying mandatory Safe Sport initiatives to funding conditions alone for national governing bodies are blunt tools without a coordinated effort in policy implementation, education and independent case management oversight. As Professor McLaren said in relation to the Canadian government’s 2020 review to consider a national code of conduct to prevent maltreatment in sport in Canada and a mechanism to enforce it: *“there’s a huge momentum swing and athletes and sports organisations all say the community wants this.”*<sup>41</sup>

5.9 Whilst we have modelled many of our Safe Sport initiatives after Canada’s system, their learnings and country specific structural barriers should also be factored into decisions relating to our framework.<sup>42</sup>

5.10 Due to the conflicts of interest that inevitably arise within national governing bodies, the importance of arms-length case management has become a focus area by athlete and interest groups who are calling for independent oversight of NSOs/NGBs in relation to Safe Sport issues (CAN, UK, NZ, AUS). The reviews in nearly all the jurisdictions have indicated the need for an independent reporting and/or complaints management mechanism (UK, CAN, NZ, Sri Lanka).

5.11 The inherent conflicts become more significant if we consider that the person who is impacted by the alleged Safe Sport breach is not a party to the disciplinary proceedings. Unlike civil proceedings, disciplinary proceedings are not forums for adjudication between a perpetrator of abuse or harassment and persons concerned. They are proceedings between sporting bodies and persons who have breached the standards of behaviour. The sporting body represents the best interests of each sport and its participants by setting such standards of behaviour. However, where proceedings are not independently adjudicated, the affected party’s interests are inevitably subsumed with other concerns of the sporting body.

5.12 The reality is that national governing bodies are often working with tight budgets (from members subscriptions, government support, and sponsorships). Negative publicity associated with Safe Sport incidences could lead to lower participation rates, sponsors, and key personnel who are crucial to the success (and consequent financial stability) of the organization. This can create an environment that is susceptible to the tolerance of poor practices, which may manifest into barriers to reporting or worse, attempts to bury the issue.

5.13 An independent case management mechanism is appearing to be the kryptonite for Safe Sport frameworks in the cross-jurisdictional analysis (illustrated by calls for an Ombudsman in NZ and the UK; and the establishment of supplementary complaints channel for Gymnastics Australia and Gymnastics NZ). Barring some well-established and/or well-funded national governing bodies, many lack the capacity (funding & manpower) and capability (knowledge) both at an employee, volunteer and/or board level to deal with these matters appropriately.

<sup>41</sup> Renowned London anti-doping crusader turns sights to mistreatment of athletes, The London Free Press, 28 July 2020

<sup>42</sup> ibid. CSPS

- 5.14 Based on the experience of the SSTF in the last two years, many low-resourced national governing bodies and/or sporting organisations in Singapore do not have the capacity (human resource) and/or capability (i.e. volunteers and/or paid persons with the relevant skills and knowledge) to establish independent case management processes. It is for these sporting organisations that the SSTF may be of most assistance.
- 5.15 In view of the above, there is a need for independent case management service to support both the sporting organisations and Participants. Sporting organisations will be able to delegate their authority through the framework thus relieving themselves of functions which are not part of their core activities. Such a case management service would comprise (1) an independent reporting channel managed by a trained safeguarding officer to receive and respond to reports of concern; (2) a trained case manager to triage and appraise reports and work with the sports organisation to resolve low level concern cases; and (3) trained investigators to look into serious allegations and/or liaise with law enforcement where necessary.

**Recommendation 12:** Establish an independent case management service comprising a reporting channel, a triaging function and an investigation role.

- 5.16 In situations where disciplinary action must be taken, the case for independent adjudication is compelling. For unlike antidoping, cheating or corruption, there is the interest of the affected party (who may have suffered physical and/or psychological harm) which should be best represented by the sporting body. This averts the possibility of accusations of impartiality which often that dog internal disciplinary processes. Whilst a few NSAs with developed disciplinary structures may well have independent or quasi-independent panels, this is not the case for many others.

**Recommendation 13:** Undertake a needs assessment including a consultation with NGBs/NSAs and sports organisations if an independent Safe Sport Tribunal with general and/or appellate jurisdiction should be established.

- 5.17 Recommendations were made previously to enhance the NROC hearing process by appointing an independent Hearing Panel.<sup>43</sup> The concept paper for the Safe Sport Tribunal at Annex 6 furthers these recommendations.
- 5.18 Whilst the development of a code should inform the rules that such an independent disciplinary tribunal should apply, there are also regulatory requirements of the International Federations which may be applicable to these NSAs/NGBs. Although challenging, there is an opportunity to develop a harmonised disciplinary framework which will help ensure consistency and accountability if widely adopted. In any event, minimum standards for due process and a recommended decision-making process for the assessment of seriousness and sanctioning are important tools for all sport organisations disciplinary processes. We should not shy away from this initiative.

**Recommendation 14:** Develop a disciplinary framework comprising minimum standards for due process (including a standard of proof), decision-making process for the assessment of seriousness and sanctioning.

### Alternative Dispute Management

- 5.19 Across the jurisdictions, it appears that Safe Sport forms a small number of the SSDRCs' caseload. For example, of the total number of 128 cases dealt with by the Sports Tribunal of New Zealand from 2010 to 2019, 66% were for Anti-Doping, 20% for selection issues, 8% for challenging a NSO decision.<sup>44</sup> Of the 70 cases dealt with by the Sport Dispute Resolutions Center Canada in 2019-2020, 4 were for harassment and

<sup>43</sup> Review 2020 Recommendations 5 & 6

<sup>44</sup> *ibid.* Simpson and Grierson



the majority of disputes 70% were for doping, selection and carding.<sup>45</sup> These numbers however, should be viewed in the context that these SSDRCs do not hear Safe Sport type issues in the first instance and disputes of such nature can be avoided if dealt with clearly and transparently in the organisations disciplinary processes.

- 5.20 Given Singapore’s sporting landscape, a more thorough investigation through a feasibility study and/or needs analysis for a SSDRC, a “Singapore Sports Tribunal”, for not just anti-doping and safe sport but also for any type of sporting disputes may be undertaken<sup>46</sup>. If established, such a Singapore SSDRC, would presumably operate mediation and arbitration services and offer different disciplinary panels for anti-doping, disciplinary (including safe sport) and other types of sports disputes (e.g. selection, funding).
- 5.21 To this end, the 2-year pilot of the Safe Sport Tribunal and the Anti-Doping Disciplinary’s historical caseload will help inform such feasibility study and/or needs analysis.<sup>47</sup>

### Licensing / Legislation

- 5.22 Whilst some sort of licensing legislation for sport instructors and/or operators may be explored contemporaneously<sup>48</sup>, the scope and consultation for the legislative project will be extensive and may involve other considerations outside of Safe Sport (e.g. impact to what is now a vibrant and relatively unregulated sport industry which creates opportunities for participation and jobs that help contribute to the economy; scope of “sport”; who is a coach / instructor).
- 5.23 Importantly, legislative action in respect of sport instruction may capture sport instructors but does not address other relationships with a power imbalances, peer-to-peer issues and organisational cultures which are tolerant of poor practices. Most pertinently, it also does not detract from the need for a development of a Safe Sport framework by which the legislation may refer when dealing with errant coaches.

### Function v Form

- 5.24 Finally, we have discussed the various functions for the proposed framework and left its form to the last.
- 5.25 Government Sport Agencies have taken a variety of approaches with respect to the body in charge of delivering P.E.C. strategies for integrity issues (see table at Section 4.14) which are appropriate to the threats of their sporting landscape.
- 5.26 As highlighted above, the independence of body delivering the case management function is a central tenant of all the frameworks. It is therefore necessary that some arms-length be established from the central functions of SportSG.
- 5.27 Whilst the SS Commission was appointed for the purposes of advising the work of the Safe Sport Taskforce, it already has the requisite composition to be re-positioned as the vehicle for the delivery of the Safe Sport framework:
- Olympic and Paralympic (3)
  - NSAs (1)
  - Government agencies (3)

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<sup>45</sup> SDRCC annual report [2019-2020](#)

<sup>46</sup> Review 2020, Recommendation 2

<sup>47</sup> Review 2020, Recommendation 2

<sup>48</sup> Review 2020, Recommendation 1

- Community Sport (1)
- SportSG (High performance) (1)

5.28 The quasi-independence of the SS Commission will give the necessary assurance and confidence in the case management processes whilst maintaining all the links necessary to drive its initiatives.

**Recommendation 15:** The SS Commission be re-positioned and staffed with a Secretariat to deliver the Safe Sport framework.

5.29 More detail on the re-positioning and staffing requirements of the SS Commission is discussed in Section 6.

## SUMMARY

- There is a need to create a more extensive Safe Sport framework to better support the wider sporting community and protect the Singapore sporting ecosystem.
- The delivery of such a framework should be executed by the Secretariat of the SS Commission as quasi-independent body [Recommendation 15].
- Elements of the Safe Sport framework should include:
  - safeguarding policy resources [Recommendation 10] focused on the needs of the community [Recommendation 9];
  - a Code [Recommendation 11];
  - an independent case management service with trained and qualified persons [Recommendation 12]; and
  - a Disciplinary Framework [Recommendation 14].
- Elements of the Safe Sport framework may include the delegation of general/appellate jurisdiction to an independent Safe Sport Tribunal for sporting organisations [Recommendation 13].



# WHAT

a framework for Singapore should look like

PART III

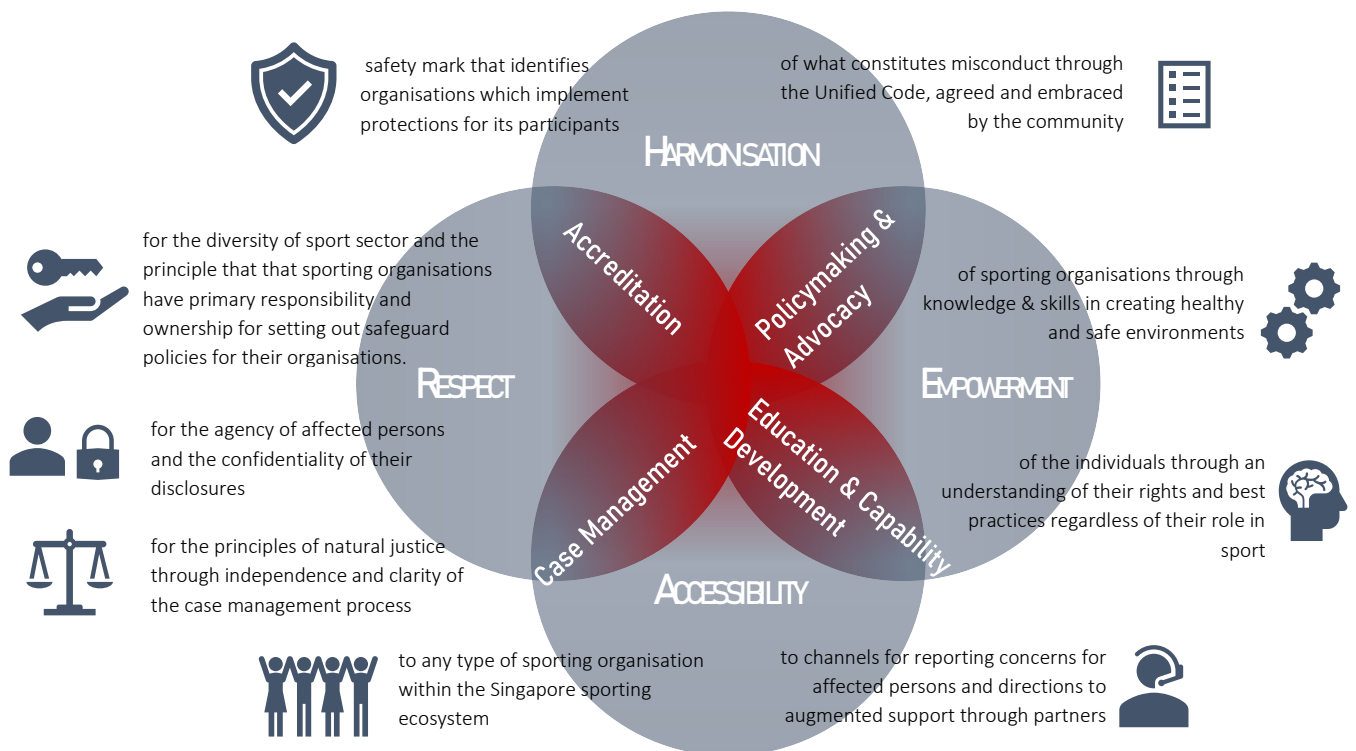
## 6. A Proposed Framework – Safe Sport Programme

