This section examines the core components of athlete-safeguarding policies for sports organisations.

There are two parts to this section:

— **Part 1**: Developing an organisational athlete-safeguarding policy

— **Part 2**: Developing a competition-specific safeguarding policy
Part 1
Developing an organisational athlete-safeguarding policy

This section outlines the core components of an organisational athlete-safeguarding policy.

What is an ‘organisational policy’?

In this instance, an organisational policy refers to a policy that is in place all year round. It may be intended to safeguard all athletes who are linked to your organisation, whether directly (e.g. an NOC delegation) or indirectly (e.g. athletes under your National Federations). An organisational policy involves collaboration with multiple stakeholders, including members of your organisation and national organisations.

Organisational athlete-safeguarding policies assist organisations to effectively receive and manage reports of harassment and abuse that fall within the scope of the policy.
The following core components complement the IOC Guidelines. The information provided is not exhaustive, and thorough research regarding how each component applies in the context of your organisation is advised.

**Steps 1 and 2: Outlining your policy**

If you have completed Section 2 of this toolkit you may already have the first part of your organisational safeguarding policy. To recap, this should be:

- Stating what is considered by your organisation to be harassment and abuse (in line with the IOC consensus statement and any applicable laws); and
- Stating to whom your safeguarding policy applies (e.g. anyone affiliated to your organisation).

**Step 3: Define a reporting procedure**

The next step is outlining how reports of harassment and abuse may be reported to your organisation.
**Part 1 Contd**

**Developing an organisational athlete-safeguarding policy**

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**Organisational Policy: Core Components**

**The Case**

Athlete X has been receiving unwanted attention from someone close to him in the sporting movement. He has started to dread going to practice, and his performance is dropping. He is considering leaving the sport completely. He wants to tell someone, but he doesn’t know how.

It is clear that Athlete X would benefit from being able to report what is happening to his sporting organisation. But how does he report it? What is the process? What happens when he does?

Fear of reporting has been found to be a real concern within numerous studies. Therefore, having a good reporting mechanism and procedure is very important.

The table below uses the Bronze, Silver and Gold format to identify what the IOC Guidelines note as minimum standards related to reporting procedures (Bronze), and what best practice would indicate (Gold).

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| **Key** | As noted in the introduction of this toolkit, specific suggestions are broken down using a Gold, Silver and Bronze format as follows:
| **Please note** | this method attempts to demonstrate that there are possible solutions for all organisations. The examples are not exhaustive and further research is recommended.

| **B** | The minimum requirement as stated in the IOC Guidelines

| **S** | Provides examples of good practice features

| **G** | Indicates what research considers to be best practice

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| **Bronze** | Establish a reporting procedure for alleged incidents of harassment and abuse, specifying the different reporting channels and designated persons through which an alleged incident of harassment and abuse may be reported to the IF or NOC, as well as the information that should be included in the report.

| **Silver** | Good practice would indicate that the reporting system includes the following key features:

- Anonymity should be offered;
- The reporting procedure should be easy to use and understand; and
- The reporting procedure should be accessible and widely communicated, including informing the reporter where the report will go to.

| **Gold** | Best practice indicates that the established reporting system should include the following key features:

- It should be reliable and secure;
- Confidentiality should be ensured; and
- The reporting system should be operated and managed by someone at arm’s length to the organisation, to reduce the possibility of conflicts of interest.
Organisational Policy: Core Components

**Reporting mechanisms:**
Below are listed some potential reporting mechanisms, alongside the potential benefits and drawbacks of each method. This list is not exhaustive and other methods may be possible.

