

# SAFE SPORT UNIFIED CODE

#SGSafeSport Play Your Part

## COMMUNITY CONSULTATIONS INTERIM REPORT

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# 1. Introduction

1.1 This interim report sets out the findings of the Safe Sport Unified Code Community Focus Group Discussions (Phase 2) conducted in April and May 2021. These discussions are part of the 3-Phase consultations which are set out in the paper titled *A Safeguarding Framework for Singapore* (Dec 2020).

1.2 The aims of the 3-Phase consultations are to:

- contextualise the different types of abuse and harassment defined by the International Olympic Committee based on local laws, view of experts in safeguarding and the culture of our sporting community
- inform the design, administration, and operation of the Safe Sport Programme by gaining an understanding of the issues faced by participants and the needs of sporting organisations
- create awareness and generate open and honest conversations about concerns regarding inappropriate behaviours in the sporting ecosystem



## SPORTING COMMUNITY

- Safeguarding Officers
- Athlete & Sportspersons
- Coaches & Instructors
- Parents & Volunteers
- Para Sports Community
- Sport Administrators & Support Staff
- Organisational Leaders
- Sport Programme & Facility Providers

## Phase 2

Jan to March 2021

April to June 2021

July to Sep 2021

## Phase 1

### EXPERTS

- Ministry of Social and Family Development (MSF)
- Ministry of Education (MOE)
- Singapore Police Force (SPF)
- KK Women's & Children's Hospital (KKH)
- Singapore Children's Society (SCS)
- Association of Women for Action and Research (AWARE)

### OLYMPIC & PARALYMPIC MOVEMENT LEADERS

- Singapore National Olympic Council (SNOC)
  - SNOC Athletes' Commission
  - SNOC Medical Commission
  - SNOC Women in Sport Committee
- Singapore National Paralympic Council (SNPC)
- Singapore Para Athletes Commission
- Singapore Disability Sports Council (SDSC)

## Phase 3

### KEY STAKEHOLDER WORKING GROUPS



1.3 In the course of facilitating these discussions, we have been humbled by the response and generosity of the participants in sharing their time and voices through personal stories, concerns, thoughts and ideas for the cause.

**Safe Sport Taskforce**  
19 June 2021



## CONSULTATION OVERVIEW



*...every athlete should be given the chance to train and compete in a safe and respectful environment, only then can they truly excel and realise their potential. We need to do our part to help educate, create more awareness and work together towards a Unified Code.*

Shayna NG

## 2. Consultation Overview

### Stakeholder Groups

Focus Group Discussions were held with the following stakeholder groups in the sporting community:

STAKEHOLDER GROUPS	DATE	MODE
Safeguarding Officers	25 March 2021	In person
Athletes & Sportspersons	20 April 2021	In person
Coaches & Instructors	27 April 2021	In person
Para Sports Community	29 April 2021	In person
Sport Administrators	4 May 2021	In person
Parents & Volunteers	6 May 2021	In person
Organisational Leaders	18 May 2021	Online*
Sport Programme & Facility Providers	19 May 2021	Online*

\* Phase 2 (Heightened Alert) period



### Method of Recruitment

The Focus Group Discussions were open to all members of the community through public sign ups on <http://go.gov.sg/safesportprog> and promoted through:

- Circulars to the National Sports Associations and direct mailers (e.g. National Registry of Coaches (NROC) Newsletters)
- Stakeholder Interest Groups (e.g. Team Nila, ActiveParents Network, Singapore Sports School Parents, Dads for Life, Mums for Life)
- Sport industry direct mailers
- Olympic and Paralympic partners – Singapore National Olympic Council, Singapore National Paralympic Council, Singapore Disability Sports Council



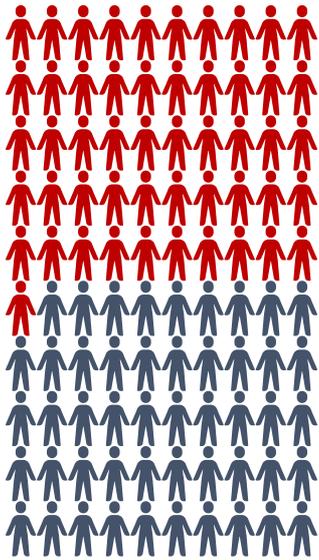
### Format of Sessions

Primers were provided to participants ahead of the Focus Group sessions (see Annex 1):

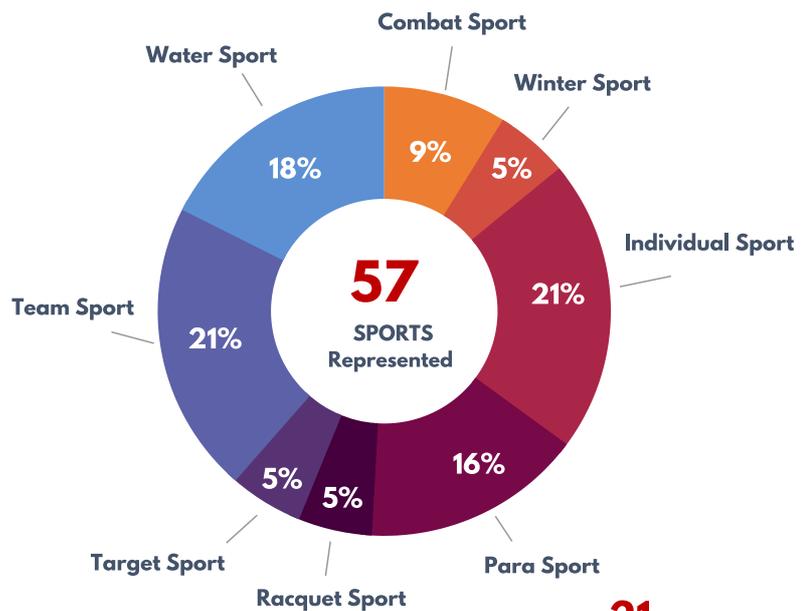
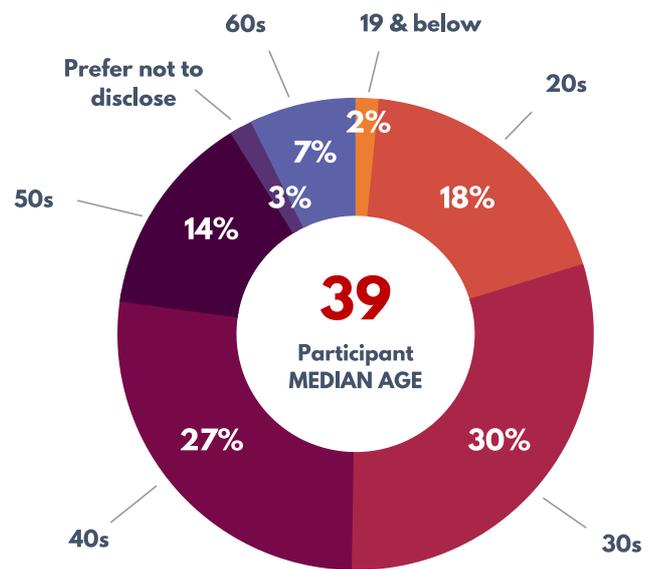
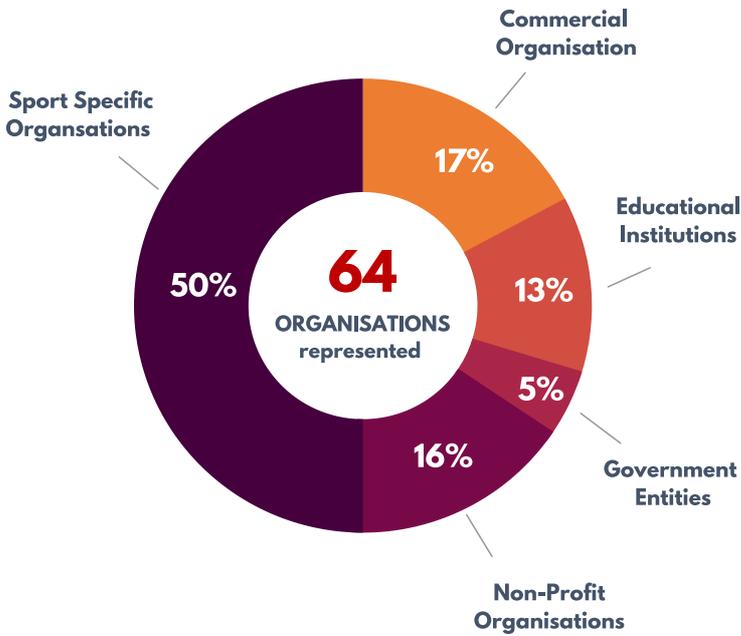
- Blueprint for the Safe Sport Programme
- Safe Sport Unified Code Part 1 (Misconduct) v2.0

During each session, briefings were conducted prior to each breakout to contextualise the discussions and specific application of the Safe Sport Programme and the Unified Code.

## Profile of Participants



**196**  
Participants  
**51% of FEMALE**  
&  
**49% of MALE**



**21**  
Participants from  
Multi-Sport Institutions



## Discussion Points Covered

The questions posed at each focus group session were tailored for the interests of each stakeholder group. Considerations were given to the relevance of the Unified Code and the Safe Sport Programme to their specific roles in the sporting community.

The discussions across the eight (8) focus group sessions have been consolidated and set out at Page 7 to 17. More detailed notes of each stakeholder focus group session are set out in the Annex 3.

Areas	Topics	
Community Concerns & The Safe Sport Programme	A1	Behaviours of concern within the community
	A2	Barriers to disclosure and considerations for the Case Management Unit
	A3	Views on elements of the Safe Sport Programme
Misconduct in the Unified Code	B1	Whether Intimate Relationships (as defined) should be addressed by the Unified Code or be left to organisations
	B2	Whether Grooming (as defined) constitute Misconduct
	B3	Whether Wilful Tolerance (as defined) constitute Misconduct
Operation & Administration of the Safe Sport Programme	C1	Case Management Model which is most appropriate for the needs of the community
	C2	Whether an organisation that is accredited by the Safe Sport Commission provides assurance to stakeholders Whether commercial Sport Programme and/or Facility Providers are keen to adopt the Safe Sport Programme
	C3	Considerations specific to the Para Sports Community

Broad areas of discussion	Community Concerns & The Safe Sport Programme			Misconduct in the Unified Code			Operation & Administration of the Safe Sport Programme		
	A1	A2	A3	B1	B2	B3	C1	C2	C3
Safeguarding Officers									
Athletes & Sportspersons									
Coaches & Instructors									
Para Sports Community									
Sports Administrators									
Parents & Volunteers									
Organisational Leaders									
Programme & Facility Providers									

## Community Concerns & the Safe Sport Programme

### A1 Behaviours of most concern within the sporting community

**CONTEXT:** Four broad categories of Misconduct set out in the Unified Code: Sexual Misconduct, Psychological & Physical Misconduct, Other Inappropriate Conduct and Code Specific Misconduct (*see Annex 1 for visual*)

**SUMMARY:** Participants across the groups raised concerns with all the types of Misconduct. Psychological Misconduct was the most common form of misconduct witnessed and experienced by athletes. Parents were most concerned about Sexual Misconduct.



- Misconduct was wide-ranging and not limited to the top 3 forms of Misconduct (Psychological Misconduct, Other Inappropriate Conduct, Physical Misconduct) identified by the *Safeguarding Officer Pulse Survey* conducted by the Safe Sport Taskforce in December 2020.
- Verbal abuse has been normalised somewhat and is usually attributed to coaching styles or passion for the sport.
- The prevalence of hazing or physical abuse were attributed to the lack of awareness or education over what constitutes misconduct.
- There is a general acceptance within the sporting community that athletes must be able to endure mental, emotional and physical hardship to be resilient. Whilst this broad statement may be true, some training methods are questionable. Participants from various groups shared examples of lasting physical and psychological injuries which were sustained by athletes under the belief that such training methods create more resilient athletes.
- **PARENTS** were most concerned about sexual misconduct, which could arise or start from physical and psychological abuse. The emphasis on winning and results can also lead to behaviours amounting to misconduct. Examples such as athletes starving themselves to attain the ‘ideal’ physique promoted by coaches or leaving the sport entirely due to neglect.
- **ATHLETES.** A straw poll conducted during the focus group among athletes found that Psychological Misconduct was the most common form of misconduct experienced (87%) or witnessed (72%) in the past. Athletes felt it was important that coaching education includes knowledge beyond pedagogy. The general sentiment was that many coaches have not evolved with new coaching practices.
- **PARA SPORTS.** In the Para Sports Community, the main concerns related to inappropriate physical contact and Psychological Misconduct (as defined). Persons with special needs may not be aware that their own behaviour and/or what they are experiencing is inappropriate. There is a need for specific safeguarding policies tailored to the needs of the community.
- **SPORT PROGRAMME & FACILITY PROVIDERS** Grooming, intimate relationships and inappropriate physical contact are the biggest concerns for the fitness industry. For the Sport Programme participants which have programmes specifically designed for children, Psychological Misconduct such as favouritism or neglect was the primary concern.

## A2 Barriers to disclosure and considerations for the Case Management Unit

**CONTEXT:** Since 2019, the Safe Sport Taskforce has trained over 170 Safeguarding Officers in over 80 organisations to be advocates and first responders. Over 95% of all Safeguarding Officers are employees and/or involved in the management of their organisations.

### **SUMMARY: Key Barriers to Reporting**

- (1) Lack of awareness that something inappropriate has happened
- (2) Uncertainty of where to report the incident
- (3) Distrust of organisations to investigate fairly and appropriately



### (1) LACK OF AWARENESS

- There is a general lack of awareness and/or understanding of misconduct or inappropriate behaviour due the lack of formalised organisational guidelines and/or policies. Even where they exist, they may not be clearly communicated.
- **ATHLETES** shared that on hindsight, past incidents they had witnessed within their environments were inappropriate behaviours which they should have stepped in to speak out against or reported. However, without the Unified Code at that point of time, there was a lack of awareness over what was considered unacceptable behaviour.

### (2) UNCERTAINTY OF WHERE TO REPORT

- There is a lack of awareness on the process of reporting misconduct. Most athletes professed not knowing who their National Sports Association (“NSA”)’s Safeguarding Officer is or that they even know their NSA had appointed a safeguarding officer
- Reporting channels are not well publicised or signposted. Generally posting the reporting channel on the website was viewed as the minimum requirement. Further amplification of reporting channels is necessary.
- Additionally, clear and transparent protocols are needed to provide a safe platform to facilitate disclosures.

- Having multiple channels of reporting was important as athletes should be able to decide who they are comfortable making the disclosure to.

### (3) DISTRUST OF ORGANISATIONS

- There is a general distrust of NSA investigative processes and outcomes. Examples were shared about past incidents which were not dealt with properly by NSAs, including downplaying of incidents and inaction.
- **ATHLETES and PARENTS** observed that organisations (and not just individuals) could act in ways which would constitute Retaliation (as defined). Specific examples were shared of institutional retaliation such as withholding of resources, non-selection, debarment from games. These incidents fed into the perception of a culture of tolerance within organisations. This culture of tolerance was attributed to the close relationships between NSA leadership with the subjects of the incidents of concern (e.g. staff, board members, coaches)
- **NSA REPRESENTATIVES** (Sport Administrators, Organisational Leaders, Safeguarding Officers) feel that due to limited capacity, NSAs are unable to investigate every incident. Examples were given on the resources taken to investigate these incidents, which organisations found to be complex and time consuming.

## A3 Elements of the Safe Sport Programme

**SUMMARY:** The Safe Sport Programme is necessary and welcomed by the community as it provides clarity on what constitutes unacceptable behaviour, the available avenues to get help, and create awareness of Safe Sport.