### Strategies

- 6.1 The 3 strategies of Policymaking & Advocacy (P.), Education & Capability Building (E.), Case Management (C.) should continue to be pursued, enhanced and/or augmented.
- 6.2 3 corresponding steps will serve as the modes for delivering these strategies to the sporting organisation.
  - P. Policymaking & Advocacy → Adoption
  - E. Education & Capability Development → Implementation
  - C. Case Management → Delegation
- 6.3 The addition of a 4<sup>th</sup> strategy of Accreditation will assist the community in identifying organisations that have adopted and/or implemented safeguarding protections for their Participants.

### Core Principles

- 6.4 Recognising that the interests of both sporting organisations and the Persons Involved in the sporting ecosystem are important, we have been guided by the following principles in applying the P.E.C strategies – Harmonisation, Empowerment, Accessibility and Respect (H.E.A.R.):



## Framework

6.5 The framework will be delivered through an opt-in programme for sporting organisations, the Safe Sport Programme (“SS Programme”), which is designed to bring cohesion to the 3 strategies (P.E.C) and the Core Principles (H.E.A.R):

Safe Sport Programme				
Steps	Adopt	Implement	Delegate	Comply
Priorities	Sports that present High Risk Environmental Factors	Support Low Resourced Sport Organisations	Reach out to sectors of sport industry without regulatory leadership	
SS Programme Goals	Prevent		Address	Assure
	Develop & promote specific & relevant policies that meet the needs of organisations	Empower organisations and individuals through awareness and knowledge of skills needed to keep the sporting environment positive and safe	Provide an independent mechanism for the resolution of breaches of the Code	Give assurance of standard of safeguarding protection to participants
Strategies	Policy Development & Advocacy	Education & Capability Development	Case Management	Accreditation
<b>Harmonization Empowerment Accessibility Respect</b>				

## Considerations for Elements of the SS Programme

6.6 The rationale for various elements of the SS Programme have been set out in Section 5 and the following sections explore considerations for some of the specific elements.

### A Participation Model

6.7 The SS Programme has been designed as participation model through different tiers of membership. This would allow for a greater adoption and capability building across the wider sporting community.

Level of Participation	Type of Organisation	Steps Required
Supporter	Any organisation	1 -Adoption
Affiliate	Any organisation, NSA, NF	1 - Adoption 2 - Implementation
Member	SportSG (NROC), NSA, NF	1 - Adoption 2 - Implementation 3 - Delegation

6.8 Notwithstanding that SportSG may still require NSAs to participate to the SS Programme through the funding arrangements, an *opt-in* approach is recommended to leverage the global recognition and urgency

for sound organisational policies in this area. Importantly, this reflects the cognisance of organisational ownership in creating a safe environment which is a core principle of the Safe Sport Programme.

6.9 The reasons for the model are:

- a. the establishment of a relationship between the SS Programme and its members manifested through obligations and benefits as part of the participation in the SS Programme;
- b. membership of the Safe Sport Programme also presents a neater vehicle for expressing NSA safeguarding obligations through the funding arrangements;
- c. a tiered membership structure which recognises that:
  - beyond NSAs, other sport organisations are very much part of the sport ecosystem and may equally be served by the elements of the SS Programme;
  - whilst acknowledging that different types of sporting organisations have different human resource considerations when managing incidents of concern.

6.10 The participation model will also require a campaign to promote a “buy in” of the SS Programme and will require outreach not just to organisations but more importantly, Participants, for they drive the demand for the services & programmes run by sporting organisations.

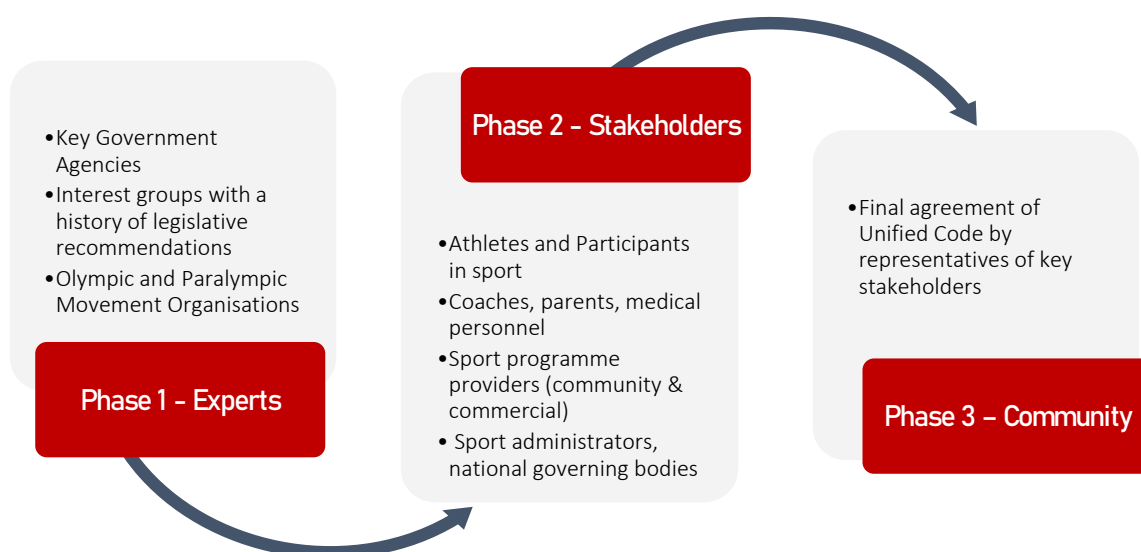
6.11 Additionally, the model does not necessarily rule out legislating participation in the SS Programme (like a US Safe Sport Authorization Act) in the future. In fact, it provides an existing framework to which future legislation may refer.

### Benefits to Participation for sports organisations

- Demonstrates commitment to safeguarding their affiliates and Participants
- Provides clarity to organisational staff and Participants through a Unified Code
- Savings in time and resources in developing safeguarding policies and training of personnel, including coaches, administrators, volunteers
- Improve and develop knowledge and skills of staff in interaction with participants
- Access to latest information and developments in Safe Sport including local and international networks
- Reduces administrative resources applied to case management and accusations of biasness/ procedural irregularities, which has a reputational cost
- Help attract and retain members through the SS Programme accreditation mark which is a signal to members/Participants of the organisation’s commitment to safeguarding action and accountability where concerns are raised, or a breach occurs

## A Unified Code

- 6.12 A unified code that is a common point of reference for abuse and harassment should be the bedrock of the SS Programme (“Code”). A Code is not a replacement for the need for specific safeguarding policies but instead defines and lists comprehensively what constitutes abuse and harassment in sport.
- 6.13 One of the key mechanisms of the participation model is the separation of the Code as a definitions document which may be adopted by any sporting organisation. (e.g. referred to in a member safeguarding policy of a gym operator). This will provide a common point of reference for not just NSAs but the sporting community and to which disciplinary processes may refer.
- 6.14 The Code will also allow for the SS Programme to differentiate levels of inappropriate behaviour in its case management process:
- [Tier 1] a breach of an organisations/sport-specific safeguarding policy (e.g. poor practice or grey areas) should be handled by the organisations as close monitoring may be required.
  - [Tier 2] allegations of a potential breach of the Code, should be dealt with under a process that meets the Safe Sport Programme’s minimum standards for a case management or delegated to the SS Programme’s case management team.
- 6.15 The Code will set out the definitions of misconduct in respect of:
- Sexual Misconduct
  - Psychological & Physical Misconduct (including bullying, hazing and harassment)
  - Other Inappropriate Conduct
  - Misconduct relating to the Code (including false reporting, retaliation and abuse of process)
- 6.16 The Code will also include a list of measures and sanctions including:
- temporary measures such as no contact directives, education requirements
  - probations, suspensions, permanent ineligibility
- 6.17 A draft Code has been developed and a proposed 3-Phase Consultation Process with experts, law enforcement and stakeholders planned.

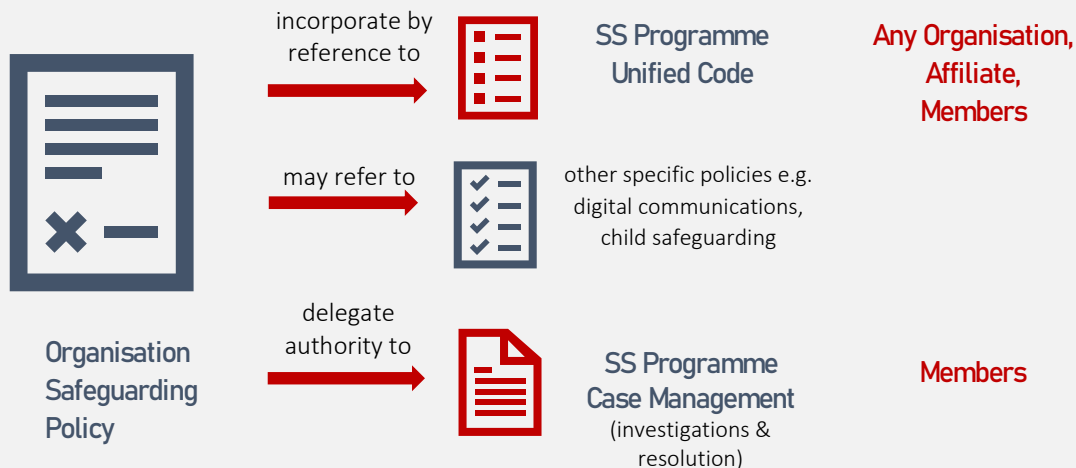


### Terminology Check

“Policy” is a document outlining an organisation’s principles and approach to safeguarding athletes from harassment and abuse.<sup>49</sup> This may include procedures detailing of the series of specific steps or actions which should be followed to achieve the objective of the policy

“Code” refers to a comprehensive list of prohibited behaviours (e.g. in law, the Penal Code)

### Mechanism for adoption



## Education & Capability Building

6.18 Education is at the heart of the prevention and in this respect, a suite of Safe Sport modules will be made available on the SportSG-Education and Development (SportSG-ED) platform. Each module comprises case studies and a self-assessment.