<table>
<thead>
<tr>
<th>Mechanism</th>
<th>Potential benefits and drawbacks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report in writing</td>
<td>✔️ Easy, accessible, confidentiality may be offered (if handled correctly). ✗ Can be difficult to understand. The reporting person may not know what information to include, limited ability to respond. Potentially unreliable.</td>
</tr>
<tr>
<td>Report via online form/service</td>
<td>✔️ Easy, accessible, reliable, confidentiality may be offered, response possible. ✗ Financial investment, internet access required, must be well advertised.</td>
</tr>
<tr>
<td>Report via email</td>
<td>✔️ Easy, reliable, ability to respond, no extra financial investment. ✗ Email address and internet required, the reporting person may not know what information to include.</td>
</tr>
<tr>
<td>Report in-person</td>
<td>✔️ Possibility to ask relevant questions to obtain relevant information and provide advice/support. ✗ Geographical restrictions, potential financial investment, person who receives the report would need to be trained, and have no conflict of interest, linguistically it may be problematic.</td>
</tr>
<tr>
<td>Report via telephone hotline</td>
<td>✔️ Easy, accessible. ✗ Can be difficult to understand, no layout of information required, limited ability to respond, must be well advertised.</td>
</tr>
</tbody>
</table>

Athlete X may also appreciate an information sheet that outlines the complaint process. An example of this can be found [here](#).

At this point, it might be good to check to see whether your organisation already has a reporting system in place to flag other issues. If there is, perhaps you might like to consider whether it may be possible to include harassment and abuse reporting within this already existing structure, or use the existing reporting mechanism as a model.

**To Do List**
- Ascertain if there are reporting procedures currently in place at your organisation (for example an ethics/integrity hotline)
Mandatory reporting – to public authorities

Some countries/regions may have specific legislation in place that outlines when reporting of harassment and abuse may be mandatory, especially when related to child welfare. In some countries there is obligation to report not only actual cases of abuse, but suspicion of abuse can be enough to trigger duty to warn (a legal concept which indicates that a party will be held liable for injuries caused to another, if the party had the opportunity to warn the other of a hazard and failed to do so).

Organisational Policy: Core Components

National Olympic Committees

It is recommended to research whether:
— Such mandatory reporting requirements apply in your state/country, and if this is applicable to you;
— To whom these apply; and
— What forms of harassment and abuse come under these mandatory reporting requirements.

This is important, as there may be legal and/or civil liabilities that may be incurred if legislation regarding mandatory reporting of actual or suspected abuse is not followed.

If this does apply, then the information related to where and when harassment and abuse should be reported to public authorities, (e.g. directly to law enforcement agencies), should also be included in your organisational policy.

International Federations

It is also recommended that you research any applicable law that is relevant to you with regard to mandatory reporting to public authorities and, as the case may be, include such information in your organisational policy. Furthermore, it is suggested that if assisting National Federations to implement safeguarding policies and procedures, that it is indicated that they should research what their obligations are in relation to mandatory reporting to public authorities or duty to warn within their country/region.

Organisational mandatory reporting

Many organisational athlete-safeguarding policies detail mandatory reporting responsibilities that are broader than the legal obligations of a country/state/region. However, applicable law should always be taken into account.

For example, as noted in the Team USA Team Training Video (SafeSport, Lesson 16), your organisation “may require you to report grooming behaviours – such as an adult giving a particular athlete gifts, or spending time with an athlete outside of practice – which may not be reportable under the law”.

You should therefore consider whether you would include broader mandatory reporting provisions within your policy (considering any national/regional requirements which may apply).

If so, it is important that you clearly detail in your policy to whom within your organisation, as well as when and how suspected harassment and abuse, has to be reported. The policy should also specify who is not obliged, but encouraged, to report suspected harassment and abuse within your organisation.
Organisational Policy: Core Components

Example Application: Australian Sports Commission
The following extract is from the Australian Sports Commission: Harassment-Free Sport, Protecting Children from Abuse in Sport (version dated 2000). The section focuses on ‘The law and child protection services in Australia’.

“Mandatory reporting [to public authorities] of child abuse, where some professions are legally required to report any abuse they notice, applies in all states and territories, although the professions involved are different. In New South Wales for example, legislation requires people in professions including recreational services (sporting organisations), who have reasonable grounds to suspect that a child under 18 has been abused, to report their suspicion…

Even where people aren’t required to report suspected child abuse, there may be some situations where this is the most appropriate action to take to protect the child concerned.

The law protects people who notify the authorities of suspected child abuse.”

Example Application: ITTF Anti-harassment policy and procedure
The following is an extract from the ITTF Handbook (version dated 2017).