In particular, the Unified Code and the independent Case Management channel are positive steps forward in preventing and addressing concerns.



### UNIFIED CODE

- The Unified Code is a welcome change as it is seen as a new standard applicable across sports and for the industry which will:
  - a. educate all stakeholders on what is considered appropriate and inappropriate behaviours, especially for 'grey' areas;
  - b. clearly state the avenues and process for anyone who wants to make a report of concern.
- Education will be necessary across athletes, coaches, sport administrators and parents. The training resources needs to be tailored for each individual group. (Role-specific Safe Sport modules on the SportSG-ED online learning platform were introduced later in the session.)
  - a. ensure action is taken and preventing instances where incidents are reported to the NSA but no action is taken;
  - b. serve as a deterrence to would-be offenders knowing that an independent body managing these cases would grant them no favourable bias;
  - c. provide a safe avenue for participants to come forward;
  - d. benefit the community by providing a central incident management system that would capture records of individuals over a period of time and/or over different sports.

### ACCREDITATION

- Accreditation is seen as providing assurance for athletes and parents, and some opined that it should be mandated (compulsory) for NSAs to attain accreditation.
- **PARENTS** suggested having an accreditation system for coaches through training and certification by Safe Sport Commission. (These were spontaneous suggestions before discussions specific to the Safe Sport Programme were introduced at the same session.)

### CASE MANAGEMENT UNIT (CMU)

- There was strong support for the establishment of the CMU as it was the general view that the CMU would:
  - a. ensure action is taken and preventing instances where incidents are reported to the NSA but no action is taken;
  - b. serve as a deterrence to would-be offenders knowing that an independent body managing these cases would grant them no favourable bias;
  - c. provide a safe avenue for participants to come forward;
  - d. benefit the community by providing a central incident management system that would capture records of individuals over a period of time and/or over different sports.

- The CMU's independence (from NSAs and SportSG) was critical to promoting trust and transparency when managing cases. Perception of the CMU's independence would depend on the composition of the CMU as the community is very small.
- The investigation process must be seen as fair to all parties and confidentiality of cases must be maintained.

**SAFEGUARDING OFFICERS** highlighted the importance of obtaining buy-in from NSA leadership on the Safe Sport Programme. Being an employee of the NSA and a Safeguarding Officer, they are often caught in the middle when investigating a case and adhering to the directions of the NSA leadership (which tends to have a culture of tolerance and generally protects coaches and/or persons related to the organisation).

## Unified Code: Types of Misconduct

### B1 Whether Intimate Relationships (as defined) be addressed by the Unified Code or left to individual organisations



**CONTEXT:** Intimate Relationships were discussed in the context of where there is a Power Imbalance between (i) an adult and a Minor (Under 18) and (ii) between adults

**SUMMARY:** The need for inclusion of this provision is clear when it involves minors. There was agreement that where consenting adults in relationship with a power imbalance, a declaratory approach should be taken with guidelines to manage potential issues arising out of the dual relationship.

#### MINORS

- There was unanimous agreement that intimate relationships should be forbidden between any Minor (as defined) and adult.

#### CONSENTING ADULTS

- All participants agreed that the Unified Code should address the intimate relationships in the form of strict prohibition (between adults and minors) and a mandatory declaration between adults to provide some overarching guidelines.
- The tone of the message sent regarding declarations on intimate relationships between adults should not be stigmatizing but one that promotes the safety and well-being of the athlete. Often it is the athlete who ends up bearing the brunt of the negative perceptions and doubts. Additionally, the declarations provide a level of transparency which may protect the coach against unfounded allegations of bias or unprofessionalism.
- Declarations on intimate relationships should apply equally to individuals of the same gender. It was acknowledged that this would be more challenging as there already exists some stigma around same-sex relationships.
- **ATHLETES** felt strongly that intimate relationships, where there is a Power Imbalance between adults, should be considered inappropriate and regulated. This should be standardised and not left to individual organisations, to remove any potential doubts of favouritism or unfair treatment when it comes to athlete selection. The stakes are amplified where selections for national teams are concerned.
- **SPORT ADMINISTRATORS** had a different view for intimate relationships between adults in the context of community sport, where a flexible approach should be taken as genuine relationships can develop. They agreed that these relationships must be declared in the name of transparency.
- **COACHES** acknowledged that generally coaches are getting younger (such as former athletes) and the age gap between the coach and the athlete is narrowing. Although intimate relationships between adults should be discouraged, they need to be managed carefully where they do happen.
- **ORGANISATIONAL LEADERS** suggested allowing NSAs to implement higher/stricter limits on intimate relationships between adults where appropriate (e.g. national teams). The Unified Code would provide the baseline limits.

## B2 Whether Grooming (as defined) should constitute Misconduct



**CONTEXT:** Sexual Grooming under the Penal Code occurs when a person above 18 meets or travels to meet a minor (under 16) with an intention to commit an offence.

Under the Unified Code, Grooming is the act of establishing trust and an emotional connection in a relationship between an adult and Minor and/or where a Power Imbalance exists which creates an environment where an individual becomes receptive to improper advances. It can occur in person or online.

There are now recognised and established stages of this gradual and escalating process which are set out in the Code.

**SUMMARY:** Yes. There is agreement that such inappropriate behaviour need not reach the level of criminal sexual grooming to be considered Misconduct, but grey areas exist so there needs to be greater education and clarity on what constitutes Grooming

- All participants agreed that:
  - a. grooming behaviour that takes place with ill-intent needs to be classified as misconduct even if there is no physical meeting. This will serve as a form of deterrence and help raise awareness and understand of what Grooming is to the wider community;
  - b. grooming may be difficult to detect as it usually happens in private between parties (such as on messaging applications and on social media);
  - c. education is required to help athletes (especially Minors) or any third-party observers to identify that that it is happening and to seek appropriate help;
  - d. parents are important in educating their children regarding the use of digital communications.
- Attention must be placed on overseas training trips or competitions as these are environments where athletes are particularly vulnerable over an extended period of time. Travel policies on grooming and non-training related activities should be clearly set out.
  - **COACHES** unanimously agreed that behaviours associated with Grooming (as defined) should be classified as misconduct and a strict approach should be adopted. Strong coach-athlete relationships are necessary based on trust for the success of the athlete. Grooming would be a breach of this trust that would lead to long-term psychological impact on athletes.
  - **COACHES and SPORT PROGRAMME PROVIDERS** reflected that guidelines are uncommon among NSAs and local organisations in respect of Grooming behaviours. Many international schools provided clearer and more stringent guidelines for external vendors. Some examples were explicit rules on:
    - a. giving rides to students without parental consent;
    - b. possession of personal phone numbers of students or private chats;
    - c. differentiated or personalised treatment of students.

- **ORGANISATIONAL LEADERS** feel that some of the behaviours identified with Grooming can be done with innocent intentions. There is no clear understanding of what grooming is and what behaviour is considered inappropriate. As such, case studies/examples are required to educate the community on what Grooming is as there is a thin line between an appropriate and inappropriate relationship between a coach and athlete.
- There was no conclusion if Grooming should constitute misconduct if it happens between two consenting adults where there exists a Power Imbalance.

## B3 Whether Wilful Tolerance constitute Misconduct



**CONTEXT:** This would apply where the person who Wilfully Tolerates the Misconduct is in a relationship where a Power Imbalance exists with the Concerned Person and/or the Concerned Person is a Minor.

**SUMMARY:** Yes, for serious offences where it is extremely clear what has happened is inappropriate. Persons of authority have greater responsibility to report misconduct.

- Participants generally agreed that:
  - a. there is a prevailing culture of ‘mind your own business’. Individuals do not report inappropriate behaviours for fear of being tagged as a whistle-blower in the small community;
  - b. specifying that Wilful Tolerance (as defined) constitutes Misconduct in the Unified Code helps to promote a culture of ‘speaking up’ by calling out poor practices. This will lead to a cultural shift on speaking out when observing inappropriate behaviour;
  - c. Wilful Tolerance of serious offences such as hazing, physical abuse or improper touching, or where a Minor is involved should be highlighted. Other types of misconduct such as Grooming may be harder to detect and report.
- **COACHES** agreed that Wilful Tolerance is unacceptable, especially when the person witnessing the incident is a person of authority – a coach, sport administrator, NSA leader or team captain. Being leaders, they need to set the correct example by flagging out Misconduct.
- **NSA REPRESENTATIVES** (Sport Administrators, Organisational Leaders, Safeguarding Officers) feel they have a duty to investigate incidents that are reported, but that they have limited resources especially if the complaint is not made against a person under the immediate jurisdiction of the NSA. Having a CMU or neutral channel for athletes to ‘consult’ and ‘check-in’ if their case is valid will be useful.
- There was disagreement over whether Wilful Tolerance should be constituted as misconduct if the observer is not a person of authority due to a culture of non-interference in Singapore.

## Administration and Adoption of the Safe Sport Programme

### C1 Case Management Model which is most appropriate for the needs of the community

CONTEXT: Participants were presented with three models of Case Management (*see Annex 1 for visual*)

1. Severity of Misconduct (i.e. CMU handles those assessed as Medium severity and above)
2. Type of Misconduct (i.e. CMU handles Sexual only)
3. Hybrid\*

\*By design, there was no prescribed description of the Hybrid model so as to avoid limiting the discussion on the possibilities



**SUMMARY:** There was a clear preference for a Hybrid model that was not strictly based on the Type of Misconduct or Severity. Participants felt more assured by the independence of the CMU for medium to high-level severity cases. Organisational leaders were comfortable to delegate medium to high level severity incidents to the CMU due to their complexity and time taken.

#### MODEL 1 and 2

- **WEAKNESSES OF MODEL 1**
  - a. the NSA could downplay incidents by declaring incidents as low level of severity if no clear method of assessing severity was established;
  - b. participants shared fears that some NSAs/organisations might classify more serious cases as 'low severity' to avoid escalation to the CMU out of concerns over negative publicity.
- d. **WEAKNESS OF MODEL 2:**
  - a. excluding the other types of misconduct which could have serious consequences. The Safe Sport Commission might be viewed simply as an organisation concerned only with sexual misconduct when Safe Sport is much more;
  - b. NSAs may also not be equipped to effectively manage incidents of medium to severe levels of Psychological or Physical Misconduct.

#### MODEL 3

- Common themes for a Hybrid Model were:
  - a. CMU to deal with incidents of medium to high levels of severity;
  - b. ability to refer low severity incidents to the CMU in certain circumstances (e.g. conflicts of interest and/or reasonable grounds for believing that the incident would not be dealt with fairly).
- The Hybrid model allows flexibility in allowing NSAs to manage low severity cases. Smaller NSAs with more limited resources may refer low severity cases to the CMU, while larger NSAs with more capability and capacity may handle low severity cases on their own.
- Several participants expressed concern with the capacity and sensibilities of NSA staff to deal with even low severity incidents. In an ideal scenario, and subject to CMU resources, the CMU should handle all incidents and shift towards Model 1 as NSA training and capability is developed by the CMU.

- In assessing severity:
  - a. clarity is required on how to assess the severity of each case. Something which is deemed high severity to an athlete might be categorised as low severity to the organisation/NSA (e.g. psychological abuse such as verbal abuse during coaching might appear low to organisation);
  - b. assessment of severity should ideally involve both the CMU and the Safeguarding Officer/NSA.

## CONFIDENTIALITY

- e. The CMU can serve as a neutral channel which allows anyone to do a 'sense check' if what they have experienced or observed is indeed misconduct and if there is a need to report an incident, without involving the NSA due to privacy concerns.
- f. In instances where the NSA needs to be involved in the investigation or assessment, the person making a disclosure should be informed, as some may fear repercussions for speaking out.
- g. Confidentiality of each case must be assured, especially as cases may involve coaches, staff in

the NSAs or other persons in a small sporting community.

## DISCIPLINARY OUTCOMES

- h. **ORGANISATIONAL LEADERS** were in favour of the establishment of a Safe Sport Tribunal.
- i. The consequence of each offence needs to be clearly outlined in the Unified Code for consistency across sports. The same offence should face the same consequence (e.g. length of suspension). Each sport could consider specific policies to cater its unique differences, such as physical touching in coaching for contact versus non-contact sports.
- j. Decisions on any outcomes such as sanctions or suspensions should also be made / decided by the CMU/ Safe Sport Tribunal rather than NSAs/organisations themselves, as there are instances where coaches/staff work across sports.
- k. **PARENTS** suggested a demerit system where demerit points are awarded for any offences, with suspension for repeat offenders.

## C2 Whether an organisation that is accredited by the Safe Sport Commission provide assurance to stakeholders. Whether commercial Sport Programme and/or Facility Providers are keen to adopt the Safe Sport Programme.

**SUMMARY:** Sport Programme providers welcome a formal code which can serve as a baseline for their own internal guidelines, while parents look forward to implementation of the Safe Sport Programme as a way to ensure greater safety for their children



- **PARENTS** felt assured that an organisation accredited by the Safe Sport Commission would:
  - a. comply with the requirements of a formal reporting structure;
  - b. delegate its case management processes to a neutral party, the CMU.

The existence of a Safe Sport Programme, the formalised system for reporting and protection for whistle-blowers would be a deterrent for would-be offenders. Ideally, private academies and private coaches should also be accredited.

- **SPORT PROGRAMME PROVIDERS** feel that Unified Code would be useful for the industry as:

- a. it is endorsed by the SportSG as the sporting authority;
- b. would help raise awareness and encourage discussions about these issues. There is a taboo about discussing inappropriate behaviours due to the fear of perception of distrust of its employees;
- c. most Sport Programme Providers do not have in-house policies regarding Safe Sport, but instead rely on the guidelines required by international schools for external vendors;
- d. potentially grow the business by providing assurance to clients and/or parents;
- a. increase awareness of the importance of safeguarding programme participants, who tend to be minors.

## SAFE SPORT MARK

- Fitness industry participants agreed with the concept of the Safety Mark but raised concerns over the cost and processes required to receive accreditation due to the current challenges facing the industry. Nonetheless, they would be willing to pay a reasonable annual fee for membership. There should also be an option for freelancers such as a training program, which may be subsidised by SkillsFuture or uTAP.
- SportSG can encourage adoption of the Safety Mark and accreditation by ensuring that SportSG or PA facilities can be booked by accredited organisations.

## C3 Considerations specific to the Para Sports Community



**CONTEXT:** Studies have demonstrated that disabled children are between 3 to 4 times more likely to be abused while participating in sport than other children.

The Para Sports Focus Group session was one of the largest sessions with stakeholders across the community - athletes, coaches, parents, support staff, sport administrators, organisational leaders from non-governmental organisations involved with disabilities.

The detailed notes of the Para Sports Group are set out in Annex 3.

There is a need to develop specific educational resources and policies for the Para Sports Community tailored to the different groups in the community.

Volunteers & Coaches were highlighted as stakeholders who would benefit from education and guidelines on interacting with persons with different types of disabilities.



- Among the Para Sports Community, the Safe Sport Programme was a welcomed initiative which organisations would be keen on participating in for guidance on policies,

educational resources and accreditation. Whilst schools usually have MOE guidelines regarding misconduct, this is not always the case with sporting organisations.

## AREAS OF CONCERN

- Physical touch is often necessary especially for visually impaired athletes, and communication of boundaries is key. Problems arise when some of such contact is opportunistic.
- Neglect is also concerning, especially when coaches do not have an appreciation of the specific needs of their athletes.
- **PARA ATHLETES** felt that they were treated less favourably from athletes without disabilities. Coaches had lower awareness of how the disabled athletes perform. Instances of insensitive jokes, inappropriate choice of words, sarcasm and shouting were cited as examples of inappropriate behaviour arising out of this lack of awareness.
- Risk of exposure to voyeurism and other inappropriate behaviours were high as changing in the toilets open areas with other athletes is also common, with disabled athletes being particularly vulnerable and exposed.