Module	For	Learning	Remarks
General	Coaches	Online	UAT – Roll out Q2 2021
	Athletes	Online	UAT – Roll out Q3 2021
	Parents	Online	UAT – Roll out Q3 2021
	Sport Administrators	Online	UAT – Roll out Q3 2021
Specific	Safeguarding Officers	Blended	Currently separate trainings for: Component 1 - understanding barriers to reporting, receiving Component 2 - psychological first aid (PFA) <sup>50</sup>  To develop a blended learning module in Q3 & Q4 2021 for roll-out in 2022.

6.19 The SportSG-ED platform provides an infrastructure for the SS Programme education strategy. It will also be a powerful tool for evaluation, monitoring and certification for members of the Programme.

<sup>49</sup> IOC Toolkit for safeguarding athletes from harassment and abuse in sport

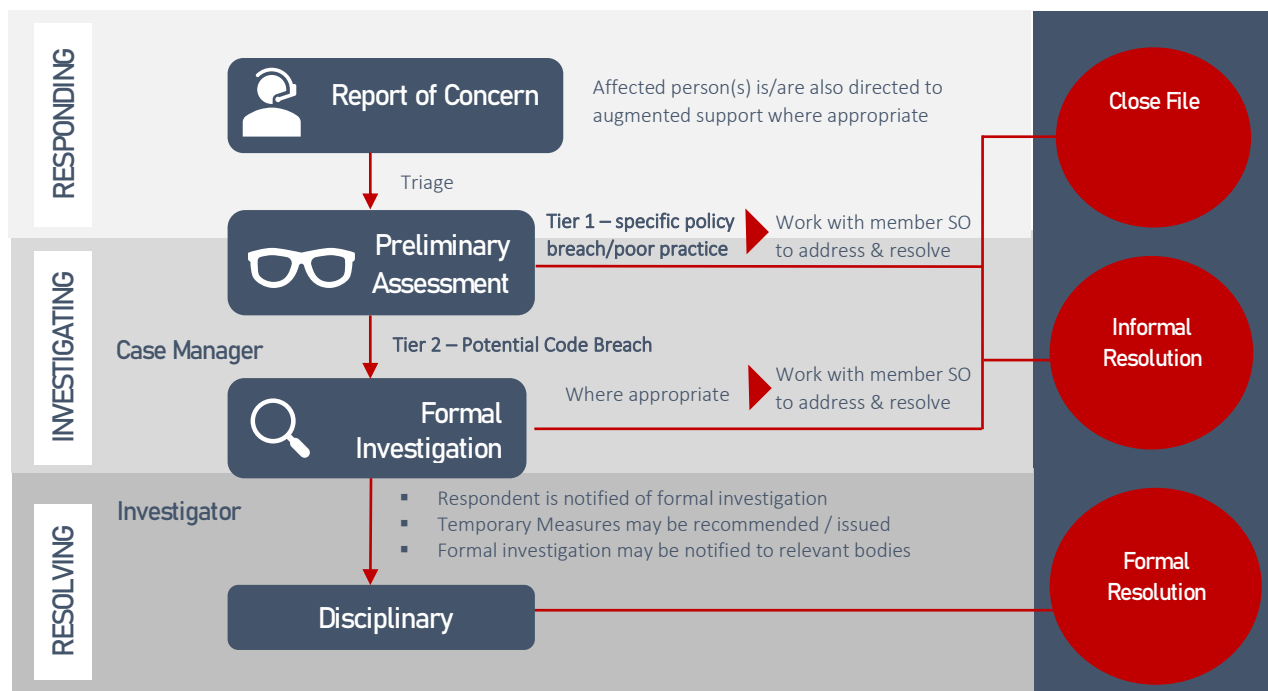
<sup>50</sup> Review 2020, Recommendation 4



6.20 Access to modules may be made available at a preferential rate for affiliates and members of the SS Programme and front-end development will need to be done.

### Case Management

6.21 If nothing else, the cross-jurisdictional analysis in Section 5 has made clear the importance of establishing an independent case management process.



6.22 The agency of the affected persons is most powerful at this point of the process and critical decisions are made (e.g. whether to investigate, whether appropriate to resolve informally). The transparency of the processes and clarity in procedures are also important for potential respondents (e.g. basis for temporary measures, circumstances for reporting to relevant authorities)

6.23 The importance of the decisions at all stages of the case management processes becomes even more significant when we consider the disciplinary processes below.

### A Safe Sport Disciplinary Framework

6.24 As discussed in Section 5, regardless of whether a Safe Sport Tribunal is established, a recommended Disciplinary Framework is advised to:

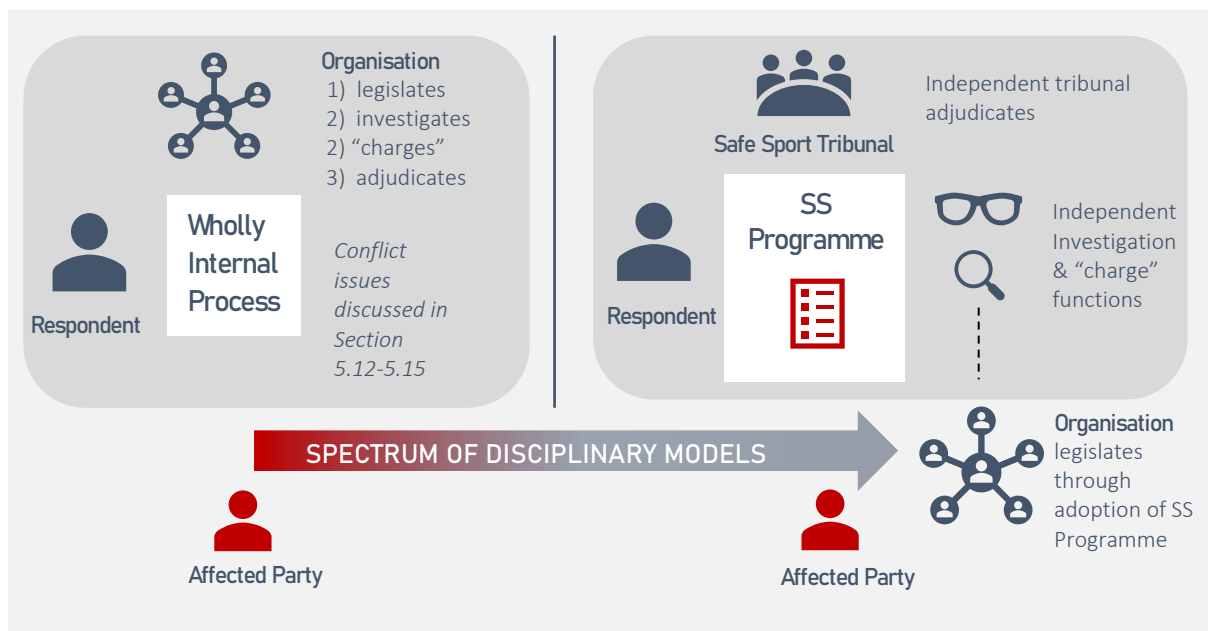
- support organisations without adequate written procedures by simple adoption or incorporation
- ensure due process clarity and transparency to processes for individuals who are subject to the disciplinary proceedings.
- provide assurance there is consistency and proportionality in sanctioning processes
- set up a benchmark for accreditation of the Safe Sport Mark

6.25 The elements of such a Disciplinary Framework to accompany the Code should set out:

- procedures to ensure due process (including the standard and burden of proof); and
- Decision-Making Process for assessment of seriousness and sanctioning and a sanctions matrix.

## Safe Sport Tribunal

6.26 As discussed in Section 5, the case for independent adjudication for abuse and harassment type breaches is compelling. Unlike antidoping, cheating or corruption which concern conduct against the *spirit of sport*, Safe Sport incidences involve conduct against *another person* (who may have suffered physical and/or psychological harm).



6.27 Beyond reporting, the agency of the affected person is lost in the disciplinary processes where he/she has no standing. Their interest as a Participant in the sport may only be, and is best represented, by the sporting body in enforcing the Code, including, and crucially, the right to appeal against decision and finding of independent tribunal.

6.28 Independent adjudication thus averts the possibility of accusations of impartiality which often dog internal disciplinary processes.

6.29 Each sport organisation has its own disciplinary process which sits somewhere on the spectrum of disciplinary models and it is important to remember one of the core principles of respect for each organisation’s independence and governing structures.

6.30 Therefore, the establishment of the independent Safe Sport Tribunal should factor the needs and obligations of NSAs and NFs and their obligations under their respective IFs. A consultation with the NSAs and NFs on their capabilities and obligations is proposed for Q1 2021. This consultation should culminate in an assessment of how a disciplinary framework might apply and the need for the establishment of a Safe Sport Tribunal by Q2 2021.

6.31 If assessment concludes that such an independent tribunal is required, the proposed term, appointment, composition of the Safe Sport Tribunal is set out at **Annex 5 – Safe Sport Tribunal Concept Paper**

### Accreditation through a Safe Sport Mark

6.32 Another important element of the SS Programme is the recognition for organisations that achieve differing levels of safeguarding protection. This will allow participants to identify organisations that are committed to safeguarding.

Accreditation through Safe Sport Mark	Steps Required	Criteria Concept
Safe Sport Ally	1 - Adoption	Adoption of Code into organisations policy/foundation documentation
Safe Sport Partner	1 - Adoption 2 - Implementation	In addition to criteria for Adoption, Implementation in the form of: <ul style="list-style-type: none"> <li>▪ General Education - Certification of relevant persons and inclusion in onboarding for new employees/staff/membership</li> <li>▪ Specific Education - Certification of Safeguarding Officer</li> <li>▪ Clear signposting of policies and reporting channels</li> </ul>
Safe Sport Champion	1 - Adoption 2 - Implementation 3 - Delegation	In addition to criteria for Adoption & Implementation <ul style="list-style-type: none"> <li>▪ Establish minimum standards for responding, investigation and resolution within organisation OR</li> <li>▪ Delegation of case management to SS Programme</li> </ul>

6.33 A comprehensive accreditation framework should be developed and specify criteria for the varying levels of the Safe Sport Mark.

