



SAFEGUARDING ADULTS IN SPORT

Developing the International Safeguards for Adults in Sport

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A project of Safe Sport International

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Abstract

Safeguarding in sport has received growing attention over recent years with most of the research, policies and practices being focused on children. However, it is important to recognise that there is a duty of care to safeguard everyone in sport and that an individual does not suddenly become safe on their 18th birthday. This project aimed to develop the first set of international safeguards focused on adults in sport. In Phase 1, a rapid evidence assessment was conducted related to safeguarding adults in and beyond sport. In Phase 2 an online sand-pit discussion was conducted with 33 participants representing a range of stakeholder groups. The discussion considered the differences and challenges of safeguarding adults versus children. Based on the insights gained through phases 1 and 2, a draft set of International Safeguards for Adults in Sport was developed, using the existing child-version as a guiding framework. In phase 3, the draft adult-version was then reviewed by 15 experts representing 3 advisory groups focused on the athlete voice, education, communication and training, and researchers. The feedback was used to develop the final version of the international safeguards for adults in sport which are presented in this paper. Specific issues of relevance to participants aged 16 and 17 are also highlighted. In tandem with the child-version, these resources represent an inclusive approach to safeguarding everyone involved in sport.

Introduction

The need to safeguard individuals in sport is not exclusive to children but should be afforded to all that participate. This includes adults, such as referees, coaches, athletes, volunteers, and fans. Adults, regardless of their age or identity, can be subjected to abuse and harm within sport. Reviews into the culture of sport, including those that have reached the media highlight the prevalence of abuse of adult athletes in sport. These athletes were subjected to physical, emotional, and sexual abuse by individuals in their sport, demonstrating that safeguarding should not stop once a person reaches legal adulthood. In addition to anecdotal evidence, research has shown that in a sample of elite female athletes aged 23 years or older (42%) reported sexual harassment and abuse from male authority figures in sport, which was significantly more than young athletes (Fasting et al., 2003). The present project addressed the clear need for safeguards to be developed which are specifically focused on safeguarding adults in sport.

Safeguarding Children in Sport

Abuse in sport has become a key issue for all sport stakeholders and for those with statutory responsibility for safeguarding children and adults in society, including governments, sport governing bodies, universities, advocates and researchers. Research has identified how children have experienced a range of rights violations in the context of organised sport, including sexual, physical and emotional abuse (Rhind et al., 2015). The focus has primarily been on children because this is the remit of those organisations who have shown leadership in this area. Child abuse in sport has been looked at through a child rights lens (David, 2005). Organizations such as the United Nations, UNICEF, and the IOC have adopted policies and produced statements that outline how abuse and harassment violate children's rights).

A key advancement has been the development and launch of the International Safeguards for Children in Sport (Rhind & Owusu-Sekyere, 2020). These Safeguards are: (1) developing your policy, (2) procedures for responding to safeguarding concerns, (3) advice and support, (4) minimizing risks to children, (5) guidelines for behaviour, (6) recruiting, training, and communicating, (7) working with partners and (8) monitoring and evaluating. They were developed based on a comprehensive review of the literature, empirical evidence, relevant policies, and existing programmes at the national and local level.

The impact of working towards the International Safeguards was captured through a longitudinal research project with

32 organizations (Rhind & Owusu-Sekyere, 2019). Key changes were identified at the organizational, personal, and behavioural levels. As the organizations worked to implement the Safeguards, people's thoughts and feelings about safeguarding in sport became more positive. The ways in which safeguarding was discussed was also reported to have changed from people generally being opposed at the start of the project compared to being active at the end. Behavioural changes were also observed with people acting more in line with safe practices as well as an increase in the number of safeguarding concerns being disclosed. An increased engagement with children on issues related to safeguarding was also an important indicator of a cultural change (Rhind & Owusu-Sekyere, 2019). The effective implementation of these Safeguards has been found to be based on eight CHILDREN pillars: cultural sensitivity, holistic, incentives, leadership, dynamic, resources, engagement, and networks (Rhind et al., 2017). The International Safeguards are now endorsed by over 125 organisations who work with over 50 million children worldwide.

Current Safeguards and Rights for Adults in Sport

As it is evidenced from previous work, when fully implemented, safeguards protect people. However, adults and children are different. Those differences need to be recognised to develop safeguarding guidelines that protect adults while also respecting their right to self-determination. The right to self-determination is, in international law, the “right of a people to determine its own destiny” (Unrepresented Nations & Peoples Organization, 2017) and is predominantly embedded in Article 1 of the Universal Declaration of Human Rights (United Nations, 1948). Particularly regarding adults in sports and self-determination, the Ann Craft Trust (ACT), a UK based organisation that provides the safeguarding adults in sport framework in the UK highlights the unique aspect of safeguarding those of adult age such as, “adults may choose not to act at all to protect themselves.” In addition to the differing element of self-determination between adults and children, the ACT also highlight that the terms used are different, procedures for reporting and managing cases are different, and that there are key differences in legislation. There may also be issues which are more salient in relation to adults in sport, such as unequal pay (violation of Article 23) and issues related to having children (violation of Article 25).