7.9. REPORTING TO HARASSMENT OFFICERS
7.9.1. Every member of the ITTF has a responsibility to play a part in ensuring that the sport environment is free from harassment.
7.9.2. The ITTF encourages all incidents of harassment to be reported, regardless of who the offender may be.

Example Application: World Curling Federation, Harassment And Bullying Policy
The following is an extract from the World Curling Federation Harassment and Bullying Policy (version dated 2016).

3.1. Managers/Supervisors have an obligation to prevent harassment/bullying and to take immediate action once it has been identified, whether or not a complaint has been made.

To Do List

Ascertain whether your country/state/region etc. has mandatory reporting regulations in place related to harassment and abuse, and if so whether this applies to your policy
Organisational Policy: Core Components

Step 4: Personnel

The Case
Coach Y has seen information on his NOC’s website, informing him that there is an online reporting system, where he could report harassment and abuse to his NOC, IF or National Federation. He has strong suspicions regarding the welfare of Athlete X; however, he is concerned about what happens after a report is lodged on the online system. Where does this sensitive information go? Who receives it?

Now that you have determined which reporting mechanisms will be available, it is time to consider who receives these reports.

Support for concerned persons: Key personnel

The table below uses the Bronze, Silver and Gold format to identify the IOC Guidelines note as minimum standards related to support for concerned persons (Bronze), and what best practice would indicate (Gold).

| Bronze | Establish appropriate mechanisms to provide support and information to persons involved in an alleged incident of harassment and abuse (“concerned persons”) including the appointment of someone who is responsible for following up on all alleged incidents of harassment and abuse (e.g. a “Welfare/Safeguarding Officer”). Such person should be trained and experienced in the field of safeguarding from harassment and abuse (e.g. medically and/or legally), and his/her responsibilities should, in particular, include playing a central role in: (i) the reporting and investigation procedures, (ii) determining whether information of a case should be disclosed to the competent local authorities, and (iii) providing support to any concerned persons throughout the reporting and investigation procedures. |
| Silver | Good practice would indicate that support for concerned persons should include:  
— The Safeguarding Officer/Ombudsman be the same person who receives the reports; and  
— It should be clearly communicated that there is an established person/persons who receives the reports and is responsible for the case management of reports. |
| Gold | Best practice indicates that support for concerned persons should include:  
— That the trained Safeguarding Officer/Ombudsman be at arm's length to the organisation, ensuring impartiality of dealing with all reports; and  
— That there be both a male and female Safeguarding Officer/Ombudsman available. |
### Organisational Policy: Core Components

Below are listed different options related to the centralisation of support for concerned persons, alongside the potential benefits and drawbacks of each. This list is not exhaustive and other options may be possible.

<table>
<thead>
<tr>
<th>Centralised person</th>
<th>Benefits and drawbacks</th>
</tr>
</thead>
</table>
| Person within the IF/NOC administration | ✓ Understanding of sports administration, connection with National Federations and grassroots.  
✗ Requires human resource input by the IF/NOC, potential conflict of interest. |
| Person within the IF/NOC Medical Commission | ✓ Degree of independence, understanding of sports administration, medical knowledge.  
✗ Commission members usually operate on a voluntary basis, potential for conflict of interests. |
| Report to an independent organisation | ✓ Independent from the sports organisation. Minimisation of potential conflicts of interest.  
✗ Organisation should be officially recognised as acting in this capacity. |
| Person within a local health authority | ✓ Independent from the sports organisation. Potentially easier to access geographically if multiple qualified persons in local health authorities are identified.  
✗ An agreement would need to be formed between the local health authority and the sport/sports organisations involved. |
| Reports to a national charity/NGO | ✓ Potential to have multiple regional centres, independent from the sports organisation.  
✗ An agreement would need to be formed between the national charity/NGO and the sport/sports organisations involved. |
Part 1 Contd
Developing an organisational athlete-safeguarding policy

Organisational Policy: Core Components

Step 5:
Investigation procedure

The Case
Sandi is a Safeguarding Officer for a National Federation, and received the online report from Coach Y. What is the next step?

It is important to outline in your policy an established investigation procedure to respond to alleged incidents of harassment and abuse. This procedure should aim to assemble comprehensive information on the alleged incident.