## PARA SPORTS SPECIFIC POLICIES

- Specific policies for the Para Sports Community need to have provisions addressing:
  - a. the ratio of coaches to athletes;
  - b. changing room policies;
  - c. physical transfer of athletes;
  - d. skill / technique correction for different types of impairment (physical touch);
  - e. conduct when overseas.

- Such policies should apply to all stakeholders in this community; besides athletes, coaches, sport administrators, it should also include parents/caregivers and volunteers as these groups tend to be highly involved, with the end goal of building a safe community.
- Parents of Para Athletes are responsible for educating their children on Safe Sport. Para Athletes will require customised educational programmes and materials which cater to their needs, such as those with intellectual impairment or special needs.

## REPORTING

- On process, Parents should provide medical/therapy records of the Para Athlete prior to case review.
- The barriers to reporting the Para Sports Community are as follows:
  - a. difficulty in finding coaches who want to work with Para Athletes leads to hesitation in raising concerns (e.g. inappropriate touching by coaches);
  - b. being a highly volunteer-dependent sport, when volunteers push the limits of appropriate behaviour (in terms of language or words used), no one speaks up as they do not want to lose the volunteer;
  - c. it is a tight knit community with reporting almost certain to wreck relationships.
- **COACHES** expressed concerns of false reporting as some athletes have a history of mood disorders.

# NEXT STEPS



*It is important to ensure that there is a safe environment to pursue sports, either competitively or recreationally, and it should not be taken for granted.*

KOH Jian Ying

## 3. Overview & Next Steps

3.1 The completion of the 8 Stakeholder Focus Group Sessions concludes Phase 2 of the Unified Code Consultation.

### Summary of Discussions

- All the forms of Misconduct were present in our community with Psychological Misconduct being raised most frequently. There was broad support for the Unified Code to harmonise and set standards across the community.
- Apart from the widely accepted types of misconduct set out in Part I of the Unified Code, participants agreed that safeguarding provisions in respect to Grooming, Wilful Tolerance and Intimate Relationships where there is a Power Imbalance and/or involving Minors (Under 18) were merited.
- Maintaining dual relationships between adults where there is a Power Imbalance should be discouraged and where they do happen, be declared.
- Currently, key barriers to reporting are:
  - 1) lack of awareness that something inappropriate has happened
  - 2) uncertainty of channel for reporting
  - 3) distrust of organisations to investigate fairly and appropriately
- Independence of the Safe Sport Commission's Case Management Unit was seen as a salient feature of the Safe Sport Programme and supported by organisations (for reasons relating to capacity and capability) and participants (who felt that an arm's-length assessment and investigation would provide assurance).
- The Case Management Unit should handle all incidents classified as medium to high level of severity and maintain flexibility in assisting and/or handling low-level incidents where there are concerns of conflicts of interest and/or there are reasonable grounds for believing that the report of would not be fairly handled.
- Organisational Leaders were in favour of the establishment of a Safe Sport Tribunal.
- The system of accreditation was welcomed by athletes, parents and commercial programme providers.
- Regardless of an individual's role, awareness and education of all stakeholders are critical in respect of:
  - 1) what constitutes inappropriate behaviour; and
  - 2) channels for making reports of concern.

3.2 Phase 3 of the Consultations will take place over June to September 2021 with Key Stakeholder Working Groups on the approach and structure to Part II and Part III of the Unified Code:

- Case Management process (including provisions for confidentiality)
- Decision Making Framework for assessing the seriousness of Misconduct
- Disciplinary Regulations (including the provisions for the Safe Sport Tribunal)

# ANNEXES



*... every athlete deserves a safe environment where they can not only train and compete comfortably, but also be able to speak up fearlessly.*

Contessa LOH

## Annex 1 Focus Group Primers & Key Visuals



Safe Sport Unified Code Part 1 (v 2.0)

[Download](#)

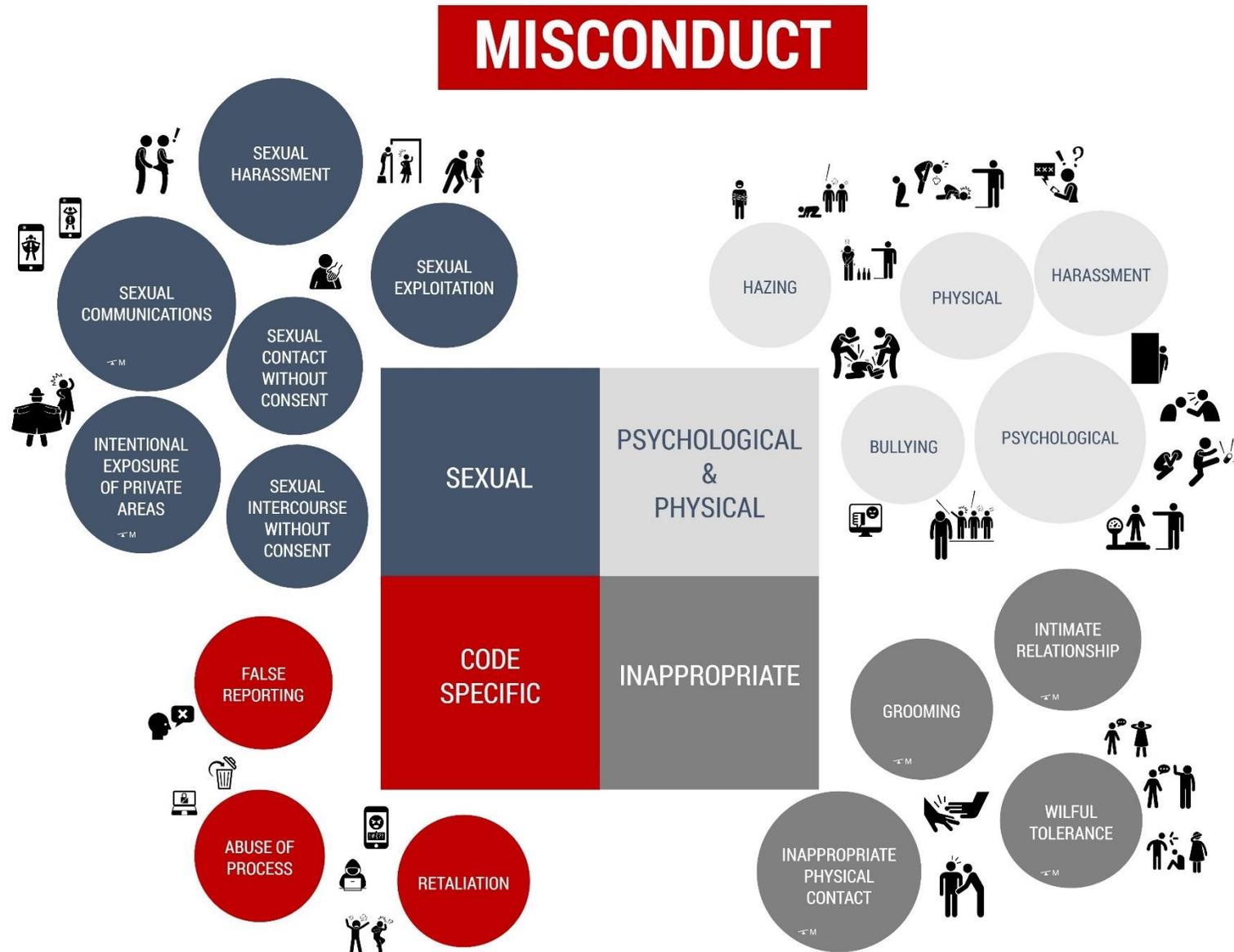
### A Blueprint of the Safe Sport Programme

Steps	Strategy	SS Programme Elements	Participation	Accreditation
ADDITION	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	Safe Sport "Ally" (Bronze)  where Code is appropriately incorporated
		<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	Safe Sport "Partner" (Silver)  where designated standards are met.
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>	Members - SportSG, applicable NSAs, NGBs	Safe Sport "Champion" (Gold)  where compliance in case management is delegated or achieved to a designated standard.
		<p><i>*subject to assessment</i></p> <p><b>Formal</b> - 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>		
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>

HARMONISATION EMPOWERMENT ACCESSIBILITY RESPECT

Blueprint of the Safe Sport Programme

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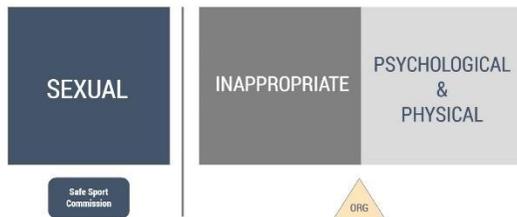


# CASE MANAGEMENT MODELS

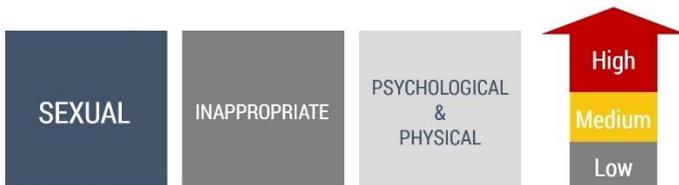
## OPTION 1 Severity of Misconduct



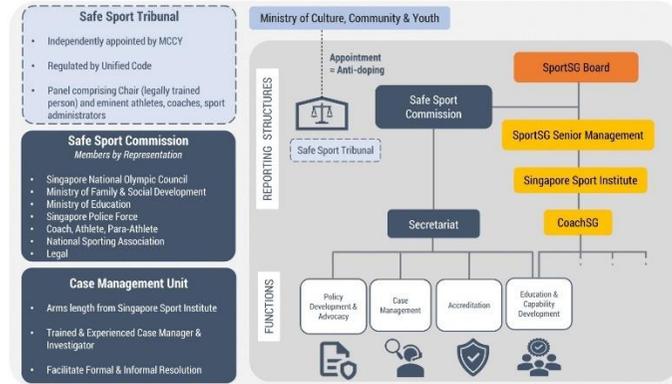
## OPTION 2 Type of Misconduct



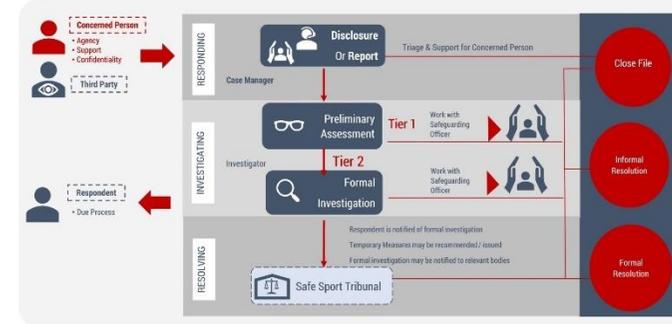
## OPTION 3 Hybrid



# SS COMMISSION & TRIBUNAL



# CASE MANAGEMENT



## Annex 2 Participant List

### Job Designation or Role & Age

Athlete	18	Coach	27
Athlete	19	Executive (Programmes and Membership)	27
Athlete	19	Sport Partnership Officer	27
Athlete	21	High Performance Manager	27
Athlete	21	High Performance Executive	28
Athlete	22	Athlete	28
Athlete	22	Coach	28
Athlete	23	Athlete	29
Athlete	23	Coach	29
Athlete	23	Athlete	29
Athlete	23	Athlete	29
Athlete	24	Sport Psychologist	29
Athlete	24	General Manager	30
Athlete	24	Athlete	30
Athlete	25	Team Manager	30
Athlete	25	Senior Executive	30
Athlete	25	Parent / Volunteer	30
Athlete	25	Volunteer	30
Athlete	25	Coach	31
Coach	25	Coach	31
Athlete	26	Committee Member	31
Athlete	26	Athlete	31
Sports Development Manager	27	Secretary	31
Athlete	27	Teacher, Coach, Volunteer	31
Athlete	27	Team Lead	32
Coach	27	Athlete	32

Athlete	32	General Manager	37
Development Manager	32	Admin & Events Director	37
Coach / Financial Consultant	32	General Manager	38
Coach	32	Senior Manager, Coaching Development	38
High Performance Manager	32	National Head Coach	38
Senior Executive	33	Subject Head for Adapted PE and CCA	38
Coach	33	Parent	38
High Performance Assistant Manager	33	Organization leader	38
Volunteer	33	Customer Relations Officers	38
Assistant Hon Sec	33	Chairperson	39
Manager	34	Operations Manager	39
Athlete	34	Head	39
Support Staff	34	Executive Director	39
High Performance Manager	34	Head	39
Sport Psychologist	34	Head of Training & Development	39
Volunteer	34	Administrative Manager	40
Coach, Logistics and Facilities	34	Coach	40
Senior Instructor	35	Executive Director	40
Sport Physiotherapist	35	Executive	40
Manager	35	Head	40
Training Manager	35	Assistant Director	40
Athlete	36	Senior Manager	40
Coach	36	General Manager	41
Athlete	36	National Assistant Coach	41
Director & Head Coach	36	Deputy Director	41
Academy Director	36	High Performance Manager	42
Manager, Performance Pathways	37	Senior Manager	42
Coach	37	Coach	42
Athlete	37	General Manager	42

Coach	42	Team Manager	47
Student Development Officer	42	General Manager	47
Head	42	Coach	48
Vice-President	42	Coach	48
General Manager	42	Parent	48
Assistant General Manager / Head of High Participation	43	Teacher	48
Athlete	43	Senior Director, Coaching and Athlete Development	49
Teacher	43	Physiotherapist	49
Director	44	Parent	49
Coach	44	Volunteer	49
Sport Manager	44	President	49
Team Manager	44	CEO	50
President	44	Coach & Brand Ambassador	50
Deputy Director	45	Manager	51
Para Sports Coach/Coach Developer/Principal	45	Senior Instructor	51
Head of Competitive Sport (Athletic Director) / Head		Parent / Volunteer	51
Performance Coach	45	Parent / Volunteer	52
Manager	45	Head of NSA Safe Sport Committee	52
Parent	45	Coach	53
Volunteer	45	Manager	53
Founder	45	Teacher	53
President	45	Executive Director	53
Executive Director	45	Volunteer	53
National Assistance Coach	46	Counsellor	53
Pathway Manager	46	Psychologist	54
General Manager	46	Director	54
Coach	47	Principal	54
Coach	47	Coach	55
Pathway Manager	47		

Parent	56	Organization Leader	-
Vice-President	56	Third Vice President	-
Parent	57	Coach	-
General Manager	57	Athlete	-
Volunteer	57	Athlete	-
Chairman	57	Honorary Secretary and Sports Director	-
General Manager	58		
Secretary	58		
Coach	58		
Volunteer	59		
Self Employed	60		
General Manager	60		
Hon Secretary	61		
General Director	61		
Coach	62		
Volunteer	63		
Coach	64		
General Manager	65		
Coach	68		
Senior Coach	68		
Parent	69		
President	69		
Parent	70		
Parent / Volunteer	73		

## Organisations Represented

Anti-Doping Singapore  
AquaFins  
Archery Association of Singapore  
Association For Persons with Special Needs (APSN)  
Basketball Association of Singapore  
Bowling Association for the Disabled (Singapore)  
Bukit Timah Saddle Club  
Cerebral Palsy Alliance School  
Deaf Sport Association  
Down Syndrome Association  
Equestrian Federation of Singapore  
ESPZEN Pte Ltd  
Fencing Singapore  
First Kick Academy  
Fitness First  
FitnessSG  
Football Association of Singapore  
Goalball Association  
HomeTeamNS  
JSSL Singapore  
Jump Rope Federation Singapore  
METTA School (Majority II)  
MINDS  
Ministry of Education  
Montfortian Sports Excellence Program Advisory Council (MSPEX)  
National Instructors & Coaches Association (NICA)  
National Youth Sports Institute (NYSI)  
Overseas Family School  
PAPAGO Badminton  
Para Athletics Singapore  
Raffles Institution  
Singapore Bowling Federation  
Singapore Canoe Federation  
Singapore Cycling Federation  
Singapore Disability Sports Council (SDSC)  
Singapore Dragon Boat Association  
Singapore Floorball Association  
Singapore Golf Association  
Singapore Gymnastics  
Singapore Ice Skating Association (SISA)  
Singapore Institute of Management (SIM)  
Singapore Lifesaving Society  
Singapore Management University  
Singapore National Olympic Council (SNOC)  
Singapore Powerboat Association  
Singapore Rugby Union  
Singapore Sailing Federation  
Singapore Shooting Association  
Singapore Silat Federation  
Singapore Sports School  
Singapore Swimming Association  
Singapore Table Tennis Association  
Singapore Tennis Association  
Singapore Trampoline Academy

Singapore Wushu Dragon & Lion Dance Federation  
Southeast Asia Regional Anti-Doping Organization  
Special Olympic Singapore  
Sports Lab Pte Ltd  
SportSG  
Sportz Kulture Pte Ltd  
Table Tennis Association for the Disabled (Singapore)  
Towerrunning Association of Singapore  
Triathlon Association of Singapore  
Volleyball Association of Singapore

## Annex 3 Stakeholder Focus Group Notes

### Group 1 – Safeguarding Officers

26 March 2021, 3.30pm, SIRC Room

**As Safeguarding Officers, which elements of the Safe Sport Programme are GOs (good initiatives), NOs (possibly challenging to implement) or POs (consider other possibilities)?**

Participants felt positive about these elements of the Programme:

- Unified Code
  - a. Clarity of behavior (address “grey areas” on what is appropriate / inappropriate)
  - b. Common reference across sports and set some standards for the industry
  - c. Generally providing direction for NSAs as inaction is often the root of the problem and now there is a roadmap with clear directions
  - d. More easily addressed in the hiring process and can be incorporated into the employment clauses as part of the terms of employment.
  