### Safe Sport Commission & Secretariat

6.34 For the reasons set out in Sections 5.25 to 5.29, the re-positioning of the Safe Sport Commission from an advisory body to one that maintains a Secretariat for the following functions is necessary:

- Policy Development & Advocacy
- Education & Capability Development
- Case Management
- Accreditation Quality Management

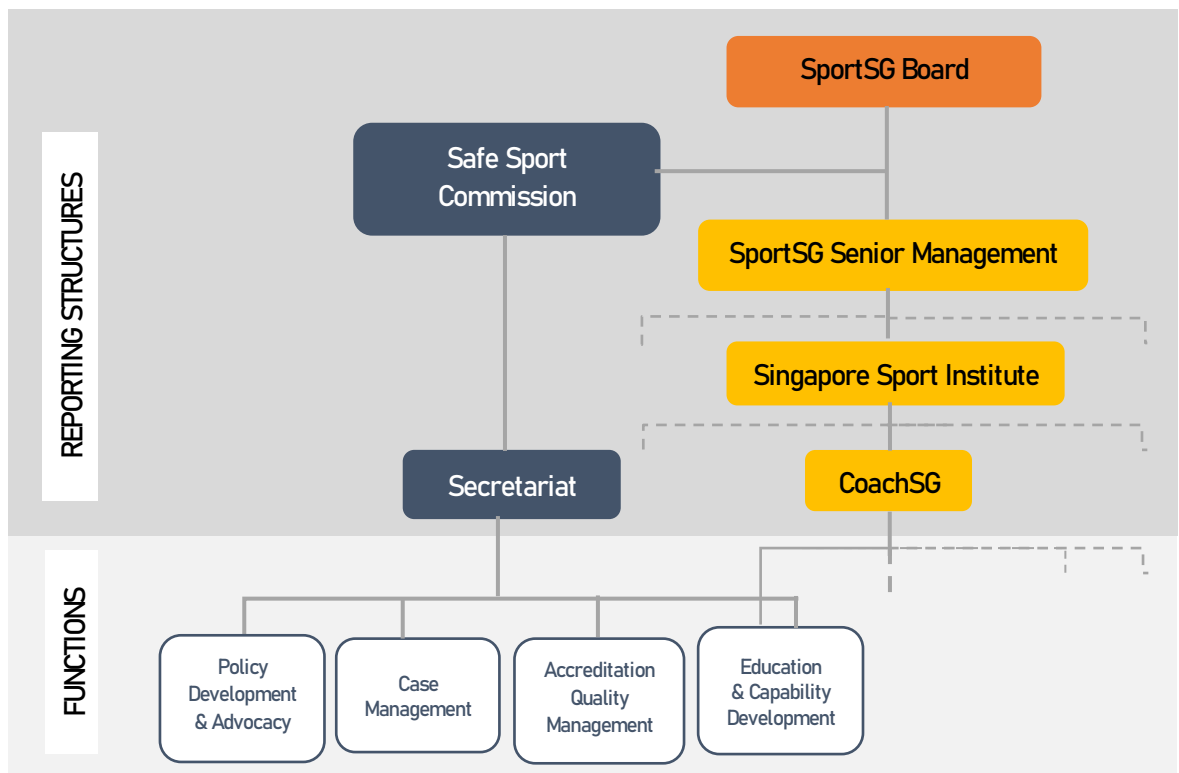
6.35 Capacity for these functions needs to be enhanced in terms of headcount as the SSTF currently comprises four (4) members of the CoachSG staff (Singapore Sport Institute (“SSI”)), three (3) of whom are double hatting. The transient structure of the taskforce does not lend itself well to heavy lifting that is required for the getting up of the Safe Sport Programme.

6.36 In particular, the specialist roles required for the following functions are not within SportSG’s current capabilities and it is important that these personnel have a working knowledge of psychological first aid and be experienced in interacting with minors, vulnerable persons and/or persons with disabilities:

- Safeguarding Education & Outreach
- Investigation
- Case Management

6.37 A concept paper was submitted to MCCY proposing the re-positioning of the Safe Sport Commission Secretariat and a request to support the proposed headcount. Extracts of the paper with the detailed job roles are set out at [Annex 6 – Extracts of Safe Sport Commission Paper for MCCY](#)

6.38 To maintain an arms-length in its case reporting and reporting lines, a diagrammatic representation of the proposed governance structure is set out below:



## Blueprint of the SS Programme

Steps	Strategy	SS Programme Elements	Participation	Accreditation
ADOPTION	Policy Development & Advocacy	<p><u>Unified Code</u></p> <p>Incorporation of Unified Code into organisation’s code of practice &amp; all relevant documentation binding all Persons Involved</p> <p>Access to Organisational Safeguarding Policy Repository of specific safeguarding policies (e.g. best practice/ guidelines for interactions with children and vulnerable persons, social media use, body positive messaging).</p>	Supporters - Any sporting organisation	<p>Safe Sport “Ally” (Bronze)</p> <p>where Code is appropriately incorporated</p>
IMPLEMENTATION	Education & Capability Development	<p>General – Safe Sport Training &amp; Certification of applicable individuals of members via online modules: for participants, administrators, parents and coaches.</p> <p>Specific – Training &amp; Certification for designated Safeguarding Officer (through blended learning and practical sessions) which comprises a First Responder Module and a Psychological First Aid Module</p> <p>Clear &amp; visible signposting for Participants and onboarding protocols for all Persons Involved</p> <p>Continual engagement through members’ safeguarding officer communities of practice, (with higher levels of engagements for High-Risk Sport)</p>	Affiliates - any sports organisation applicable NSAs, NGBs	<p>Safe Sport “Partner” (Silver)</p> <p>where designated standards are met.</p>
DELEGATION	Case Management	<p><u>Reporting &amp; Response</u></p> <p>Independent channel for receiving and triaging reports of concern</p> <p>Differentiation between Low-Level Concerns (LLCs) (i.e. poor practice) and potential Code breaches.</p> <p><u>Investigation</u></p> <p>Access to SSP for investigators for potential breaches</p> <p><u>Resolution</u></p> <p><i>Informal</i> – where appropriate, through advice and recommendation of Case Manager working with the designated Safeguarding Officer</p> <p><i>*subject to assessment</i></p> <p><i>Formal</i> - Mandatory application of Disciplinary Framework:</p> <ul style="list-style-type: none"> <li>▪ Minimum standards in procedures to ensure due process</li> <li>▪ Assessment of Seriousness and Sanctioning</li> <li>▪ Sanctions Matrix mapped to Code</li> </ul> <p>Delegation of hearing at first instance (where minimum standards cannot be met and independent adjudication is not possible) and/or delegation of appellate jurisdiction</p>	Members - SportSG, applicable NSAs, NGBs	<p>Safe Sport “Champion” (Gold)</p> <p>where compliance in case management is delegated or achieved to a designated standard.</p>
COMPLIANCE	Accreditation	<ul style="list-style-type: none"> <li>▪ Recognise organisations that meet the differing levels of Safeguarding protection</li> <li>▪ Licence use of designated SSP Mark in all marketing material</li> <li>▪ Surveillance &amp; monitoring through collaboration and information sharing with nominated Safeguarding Officers</li> </ul>		



Other Safe Sport Initiatives	
<b>COLLABORATION</b>	<p><b>Partnerships</b></p> <p>Explore &amp; establish partnerships for</p> <ul style="list-style-type: none"> <li>▪ action research to undertake impact analysis, organise Safe Sport Seminars, host regional and international conferences</li> <li>▪ support for concerned with augmented professionals (counsellors, psychologists)</li> <li>▪ facilitating other channels for whistleblowing, disclosure / reports of concern (through Singapore Sport Institute, NYSI, HiPAL/SNOC through the Athlete’s Commission, Women in Sport Committee)</li> <li>▪ promoting guidelines for Safe Sport facility design and working with the Sport Infrastructure Group to include guidelines into a broader sport facility design code</li> <li>▪ Explore legislation on licensing, sports centre of integrity with relevant bodies &amp; agencies</li> </ul>

### Differences between current initiatives and the SS Programme

6.39 Set out in the table below are the differences between the current Initiatives and the SS Programme and how the latter will have a greater impact on the sporting ecosystem.

	Current Initiatives	SS Programme
<b>Reach</b>	NSAs & SportSG	Any sport organisation (not-for-profit or commercial)
<b>Terms of engagement</b>	KPI in NSA funding arrangement	Establish relationship by membership and affiliation. Open to any sport organisation.
<b>Safeguarding Reference</b>	NSAs develop own safeguarding policies.	Adoption of Unified Code  (mandatory for members but equally accessible by incorporation as a standalone document into any organisation’s code of conduct)
<b>Education &amp; Certification</b>	NSAs NROC & SportSG assets	Access to affiliates & members  Backended by SportSG-ED online Safe learning suite with modules for Coaches, athletes, parents and sport administrators
<b>Safeguarding Officer Training</b>	NSAs & SportSG	Available to all affiliates & members  Mandatory appointment of organisational staff to promote best safeguarding practices & act as a first responders to all related concerns.
<b>Case Management</b>	Limited to NROC Coach breaches	Available to members  Independent Case Management by delegation, including responding, triaging, investigation and resolution informally or formally via Disciplinary Hearings to an independent Safe Sport Tribunal  Mandatory application of Harmonised Disciplinary Framework  Satisfaction of minimum standards that includes an arms-length reporting mechanism, investigation, and resolution.
<b>Accredit</b>	NA	Accreditation & Recognition of members that achieve differing levels of safeguarding protection for their participants though a Safe Sport Mark.

## Work Plan

6.40 If approved, the SS Programme will require substantial getting up and a dedicated budget.

Strategy	Getting Up
Policy Development & Advocacy	Establishing policy research capability and based on parameters from the prevalence survey  Develop an Organisational Safeguarding Policy Repository
Education & Capability Development	Developing a front-end system for access to SportSG-ED educational modules and monitoring system
Case Management	Developing Case Management Protocols (Responding & Triaging) Developing Investigation Protocols Establish a Case Record Keeping System Establish a Disciplinary Framework for the Code ----- Establish regulations for the formation and appointment of a Safe Sport Tribunal
Accreditation Quality Management	Developing an accreditation & licensing framework for use of Safe Sport Marks

A detailed Work Plan is set out at [Annex 7 – Work Plan 2020 – 2021](#)

6.41 It is also vital that the proposed initiatives are evidence and community driven and to that end, several consultations have already started or are in progress:

- 3 Phase – Code Consultation – January 2021
- Safeguarding Officer Pulse Check Survey – December 2020
- Athlete Climate Survey – February 2021
- NSA Capability Engagement – April 2021

6.42 If sufficiently and appropriately staffed by Q1 2021, the milestones for Safe Sport Programme will be as follows:

Milestones	Timeline
Refining Scope (needs assessment, prevalence survey) by SSTF	By end Q2 2021
Getting Up (Code Consultation, establishing protocols, developing systems) by Secretariat	By end Q3 2021
Roll out to NSAs	Q4 2021
Roll out to any sport organisation	Q3 2022

## 7. Conclusion

- 7.1 The stories of sport inundated by allegations of abuse and harassment today illustrate the danger of the slow burn of tolerance to low-level inappropriate behaviours over time. The threats to Safe Sport are not confined only to deep-seated institutionalised attitudes or the lack of organisational protections but include new menaces evolving with the rapid changes to our world through technology.
- 7.2 Each life impacted by abuse or harassment is not just a dereliction of duty by the perpetrator but is also a reflection on those placed in charge of protecting its Participants. Current events have shown how quickly international governing institutions have been caught on the backfoot resulting in reputational damage that will take years to recover from.
- 7.3 Whilst current efforts have, sensibly, been focused on the channels of most influence for SportSG, their limitations with respect to the wider sporting community are clearer on examination. Bearing the objects of SportSG in mind, it would be remiss to stay the current narrower course and risk hurting public trust and confidence in the integrity of sport in Singapore.
- 7.4 Even in the best of times, many sports organisations struggle to deal with incidents of abuse and harassment. As COVID-19 continues to ravage the sports industry and threaten the survival of leagues, tournaments, and national governing bodies, shrinking budgets may lead to the erosion of safeguarding resources and protections within national governing bodies. The role that SportSG plays in supporting Safe Sport efforts is more critical than ever.
- 7.5 On analysis, it is evident that there is no exemplary framework. There is only an appropriate framework. The SS Programme is proposed as the framework that best fits the structures within the Singapore sporting ecosystem and is rooted in an evidentiary and community driven approach.
- 7.6 To materialise the SS Programme, a dedicated team is required to execute and plan and to reflect SportSG's convictions. Present arrangements in terms of capacity and capability are incommensurate with the proposed purpose.
- 7.7 As the examples of the other sporting nations have revealed, constant refinements and adjustments are also required to the most established of structures. As such, continued and frequent consultations and reviews will be required to stay nimble.
- 7.8 The SS Programme is ambitious, and we would submit, necessary, if SportSG is to have a wider and greater impact on Safe Sport efforts within the Singapore sporting community.