As noted before, this procedure is usually performed by the Safeguarding Officer/Ombudsman. All reports should be recorded by the Safeguarding Officer/Ombudsman and kept safe.

It is important to stress in your policy that it is not appropriate for sporting organisations to investigate, or attempt to resolve concerns, where a criminal offence is suspected to have been committed. Cases which may include a criminal offence are considered in Step 9.

Step 6:
Disciplinary procedure

All cases of harassment and abuse where an offence has occurred, according to your organisation’s definition of harassment and abuse, should be referred through an established disciplinary procedure.

This may mean that the case is brought before your organisation’s Disciplinary Commission, or other such entity which exists within your organisation to respond to infractions of your organisation’s statues, rules, regulations etc.

The Safeguarding Officer/Ombudsman should provide support to the concerned parties throughout this procedure, in their trained capacity.

To Do List

At this point you should have:
- Determined how reports of harassment and abuse may be reported to your organisation
- Ascertained whether mandatory reporting obligations will be included in your policy and to whom these apply
- Identified who receives the reports of harassment and abuse, and provides support to concerned persons (Safeguarding Officer)
Example flowchart demonstrating harassment and abuse report response

Please note: disciplinary procedures and procedures before public authorities can go in parallel
Part 1 Contd
Developing an organisational athlete-safeguarding policy

Organisational Policy: Core Components

Step 7: Measures and sanctions
Measures and sanctions will exist in your organisation in the event of a contravention of the rules/regulations/statutes of your organisation.

It is important that guidelines are established on measures and sanctions detailing how incidents of harassment and abuse should be sanctioned.

Measures and sanctions must respect the principle of proportionality and be consistent with applicable laws. The following factors should be taken into consideration when determining proportionality: the nature and severity of the violations; the number of violations; any other relevant circumstances (e.g. when the abused or harassed person is a minor).

Step 8: Fair process
The IOC Guidelines (for IFs and NOCs related to creating and implementing a policy to safeguard athletes from harassment and abuse in sport) highlight the importance of providing the responding party with fair process.

In practical terms, this means that if an allegation is made against someone in your sporting organisation, the following should occur, in line with applicable law:

— Notice should be provided to the individual/individuals concerned
— The right/opportunity to be heard should be offered, before any measure or sanction is applied.

Furthermore, information detailing the rights of the complainant and the rights of the respondent should be provided.

Step 9: Involvement of relevant public authorities and other organisations
As previously mentioned, it is important that, in compliance with applicable laws, relevant public authorities are informed about potential criminal cases.

It is therefore recommended that the Safeguarding Officer/Ombudsman dealing with harassment and abuse reports, as per your policy, have knowledge regarding which cases and how to contact the relevant public authorities and who they may be.

Furthermore, as previously noted in Section 1, there may be other public authorities or organisations that should be informed in the event of potential criminal cases. It is important that you know these organisations and any obligations, legal or otherwise, that you have to disclose information related to reports, and what information you are able and obliged to disclose.
Organisational Policy: Core Components

Step 10: Confidentiality
Reports of harassment and abuse often contain extremely sensitive information. Often, athletes are reluctant to officially make reports, and therefore it is very important that reports are followed up in a timely and appropriate manner.

It is recommended that you establish a confidentiality policy related to reports of harassment and abuse and ensure that it is communicated to all stakeholders.

Such a policy should state that an alleged incident of harassment and abuse be regarded as confidential, and that personal information (including in particular name, date of birth, address, identification numbers) should not be disclosed, except, for example, if the concerned person gives his/her prior consent, if disclosure is necessary to protect someone from harm, or if a potential criminal act comes to the attention of the IF or NOC.

It is important that you research applicable law, including, for example, any applicable data protection laws which may apply.

Step 11: Involvement of athletes
As noted in the IOC Guidelines, it is recommended that athletes are involved in the development of safeguarding policies. You may want to collaborate through your organisation’s Athletes’ Commission. It is essential that the athletes’ voices and opinions are taken into account.