- Trained Safeguarding Officers (SO)
  - a. Equip SO with resources & skills to deliver workshops prior to online training to highlight importance.
  
- Education
  - a. Available resources for different stakeholders
  - b. Should be made compulsory as there are accepted attitudes by parents acceptance of ‘scolding’, punishment and fear of impact/ consequences. Coaches who are used to ‘traditional coaching’ by scolding, monkey see, monkey do.
  - c. Alignment of training materials to participants together with other agencies (e.g. MOE)
  - d. Possible language barriers in understanding training material (possibly minimally Chinese) especially for foreign coaches
  
- CMU
  - a. Important to have an independent body in charge
  - b. Promotes trust in the system if there is transparency in dealing with cases
  - c. Notification for incident management important to ensure critical info/notification is made to relevant parties (masking of identities)
  - d. Important that there should be declarations of criminal records/disciplinary records for all roles (not just coaches)
  - e. Response time from the CMU must be timely and fair
  
- Accreditation
  - a. Provide assurance to athletes and reputational boost for sporting organisations
  - b. Should be introduced progressively but mandated for NSAs
  - c. Aligned with IOC goals for ensuring Safe Sport
  - d. Fulfilment of compulsory training by a stipulated timeline
  - e. NSA affiliated clubs should also be required to nominate safeguarding officers and attain champion status
  
- Possible Challenges:
  - a. Implementation / Enforcement especially from NSA leadership. Poor leadership sometimes leads to undesirable consequences and may face resistance on their part which will need to be managed. One participant spoke of NSAs fear of “leaving records” and therefore not reporting to Safe Sport (SS) Taskforce / Commission. More than one participant cited that Management approval is usually required currently for reporting to SS Taskforce and as the Safeguarding Officer, there is an obligation as an employee to comply with the wishes of higher management.

- b. Generally, there is a culture of tolerance and one of 'protecting' coaches. There is a need to manage the NSAs mindset
- c. Clubs not hiring coaches under the National Registry of Coaches (NROC), will need to leverage on affiliations / membership which may vary across sports. Overseas coaches who come from a different culture.
- d. There needs to be further support for NSAs, more education, more awareness and reporting and assistance on how to record statements, filing of reports
- e. NSAs require assistance for contextualisation & policy formulation for different sports
- f. Considerations for false allegations
- g. Mandatory reporting under section 424 of the Criminal Procedure Code (CPC)
- h. Take into account Personal Data Protection Act (PDPA) considerations if reporting on disciplinary sanctions

**Which of the Case Management Model do you feel would best serve participants?**

**Model 1 - Severity of Misconduct (i.e. CMU handles those assessed as Medium severity and above)**

**Model 2 - Type of Misconduct (i.e. CMU handles Sexual only)**

**Model 3 - Hybrid**

- Generally the participants preferred the Hybrid Model which allowed for more flexibility in terms of:
  - a. conflict of interest issues arising which may be another parameter for determining the thresholds instead of the three models suggested
  - b. where capacity of NSA is small. In such cases, dealing with low level incidents may also be problematic
  - c. cases of Sexual Misconduct, which even if considered low level, might require more expert handling
  - d. assessment of severity would be important and good to involve both the CMU and the Safeguarding Officer
  - e. having autonomy to handle low level cases where there is capacity and capability
- Many participants suggested that at the start, CMU to deal with all types of cases and as NSAs are better trained, NSAs to progressively deal with lower level incidents and move to a Hybrid Model.
- Problems with Model 1 (Severity)
  - a. Something HIGH to an athlete, might be LOW to organisation (e.g. psychological abuse might appear to be LOW to organisation) and therefore not reported even if it has been happening for years. If there is no intervention, harm may continue to be suffered by athlete, can it be escalated to the CMU?
- Problems with Model 2 (Type of Misconduct)
  - a. Would not recommend that SS Commission only deals with Sexual Cases as it would seem that the SS Commission's sole job is just a sexual assault / harassment monitoring body
  - b. In terms of optics, if anything sexual is handled by CMU, would that be perceived as defensive?
- Possible challenges
  - a. Actions that are contextualise; would SS commission have technical experts? -> existing provision of technical resource persons
  - b. Competency & Confidence of trained Safeguarding Officer is important even in low level incidents, some may not be competent or have insufficient practice of report writing, fact finding and interviews. Possible to share/pool Safeguarding Officers from other organisations as some organisations have limited resources? Perhaps have more regular conversations with Safeguarding Officers to understand cases
  - c. Accountability of NSAs / sporting organisations, how many are competent & will update Safe Sport Taskforce.
  - d. Jurisdiction – important that outcomes (e.g. sanctions) be enforced by the NSAs
  - e. Definition of Low, Med, High

## Group 2 – Athletes & Sportspersons

20 April 2021, 7.00pm, SportSG Auditorium

**Top 3 Types of Misconduct highlighted by Safeguarding Officers (Neglect, Psychological Misconduct & Inappropriate Acts) Do you agree and are there other types of Psychological Misconduct / Inappropriate Acts that are not captured under the Code?**

### ON INTIMATE RELATIONSHIPS

- Agreement that any form of intimate relationships where there is a Power Imbalance should be considered inappropriate, even if between adults. This should be standardised and not left to individual organisations, to remove any potential doubts of favoritism or bias when it comes to athlete selection.
- Intimate relationships between coaches and athletes were common in some sport. **Perceived unfair treatment due to the relationship and the conflicts of interest were the biggest complaint where these relationships in sport were prevalent.** Some participants suggested requiring a declaration once such a relationship was forming might provide an alternative instead of a blanket prohibition.
- Concerns were raised amongst those responders which NSAs were smaller and their ability to formulate these policies and communicate them to those involved.
- Many participants felt that a strict liability should be applied where one party was a Minor (under 18 in the Unified Code)
- Application of code to fitness industry with seemingly high incidence of such relationships based on age of participants
- Most participants agreed **that addressing intimate relationships within the Unified Code (whether as a strict prohibition or by requiring a declaration) was important to provide some overarching guidelines to NSAs).**

### ON WHETHER GROOMING SHOULD BE PART OF MISCONDUCT

- Opinions were mixed on whether grooming such as treating an athlete with rewards could be a recognition for performance but could be misconstrued as grooming. If there were any minors involved, coaches/staff should always inform the parents to prevent any accusations of grooming. Participants felt Parents should be aware of athlete's "whereabouts" & training environment.
- One participant shared that he/she had witnessed many acts of the initial stages of Grooming such as extra attention after training and based on the content and intent of the communications.
- Several participants felt it was important in educating athletes (especially younger ones) to report discomfort as their eagerness to learn make them susceptible to grooming
- There was no conclusion if grooming is a misconduct if it happens between two consenting adults, although a power imbalance would complicate this.

**Top 3 Types of Misconduct highlighted by Safeguarding Officers (Neglect, Psychological Misconduct & Inappropriate Acts) Do you agree and are there other types of Psychological Misconduct / Inappropriate Acts that are not captured under the Code?**

- Misconduct is common across the sports represented in the group, with a mix of participants witnessing misconduct or experiencing it themselves. A quick survey reflected Psychological Misconduct (87%) including neglect (40%) as the most common form of misconduct experienced. Psychological misconduct (72%) and Inappropriate Acts (56%) were the most common forms of misconduct that the participants witnessed.
- The forms of misconduct are quite wide-ranging and not limited to the top 3 (Psychological, Inappropriate Acts, Physical) indicated in the safeguarding officer survey.

- **Athletes are not aware that these behaviors are forms of misconduct.** Several participants felt that because it is generally accepted within the sporting community that athletes must be able to endure hardship, athletes sometimes are not aware that some actions border on inappropriate. Excessive physical training of an athlete was justified by the coach as “toughening up” and only recognised later by teammates as physical abuse when the athlete suffered a lasting injury. Neglect was another area which some athletes felt that participants were vulnerable. One participant felt that raising a concern about overtraining led to feelings of guilt even though they experienced pain which could worsen. One participant cited the reduction of medical coverage due to budget constraints as a risk factor.
- **Coaches are not aware their actions are forms of misconduct.** Many participants felt that verbal abuse has been normalised in the sporting environment. Verbally abusing and yelling at athletes by coaches was seen as out of passion for the sport, and the participant felt the coach had good intentions underneath it. Some participants felt that verbal abuse was more prevalent in team sport.
- **It was important to have an objective measurement for Psychological Misconduct** as different athletes react differently. One participant felt that it would be tricky for the coach to talk about a person’s size and physique without it being perceived as body shaming (in particular for sports with weight categories). Participants agreed that different “coaching styles” was the usual reason provided for suspect behavior. It was important in coach education to learn about how to manage athletes instead of just pedagogy. Several participants felt many coaches had not evolved with new coaching practices.
- Several participants cited **weak management in their NSAs** (Executive Committees and Management) with Executive Committees having absolute power. The mismanagement of this power had led to some instances of neglect and inappropriate comments.

**What are the barriers to disclosure/reporting for an athlete? Would athletes still have concerns with a third-party Case Management Unit in place?**

- Ignorance / lack of awareness was the key barrier to them taking action on the misconduct. Athletes were also afraid to voice out as there are fears of being identified as the “trouble-maker”, that the report would cause a rupture in the small community. The costs of reporting were even higher in a low resourced sport where the coach was one of few talents.
- **Concerns distinguished from formal process.** Reporting seems like a formal process which may blow up everything and cause a lot of friction in the community.
- **Athletes are unaware of who to report misconduct to.** Low awareness of safeguarding officers. Majority of the participants did not know who their organisational safeguarding officer was and/or that they had a safeguarding officer to whom they could make a report of concern. Upon learning that there were safeguarding officers in their organisations, many felt current communication efforts from their NSAs was poor and more proactive information (SO information) flow to the athletes and transparent reporting processes were important. Several participants raised doubts over the that neutrality of the officers as they are closely linked to the organisation/NSA / office holders. This was especially so when the perpetrator was an integral part of the organisation.
- **NSAs are not equipped to manage reports of misconduct.** An athlete was unwillingly filmed in the shower by another athlete and this was reported, but no action was taken as the NSA did not know how to react to this.
- **Lack of Trust in NSA based on previous experiences.** Several participants felt that through their experiences in interacting with the NSA, they had no confidence that the NSA would be able to handle such issues. This was exemplified by inaction on the part of the NSAs when other types of issues were raised and/or pushback by the NSAs. There was a general feeling of powerlessness as athletes amongst one group.
- **Punishment for speaking out.** It was a common feeling in one group that it was better to keep quiet than to go to the NSA with issues due to the reprisals (withholding of resources, non-selection and/or debarment from games). One participant had spoken about how another athlete had been punished via a disciplinary process because the athlete had spoken frankly about how the sport could be improved. This sent a chilling signal to the rest of the athletes that saying anything about the NSA would not be viewed kindly. One group of

participants spoke about how the younger athletes were more vulnerable. As older athletes they would be more willing to speak up once closer to the end of their careers as there was less to lose.

#### Which of the following Case Management Models do you feel would best serve participants?

**Model 1 - Severity of Misconduct (i.e. CMU handles those assessed as Medium severity and above)**

**Model 2 - Type of Misconduct (i.e. CMU handles Sexual only)**

**Model 3 - Hybrid**

- Idea of a CMU was welcome as it ‘forces’ NSAs to take action on complaints of misconduct and ensure that a neutral party is involved to provide assistance if required. Some participants also felt the CMU would be able to provide a fresh perspective (as many incidents were brushed off as part of the norm), a sense of security and offer some sort of protection/assurance.
- The ability of the CMU to understand the context of each sport was raised as being important as well as accessible by Minors. One participant felt that it was important for the CMU to have context of the situation when channeling the feedback to NSAs. If parties were uncomfortable speaking directly to the CMU and did not want to go their NSA, the Athletes’ Commission was mooted as an alternative party to provide that connection to the CMU. It was suggested that the avenues of reporting be more clearly signposted to athletes (name, someone they trust, email, cut red tape e.g. athlete lounge, aunty dolly, gym)
- Generally, the Model 3 Hybrid approach was preferred to provide flexibility. The NSA can be involved for less severe misconduct instances but can tap on CMU’s resources. CMU’s involvement ensures accountability and ensures there is another party looking at grey area incidents which may sometimes be dismissed by the NSA. Another suggestion was for the CMU to handle Sexual, Psychological & Physical Misconduct with the NSA looking at Inappropriate conduct.
- One Participant felt that if someone went to the CMU, he/she might feel played out if they the case goes back to NSA for handling and it may be the very reason they went to the CMU in the first place and it was important to build trust in the system.
- Weakness of Model 1 is NSAs would be compelled to classify all reports as ‘low severity’ to brush things under the carpet. Participants felt it was important for the Safeguarding Officers to review each reported case with the CMU. Several participants felt that even for smaller NSAs, dealing with low level incidents might prove to be a challenge due to the manpower and knowledge required.
- Weakness of Model 2 is that Inappropriate, Psychological/Physical misconduct have a serious impact on the athlete and there should be a way to escalate this to CMU.
- Some participants felt that if resources are available, all types to be managed by SS Commission.
- A participant noted that when classifying the severity of misconduct, the **impact on the athlete must be taken into account**

#### Key Takeaways

- The Unified Code was welcomed as it would help clarify the “grey areas”.
- Education is key for the Safe Sport Commission
- Educating athletes & stakeholders of the sport - what is considered inappropriate behavior
- Raising awareness of the channels to report misconduct, **especially channels outside of their own NSAs** such as safeguarding officers in other NSAs who can help, or to the Case Management Unit
- CMU forces accountability to the NSAs to investigate any allegations, and the unified code makes it clear what is inappropriate to remove any doubts

- NSAs adherence to Safe Sport Programme and Unified Code was important. A multi-party approach is required so that everyone is aware of their rights and scope of the Safe Sport Programme. Application of the Unified Code beyond the NSAs and to its membership was also important as for some sport, the clubs played a more significant role in the athlete's training interactions.