# Annexes

# Annex 1 – Incidents Reported in the Press

**Badminton coach jailed 5 years for grooming and sexually assaulting boy**

The coach had dismissed his sexual relationship with his young student as "boys being boys".




By Vanessa Pooj Cheeian  
12 Jan 2014 12:40PM

SINGAPORE: A badminton coach who groomed his young student and pressured the 14-year-old boy to engage in sexual activities with him was sentenced to five years' jail on Wednesday (Jan 15).

The coach cannot be named to protect the identity of the victim.

**Ex-swim coach jailed 10 months for sexual exploitation of boy at public pool**



File photo of Hougang Swimming Complex. PHOTO: THE NEW PAPER

PUBLISHED MAY 5, 2017 1:50 PM SGT  
UPDATED MAY 5, 2017 5:09 PM

**Basketball coach found guilty of sex acts with boy**


PUBLISHED DEC 19, 2017 6:00 AM SGT

A basketball coach committed sexual acts on his then 13-year-old student and the teenager told his mother about his ordeal only two years later when he feared contracting a sexually transmitted disease.

Following a five-day trial, District Judge Mathew Joseph yesterday found the man guilty of committing two sexual offences in 2013 - sodomising the minor and performing oral sex on him.

The 57-year-old man cannot be named because of a gag order to protect the identity of the victim, now a 17-year-old polytechnic student.

**Figure skating: Singapore's 2017 SEA Games champion Yu Shuran opens up about systemic abuse in China**




Yu Shuran stands on the podium after the SEA Games women's figure skating competition on Aug 27, 2017. PHOTO: ST FILE

PUBLISHED JUL 23, 2020 5:10 PM SGT

SINGAPORE - While recounting the constant beating, kicking and verbal abuse she

**Rope-skipping coach found guilty of raping young student**



PUBLISHED FEB 20, 2018 5:28 PM SGT  
UPDATED FEB 20, 2018 9:16 PM

SINGAPORE: A rope-skipping coach was found guilty on Tuesday (Feb 20) of sexual offences against a student who was a minor.

**Football coach, 28, gets 26 years' jail, caning for sexually assaulting seven boys**


PUBLISHED MAR 19, 2018 2:24 PM SGT  
UPDATED 11 HOURS AGO

SINGAPORE - A football coach was sentenced to 26 years' jail and 24 strokes of the cane for sexually assaulting seven boys aged between eight and 11.

Bernard Tan Meng Soon, 28, pleaded guilty on Monday morning (March 19) to five charges of sexual assault.

Twenty other charges of sexual assault by penetration were taken into consideration.


**Former assistant coach of Albirex Niigata Singapore football club gets 10 days' jail for molesting teen**



Japanese national Takafumi Mizuno, 30, first molested the girl in a shop in Jooong East Street 31 at 5:40pm on July 6, 2017. ST PHOTO: WONG KWEE CHOW

PUBLISHED MAR 23, 2018 11:47 AM SGT


**Veteran track and field coach Loh Chan Pew found guilty of molesting teenage athlete**



PUBLISHED JUN 3, 2020 12:47 PM SGT

SINGAPORE | COURTS & CRIME

**Jail for tennis coach who performed sexual acts on underage male student**




Phoo Sang Qung was sentenced to two years and nine months' jail for committing the offences in 2013 and 2014. ST PHOTO: KIMBERLY KOVEK

SINGAPORE - A tennis coach who often kissed one of his male students goodbye when sending the teenager home later performed sexual acts on the boy.

The prosecution told a district court that Phoo Sang Qung had abused the trust placed in him and targeted the victim, who was between 14 and 15 years old at the time.

SPORT

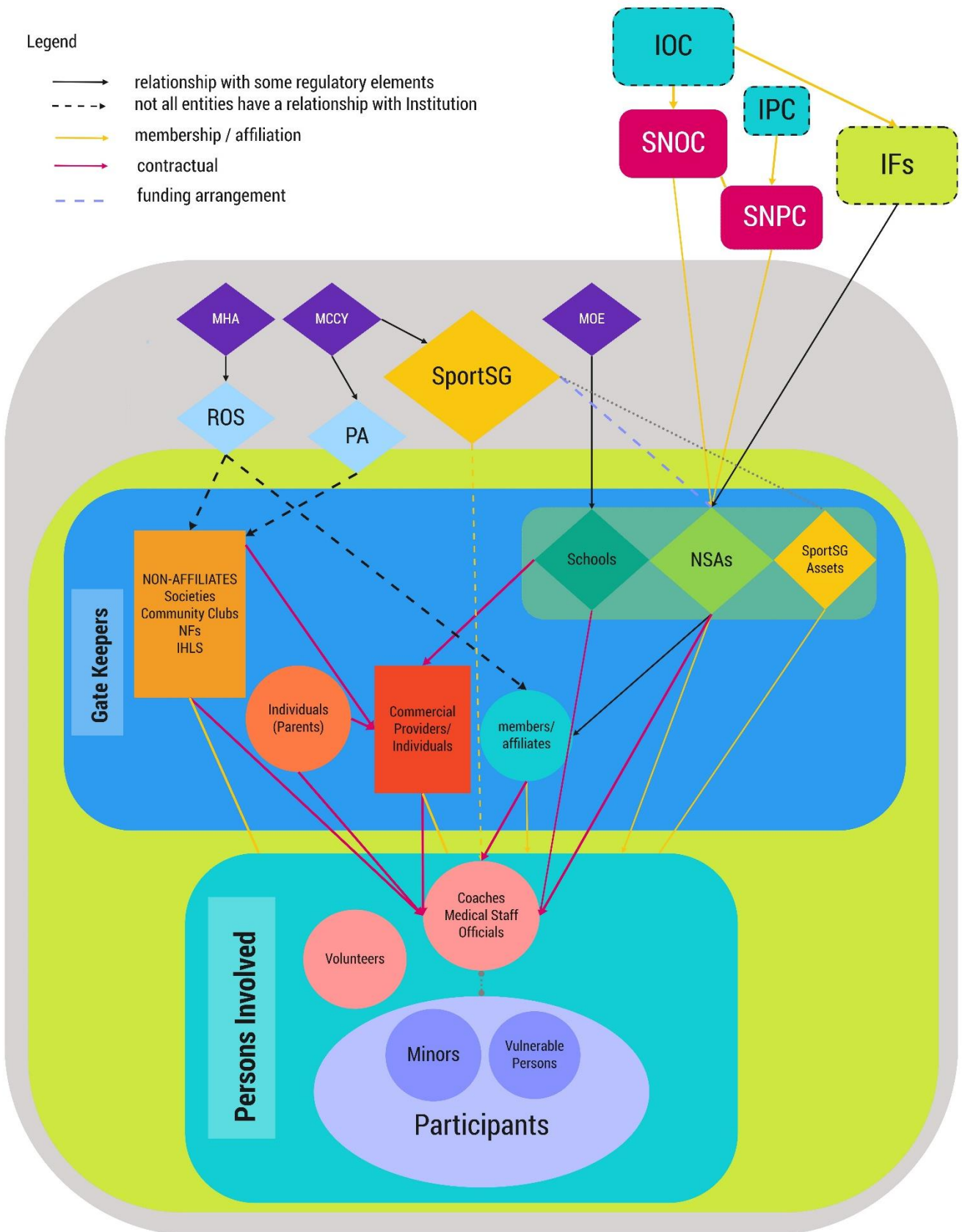
**'We were being pressured to lose weight': S'pore athletes push back against culture of abuse in sport**



Former rhythmic gymnast Kathryn Chia (left) and synchronised swimmer Debbie Soh are among athletes who have spoken out about their struggles with body image. PHOTOS: COURTESY OF KATHRYN CHIA, KEVIN LIM

SINGAPORE - For a long time, gymnastics was a game of numbers for Kathryn Chia.

## Annex 2 - Singapore Sporting Landscape



## Annex 3 – SWOT Analysis & 2020 Review Recommendations

### Strengths

#### 1 Interagency Expertise on SS Commission

The SSTF has been able to leverage the expertise of the members of the SS Commission including but not limited to:

- content development and delivery of the Safeguarding Officer Training through representative from Ministry of Social and Family Development
- screening information and processes from Ministry of Education, People’s Association and Singapore Police Force,
- legal advice and consultation from legal representative
- recruitment policy inputs by Ministry of Social and Family Development and Ministry of Education)

#### 2 NSA Engagement

A strong foundation in awareness of Safe Sport has been laid through the engagement of the NSA

leadership through the required Key Performance Indicators (“KPIs”) for Safe Sport in the NSA funding agreements.

#### 3 More than 80% of NSAs have a trained safeguarding officer in place

Within majority of the NSAs there is a touch point for the Safe Sport Taskforce. The Safeguarding Officers serve as advocates and first responders.

#### 4 Existing Training Infrastructure

Through the CoachSG-ED online learning platform, CoachSG has developed 4 Safe Sport learning modules for athletes, coaches, parents and sport administrators which will be rolling up in phases over the first half of 2021.

This provides method of delivery and certification that will be invaluable for evaluation and monitoring.

### Weaknesses

#### 1 Evaluation, Monitoring, Quality Assurance

Although KPIs have been incorporated into funding arrangements for NSAs with respect to Safe Sport policies and practices, and nomination of safeguarding officers, these KPIs do not equate adherence to the commitments set out or that the education and awareness of Safe Sport is communicated throughout the NSA membership.

NSAs are also not formally obliged to inform SportSG of reports of concern or cases investigated (although they are advised to). The SSTF has little leverage in ensuring the application of these policies are not just paper exercises.

Current knowledge of Safe Sport cases come to the SSTF through reports in the press, through the grapevine and/or when an NSA is struggling with managing a case. This makes evaluating the prevalence of Safe Sport concerns and monitoring the progress of the current initiatives a challenge.

#### 2 Limited impact of initiatives on the sport ecosystem

**2.1 Jurisdiction of NSA** – Although NSAs wield the authority from their International Federations (IFs) to regulate and govern their respective sports in Singapore, the ability of NSAs to influence their members depends on each NSA membership structure. NSA constitutions vary in terms of membership categories (individuals or clubs, voting or non-voting) and reach. Consequently, not all NSA memberships are reflective of the participation or within each sport which has the potential to leave many enforcement gaps even if a Safeguarding policy is in place.

**2.2 limited to government funded sport organisations** – Outside of NSAs, there is less leverage for SportSG as other national governing bodies are not part of any funding arrangements. In the sport and recreation space, there is no single organisation that regulates or certifies sport instruction (e.g. personal training, yoga, Pilates, children’s multi-sport or fitness instruction). Several incidents reported in the

press have arisen from these environments which are under the charge of private providers

2.3 **Accountability** – Accountability for breaches by is only assured under the NROC framework. Even within the NSAs, there are no strict requirements for coaches to be NROC accredited.