If you are unable (e.g. due to lack of financial or human resources) to adopt and/or implement the above-described safeguarding measures, assistance and support could be sought from relevant public authorities or other organisations.
## Section 3: Core components

### Checklist

**Does your policy:**

- Identify and address issues related to harassment and abuse in sport;  ✔️  ❌
- Apply to all involved in the organisation;       ❌
- State that all members have a right to respect, safety and protection;  ❌
- State that the welfare of members is paramount;  ❌
- Identify who is responsible for implementing and upholding the policy;  ❌
- Specify what constitutes a violation;  ❌
- Specify the range of consequences for such violations;  ❌
- Specify procedures for reporting and handling complaints;  ❌
- Provide details of where parties involved in a complaint can seek advice and support;  ❌
- Specify procedures for maintaining records; and  ❌
- Provide guidance for third-party reporting (“whistleblowing”).  ❌

**Is your policy:**

- Clear and easy to understand.  ✔️  ❌

**Has your policy been:**

- Approved by the relevant management body (e.g. Executive Board); and  ✔️  ❌
- Incorporated into your organisation’s constitution and/or regulations.  ❌

**Was your policy:**

- Developed in consultation with athletes.  ✔️  ❌

**Will your policy be:**

- Regularly reviewed and updated, particularly when there is a major change in the constitutional regulations of the organisation or in the law.  ✔️  ❌
Part 2
Developing a competition-specific safeguarding policy

This section details how to develop a safeguarding policy which applies during any sports competitions sanctioned by your organisation, for example a world cup or national championship.

Why is it important to have this in place?

Athlete safeguarding is intrinsic to good governance and should be ingrained in the psyche of sports organisations. Having a safeguarding framework (such as the IOC Games-Time Framework for the Olympic Games) in place during competitions sanctioned by your organisation demonstrates a strong commitment to providing a safe sporting environment for athletes to participate in.

The good news

The good news is that most organisations will already have the necessary mechanisms in place as part of the normal operations of competitions. The important thing here, however, is to link these mechanisms together in a formal procedure, and to ensure that the athletes and other participants at your competition are aware that this procedure exists.

Competition-Specific Policy: Core Components

A competition framework may have similar key sections to your organisation’s safeguarding policy. The IOC Games-Time Framework, for example, has eight key sections, listed below:

1 Preamble
2 Objective
3 Scope of application
4 Preventative measures
5 The Safeguarding Officer
6 Reporting and procedure for addressing incidents of harassment and abuse
7 Disciplinary procedure
8 Confidentiality

These eight sections, or steps, are outlined on the following pages. This is intended to provide an example of a competition framework. There are other options and examples, some of which can be found in the “resources” section of the online toolkit.
Part 2 Contd
Developing a competition-specific safeguarding policy

**Step 1: Preamble**
The preamble may be used to outline the basis on which the Competition framework is supported. For example, the IOC Games-Time Framework notes Olympic Agenda 2020 Recommendation 18: Strengthen Support to Athletes; the Recommendations related to the prevention of harassment and abuse from the 2015 International Athletes’ Forum, and the IOC Code of Ethics (2016). The IOC Games-Time Framework preamble further notes the role of four IOC commissions in the development of the IOC Games-Time Framework.

**Step 2: Objective**
The objective outlines what the competition framework looks to achieve and when. For example, “This Framework is intended to help safeguard Athletes and other Participants from harassment and abuse in sport during... [Competition information].”

**Step 3: Scope of application**
The IOC Games-Time Framework includes the following information in this section:

- To whom the framework applies (e.g. all Participants of the Olympic Games)
- When the Framework applies (e.g. from the opening to the closing of the Olympic Village)
- To what the framework relates (e.g. prevention of harassment and abuse)

In this section the IOC Games-Time Framework further provides a definition of the key terms, including what is meant by ‘participant’ and how the IOC defines harassment and abuse.
Step 4: Preventative measures

In order for a competition framework to be effective, the participants of the competition should be aware of its presence, and what may constitute harassment and abuse, and thereby what should be reported.

It is therefore recommended that communication related to this framework be considered for all stakeholders. This could be in the form of a memo, an information sheet at the competition, educational courses, etc. For more information regarding preventative measures, please refer to Sections 4 and 5 of this toolkit.