## Group 3 – Coaches & Sport Instructors

27 April 2021, 11.30am, SportSG Auditorium

### Should Intimate Relationships be regulated by the Unified Code in these circumstances:

**A. where there is a POWER IMBALANCE; and/or**

**B. between an Adult & a MINOR**

### Should it be left to the organisations to make their own rules around this?

- There was unanimous agreement that:
  - a. rules around intimate relationships between adults and minors should be on strict liability basis
  - b. the **rules governing intimate relationships where there is a power imbalance should be uniformly applied across all sports** as there would be inconsistent treatment if organisations are given the flexibility to have rules on this (currently some institutions are strict, and some not); for e.g. some employment contract prohibit dual relationships. In the context of coaching, this will help set standards for different coaching practices. Academies and clubs which might not follow the NSAs, the Unified Code will force the clubs and/or affiliates to comply
  - c. applies regardless of gender of both parties
- Prevalence - Intimate relationships are common in some sports between coach & athlete. Perception of conflicts of interest are real. Where there is a coach-player relationship, there are often accusations of biasedness and often, it impacts the athlete more than the coach (stress that others do not believe they are capable or merit their selection)
- Grey areas include – two consenting adults even with a power imbalance, or an adult and a minor without power imbalance and a small age gap (e.g., two athletes who are 19 and 16 years old). Would there be a close in age exception? Athlete close to 18 and coach is early 20s. These grey areas should be looked at on a case-by-case basis. In some cases, positive and healthy relationships developed despite power imbalance.
- Consideration for prior relationship e.g. two athletes are in a relationship and one assumed the role of coach, it would not be deemed as a breach but one should still declare such relationships.
- One participant pointed out that coaches are getting younger and they have different mindsets/thought processes. They could be more adventurous and stretch the limits.
- One NSA has a clear code of conduct. Should intimate relationships happen, they need to be declared and the athlete would be reassigned to another coach.
- **Education should extend to guidelines on positive relationship-building** – what is permissible, what is healthy, how to make the relationship a rewarding and positive one for both coach and athlete? For example:
  - a. Coaches should refrain from participation in social activities and if really need to, be limited to group activities.
  - b. Coaches need to be mindful of their social media accounts & communication through short messaging and limit interactions to business purpose communications
  - c. Social media can be used to understand their athletes better, but coaches should be mindful of interactions/communications with their athletes on such platforms.
- The message should be that the Code is meant to protect and not to penalise.

### Should Grooming behaviors be treated as Misconduct?

Context: *Criminal only if a meeting took place and there was intention to commit an offence*

- Group unanimously agreed that grooming should be classified as misconduct and a strict approach should be adopted.
- Coaches unanimously agree that a relationship is an important part of coaching – athletes need to trust their coach, respect their coach, look to them in times of pressure. Participants felt grooming was really a breach of trust and has a lasting psychological impact on the athletes which justifies its inclusion as misconduct.
- Grooming, in the sense of pushing an athlete to do better, grooming them to be the best athlete possible, is part of a coach’s job. However, once grooming involves “evil intent”, i.e., intent to control and manipulate, whether sexual or otherwise, crosses the line and is considered inappropriate.
- Whilst there are many grey areas, coaches agree that a sexual relationship, being physical outside of training context and grooming with intent to manipulate crosses the line and are inappropriate.
- One coach shared that grooming behaviours were common in sport particularly at the academy (non-national level) and some experience with institutional cover ups on this type of behaviour - gifting was always one of the common themes
- One coach shared that when she was an athlete she did not know about grooming and with that knowledge now, she realised she was groomed by her coach.
- Persons of perceived attractiveness (e.g. famous / power / idols) may have advantage in grooming participants. Factors in vulnerability may include athletes who are eager to do well in competing at high performance or school teams or those facing problems at home or school
- If player comes forward and mentions that coach say do not tell anyone about the private coaching and any other acts - misconduct by itself!
- Some participants felt there should be safeguards for coaches against athletes overreacting / one-sided feels
- **Case Management** – Where there is an alleged case of grooming:
  - a. it is important to conduct a fact-finding / investigation to determine intent. It does not need to satisfy the requirement for it to be a crime.
  - b. It is important to maintain case archive of grooming cases including alleged cases for tracking a serial “groomer”
  - c. Consequences of breaches for such breaches of grooming are to be calibrated based on severity (e.g. termination, warning)
  - d. Consideration for assessment of grooming includes the Consensual vs Non-Consensual
  - e. Consideration of age gap for grooming behaviours and dual relationships (e.g. 17-year-old athlete VS 28-year-old coach / 17 VS 38-year-old coach or roles of power)
- Professionalism remains the key in terms of coach behaviour and policies/rules will help to ensure these lines are not crossed:
  - a. at the International Schools in Singapore, coaches are not allowed to give rides to students without permission from parents and must keep the school informed
  - b. there should be rules on transfers between venues and giving lifts to students/athletes (e.g. always asking permission, educating athletes)

- c. there should not be personal conversations between coaches and athletes. Conversations can be with the rest of the team, with parents (use of Whatsapp group chats), or even with another coach. Convenience and practicality should take a backseat to these safeguards
  - d. unacceptable to confer “special treatment” for e.g. children’s day, all children should receive equal treatment (no personalised gift). These sorts of policies protect the coaches and children equally.
  - e. Cannot be one-to-one coaching without parental consent
- **Educating young children** (who may not understand what it is) on the various steps involved in grooming is important and needed especially since it takes place over time. Messages in the form of examples such as “this person” is my bestie / “this person” shares many secrets with me

#### **Should Wilful Tolerance constitute Misconduct?**

- Majority of the participants agreed that wilful tolerance should be regarded as a form of misconduct and the examples provided in the code were quite straightforward.
- The upsides to stating this clearly in the code:
  - a. create a culture of speaking up as where people do not speak up, this results in frustration with the system and a high turnover
  - b. coaches have a duty to call out poor practices
  - c. helps to provide structure within organisations
- Wilful tolerance is especially important where the person is a person of authority – a coach, an administrator, NSA, team captain. These are people who are trusted, looked up to and should therefore know that they must do the right thing. As such, their wilful tolerance is a clear misconduct.
- Questions were raised about whether institutions could be guilty of wilful misconduct as there were instances of “cover ups” by member clubs/academies. As such organisations also posed a security risk, not just individuals. One participant shared an example of a coach who subjected athletes to long duration under the hot sun, fat (body) shaming. Teachers raised their concerns but no action was taken and the coach continued to practice in the school. It seems the coach is influential and has a lot of power such that the blind eye was turned to this incident.
- One participant pointed out that there could be different expectations in a high-performance vs community setting in terms of what constitutes misconduct and this would need to be considered.
- Opinions were divided on whether wilful tolerance by a fellow athlete or a parent is considered misconduct. There is a culture of non-interference in Singapore. If an athlete witnesses abuse and tell his parents about it, and they decide not to do anything, is it misconduct? This is especially so for psychological abuse (hazing), which might be seen sometimes as a rite of passage. Some feel it is not misconduct, whilst one feels it is and is clearly listed on his NSA’s code of conduct as misconduct.

#### **Which of the following Case Management Models do you feel would best serve participants?**

**Model 1 - Severity of Misconduct (i.e. CMU handles those assessed as Medium severity and above)**

**Model 2 - Type of Misconduct (i.e. CMU handles Sexual only)**

**Model 3 - Hybrid**

- Coaches welcomed the idea of a CMU as it opens the avenues for athletes to voice their grievances. A CMU will encourage them to come forward. Independence of case management personnel would increase confidence in management of cases. It in turn would encourage reporting due to confidence in management. Currently, there is no recourse if incidents are reported to the NSAs and nothing is done. Overall, there might be a decrease in case as perpetrators would be deterred due to proper management of cases by independent bodies.

- While coaches feel the CMU might initially be flooded with complaints, it is part of developing a safer environment for sports because NSAs will take time to develop their own processes for case management. While they are growing their own case management processes, the CMU is there to give athletes a channel for complaints.
- Coaches were divided as to whether the CMU should involve the NSAs. Some feel that NSAs' involvement is an important part of growth for the NSAs in their case management, while others feel that involving the NSA might negatively impact the athletes, e.g., not being selected for the team because they complained. As such, this should be evaluated on a case-by-case basis and the athlete who complained should be consulted.
- Majority were in favour of the hybrid model as it is more flexible. It would allow athletes to go beyond the NSAs if they feel that their issues have not been resolved. Additionally, some NSAs would not have the capacity to deal with even a lower level incident
- Model 1 (Severity of Misconduct) might result in NSA declaring every issue as low severity. There was preference for inclusion of at least one independent party even for lower-level incidents and/or an option to refer to the Case Management Unit. Judgement of severity can be subjective based on person by person and there is a need to ensure alignment on severity.
- Model 2 (Type of Misconduct) might exclude a range of serious, but not criminal cases of misconduct, e.g., bullying.
- All highlighted the importance of education of Safe Sport to all in the sporting fraternity. It is important to educate athletes on the process – awareness is key. At the most basic level, awareness of who the safeguarding officer is should be spread within the organisations.

## Group 4 – Para Sports Community

29 April 2021, 7.00pm, CoachSG Room & Biomechanics Lab

### Which types of behaviours concern you the most in your community?

#### Athletes

- Generally, communication of boundaries (coach-athlete; coach-parent) were important. Athletes sometimes were unable to express themselves when feeling uncomfortable. Coaches unable to read body language (this may result in misunderstanding)
- Athlete also raised concerns about support for athletes when cases are brought to the authorities as disabled athletes may need different / more support
- Perhaps a specific code of conduct for various disabilities needs to be set by SDSC or SNPC. The athletes also felt it was important for clear code of conduct understood by all parties (competition & training environment). Some specific policies which are needed are:
  - a. Ratio of coach to athlete
  - b. Changing room policies
  - c. Transfer and technique correction for different types of impairment
- On Inappropriate Contact
  - a. Physical touch is necessary especially for visually impaired and other athletes that require correction of techniques. Athletes highlighted that comfort level varies across athletes. Coaches may also be uncomfortable in touching athletes (unsure of their comfort level)
  - b. Clear boundaries of touching need to be set and there needs to be accountability. There needs to be a consensus on appropriate touching to reduce the difficulties and feasibility of frequent requests for permission due to the higher frequency of physical touching required
  - c. Certain types of behaviours are normalised - changing in the toilet / being naked with other athletes in the toilet. For disabled athletes (especially athletes with Intellectual Impairment), easily being taken advantage of if anyone wants to do so in the toilet. There should be some form of changing room policies/ boundaries.
- On Psychological Misconduct
  - a. environmental factors may affect athlete's performance (e.g. lighting) and it was important to educate coaches on this and not be quick to scold them or be harsh on them
  - b. Coaches making assumption about athlete's "tiredness" performance (and being too hard on them)
  - c. Where to draw the line in terms of words used by coaches (e.g. "are you blind?" to visually impaired athletes) -> jokes that are insensitive
  - d. There was often wrong interpretations / appropriate words or language. Coach should explain clearer instruction and use the right kind of words in the portrayal of athletes with impairments
  - e. Generally, the athletes felt that they were treated differently from athletes without disabilities
  - f. Athletes cited examples of sarcasm and yelling sometimes
- Athletes also highlighted inappropriate behavior overseas (friendly gestures between athletes of different culture and nationalities). There were examples of athlete & overseas athletes' relationships. Sometimes it is

hard to discern the intentions of other athletes in these circumstances. In particular, distinguishing hugs and other types of physical actions that are appropriate

### Coaches

- All agreed on the vulnerability of this group of participants in sport. There is a need to educate everyone involved in Para Sports about acts and behaviours that are commonly observed and for the coach/caregiver/volunteers to determine if they are able to accept “working” in such environment (e.g. of a coach who was traumatised after seeing such behaviours by the athletes)
- All agreed on the importance of awareness and proper education (perhaps through workshops) for new coaches/volunteers to educate them on Safe Sport practices e.g. asking for permission, appropriate physical contact when needed such as transferring athletes from wheelchair to sport equipment. Coaches need to seek consent and ask if assistance needed, seeking help from caregivers & communication is the KEY
- On Inappropriate Relationships
  - a. Inappropriate relationship not common or not observed
  - b. Athlete - Athlete (minors + adult) sexual relationships are definitely not acceptable, but some participants felt that where two adults were concerned that it might be acceptable
- On Inappropriate physical contact
  - a. Participants shared that there is bound to be touching when working with disabled athletes so it would be hard not to have any touch
  - b. There seems to be a fear/dilemma of bringing up possible inappropriate touching as it is difficult to find coaches and volunteers who want to work with disabled athlete so when they have them they don't want to lose them and hence do not report it even if they see possible inappropriate physical contact happening
- Psychological & Physical
  - a. Generally, there is a fear of speaking up
  - b. Shouting – One participant shared that in Special Olympics they are quick to stop such behaviours when these are witnessed
  - c. Many participants have observed athletes (senior) bullying junior athletes
  - d. There are so many different levels of disabilities and therefore vulnerabilities
  - e. Sometimes things may happen outside training setting so they may not be aware. E.g. There have been instances of seniors making juniors buy drinks (force) for them and think the behaviour is ok. There is a need for awareness and education
- On Sexual Misconduct & Grooming
  - a. Sexual misconduct & inappropriate behaviour especially during overseas trips
  - b. Some participants felt it was hard to determine the intent in sexual grooming and none of the participants had encountered such instances of grooming
  - c. On intentional exposure, the reverse may be true. It is quite common for person with intellectual impairment to expose himself, but he would not think it is inappropriate

- On Wilful Tolerance
  - a. All agreed on the importance of being clear about the definition, boundaries and when the lines are crossed
  - b. Where there are family members involved, it can be difficult to point out even if there is unacceptable behaviour when the family members tolerate and are ok with it. For bystanders or others, they often they don't know when to jump in to address the issue with the family members, which creates dilemmas.
  - c. There is a high dependence on volunteers for many of the activities in Para Sports so they do not want to do something that will lose the volunteers so there is Tolerance and that may lead to accepted or stretching of boundaries on what is appropriate and what is not. One participant shared an incident of volunteers being very brash to athletes but the act was tolerated because the thinking is that it is hard to get volunteers and they do not want to lose the volunteers. This creates a situation where parents (and/or others) tolerate the behaviour
- On the Code Specific Misconduct
  - a. There were many different opinions on this. Unintentional (e.g. outbursts) behaviors often take place in Para Sports. Often coaches / teachers are the ones on the receiving end by the athletes because of their Intellectual Disability.
  - b. Some participants raised concerns about false reporting. Many athletes may have history of mood disorders and this might give rise to misunderstandings. Examples were cited of Individuals holding grudges when triggered, dig up past experiences and claimed abuse
- E.g. Athletes who were not selected for competition may make false report toward the coaches (“revenge” on not being selected for competition even though they have a good relationship with the coach before the selection)
- Another coach raised an incident of false reporting due to misunderstanding (e.g. case in football where coach accidentally kicked player on the back, and player claimed physical abuse and dug out all other alleged acts from years back). His word against the coach for acts done many years ago. No evidence, no injuries, no marks on the body