2.4 **Coverage of facility-based approach through NROC requirements** – NROC registered swimming coaches are permitted to engage in coaching at SportSG swimming facilities. Efforts have been made through to reach out to users of coaching services (including parents, private education institutes, sporting facilities owners and private residence owners) who utilise the services of NROC registered coaches. However, coach accreditation requirement would not cover inappropriate conduct from other Persons Involved, like medical staff, parents, athlete breaches.

### 3 NSA independence & capabilities

3.1 **Reporting Channel not Arms-Length** – Nearly all the Safeguarding Officers are staff, employees or board members of the organisations they represent. Inherent in this is the perception that reports of concern may not be treated on an arms-length basis.

3.2 **Case Management** – There are only a few well-staffed NSAs and/or NSAs with well-developed disciplinary processes who have the capacity and capabilities to handle Safe Sport case

management processes from responding to investigations and to resolution. Resources and time devoted to handling reports of concern are a challenge for many NSAs are already struggling with funding and keeping their sport afloat. Apart from confidentiality considerations, extended interactions (e.g. interviewing) with persons who have been affected (in particular, children and young persons) require skills beyond a first responder training course.

### 4 Enforcement

The lack of a central repository or a system of reporting decisions presents some gaps in enforcing sanctions. Because of the varying structures of the NSA memberships, it is not unheard of that a person who is sanctioned by a NSA, may still be operating in facilities, conducting activities or be involved in the sport outside of the NSA's jurisdiction.

### 5 SSTF capacity

The SSTF currently comprises four (4) members of the CoachSG staff (Singapore Sport Institute ("SSI"), three (3) of whom are double-hatting. Even if assistance is requested by NSAs, the specialist roles with some expert knowledge is required for the case management process (i.e. Responding & investigations) which are not within SportSG's current capabilities. Headcount has been requested in December 2020 for specialist staff to roll out the Safe Sport Program (Section 6).

### 6 Lack of safeguarding protections generally

See Sections 4.7 (Screening) and Section 5.4 (Key Takeaways)

## Opportunities

### 1 Global Urgency

The prioritisation of Safe Sport by the IOC and several International Federations' recognition of Safe Sport concerns at this moment in time cannot be understated. This provides impetus for NSAs, within the Olympic movement in especially, to up their safeguarding game.

### 2 Resources & Learnings from established sporting nations

Government Sporting Agencies the world over may have more developed integrity systems for

antidoping, match-fixing and wagering, but they are also having to wrestle with the appropriate mechanisms for dealing with Safe Sport concerns. Much literature has been produced in the last few years and the lessons and recommendations from reviews and reports from the leading sporting nations is addressed in Section 5.

### 3 Existing body - Safe Sport Commission

The key government agencies and athletes represented on the SS Commission, lends validity and gravitas to extend the work of the SSTF. It is well

placed to pivot from an advisory body to a quasi-independent body which may deliver the case management oversight (See Section 6)

4 Safeguarding Officer Network

A network of Safeguarding Officers within the NSAs and SportSG assets has been established and these persons provide touch points within the sporting community for data gathering and dissemination of information. A Safe Sport Pulse Survey was

conducted this month via the Safeguarding Officers to gauge the prevalence of Safe Sport incidents, assess potential risks and organisational capabilities.

5 Our geographical size

As examined later in Section 5, as a small country, Singapore faces less barriers in terms of jurisdictional boundaries and geographical barriers in relation to the other developed sporting nations.

## Threats

1 Lack of safeguarding obligations for the increasing number of commercial sport instruction services

The commercial sports and recreation sector has grown rapidly in the past decade. Outside of school activities, children are engaged in sporting activities through academies and sports leagues. Personal training, martial arts gyms, Pilates and yoga studios and general fitness classes for adults are commonplace in all neighbourhoods. There are no regulations covering these commercial entities in terms of child safeguarding and/or member protection. As far as safe sport protections are concerned, there are no safeguarding requirements placed on these entities.

Allowances need to be made for disclosures of poor practices and other type of low-level concerns which may not result in serious sanctions or sanctions at all but warnings or education directives. If low level concerns are not dealt with, this can lead to a culture of permissibility which may snowball into more serious transgressions.

This drives disclosure to public channels (e.g. social media) which reflects badly upon the sports sector in general.

Efforts are being made for communities of practice within SOs in 2020 for some of the highest risks sports in NSAs. Again, the general sport and recreation sector and other Gatekeepers (NGBs, commercial entities) are not covered.

2 Increasing trends in cyber related harassment, sexual crimes & bullying

Addressed above in Section 2

4 Consistency in decisions making processes

As every NSA has a different disciplinary processes, procedures and rules, it is not clear how sanctions have been applied by NSAs to existing/prior Safe Sport breaches and/or if what factors are considered when meting out sanctions. Whilst the argument that NSAs should regulate their own proceedings is one grounded in the fact that the NSAs are independent entities, different treatments by different sports for the same type of transgressions could potentially be problematic.

3 Channels for disclosure verses reporting (increase in SM disclosure)

There is currently little distinction between a channel for disclosure and reporting. Not all persons who witness or experience a Safe Sport concern may want to lodge a report, which is often associated with ill consequences for the alleged perpetrator and or animosity against the reporter.

## 8 Recommendations by the Internal Review Committee (September 2020)

**Recommendation 1:** Legislation & Licensing of coaches, fitness instructors, technical officials & referees for sports & physical activities

**Recommendation 2:** Enhance the independence when dealing with Safe Sport Incidents. Explore the creation of an Independent body to deal with Safe Sport Incidents together with matters such as Anti-Doping. Scope to include a Sports Tribunal with jurisdiction to hear disputes over sports matters including Anti-Doping matters

**Recommendation 3:** Segregate personnel involved in implementation of Safe Sport policy and practices from those Managing Safe Sport Incidences - Complaints relating to safe sport matters could impinge on quality of safe sports efforts - Only Safeguarding Officers have access to the generic Safe Sport email account for reporting

**Recommendation 4:** Support Framework - To include 'Psychological First Aid' (PFA) training for SOs and consider PFA Support and counselling

**Recommendation 5:** Enhance Independence & Credibility of NROC Hearing Panel with independent members






**Recommendation 6:** Enhance process - Improve documentation of Rules of Hearing for NROC Handbook. NROC Inquiry Panel & Appeals Board to include a member trained in proceedings of hearing.

**Recommendation 7:** put in place Sanctions Framework based on recommendations by external lawyers who benchmarked against other sports bodies. Publish the Sanction Framework as part of education and deterrence purposes

**Recommendation 8:** Benchmark current safe sport efforts against Canadian system to determine our vulnerabilities.

Annex 4 - Screening

# REFERENCES & BENCHMARKING: INTERNATIONAL SCREENING

	AUSTRALIA	CANADA	NEW ZEALAND	UK	USA
 <b>How is it enforced?</b>	From 1 July 2020, <b>Sport Integrity Australia</b> assumed responsibility for child safeguarding for the sport sector.	<b>Part of Responsible Coaching Movement</b> - Rule of 2, Background Screening and Ethics training.	Each club or organisation can decide which roles should be Police Vetted. <b>The Children's Act 2014</b> provides the legal requirements for Police vetting.  Best practice standards go beyond the legal requirement and recommend that any person who has regular contact with tamariki or rangatahi, such as a coach, manager, or supervisor or volunteer, someone who drives children to activities and events, and anyone responsible for overnight trips away should be police checked prior to working with children.	<b>Legislated</b> for anyone aged 16 & above who undertakes any unsupervised roles with children & young people < 18 yrs  <b>The Protection of Freedoms Act, 2012</b> identified regulated activity as specific activities, carried out frequently or intensively, which is unsupervised.  This includes those whose roles involve teaching, training, instructing, supervising, giving advice or guidance on wellbeing or caring for children or driving a vehicle solely for children on behalf of a club or organization.	Promoted as best practice by National Sporting Organisations but <b>legislated in certain states e.g. Pennsylvania Act 153: Requirement for Youth Coaches</b>
 <b>Requested by</b>	Individual or organisation may request	Individual or organisation may request	Only organisation can request.	Only organisation can request	Person give informed consent to screen and organisation submit request to partners / Only organisation can request
 <b>Validity</b>	3 - 5 years	Validity requirements are set by the requesting organization.	3 years	No official expiry date	Different state have different validity
 <b>Application duration</b>	Within a month	1 business day	20 working days	85% of enhanced disclosures returned within 5 working days 95% of standard disclosures returned within 5 working days 80% of basic disclosures returned within 10 working days	3 – 30 business days
 <b>Who pays?</b>  <b>Where to make payment?</b>  <b>Cost?</b>	Coach / Organisation  Different territories have different agencies.  Employees: AUD\$115.50 Students: AUD\$63.25	Organisation  Local Canadian police service / sterling talent solutions  CDN\$25 - hundreds	Organisation  New Zealand Police Vetting Service  NZD\$8.50 + GST per vetting request	Organisation  DBS (Disclosure & Barring Service)  Basic Checks: £23 plus admin fee Standard Checks: £23 plus admin fee Enhanced Checks: £40 plus admin fee	Organisation  NCSI (National Center for Safety Initiatives) / Others Companies  USD\$20.50 or more



# REFERENCES & BENCHMARKING: INTERNATIONAL SCREENING

## CANADA

**Vulnerable Sector Verification**  
(including Canadian Criminal Records Check, Enhanced Police Information Check (EPIC) and Pardoned Sex Offenders Database)

*EPIC: outstanding charges, probation orders, interim release conditions, peace bonds and restraining orders, summary conviction offenders that cannot be added, recent convictions yet to be listed*



## UK

### UK Football:

All sex offences, murder and homicide regardless of time limit, felony, violence and felony drug offences in the past 7 years, more than two convictions for misdemeanor drug and alcohol violations within the past 5 years; or any other crimes (not listed) against children in the past 7 years. Cases found to have pending court cases for any of the above will also be reviewed. Only if the court results is a non-conviction, then coaches may proceed to coach.

Old offences are not viewed as seriously as recent offences. Minor and financial crimes are usually not as relevant. Juvenile offending is generally less concerning than adult offending. The DBS is also undertaking a process to filter old and minor convictions and cautions.

Recent assaults, violence with prison sentences, sexual crimes and drug supply (considered as a higher risk)



## USA

### USA Basketball

All sex offences, murder and homicide, regardless of time, felony violence & felony drug

### USA Track & Field

Violent & sexual anytime and non-violent felony force of threat of force, sexual relations is an element, controlled substance abuse, cruelty to animals, crimes involving child regardless of time, sex offenders and coaches with no good standing with World Anti-Doping Association.

## NEW ZEALAND

### NZ Netball

Conviction (whenever it occurred), is one involving dishonesty, drugs, threatening behaviour, harassment, violence, or other crimes against a person (e.g. sex offences, assault)

### NZ Rugby:

Murder, Sexual Offences, Indecency offences resulting in imprisonment, Kidnapping, Offences connected with child prostitution, possession or publication of child pornography, assault and/or violence and/or harassment towards a child, possession of drugs for supply resulting in imprisonment, recidivist drink driving resulting in imprisonment.