The very few existing works in sport have primarily focused on those who are defined as adults at greater risk of harm within the ACT and the Care Act 2014 (United Kingdom) providing principles, a guiding framework for best practice, and types of abuse adults may experience (self-neglect, modern slavery, domestic abuse, discriminatory, organisational, physical, sexual, financial or material, neglect and acts of omission, emotional or psychological, cyberbullying, forced marriage, hate crime, and radicalisation). According to the ACT, adults at risk include people with learning disabilities,

physical disabilities, and visual and auditory impairments. In addition, the ACT has highlighted the vulnerability of elite adult athletes following reports of abuse, bullying, harassment, and misconduct in elite sport. As a result of high profile media reports, in 2015 the Minister of Sport (United Kingdom) commissioned an independent review into the Duty of Care in Sport led by Baroness Tanni Grey-Thompson DBE, DL which led to numerous recommendations for education, transition, representation, equality, diversity, and inclusion, safeguarding, mental welfare, and safety, injury and medical issues (Grey-Thompson DBE, 2017). Meeting the ACT safeguarding adults in sport standards has become a condition for receiving funding through the revised UK Code for Sport Governance.

On an international level, rights for adults in sport have been outlined by the International Olympic Committee (IOC). The IOC specifically states in Article 1.4 that athletes' human rights are to be respected and ensured, in particular:

“respect for human dignity; – rejection of discrimination of any kind on whatever grounds, be it race, colour, sex, sexual orientation, language, religion, political or other opinion, national or social origin, property, birth or other status; – rejection of all forms of harassment and abuse, be it physical, professional or sexual, and any physical or mental injuries”

Additionally in 2017, the World Players Association launched the Universal Declaration of Player Rights that consists of 17 rights and entitlements that every player should be guaranteed by their governing body and sport. Included in the Universal Declaration of Player Rights and listed as point

one in the declaration is the right for every player to have “a sporting environment that is well governed, free of corruption, manipulation, and cheating, and protects, respects and guarantees the fundamental rights of everyone involved in or affected by sport”. Universities and sporting bodies have started to develop adult specific policies (Brake, 2011; Brake & Burton Nelson, 2012; Hogshead-Makar & Steinbach, 2002). For example Football Australia has acknowledged that, “Everyone involved in our sport should be treated with respect and dignity and be free to participate without being discriminated against, harassed, bullied or abused.” Like Football Australia, South African Gymnastics Association in their safeguarding policy states that the association is “committed to safeguarding and protecting all who participate in the sport of gymnastics from harassment and abuse and ensuring that all participants are treated with respect and dignity.”

Despite these developments, there is a clear need for a uniformed and internationally recognised set of safeguards for all adults in sport. In addition to the International Safeguards for Children in Sport, the adult-specific version would help to create a comprehensive and inclusive approach to safeguarding everyone in sport. Using the child version as a foundational framework, the present project sought to answer the question: What should be in place to safeguard all adults in sport?

Method

Phase 1: Rapid Evidence Assessment

The first phase of this study consisted of a rapid evidence assessment (REA) which “is consistent with the principles underlying systematic review methodology, but also makes allowances for the rapid delivery of information” (Varker et al., 2015, p. 1199). The REA consisted of examining literature and current safeguards for adults in human rights law, workplace/ human resources, military, education, and sport. The key issues which emerged from the REA were the legal differences between children and adults, the ability to consent, the right to self-determination and the additional risks to adults in addition to those which relate to children in sport.

Phase 2: Online Sand-Pit Discussion

The key issues which emerged through the REA were used to frame an online discussion with representatives of a range of stakeholder groups. After receiving ethical approval from Loughborough University, a link to an online discussion forum was sent to a list of safeguarding experts held by Safe Sport International. The discussion topics included: “What do you think is good practice when safeguarding adults in sport?”, “What is good practice when it comes to safeguarding individuals 16 to 21 years old in sport?”, and “What are the differences between safeguarding adults versus children?”. Responses were received from 33 experts who represented the following stakeholder groups: athletes (n = 3), coaches (n = 3), volunteers (n = 4), safeguarding officers (n =9), researchers (n =7), parent (n =1), advocate (n = 2), consultant (n =2), and manager (n =2). Participants were involved in sport across all competitive levels from recreational and club sport through to elite national and international competitions. Participants primarily worked in Africa (n = 4), Asia (n = 2), Australia (n = 2),

North America (n = 9), South America (n = 2), Europe (n = 4), and Globally (n =10). The key insights through this discussion were merged with the literature review findings to inform the development of a draft set of International Safeguards for Adults in Sport.

Phase 3: Expert Feedback

The draft version was then considered by the members of Safe Sport International's three expert groups. These focus on the Athlete Voice (n =3), Education, Communication and Training (n =4), and Research (n = 8). The feedback from the panel members were then incorporated into the generated safeguards presented in this study. Demographic data has not been included to protect the anonymity of all participants. The key themes identified across all three phases were thematically analysed in relation to the key aspects of the ecological development model (Bronfenbrenner, 1992; Cicchetti & Lynch, 1993).