#### **Support Staff**

- Retaliation needs to consider context, due process, support for complainant (e.g. gender-bias)
- Define the involved parties within retaliation clearly. Usage of retaliation & reference to code is important. Does tolerance mean negligence, and are they the same thing?
- Clear definitions of the code are important & not just jargons
- Considerations for persons with intellectual impairment, important to understand what they are trying to express

#### **Para Sports Administrators**

- Most of the Para Sports Administrators were in agreement that psychological & physical misconduct are behaviors of most concern (inappropriate language especially comments about athletes with different types of impairments).
- On Inappropriate Contact
  - a. One Participant shared how most of the incidents witnessed in relation to athletes with Intellectual Impairment were opportunistic and a breach of trust

- b. The hearing-impaired athletes rely heavily on visual cues and on physical contact, so this aspect is of particular concern
- c. there are also varying levels of touch and different people have different interpretations of what is appropriate or not appropriate so there should be no assumptions and better education.
- On Psychological Misconduct
  - a. Athletes with Intellectual Impairment - may interpret things differently (e.g. coach bullying behavior by shouting and/or speaking unkind things about the athlete to other able-bodied athletes)
  - b. For athletes with Hearing Impairment, the issue was sometimes one of neglect. Coaches may not have an appreciation of the needs of the hearing-impaired athlete and may also underestimate the ability of such athletes.
  - c. During training, the athletes with hearing impairment take out their hearing aids, coaches may think the athletes cannot hear when use inappropriate words e.g. with volunteers but athletes may know but may not say so. There is also sometimes misinterpretation by volunteers/ coaches so athletes might do something different from what their coaches want which gives rise to these communication breakdowns.
  - d. Neglect, there was an experience with an athlete with severe impairments was left alone by caregiver overseas. Athlete may not be able to communicate that they are uncomfortable with these types of decisions, they are so dependent on the volunteer
- On sexual harassment - One participant cited experiences with male coach and male athlete making lewd remarks
- Important to have good onboarding processes so volunteers and coaches have a good knowledge of the different types of impairment and understand what to expect and what is appropriate.
- Generally, there is already a lack of qualified people and resources for the community, losing a very valuable coach/ threats to leave pose a barrier to reporting

### **Safe Sport Education Needs - WHO, WHAT, WHY**

#### **Athletes**

- Volunteers - Screening & training of volunteers is important - not just looking at the option that anyone or everyone can volunteer due to the lack of resources
- PWID Athlete
  - a. Understanding of Safe Sport
  - b. Communication with other athletes
- Coaches, athletes, parents/caregivers
  - a. Important to arrange meeting with parents to educate the coach (athlete's behaviour, preference, comfort level etc.) and to have continuous dialogue
  - b. The receptiveness of coach to learn more was of utmost importance
  - c. Parents also play a critical role in educating the athlete and maintaining that communication & relationship with the coach. Important to educate parents on Safe sport as for disabled athletes, parents know them best! And parents must be able to communicate well with the coach on the athletes; needs etc.

- Team Managers
  - a. Often the team managers are the decision makers for team (overseas) in training & competitions
  - b. The team managers are also the athletes' support when overseas, hence they should be educated on Safe Sport

### Coaches

- All groups need to understand "para-specific" safe sport education as Para Sports has many unique circumstances. In particular everyone needs to know what may be deemed okay in the past, may be considered abuse today (generational gaps)
- Coaches & Volunteers
  - a. People who are new to Para Sports are usually not familiar with the peculiarities of the sporting environment
  - b. This is so that they can manage their expectations and understand what their own boundaries are
  - c. Coaches and Volunteers need to be aware of the limitations (physical, emotional, psychological)
  - d. The importance of having a proper briefing / education / induction programme
- Athletes
  - a. They need customised education programme because of their e.g. Athletes with intellectual impairment
  - b. Athletes need to be educated about false reporting
  - c. School athletes are in a better place and they are regularly reminded of in/appropriate by their teachers but when they leave the school environment then they don't get those reminders
  - d. Use of videos and online resources are important and can be played and replayed easily to educate/remind the athletes and others
- Organisational leaders
  - a. They too need to be made aware and educated on the rules & boundaries -> make known to all
  - b. When dealing with minors definitely need to be sensitive
  - c. Rule of 2 - ensure that there must be 2 adults when accompanying an athlete ... to protect everyone
- Caregiver / Parents
  - a. Appropriate methods need to be taught including asking for permission and communication (e.g. transferring from wheelchair)
- Administrators & Support Staff
  - a. Need to be trained and at least know the process of being the first responder when cases are first reported to them
  - b. Need to have good observational skills to determine whether acts are in/appropriate (i.e. need to understand the sport and the athlete needs and understand adaptations needed for persons with disabilities)

- Organisational culture - to establish one where people are not afraid to speak up, address inappropriate situation and also whistleblow without fear

#### **Support Staff**

- Everyone should have baseline knowledge. Safeguarding measures for people working with all disabilities is critical.
- Prioritisation for athletes with intellectual impairment (e.g. customized slides). Athletes with Intellectual Impairment needs specialised expertise in development of resources
- Everyone should be empowered to report and say something. Coaches, ACP, athletes can present / report immediately / manage on the sport. Time lag may happen if solely reliant on sport administrators
- Coaches can also be abused by parents and this should also be looked at
- Some participants suggested including consent to be given by someone else (athletes with Intellectual Impairment - centric) below 21 mental capacity act / IQ above 80 or 75

#### **Para Sports Administrators**

- Coaches were of the utmost importance as they interact with the athletes the most. Critical that they understand the athletes' needs. New Coaches may also be influenced by the older coaches who may behave in a manner which was tolerated in the past but frowned upon in today's context. The coaches contribute greatly to the culture of the environment and set the tone for communication.
- Athletes themselves need to understand what inappropriate behaviours are and channels for reporting so that they may raise concerns.
- It is also important that Staff model best behavior as volunteers look to them in terms of how to interact with participants.
- Caregivers are also important as they spend a lot of time with the athletes. They are the first touchpoint especially in circumstances where there is high reliance on them for daily care. They will also be able to communicate any discomfort the athlete may feel.
- Volunteer management. One of the Participants reflected that as an administrator involved with athletes with Intellectual Impairment, that volunteers have different expectations and they are sometimes they are not the right match for the cause. This mismatch might give rise to some of these inappropriate remarks or misunderstandings. Better onboarding and education is required.

#### **What are the barriers to making a disclosure / report in your community? (Athlete's Only)**

- If a caregiver (helper) unwilling to speak up, it may be hard for athlete to speak up themselves
- It is a closely knit community and may wreck relationships
- Reporting channels are not well publicized or signposted even if it is on the website (public not aware, not knowing where to report). Clear, transparent protocols are needed as well as a safe platform for athletes to share. The appointment of the safeguarding officer was also important as athlete should be able to decide who they want to make the disclosure to.
- Athletes suggested involving sport psychologist (to be able to flag any indicators of abuse)
- There was a general feeling of a culture of tolerance within the teams/sports/organisations
- Availability of same gender officer especially for overseas competitions

### What are your views on the various elements of the Safe Sport Programme?

#### Coaches

- The coaches were supportive of the education efforts through SportSG-ED and the accreditation through the safety mark
- On the Case Management process
  - a. SDSC has trained safeguarding officers and they have clear process / procedures in dealing with cases of Safe Sport
  - b. Schools also have clear processes and procedures. But in cases that involves victims from outside of the school then the school leadership would make the decisions. Advantage is that they are supported by MOE who can provide guidance
- All are in agreement that Safety Mark is important and it will be something they want to sign up for. Allows them to e.g. know who is in the blacklist so that they won't hire them or engage them as volunteers/coaches

#### Support Staff

- On Education
  - a. Athletes with Intellectual Impairment important to have face to face training with their parents in too
  - b. Considerations for visual, hearing and intellectual Impairment
    - i. Special support (assistance in person)
    - ii. Target inappropriate contact (specific modules)
    - iii. To include people working with them
  - c. The group felt a top down approach for organisations to lead educations efforts for the above group (in comparison to self-directed bottom-up online learning) was critical for this population.
- On Case Management
  - a. Specialised expertise (e.g. doctor, therapist) in management of case
  - b. Record of medical / therapy diagnosis for doctor / psychologist to be provided by parents prior to case review
  - c. Hybrid model preferred with considerations for these factors:
    - i. Definition of severity
    - ii. Roles clearly defined
    - iii. Co-managed and joint agreed assessment of facts
    - iv. Inclusion of sporting organisation (context, history)
- Generally, the Sport Administrators felt that the Programme would provide assurance to sporting community through clear communication of policies & adoption of safe sport code & mark

#### Para Sports Administrators

- Many of the participants felt it was useful to have CMU to help support efforts to address cases where they arise. This was due primarily to the independence of the CMU and the expertise of the persons equipped to help deal with issues.
- Participants which were not from primarily sporting organisations felt that the CMU would be particularly helpful as the sporting context and knowledge available would be useful.

- Some concerns were raised around the obligations of the organisations around Section 424 of the Criminal Procedural Code (CPC)
- On the Safety Mark
  - a. one organisation cited possible mark fatigue – as the organisation they were at was also in the process of obtaining other marks (e.g. equal opportunity employer, green mark)
  - b. one participant highlighted the importance of ensuring that accreditation process does not become a burden although the intentions are good

## Group 5 – Sport Administrators & Support Staff

4 May 2021, 2.30pm, SportSG Auditorium

### Should Intimate Relationships be regulated by the Unified Code in these circumstances:

- A. where there is a **POWER IMBALANCE**; and/or
- B. between an **Adult & a MINOR**

### Should it be left to the Organisations to make their own rules around this?

- Majority of the Participants agreed that where a Minor is concerned a strict liability approach should be taken. It was the intimate relationship between adults that is more of a grey area.
- Where an intimate relationship develops between adults where there is a Power Imbalance:
  - a. It might be hard to have a hard and fast rule in a small community, it could be counter-productive and trade-off will be the leakage of talent if it were strictly prohibited;
  - b. one group expressed that it should be expressed that such relationships should be strongly discouraged but not strictly prohibited;
  - c. timing of existing relationship matters where a couple could be within a relationship before one of them assume a new role which involves power imbalance (e.g. two athletes and one decided to be a coach later. Or assuming office as a sport leader);
  - d. one participant from an Institute of Higher Learning (IHL) shared that they have rules between employee-student, between employees but there is “gap” as these do not apply between coach-athlete. Therefore this provision is important in the IHL context as there is currently nothing explicit.
- Other factors at play making this matter less than straightforward:
  - a. Different cultures - (some of our participants were managing NSAs or education institutions with high proportion of expats/non-Singaporeans) Age of consent varies among nationalities with 16 being common among Americans. Some cultures may also accept 50-year-old in a relationship with a 20-year-old
  - b. Age/mental capacity of athletes – while some athletes may be above 18 year old they may not be mentally mature/developed enough to make the correct decisions
  - c. Some coaches are not contracted or under the NROC so it is hard to regulate or take action on any transgressions
  - d. Some coaches coach across different sports – will a suspension in one sport means he/she is also penalised in the other sport that he/she coaches in
- Majority of the participants preferred that a declaratory approach be taken where a power imbalance exists and
  - a. Declaration of intimate relationship should be made explicit. These would be important in onboarding processes and failure to declare should come with consequences.
  - b. Declarations would help with transparency. One participant shared an instance of a relationship between a foreign coach and athlete which was not declared and the organisation only found out about the relationship after the incident.

- c. One group was initially split in their opinions if this declaration should be made public. There are also split opinions about when the relationship developed and when it ended in terms of the presence of power imbalance
  - d. Some organisations already had a declaratory system in place. Where a relationship already existed it must be declared. Where one develops during the course of their interactions in the sporting environment this had to be declared as well and in one organisation there was an explicit policy for a third party to be involved where there are decisions to be made. (e.g. involve Athlete Commission chairperson in certain areas to highlight any red flags, conduct regular evaluations of coach, have regular conversation with athletes)
  - e. One group felt it should be explicitly stated that it would apply to LGBT and that the organisation should make it safe enough to declare as there is also a stigmatisation of LGBT relationships
- All groups agreed there is a need to look into the guidance on the management of such relationships thereafter:
    - a. Organisation Culture / environment is key to this. If it is one of transparency and professionalism then such relationship should not be an issue. Organisation needs to be clear with the safeguarding measures / guidelines and that these matters are transparent rather than have it go underground:
    - b. Some expressed doubt over whether the Organisations, given their capacity and capabilities, were able to monitor and guide these situations. Guidelines in the form of recommended policies would be welcome to assist the organisations to help avoid conflicts of interest. Some participants have faced these in their own sport and all agree that when there is such relationship then there may be perceived bias (e.g. during selection)
    - c. Where it is not a high-performance environment as amateur or community teams, where there is no big 'win' at stake or any funding involved. In these instances, relationships are very common among athletes and coaches as they tend to be adults

#### **Should Grooming behaviors be treated as Misconduct?**

*Context: Criminal only if a meeting took place and there was intention to commit an offence*

- All in agreement that there need not be a physical meeting to be deemed as misconduct for as long as the intent to groom is established.
- Ideally Grooming should be listed as misconduct, but the problems exist with:
  - a. detection of Grooming intent early on. It is difficult to determine if one action or a series of actions are part of Grooming or for innocent intentions. *It is only clear that it was Grooming after the fact, once it has been reported*
  - b. certain guidelines such as no physical touching exist but may not be applicable for certain sports, coaches need to do it anyway. Asking for permission from the athlete before touching may not be possible if the athlete is a minor or the power imbalance exists
  - c. participant shared that his school only allows female coaches with female athletes but said this is impractical and does not address the possibility of inappropriate behaviour by female coaches
- Clear definitions of grooming is important to allow third party to establish if there is a breach and report it. This is because involved parties are usually blind-sided (especially minors or victims):
  - a. obvious signs of grooming which are easy to regulate i.e. secrecy which will point to intention. (e.g. Taking athlete out, meeting athlete alone) Less obvious signs which are difficult to regulate (e.g. text messages -how would we know there is a private conversation happening?) Gifts (it could be a festive occasion)

- b. MOE has a clear definition on grooming and boundaries which can be referred to
  - c. to consider the development of guidelines (e.g. notifications of type of contact to organisation)
- Education and awareness is important for all stakeholders through onboarding (induction), workshops and for young persons to understand:
  - a. especially athletes who are minors on red flag/ yellow flags (what is good touch and bad touch) and know that inappropriate behaviour can also take place between members of the same gender
  - b. Besides clear definitions, policies should also include clear physical boundaries. It should be taken in the spirit of making it a safe environment for everyone that is understood, agreed and complied by all. Policies around behaviour should not be a legalistic document that is clinical and full of jargons
  - c. with social media it is also difficult to always follow the best practices and have a parent around. Education of athletes by their parents is key for their children to identify when grooming takes place.
- Preventive actions should also be taken in terms of guidelines and policies specific to:
  - a. protocols on dress code (e.g. male coach wearing only swimming trunks and coaching females athletes - athletes may feel uncomfortable but may not dare to speak up)
  - b. communication - e.g. choice of words used by the strength and conditioning (S&C) coach (I'm going to touch you) e.g. coaches who are from a different culture to Singapore and may not understand the sensitivities of race, religion etc.
  - c. Rooming & travel arrangements overseas - one participant shared that an example where a coach and athlete were asked to share the same room because of budget constraints
- Some concern over negative consequences:
  - a. some parents tend to overreact and this might lead to a negative long term career impact on coaches
  - b. the coach -athlete relationship may become more transactional. One Participant shared that when Safe Sport concerns were shared with coaches they swung to the other extreme and did not dare to do anything that might be construed as inappropriate behaviour

#### **Should Wilful Tolerance constitute Misconduct?**

- There was agreement that persons of authority had a duty of care and should be held accountable as currently:
  - a. There are barriers to speak up (word gets around about who reported). One participant shared about an incident where obstructions to a person to report by use of threats (e.g. selection)
  - b. One group shared that current reactions are to normalise these inappropriate behaviours by dismissing reporting as 'dramatising' the situation
  - c. Internalisation by participants becomes a whole other issue(e.g. athletes not reporting when they see something as they would have the mindset of 'mind your own business')
  - d. Making it a misconduct would encourage people to talk about it, "see something say something"
- Agreement that wilful tolerance is misconduct if the offence is extremely serious and clear, such as the peeing incident in the polytechnic (hazing), physical abuse, improper touching.