### NZ Cricket:

Murder, Sexual Offences, Indecency offences resulting in imprisonment, Kidnapping, Offences connected with child prostitution, possession or publication of child pornography, assault and/or violence and/or harassment towards a child, possession of drugs for supply resulting in imprisonment, recidivist drink driving resulting in over imprisonment, any other serious offences resulting in imprisonment for over 2 years

## AUSTRALIA

Class 1: Severe sexual offences related to children Under 13

Class 2: Child exploitation, murder, bodily harm, sexual offences related to children, kidnapping, child-stealing, misuse of drugs act, child pornography, Using a carriage service to procure/groom persons under 16



## Annex 5 – Safe Sport Tribunal Concept Paper

### Introduction

1. This annex sets out the concept for the Safe Sport Tribunal based on the considerations set out in Section 6.25 to 6.30.
2. The Safe Sport Tribunal’s authority would be designated by the Safe Sport Programme and delegated from sporting organisations through their participation.
3. As discussed, an assessment should be conducted in line with the recommendations in informing the need for establishing a Safe Sport Tribunal. To this end, the needs assessment may reflect that the Safe Sport Tribunal should:
  - a. have both general and appellate jurisdiction;
  - b. have only an appellate jurisdiction;
  - c. be the default jurisdiction for breaches of the Code for SS Programme members; and/or
  - d. only be delegated jurisdiction at the option of the organisation concerned

This concept paper has been written on the basis that the Safe Sport Tribunal may adjudicate a case at first instance. In the event, it sits in its appellate capacity (at the Disciplinary Committee level, there would be no further appeal).

4. The “Safe Sport Tribunal” refers to Disciplinary and Appeal Committees constituted under the disciplinary regulations (to be developed) for the Safe Sport Programme.
5. The central tenet of the Safe Sport Tribunal is its independence - it shall be independently appointed and shall exercise its functions independently, including independently of (a) the parties to the proceedings (b) sports organisation whose jurisdiction responsibility falls, and (c) the SS Commission. The member on the Tribunal should not be office holders or employees of any of the above.

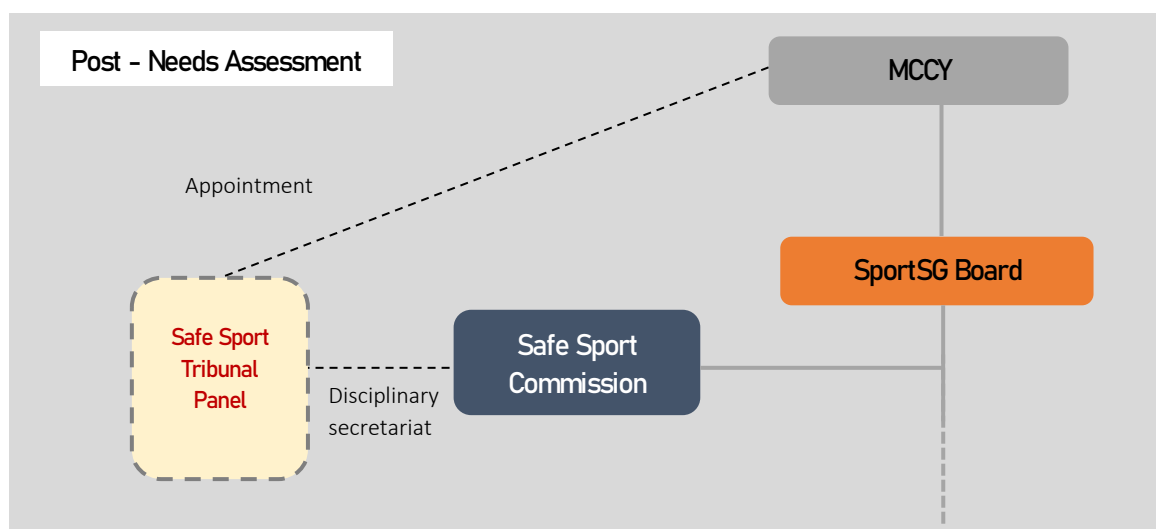
### Elements of the Proceedings involving the Safe Sport Tribunal

6. The Safe Sport disciplinary regulations should set out the following:
  - a. **Standard of Proof** – on the balance of probabilities (consistent with general sport disciplinary procedures).
  - b. **Inquisitorial Process** (vs Adversarial) – hearings should be inquisitorial in nature. This so that the tribunal is not arbitrating between the sporting organization and the Respondent as the tribunal’s legitimacy extends to the interest of sport itself. Therefore, the tribunal’s role will be to ensure that the truth prevails by asking questions and has wider discretions in the procedures.
  - c. **Principles of Natural Justice** – the respondent shall have the right to know the evidence against him/her, shall have the right to be heard, to be represented, to produce evidence and defend himself/herself before independent adjudicators.
  - d. **Appeal**
    - Right of appeal - Either the sporting organization or Respondent may appeal against the decision of the tribunal in the first instance

- Grounds of Appeal & Thresholds
    - i. there is error in law (the tribunal in the first instance applied wrong principles)
    - ii. error in central finding of fact (exercise of judgement/discretion by tribunal at first instance was manifestly wrong)
    - iii. sanction was manifestly excessive or wrong in principle
    - iv. sanction was unduly lenient
    - v. decision should be overturned in the interests of natural justice
  - e. De Novo - Appeal Committee has power to hear de novo in part or whole (as natural justice requirement)
7. **Secretariat** - the administration of regulations will be provided by a Disciplinary Officer from the SS Commission who will be responsible for coordinating the exchange of documentation and assist the Tribunal in presenting the case for a breach.
  8. **Resource person (s) or subject matter expert (s)** - may also be called to provide information to assist the Safe Sport Tribunal.

### Appointment to Safe Sport Tribunal Panel

8. Nominations for the appointment to Safe Sport Tribunal Panel may be made by NSAs, sports organizations who are members of the SS Programme and/or the SS Commission. MCCY, at the recommendation of SS Commission shall consider all such nominees for appointment against an appointment criteria.

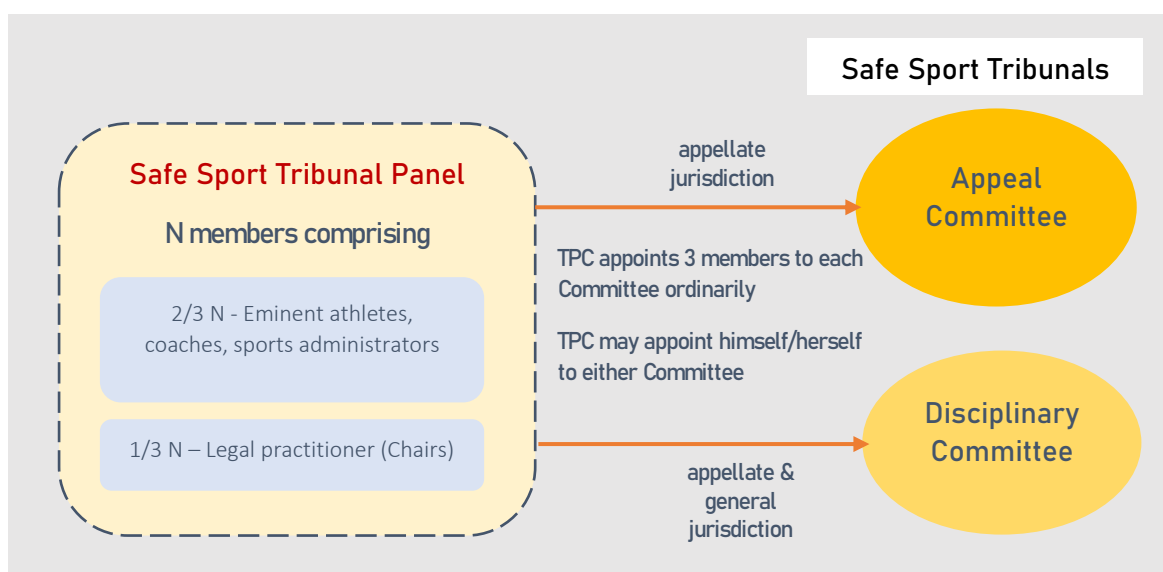


9. N (number) of persons shall be appointed to a Safe Sport Tribunal Panel (“SSTP”) for a term of 2 years. The appointment of the SSDP will not be dissimilar to the appointment to the Anti-Doping Singapore Disciplinary Committee.
10. The “N” shall be determined after the needs and assessment analysis taking into account the projected number of cases.
11. Composition of SSTP members:
  - 2/3<sup>rd</sup> N shall comprise any of the following:
    - eminent athlete (e.g. current and/or former members Athletes Commission)
    - eminent and experienced coach / official
    - experienced sports administrator

- o valued contributor to the sporting community (e.g. parent, award recipient)
- 1/3<sup>rd</sup> N shall comprise senior legal practitioners with previous experience in sport disciplinary hearings (“Legal Person(s)”)

### Safe Sport Tribunal Panel Chair

12. One of the Legal Persons should be appointed as Safe Sport Tribunal Panel Chair (“TPC”). The TPC’s role is to be the senior member of the SSTP and shall exercise his/her role with impartiality.
13. The TPC’s role will include:
  - a. specifying chairs and members to the Safe Sport Tribunals taking into considerations conflicts of interest, the subject matter at hand etc.
  - b. ensuring the expeditious disposal of disciplinary and other cases together with full and reasoned decisions expeditiously;
  - c. mentoring and assessing the performance of and training of members of the SSTP;
  - d. at his/her own volition or at the request issuing practice directions and sanctioning guidelines, memoranda relating to the SS Programme’s disciplinary processes and procedures;
  - e. at his/her own volition or, when requested, to provide input and advice to Safe Sport Commission on its discipline (and other relevant) regulations, on certain aspects of discipline policy relating to procedures etc.; and
  - f. hearing first instance and appeal cases at his/her sole discretion as a chair of a panel specified by him/her.
14. The proposed organization through a Tribunal Panel chairperson is in line with the principles of best practice in today’s sport governance on disciplinary integrity.<sup>51</sup>



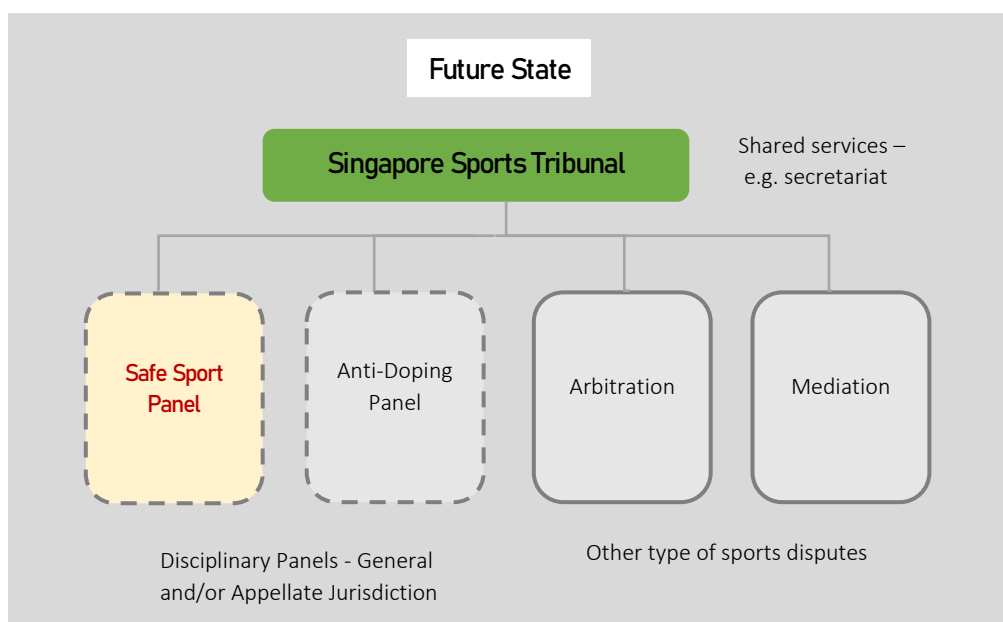
<sup>51</sup> The Quinlan Report for the British Horseracing Authority (2016), <https://www.guildhallchambers.co.uk/news/1925/>