Step 5: The Safeguarding Officer

As per the organisational policy, your competition framework should detail who is responsible for the case management of any reports of alleged harassment and abuse within the scope of your policy. At the Olympic Games, this is the IOC Safeguarding Officer.

This section does not necessarily need to name the Safeguarding Officer (or similar term), but rather outline their presence during the competition, what their role entails and how they may be contacted.

Example Application: International Netball Federation – Event Welfare and Safeguarding Officer

A Safeguarding Officer was appointed by the International Netball Federation (INF) for the Netball World Youth Cup 2017, with funding for the role coming from a Memorandum of understanding between the Local Organising Committee, and the Norwegian Olympic and Paralympic Committee.

The presence of the Welfare and Safeguarding Officer was part of a comprehensive event-specific safe-sport programme.

The Roles and Responsibilities of the INF Welfare and Safeguarding Officer, who was required to have undertaken at least basic safeguarding awareness training, and demonstrate experience of both safeguarding and sports event management, may be found here, alongside the INF Guidelines for Safeguarding and Protecting Children.
Part 2 Contd
Developing a competition-specific safeguarding policy

**Competition-Specific Policy: Core Components**

**Step 6:**
**Reporting and procedure for addressing incidents of harassment and abuse**

Similar to the requirements of an organisational policy, it is imperative that a procedure is put in place within your competition framework that details how incidents of harassment and abuse may be reported during your competition, and what the case management procedure will be to follow up on such reports.

This section should include who may report incidents of harassment and abuse under your competition framework, to whom they can report and the mechanisms of how they can report (hotline, whistleblower service, etc.).

Such reporting mechanisms commonly already exist during competitions to respond to other potential infractions, such as anti-doping violations or competition manipulations.

The important thing here is to investigate whether a reporting mechanism already exists for competition reports, and whether it could be updated to also include harassment and abuse reports.

Your competition framework should also outline whether you or other sporting organisations have jurisdiction with regard to reported incidents of harassment and abuse at the relevant competition.

**Step 7:**
**Disciplinary procedure**

If an incident reported violates your organisation's statutes/code of ethics or similar document, there may be grounds for disciplinary proceedings, as per your organisation's regulations.

Furthermore, if a report includes a potentially criminal component, law enforcement agencies should be notified. This link to law enforcement and your organisation’s disciplinary commission or similar entity should be included in your competition policy.

**Step 8:**
**Confidentiality**

Similarly to your organisational policy, confidentiality should be addressed in the competition framework, particularly related to when information can be disclosed and in which circumstances, in line with applicable law and regulations.
### Checklist

**Does your competition policy:**

<table>
<thead>
<tr>
<th></th>
<th>✔️</th>
<th>✗</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify and address issues related to harassment and abuse in sport;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Have a clearly defined objective;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>State to whom the policy applies, when and related to what;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Include information about any available preventative measures such as communication and education to stakeholders during time where the policy is enforced;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Detail who is responsible for the case management of any reports of alleged harassment and abuse within the scope of your policy;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Detail how incidents of harassment and abuse may be reported;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Include information regarding what the case management procedure will be, to follow up on any reported cases;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Include a link to disciplinary proceedings, as per your organisation’s regulations;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Include a link to law enforcement agencies; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consider how confidential information is handled, in line with any applicable laws and regulations.</td>
<td></td>
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</tr>
</tbody>
</table>

**Was your policy:**

<table>
<thead>
<tr>
<th></th>
<th>✔️</th>
<th>✗</th>
</tr>
</thead>
<tbody>
<tr>
<td>Developed in consultation with athletes.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Section 3: Core components

Review

Following this Section you should:

- Have an understanding of the key components of an organisational athlete safeguarding policy as indicated in the IOC Guidelines
- Have an overview of the key components of competition-specific athlete safeguarding policies
- Begin to identify how each core component might be applied in your own safeguarding policies, in line with any regulations applicable to your organisation and the scope and objective of your policies
- If applicable, identify the minimum requirements that your member organisations are required or are suggested to include in their organisational and/or competition-specific athlete safeguarding policy
Contact us:
safeguardingofficer@olympic.org
olympic.org/athlete365