- Agreement that it should be included as misconduct but implementation is the key. Difficulties lie where, as potential whistle-blowers may choose not to report an incident due to:
  - a. Uncertainty if it is really an instance of misconduct. E.g. grooming is hard to detect. What if only one person feels it is misconduct but not the other athletes? For example one participant shared in his NSA's annual survey of athletes, a few athletes were uncomfortable with coaches using vulgarities, but most other athletes didn't find it a problem. Unsure what the NSA should do in this case
  - b. Fear of negative consequences by being a whistle-blower – community is small
  - c. Different sport, different culture therefore in the case of the grey areas like psychological abuse - content is important

#### **Which Case Management Model should be adopted?**

##### **Model 1 – Severity of Misconduct**

##### **Model 2 – Type of Misconduct (i.e. Sexual only)**

##### **Model 3 - Hybrid**

- CMU is welcomed by all participants as it helps to provide needed expertise and relieve workloads:
  - a. one participant (who is also a Safeguarding Officer) shared how his NSA went through a mock case of misconduct to test the NSA's response to the incident and how the mock case left everyone exhausted and convinced that Safe Sport is a big problem that not all NSAs are equipped to manage
  - b. concerns were raised about how much resources will the NSAs be provided with to deal with cases should the numbers increase - normal work versus Safe Sport work. Staff doing this now did not sign up for the job with this in their JD but now have to perform that role e.g. SO
- An overwhelming majority of the participants preferred Model 3 (Hybrid model)
  - a. Several participants felt this would be helpful in supporting organisations (esp. NSAs), perhaps at the start the CMU needs to really help the organisations and as they build capacity to continue and move to Type 1. Capability development is important so that organisation have the right/trained people to deal with cases
  - b. Some participants felt if the issue was reported to the CMU, it was probably because the participant has strong feelings about reporting it to their own organisation in the first place and model 3 would allow for the CMU to handle it
  - c. One organisation shared about positive recent experience of collaborating the Safe Sport Taskforce in dealing with a case. Collaboration allows for determination of the best way forward
  - d. One participant felt that conditions should allow for organisations to decide to deal with cases even if its is high risk or sexual in nature and also direct these to CMU
- Model 1 (based on severity of misconduct), a small minority preferred this model
  - a. However, one group raised serious concerns about the safeguarding officer who may not be competent which would impact a report negatively if inappropriately dealt with even if classified as low end. In particular on the Safeguarding Officers:
    - i. what was the scope of their role (education and responding only or more)
    - ii. appointment of suitable persons, one of the participants was a safeguarding officer and was unwilling, to be one

- iii. independence (facing conflict of interest as they are employed by the organisation and may be forced to report and or share confidential details by their EXCO)
  - b. Resource - some participant felt Model 1 was only feasible in certain NSAs (e.g. some are able to have resources (manpower) and the right persons to do it)
  - c. Concerns were raised with this model as classification would also require some expertise. One group preferred model 1 as it allows some cases to be managed internally by the NSAs but how 'severe' the case is should not be determined by the NSA to prevent cover-ups
  - d. Some felt this model would showcase examples of good management of incidents by sporting organisations besides just during training. But to share with entire sporting community if possible
- Model 2 (type of misconduct) was the least preferred model (only for monitoring of sexual offences) and concerns expressed over whether NSAs could manage middle and high levels of psychological and physical misconduct.
  - Operation of CMU:
    - a. Serious concerns raised if any of the staff in the Safe Sport Commission/CMU are from SportSG. SportSG staff should not be transferred to the CMU as there is privacy concerns over any incidents being shared with SportSG, and the sporting community being very small
    - b. Trust (that information shared will be kept confidential) is key for the success of the CMU and it will need to be earned over time
    - c. The Safe Sport Tribunal should have an independent body first (possibly of retired lawyers, judges etc) to look at the facts of each case and determine the severity of the misconduct – Low, Medium, High. One participant raise concerns about terminology for classification as HIGH, MED, LOW in terms of whether the public might perceive it as something else. Additionally it may discredit and downgrade what athlete feel.
    - d. Then the CMU and NSA can decide who will investigate and resolve the case. Any criminal cases should go straight to the police.
  - The consequence of each offence needs to be clear and in the Unified Code for consistency across sport. The same offence should face the same consequence (e.g. length of suspension), no matter which sport it happens in. But each sport could consider having an annexe in the code to cater to each of its unique differences, such as physical touching in coaching for contact versus non-contact sports

## Group 6 – Parents & Volunteers

6 May 2021, pm, SportSG Auditorium

### Which types of behaviours concern you the most in your community/as a parent?

- There was consensus that all the types of misconduct were present in the environment.
- Sexual
  - a. One group felt that sexual misconduct was the biggest concern. However, that is perceived to be too late and sad if it gets to that stage. It can start from psychological & physical and inappropriate, before moving to sexual. As such, misconduct in all forms are areas of concern.
- Physical & psychological and inappropriate forms of misconduct
  - a. should be nipped in the bud to prevent them from becoming something more serious like sexual misconduct. Inappropriate behaviour like an overly friendly text could be the start of misconduct and participants feel such behaviour should be stopped because kids may not be able to tell what is appropriate and what is not.
  - b. Several groups raised the overemphasis on winning as one of the roots for physical & psychological misconduct which had long term impacts on children & young persons:
 

*Examples*

    - i. *One participant shared how athletes were told to be of a certain weight or shape and were clearly starving themselves to meet the expectations. Whilst the parent understood their weight may be a factor in their performance, there was no consideration for the stage of development the child was at (e.g. puberty) and the needs of their bodies at that stage of their physical development*
    - ii. *Neglect - Another participant shared how the coach in a school setting has shamed a child who was unable to perform (by punishing the team for his/her inability to perform certain skills) this created such an oppressive environment that the child did not want to continue and departed the sport altogether with a group of friends who also felt similarly.*
    - iii. *One participant cited examples of this happening across all levels of sport (not just at the high-performance level). A participant cited the example of IHLs, where there have been people who have departed sport because of the burnout and pressures exerted on the athlete*
    - iv. *Another example was given of a cyberbullying of a girl under 18. Both the coaches and parents were not able to address the issue as they were not tech savvy enough and there were no real rules around these behaviours*
- Evaluation of sports should go beyond medals but should also include evaluation of culture and adherence to safe sport. There is a winning at all costs mentality within the school sporting system, this results in an environment in which the coach is under pressure and where there is no space for participants who are not at the school team (or competitive level) which results in some of these behaviours. Important for a more holistic approach to sport, which is not just about skills but developing the whole person.
- Coaches emerged as the persons of most concern:
  - a. The use of the authority of the coach and his/her power was particularly of concern and/or how this can be abused by manipulating the child to think he/her cannot do without the coach
  - b. Physical misconduct was also of concern where the coach got angry and would use threats and or grab the child

- c. Many children see coaches as mentors and the things that the coaches do and/or say must be age appropriate - there is a thin line between abuse and teaching a child to be resilient.
  - d. It was important where children were concerned, that the coach to ask for permission from both athlete & parents (e.g. high jump / lifting). Ideally training sessions should be conducted in parents' presence. Setting expectations through briefing to parents to explain adjustments protocol. Athlete may be ignorant to inappropriate behaviours, especially if they are young.
  - e. Several groups raised the questions on whether coaches can be screened better. Can a certification system be set up? Coaches should go through the safe sport course and can be certified or endorsed by the Safe Sport Commission. This will give assurance to those who are looking for a coach. All these came out spontaneously before Shao's introduction of the Safe Sport Programme.
  - f. Taking the idea further, those who flout the rules can be given demerit points (like the driving license system) and repeat offenders can be suspended.
- Participants acknowledged that it was important for education not just for coaches but across all persons involved in the sporting community (including athletes and sport administrators):
    - a. The recent SCDF case highlighted how bullying and/or hazing (initiation rituals) can go really wrong if persons, especially those with authority, are not kept in check (e.g. wilful tolerance)
    - b. One participant shared that her friend had been groomed by a private gym instructor, which led to another concern – are private organisations and private coaches regulated?
    - c. Abuse of athlete against athletes are also prevalent and the code should apply to them. Sometimes they blame each other for failure in sport (Senior to junior athletes)
    - d. Coaches to clearly define delegation of roles to senior athletes /captains as they can be now placed in a position of power.
    - e. Volunteers, in particular in Para Sports, need to be properly onboarded
    - f. Parents can also sometimes be a pain where the expectations of the child to succeed result in denial of such misconduct
    - g. Another safeguard would be the teachers in charge of CCAs. They should be involved in training and aware of what's happening, aware of the relationship between coaches and athletes. Some have noticed teachers just sitting at a corner during CCA and marking papers, rather than being involved in the training.
  - Safe Sport Education
    - a. Participants drew parallels with MOE or SIA. At MOE, teachers are all taught what positive reinforcement means and are taught what words to use and what words to avoid. Private tutors and tuition centres can also register with MOE, which gives a sense of regulation. At SIA, pilots need to go through a psychological test for screening and then frequently have their license renewed (one of our participants is an SIA pilot).
    - b. Another aspect that this group would like to focus on is education of the kids to teach them what is appropriate and what is not. Parents play an important role here in the "tripartite" relationship between coaches, kids and parents. This relationship should be underpinned by trust. Parents should check in on their kids' well-being from time to time to ensure that there is no misconduct happening
    - c. In the case of children with special needs, persons involved needed to be educated on how to interact with them so as not to hurt their feelings. It was particularly important for these children to

understand boundaries and frequently remind them of the yellow and red flags. Pairing of volunteers with athletes was important (male coach with male athlete)

- Addressing Incidents
  - a. Many participants expressed the need for a channel for anonymous complaints so that the complainant can feel comfortable raising concerns.
  - b. To allow third party reporting (e.g. parents who observed a coach of an opposite gender providing massage to an athlete who is caught within a power imbalance situation)
  - c. Protection of whistle-blowers will deter predators -> It would lead to more people to whistleblowing
  
- Other comments about the unified code
  - a. should be localised to Singapore context and not just directly lifted from the US or Canadian code as their culture is perceived to be different:
    - i. Gender differentiation is important (e.g. hugs between opposite gender)
    - ii. Cultural difference (e.g. personal space should be observed more)
    - iii. Disparity of social status (left out if they are unable to afford expensive equipment)
  - b. On Power Imbalances - Volunteers' may also be caught in a situation of power imbalance. They have an 'obligation to fulfil the role'.
  - c. Grey areas need clear definition for e.g. grooming, inappropriate physical contact. There is a need to provide sport specific consideration (e.g. gymnastics or cheerleading which involves frequent adjustment or propping).
  - d. Clear policies should be set around obvious situations (e.g. during sporting event, female volunteers had to send/collect items from male changing room.)

**Would an organisation that meets the criteria set out in the Safe Sport Programme provide sufficient assurance?**

- The programme does give participants assurance, because
  - a. Formal reporting structures are currently lacking, and the Safe Sport Programme provides a structure
  - b. There will be a voice to help athletes
  - c. Signals professionalism because it provides the structure for safe sport, beyond this, the practical implementation will be key
  - d. Knowing there is oversight acts as a deterrent
  - e. Transparent as it is a 3rd party process
  
- Potential issues:
  - a. Culture of the organisation may take time to change. A culture of cover-up may be resistant to the programme. NSAs viewed as protecting their own. Culture needs to come from the top and if it does not, change will be difficult.
  - b. Those who are 'controlled' (e.g. NSA or school) are okay but private academies & coaches @ condos may not adhere if no incentive / punitive measures

- c. Some parents place high emphasis on results. They may not care about the mark or using accredited coaches
  - d. Volunteer coaches might be deterred by compulsory training and cost of training. Individuals holding the position of Head coach are to be held responsible & share the information with their team
- Safety mark which was an idea discussed spontaneously gives more assurance to participants:
  - a. Audits are important to ensure the marks are adhered to. An idea that can be explored is random surprise audits by the Safe Sport Commission to different sports venues
  - b. there was still concern about private coaches who do not opt for the accreditation. They will remain unregulated
  - c. Qualification standards should have a certain rigour (e.g. not ½ hour training courses)
  - d. Concern was expressed about enforcement by leaders of the organisations and accreditation should take that into account
  - e. Team Nila to assign volunteer only for organisations with accredited mark with a tiered approach (Champion gets most)
- Safe Sport Commission
  - a. Many participants were glad to learn that the Safe Sport Commission would be some sort of independent body
  - b. The independence, transparency and ability of the Safe Sport Commission to ensure compliance was important
- Case management
  - a. All the participants were in favour of the CMU. Many felt the effectiveness of this CMU would be the ability of the CMU and courage to enforce (through the organisations) the sanctions and measures
  - b. A clear disciplinary framework with a range of measures (e.g. warnings with 3 strikes out) & the publication of sanctions
  - c. only works if people are willing to report. The safeguarding officer plays an important role here because they can be the first whistle-blower. However, participants are concerned that safeguarding officers might also subscribe to the same culture of cover-up.
  - d. there was also a strong feeling from some participants about ensuring that organisations are taken to task if they retaliate through victimisation of the persons who report
  - e. Safeguarding Officer hired full time for the role to be fully trained and see things until the end
- Teachers in charge of CCAs were brought up again as they can be effective safeguarding officers if they are engaged during training sessions.
- Training & Education
  - a. The SportSG-ED online module may be good to understand but more important to implement through practice. Experience on the ground may be different. Important to work with IHLs on modules as part of curriculum

- b. participants feel that all stakeholders – athletes, parents, teachers in charge – should go through the safe sport module so that all stakeholders can play their part. They were further assured when told that Sports School is currently doing this
- c. Staff turnover at organisation needs to be considered in terms of frequency of training
- d. Important to include support from non-profit organisation for training.