### Tribunal Composition & Responsibilities

15. Disciplinary and Appeal Committees should ordinarily comprise three members from the SSTP but shall be at the discretion of the TPC. (e.g. Where an appeal is on a point of law, the TPC may appoint 2 Legal persons to the Appeals Committee.)
16. At least one member of the Disciplinary Committee shall be of the same gender as the person affected by the allegations against the Respondent.
17. As appeal hearings are less common, there is no need to appoint a separate appeals panel. The SSTP members may be appointed for either first instance or appeal hearings. A SSTP member who is not appointed to hearing will be available for appointment to the appeal.
18. The TPC shall appoint the Legal Person to chair the Disciplinary Committee or Appeal Committee at the hearings. The Legal Person is to take charge of the conduct of the hearings and will be responsible for giving pre-hearing directions (if any) and draft written decisions.
19. The SSTP members are to be conversant with the disciplinary regulations for Safe Sport Programme so Disciplinary Panel Members understand the procedures and will help with a more consistent decision making.

### Future State – Sports Tribunal

20. Some discussion has taken place in Sections 4 & 5 about sport specific dispute resolution services.
21. A more thorough investigation through a feasibility study for a sport-specific dispute resolution service, a “Singapore Sports Tribunal” is beyond the ambit of this paper.
22. If established, such a Singapore Sports Tribunal, would presumably operate mediation and arbitration services and operate different disciplinary panels for anti-doping, disciplinary (including safe sport) and other types of sports disputes (e.g. selection, funding).
23. To this end, the 2-year pilot of the Safe Sport Tribunal and the Anti-Doping Disciplinary’s historical caseload will help inform such feasibility study and/or needs analysis.



## Annex 6 – Extracts of Safe Sport Commission Paper for MCCY

*These are the relevant extracts of the Safe Sport Commission concept paper sent to MCCY for support in respect of:*

1. *Re-positioning the Safe Sport Commission*
2. *Headcount for a Secretariat*

*[Paragraph 4 - Recommendations for Amended Terms of Reference for the Safe Sport Commission]*

### **4. Recommendations**

4.1 For the reasons stated, the following amendments are recommended for the Terms of Reference for the Safe Sport Commission:

4.1.1 driving and providing oversight on the strategic directions in Safe Sport including but not limited to the following initiatives:

- assessing structural risks, developing Safe Sport strategies as well as implementing a framework and/or programme for strengthening the sport ecosystem;
- formulating and recommending a Safe Sport Code and promoting the adoption of the same, accompanied with the implementation of suitable safeguarding policies and best practices through SportSG, NSAs and/or through other community partners;
- developing and rolling out education of Safe Sport to the community, including forming and maintaining current partnerships with SportSG, other relevant governmental agencies, non-governmental organisations and international expertise;
- designing a case management process to respond and resolve Safe Sport concerns which may include mechanisms for reporting, investigation and disciplinary hearings and/or appeals and sanctions with appropriate benchmarks;
- creating & maintaining a record keeping system to support the same;
- developing care and support systems for concerned persons and/or referring the same to partners with relevant expertise
- driving capability development amongst stakeholders to provide support for participants, deal with complaints, assess the next steps and/or manage disputes through appointed safeguarding officers within their organisations

4.1.2 maintaining and overseeing a secretariat which reports directly to the board of SportSG and the Safe Sport Commission in the execution of the initiatives in paragraph 4.1.1.

[Annex 3 – Job Roles & Descriptions - \*Updated for this paper]

Area	Roles & Responsibilities
Policy & Implementation	<p><b><u>Policy &amp; Best Practice Manager (SM)</u></b></p> <ul style="list-style-type: none"> <li>▪ Assists members to incorporate into the member organisation’s code of practice &amp; all relevant documentation binding on applicable individuals</li> <li>▪ Formulates and implements specific policies and assist stakeholders with best practice recommendations based on current trends including online organisational toolkits</li> <li>▪ Evaluates and benchmarks policies and best practices against leading systems/countries to maintain standards and provide contextualisation</li> <li>▪ Ensures and manages stakeholder adoption and implementation of the Safe Sport recommended safeguarding policies and best practices</li> <li>▪ Assists stakeholders by identifying training needs and/or organising appropriate interventions</li> <li>▪ Provides consultation and analysis for stakeholders with respect to structural and/or physical risks in Safe Sport within their organisations/ places of practice</li> </ul>
Education & Capability Development	<p><b><u>Education &amp; Outreach (SM + SE supernumerary)</u></b></p> <ul style="list-style-type: none"> <li>▪ Designs &amp; builds online curriculum of Safe Sport related training materials (including SportSG-Education &amp; Development (“SportSG-ED”) 4 core online modules for Coaches, Athletes, Parents and Sport Administrators</li> <li>▪ Rolls out outreach programmes and campaigns relating to Safe Sport educational tools and best practices</li> <li>▪ Develops partnerships with related local and international organisations</li> <li>▪ Plans and organises Safe Sport events and roadshows (e.g. Safe Sport forums, international conference, workshops)</li> <li>▪ Manages and facilitates engagement with learners through the SportSG-ED platform</li> <li>▪ Conducts surveys, research and benchmarking exercises on Safe Sport disciplinary matters and updates case studies for education purposes. *</li> </ul> <p><b><u>Training (SE)</u></b></p> <ul style="list-style-type: none"> <li>▪ Develops and executes training framework (including competency outcome and assessment) for safeguarding officers and other members of the sporting community (athletes, administrators, parents, organisations)</li> <li>▪ Designs and updates online curriculum of all Safe Sport related training materials (including SportSG-Education &amp; Development (“SportSG-ED”) online modules and</li> </ul>

	<p>blended coach education programmes like Values &amp; Principles in Sport and SG-Coach Programmes Levels 1-3)</p> <ul style="list-style-type: none"> <li>▪ Develops communities of Practice - Engages actively with network of safeguarding officers to manage incidences of low-level concern as well as assess organisation’s risk profile</li> <li>▪ Conducts training sessions in Safe Sport to stakeholders</li> </ul>
<p>Case Management</p>	<p><b><u>Investigation Officer (SM + SM supernumerary)</u></b></p> <ul style="list-style-type: none"> <li>▪ Responsible for the policies related to disciplinary matters and stakeholder engagement with local authorities (Singapore Police Force, Ministry of Education, People’s Association, Ministry of Social &amp; Family Development) for regular information exchange</li> <li>▪ Responsible for conducting preliminary assessments and/or formal investigations of Safe Sport incidents</li> <li>▪ Trained and experienced in conducting sensitive investigation and/or interview techniques (including with minors)</li> <li>▪ Conducts basic training in the area of investigations for sporting organisations including NSAs, as well as awareness and prevention of sexual harassment, exploitation and abuse generally</li> </ul> <p><b><u>Case Management Officer (AD)</u></b></p> <ul style="list-style-type: none"> <li>▪ Establishes a case management protocol &amp; case management system*</li> <li>▪ Develops partnerships with professionals for augmented care for affected persons and directs affected persons to relevant supporting organisations^</li> <li>▪ Responsible for maintaining local and international case archives for safe sport articles *</li> <li>▪ Triage reports of concern and implement risk management plan where necessary</li> <li>▪ Responsible for recommendation with respect to preliminary assessments and formal investigations*</li> <li>▪ Manages caseload efficiently and effectively in accordance with policies, procedures, regulations, protocols and thresholds.</li> <li>▪ Works with and supports the network of designated safeguarding officers and sport administrators with organisations which adopt Safe Sport practices</li> </ul>



## Annex 7 – Work Plan 2020 – 2021

- Current initiatives
- If SS Programme approved

Steps	Strategy	SS Program Elements	Remarks	2020				2021			
				Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
ADOPTION	Policymaking & Advocacy	<u>Code Consultation</u>									
		P1 - SS Comm & Experts									
		P2 - Stakeholder	<i>Focus Groups</i>								
		P3 - Community	<i>Morality Conference/Safe Sport Forum</i>								
		Incorporation Toolkit									
		Rollout									
		<u>Policy Repository</u>									
		Prevalence study (repeat every 3 yrs)									
		Policy Development	<i>Prioritised based on Prevalence study</i>								
		<u>General Advocacy</u>									
Resources for Participants											
IMPLEMENTATION	Education & Capability Development	<u>L1 - Safe Sport Online Training Module on SportSG-ED</u>									
		Coach	<i>by Mar 2021</i>								
		Athlete	<i>by Mar 2021</i>								
		Parents	<i>by Mar 2021</i>								
		Sport administrator	<i>by Mar 2021</i>								
		Front-end adaptation for SS Programme									
		<u>L2 - Safeguarding Officer Training</u>	-								
		PFA module (supplementary)	<i>for 2019 &amp; 2020 SOs</i>								
		SO trainings + PFA	<i>for new SOs</i>								
		Blended learning module	<i>include protocols for SSP Programme</i>								
		<u>Communities of Practice</u>									
		High Risk Sport									
Vulnerable Persons											
DELEGATION	Case Management	<u>Responding &amp; Investigating</u>									
		Recruitment of headcount	<i>Case Manager &amp; Investigators</i>								
		Development of Case Management Protocol	<i>Triage</i>								
		Development of Investigation Protocol									
		Case Record Keeping System									
		<u>Resolution</u>									
		Protocols for Informal resolution									
		Needs Assessment for Disciplinary function									
		<u>Disciplinary Framework</u>									
<i>Disciplinary Procedures</i>											

ACCREDITATION	Quality Management	Assessment of Seriousness & Sanctioning		
		Map Sanctioning Matrix to Code		
		Safe Sport Disciplinary Committee	TOR, DC Secretarial Functions	
		Develop Accreditation Framework		
		Establish Annual Review Process		
		Develop Mark and Licensing Terms		
Other Safe Sport Initiatives		Remarks		
COLLABORATION	Partnerships	<u>Regional &amp; International</u>		
		cross jurisdictional comparative study	US, NZ, CAN	
		Seminars	ASIA Conference, WSC, Asia Safe Sport	
		<u>Support for SS Programme</u>		
		Partnerships with augmented professionals		
		Facilitating other channels for disclosure	HiPAL, WSC&AC	
		<u>Research</u>		
		Impact Analysis	based on prevalence studies	
		Guidelines for Safe Sport facility design	Work with Sport Infrastructure	
		<u>Long Term Initiatives</u>		
		Explore legislation action w agencies		
		licensing, sports centre of integrity		