## Group 7 – Organisational Leaders

18 May 2021, 7.00pm, Zoom

### Should Intimate Relationships be regulated by the Unified Code in these circumstances:

**A. where there is a POWER IMBALANCE and/or**

**B. between an Adult & a MINOR**

### Should it be left to the Organisations to make their own rules around this?

- Important that Power imbalance should be addressed in the unified code. Sometimes athletes don't dare to say 'no' to the coach.
- Universally agreed that Intimate relationships between Adult & Minor needs to be regulated and should be prohibited. One participant felt strongly that it would not be left to organisations to decide and clear guidelines should be set out as not stating these clearly would leave it open to interpretation.
- Code may say "relationships are to be discouraged" but if there is a genuine and healthy relationship then declaration is necessary and more reasons to go public.
- These were some of the reasons cited by participants for having a declaratory approach:
  - a. Having it in a code is the right direction, remove any issues on power imbalance that may also lead to grooming
  - b. If these are not expressed explicitly in the code, it may create an unhealthy culture. Athletes could be under pressure to perform (medals, wins), so they may be in a difficult position to say "No" to a coach, even if both are adults
  - c. Transparent and upfront (if it's in the code) – protection of coach and athlete
  - d. Surface conflicts of interest which can then be managed. (E.g. Good to bring in a third party for selection / decision making process)
- Participation Level - This code may apply differently if the sport is at a community versus competitive level, but protection of the athlete is key
- Sport specific - Some sport limit coaches and officials to fraternise with athletes outside of training (a deterrent to even progress to intimate relationships). Considerations for individual and team sports to be reviewed (team sports – usually group settings while individual sports have more one-on-one trainings or interactions).
- Member mooted that that intimate relationships between adult and minors (18-year-old and below) where there is a power imbalance should be governed within the code where it is prohibited. Individual sports may set higher limits if they want, since the unified code sets the baseline limits. It is supported by several others. One participant suggested that SportSG be considered as an ombudsman in some of these cases where reports of concerned were raised.
- Not specifically written into coaches' contracts for IHLs so this is important and useful guide. Minor 18 does not include the whole population for IHLs so some adjustments might have to be made.
- One NSA indicated that they had a wide range of participants. It was also no uncommon for some participants to enter the community with an existing relationship. Where such a relationship was declared, the NSA would take into consideration changing the coach. As it was a small community it was much easier to monitor.
- This Unified Code was a timely exercise for one NSA as it was not uncommon as individual sport to have coach-athlete relationships. Generally, the NSA felt that care needs to be exercised and that full disclosure is

best. However, the main issue within the sport was that not all coaches covered by the NSA (only 10% under NSA jurisdiction).

- Some participants expressed reservations about whether people would declare the relationship and more considerations needed to be had in relation to the actions under the code (e.g. if there is suspected relationship between minor and adult)

#### **Should Grooming behaviours be treated as Misconduct in itself?**

- The community may not understand what Grooming entails.
  - a. It would be good to provide examples to educate the community on what Grooming is, as many grey areas of what constitutes Grooming exist. Offence of sexual grooming is already in the law for a long time, past examples of sexual grooming may be raised as examples to help educate the community
  - b. Grooming an athlete is negative in the context of Safe Sport, but a common understanding of grooming can also mean training an athlete (something positive)
  - c. If a coach gives a prize to one athlete and not the other athletes – is this grooming or favouritism? The community does not have a clear understanding of this. The challenge for the NSA leaders is how do we interpret the actions to determine if this is normal behaviour or a red flag?
- Generally, it was agreed that Grooming should be included as a form of misconduct. However, these factors should be taken into account:
  - a. Inclusion of grooming will show its importance (deterrence to predators) and the inclusion will bring about awareness especially to minors who may not be aware of such behaviours. There is a need to create explanations to allow them to understand at various ages.
  - b. If a coach gets to know a young athlete there's a thin line between an appropriate and an inappropriate relationship, so we do need more clarity and guidance on this. We don't want to only act when grooming becomes criminal, but it is difficult to prove the intention of the actions. Examples of past cases will be useful to educate coaches and NSAs as benchmarks. This education/induction process can be for any new participant in the sport or NSA
  - c. It may be hard to detect as some behaviours would fall into the grey areas. The coach- athlete relationship is a closed one, some coaches may spend more time helping a good /weaker student. Drawing the line at progression (how do you exactly identify which point/behaviour) where it can be subtle. Maybe the tipping point is when it borders/related to sexual advances/topics.
  - d. Important that some focus should be placed on overseas trips, in particular training camps over long periods where everyone is in a different environment. It might start in a minor way (outside the boundaries of Singapore's jurisdiction)
  - e. Secrecy is the key part of the definition for grooming. Need to highlight that. Education to athletes/coaches – important for understanding of boundaries (declare training sessions). Silence is the friend of the abuser.

#### **Should Wilful Tolerance constitute Misconduct?**

- Generally, there was agreement that having wilful tolerance as form of misconduct where there is a Power Imbalance and/or involving a Minor was important. Many felt it was important for the adults in power to understand their responsibilities. One participant cited an example of a national athlete who quit the team because of the induction practices such as ragging. The participants in one group discussed the importance of the bystander in serious cases of misconduct which resulted in a suicide of the person affected. (One of the other participants in the group was aware of the Korean triathlon case before it was discussed before the 2<sup>nd</sup> breakout)

- A few participants felt that if certain behaviours were causing mental stress to the athlete, these should be reported. E.g. if the action is happening consistently to only one person – may be a misconduct
- For junior athletes we need to consider channels to sound off with a neutral party/informal auditor if an individual or organisation is conducting inappropriate acts/wilful tolerance of such acts. Taking care of the emotional well-being of the athlete must be prioritised.
- Sometimes when young athletes are together, they verbally abuse each other, it can be difficult to manage or control. We may need parents to step in here
- Matters raised for consideration
  - a. Between a coach or a minor, the coach may only be trying to motivate the athlete such as shouting. The intention could be trying to build mental resilience, but bystanders may interpret it as misconduct. How do we govern this? Having a whistleblowing channel. Need to educate to clarify what is ‘encouragement and building mental resilience’ versus ‘bullying’
  - b. Level of cover-ups seen in international cases is shocking. As NSA leaders, we see wilful tolerance as misconduct. But every case needs to be assessed if there is a serious issue and if it bears investigation, otherwise the NSA will be overwhelmed with investigations. Example given, if a parent makes a complaint against a coach (which is not a national coach), how much resources can the NSA spend to investigate and follow up on the case?
  - c. Sometimes cases are lodged, after talking to the parents and victim, we realise that it is not really a case after investigation. But every case is important and still needs to be looked into
  - d. There can be a consultative/neutral channel for athletes to consult and check in if their case is a real issue bearing investigation or follow-up action. This prevents us from compromising the mental resilience aspect of training, or the emotional well-being of athletes.
  - e. In order to wilfully tolerate misconduct, there needs to be an understanding of what is misconduct. One participant raised the example of bodyshaming which might be particularly tricky when it comes to sport with weight categories and what if the person involved was a valuable athlete medal winner. Participants felt where weight was concerned, guidelines from sport nutritionists and experts were important, especially where young people whose bodies were still developing were involved.

#### **Participants strongly indicated the hybrid model as their preference, what is your view as an NSA leader?**

**Hybrid Model - Medium to High Level Cases to be mandatorily referred to SS CMU. Low level cases to be handled by organisation unless**

- a. **there is a Conflict of Interest**
  - b. **Where there are reasonable grounds for believing that report will not be dealt with fairly**
- The NSA leaders agreed with the Hybrid Model:
    - a. Many NSAs liked the flexibility to manage any cases internally or escalate any cases to SS Commission. Obvious cases of medium or high severity misconduct (e.g. criminal cases are police cases) are easily classified and channelled to the police. Flexibility in the ‘low severity’ cases to cater support to the NSAs based on the size/resources/capabilities of each NSA.
    - b. More discussion is required to classify low severity cases and what action can be taken. Coming up with use cases to help NSAs to classify incidents. Examples are necessary as low-level cases are ‘grey’ and we can only use our common sense to help guide us. One Participant cited an example of having to deal with a case of ‘psychological harm’, the athlete felt aggrieved but upon investigation it was due to the coach not praising the athlete or anyone from the team at all. But it took us time to investigate this case. The grey areas between low-medium or non-existent cases-low cases needs to

be better defined and clarified through case studies or examples. Sport specific classification should also be considered– Inappropriate touching. (For contact sports, there would be a lot of contact, where do you then draw the line)

- c. One NSA indicated they would be happy to delegate the medium and higher-level incidents as the small nature of the community meant a lot of conflict of interests. Many parents were on their boards and/or executive committees and athletes had expressed concerns in the past.
  - d. Another NSA felt the get-out clause where conflicts were present was important and would welcome this model especially in the event where a senior figure from the NSA was involved
  - e. One NSA expressed some confidence handling low level incidences but as there was a wide range of possible reports, where there was a material incident (e.g. involving effects leading to suicidal tendencies, it would be better handled by external parties / experts). Participants agreed that specialised expertise is required to manage severe cases.
  - f. Confidentiality was of upmost importance for CMU (confidentiality agreement)
- If the SS Commission has the capacity, ideally all cases low/medium/high should go to the Commission to free up resources at the association, especially smaller NSAs. Every case needs to be taken seriously (unless it is a trivial case). For a recent case, even determining if it is a 'low' severity case it took 20-30 working hours and talking to 40 people by the Executive Director. Just categorising the case takes time and resources
  - SS Commission is unaware of the depth of the problem. Raising awareness of Safe Sport could mean more cases are reported.
  - Safeguarding officers at NSAs can also help do triage before escalating to the SS Commission
  - Useful for Case Management Unit to archive all past incidents and case files as records to track a pattern of misconduct if the individual moves across different sports
  - On the Safe Sport Tribunal
    - a. One participant was in favour of a model close to antidoping with an independent tribunal as it was important from the athlete's standpoint to perceive the decision-making entity as separate.
    - b. Resource member from the particular sport is to be included in evidence to provide inputs from their perspective before judgement is given.
    - c. Important to cover members or affiliates of the NSAs in these processes
    - d. Limited capabilities to manage incidents by smaller sporting organisations and having an independent tribunal to manage is welcome.
  - On the accreditation framework, one of the Participants felt that compulsory education was critical and education beyond doing and online course was also important as the human touch was important for advocating on the importance of these issues.

## Group 8 – Sport Programme & Facility Providers

19 May 2021, 3.30pm, Zoom

### Which types of behaviours concern you the most in your programme and/or business?

- Sport Programmes & Facility Providers
  - a. Grooming and intimate relationships are of concern to facility providers with tenants operating sporting programmes. The numbers can be huge and need to let them know of this.
  - b. Coaching methods – what is deemed as normal (hit, physical / squeeze hand)
  - c. Psychological Misconduct in the form of neglect was also of concern to a particular group of programme providers. Where less “talented” players receive less attention
  - d. Racial comments or discrimination especially in certain sports borne out of stereotypes could also pose a risk which might give rise to more serious incidents if not managed properly.
  - e. Social media bullying. Removing the psychological effects now when they are younger so as not to be affected when they are older
  - f. Psychological misconduct - drawing the fine line for coaches who are being firm vs being abusive (coaches should be addressing the behaviour and not being personal). To monitor the frequency where it becomes the norm (Tolerated behaviour – parable of the boiling frog).
  - g. In the fitness industry in particular, inappropriate physical contact – e.g. the case in the media (could be unnecessary adjustments)
  - h. Fundamental awareness – inappropriate body language that can snowball further
- Persons Involved
  - a. Parents should be aware of the code (especially that of grooming and intimate relationships) so that they know what to expect and to look out for. Parents can also be bullies when they speak harshly/demanding towards coaches / sport administrators.
  - b. Facility providers can support parents’ education for safe sport, especially if it involves minors. They have regular communication platforms to parents (e.g. gathering them in places while waiting for the kids).
  - c. Bullying is not limited to just coach and athletes. But it could happen between coaches as well. Especially psychological bullying (doing things behind their back, gossiping, making someone the scapegoat for their poor behaviour). Part timers / freelancers, those that just started out their journey do not see the importance of this type of behaviours and require education
  - d. There can be different culture/environment amongst multiple centres within the same organisations. Some athletes are afraid of speaking up against their coaches. They should be encouraged to inform their parents if they experience any poor behaviour.
  - e. Coaches need to be aware that even if it’s not ill intent, the outcome of the action is still not acceptable (breach). Actions that crosses the line (could be grey areas). This was especially the case for one Programme Provider which had young clients of the opposite gender. Crushes could develop on the coach and they faced these incidents but found it difficult to deal with.
  - f. In male dominated environments, some of such behaviours can create a systemic culture
  - g. Intimate Relationships (e.g. doing house-calls) to be aware of their environment and take precautions like ensuring that there is a third party around.

h. Changing rooms / toilets policy – gyms should have cameras to protect members (for some business franchise it is a requirement, but some do not abide by the guidelines)

- On Disciplinary outcomes. There is a need to manage parents' expectations who may demand for immediate actions to be taken against the coach/administrator. However, sometimes, these behaviours /experiences were not being raised to the centre/ coaches prior before and they do not have any clue about it. The centres should encourage the creation of a culture of speaking up for everyone. On the other hand, the organisation must be serious about wielding the stick. There have been examples of incidents where no action was taken against the perpetrators which sends the wrong signals to the clients.
- On the Unified Code. Definitions of misbehaviour / guidelines can be quite technical / clinical to understand. There is a need to make it simple. Educational awareness efforts are better if described as case studies / scenarios. Videos are also preferred (1 – 2 mins) to send a strong message. If you see something, say something. Step UP.
- When asked why some of the inappropriate behaviours were not explicitly addressing in their onboarding material, one of the Programme Providers reflected that there is a taboo around talking around such topics. It was attributed to our cultural attitude. Raising such matters much suggest that the Programme Provider did not trust their employees or contractors. Another Programme Provider indicated that such safeguarding topics were addressed upfront when they were engaged to provide services to international schools which were far more open about these issues and the explicit addressing of these issues highlighted to the coaches how seriously and important these things were regarded (e.g. protocols like not contacting the students directly were explicitly laid out).
- Two Programme Providers expressed that having a Unified Code would definitely be useful for the industry as coming from an authority would help them having a starting point in terms of raising awareness and start talking about these issues.

#### **Would your programme and/or business been keen to adopt the Safe Sport Programme?**

- The Sport Programme Providers were generally keen to adopt the Safe Sport Programme in some form or another:
  - a. to keep them out of trouble, reflect conviction by company (align with values), ultimately benefit the business by attracting more customers
  - b. another programme provider was starting more programmes with young girls and parents would be more assured if some of the elements of the Safe Sport Programme were in place. In fact, given the prevailing evidence that more young boys were victims to these types of behaviour, parents might be more assured regardless of whether they were sending their daughters or sons to these programmes.
  - c. It is important to prioritise efforts on safeguarding participants as their participants are usually minors and vulnerable.
- The fitness industry participants were keen in principle but highlighted some possible constraints (e.g. resources, cost) In the current landscape is challenging and many businesses are trying to survive.
- On the Safety Mark
  - a. Accreditation from SportSG would be important to one of the Programme Provider which had up to 50 freelance coaches. The accreditation would be significant to their clients and benefit everyone in the system (e.g. the company and it would look like SportSG doing something). The Programme Provider added that did have their own customer service processes and protocols but they do face different types of enquiries. With the accreditation, parents might not question so much.
  - b. It was important for one Programme Provider to ensure that organisations do not join for the sake of checking boxes to be a Safe Sport Organisation. It is more than just signing up.

- On Case Management
  - a. One Programme Provider agreed that having a third party look over such allegations might be a good idea provided it was handled with confidentiality. Similar to corporates who also had “whistle-blowing” channels to avoid accusations of biasness, an external channel might help provided it was done in close consultation with the Programme Provider. In fact, it might produce useful information which parents which were not prepared to disclose to the Programme Provider (e.g. they have an exit form but parents never actually reveal the reasons for withdrawing from the programme)
  - b. One of the other Programme Providers indicated that with 5 staff members to manage over hundreds of members and work demands, staff may not be able to manage the responses to them adequately and in a timely manner. Additionally, current Covid restrictions had added more stress.
  - c. Responding to cases of report requires training and effort in paperwork, especially for new coaches, who may need to juggle many other requirements.
- Some suggestions:
  - a. Create “options for freelancers”. Safe Sport Trained with 2-hour online training. (May only attract people to sign up if there are fees involved that can be subsidised by skillsFuture / uTAP under NTUC)
  - b. If CoachSG to issue CCEs, minimally be an Ally for fitness providers
  - c. Leverage by SportSG to ensure individuals/organisations to adhere to the Safe Sport Programme – set it as a requirement before they can book facilities; offer service. Can also work with PA to demand the same.
  - d. Non-profit organisations that champion safe sport will be good for the fraternity. It shows that this is important to them too.