Results

There was strong support for the need to develop Safeguards focused on adults in sport. The experts shared the view that safeguarding should be inclusive to everyone in sport. For example, one explained:

“organisations should have safeguarding policies and procedures that apply to all who participate in sport”.

Many participants emphasised the practical utility of an adult version of the Safeguards. For example, one expert said:

“As far as the situation in my country is concerned, I think that the Olympic Committee and all sport federations would profit very much from a framework on inclusive safeguards that includes adults, because the prevention strategies and policies have a strong focus on children and youth whereas adults are somewhat “left out”. This causes increasing concerns and requests from the sport community as to why safeguarding should only account for young people.”

A range of justifications for developing an adult-specific version of the Safeguards was identified. These included: the concept of self-determination, increased autonomy, different considerations in relation to consent, unfair contract terms, risk of not being believed because they are now an adult, fear of reporting colleagues, fear of admitting vulnerabilities when an adult, and the lack of protection for sport officials. The full list of identified issues is presented in Table 1 using the ecological development model as a framework (Bronfenbrenner, 1992; Cicchetti & Lynch, 1993).

Table 1

Ecological Development Model of Specific issues when Safeguarding Adults in Sport

Ecological Development Model Label	Key Issues
Self (Ontological Development)	Self determination Autonomy Mental capacity Identifying as being part of a group/ people that is subject to oppression Developmental stage in adulthood (ex. 18 years old versus 35 years old) Stage of career (opportunity to move up the career ladder) Pressure to perform Unaware of safeguarding policies
The Microsystem: relationships, including relationships within sport	Power imbalances in relationships (ex. Coach-athlete) Intimate relations between stakeholders (ex. Coach-athlete) Pressure to perform from other individuals
The Exosystem – community, including sport community	Win at all cost sport systems Fear of reporting colleagues in workplace Unfair contract terms Specific risks for elite athletes Lack of clarity about safeguarding adults in sport

Ecological Development Model Label	Key Issues
The Macrosystem – culture, including sport culture	Lack of support for women in sport Lack of support for marginalised groups Social norms towards gender, age, hierarchy International vs National rules Travelling to different countries with different norms Risk of not being believed because they are an adult Right to self-determination

As a result of the REA, sand-pit discussions, and feedback from the expert groups, the International Safeguards for Adults in Sport are presented below. These Safeguards compliment the already existing International Safeguards for Children in Sport (Rhind et al., 2020).

The main changes included changing the word “child” to “adult”, the inclusion of bystander and education programmes made to all stakeholders by the organisation, whistle-blower protection, and the need for an organised reporting system. All changes from the International Safeguards for Children in Sport for the application to adults in sport are highlighted in bold. Also highlighted in bold, are additional recommendations that were not included in the International Safeguards for Children in Sport.

8

Safeguards

8 Safeguards

- 01 - Developing your policy
- 02 - Developing a system to respond to safeguarding concerns
- 03 - Advice and Support
- 04 - Minimising Risks to Adults
- 05 - Guidelines on Behaviour
- 06 - Recruiting, training and communicating
- 07 - Working with partners
- 08 - Monitoring and evaluation

SAFEGUARD 01

Developing your policy

What — Any organisation providing or with responsibility for sports activities for **adults, over the age of 18**, should have a safeguarding adults policy. This is a statement of intent that demonstrates a commitment to safeguard **adults** involved in sport from harm, and provides the framework within which procedures are developed.

Why — A safeguarding policy makes clear to all what is required in relation to the protection **and safety of all adults**. It helps to create a safe and positive environment for **adults** and to show that the organisation is taking its duty of care seriously.

You have a safeguarding policy which covers all adults who interact with your organisation and is clearly written and easy to understand

The policy clearly describes your understanding and definitions of all forms of potential harm to adults,

The policy covers your organisation's commitment to safeguard **adults** in all aspects of your work

The policy is clear that all **adults** have equal rights to protection **and recognizes the intersectionality of those who identify with specific groups/identities that are subjected to oppression**

This policy is officially endorsed by staff at the highest level of your organisation

Staff at the highest level of the organisation have the responsibility to oversee the implementation of the policy **and identify who is responsible for holding them accountable for the implementation**

All stakeholders have signed up to the policy

Your organisation has consulted with **participants** and staff as part of the initial development and/or on-going review of your policy

The policy clearly defines the difference between adults and children and takes into consideration the adult's right to self-determination

The policy clearly describes your understanding of harassment and abuse and definitions of all forms of potential harm to adults

The policy recognizes your responsibilities and duty of care to all stakeholders

SAFEGUARD 02

Developing a system to respond to safeguarding concerns

What — Procedures describe the operational processes required to implement organisational policy and provide clear step-by-step guidance on what to do in different circumstances. They clarify roles and responsibilities, and lines of communication. Effective systems and structures are required which help to process any **reports of misconduct or abuse** or concerns and support **all stakeholders within the organisation**. You should build on existing systems and understand your role with regards to relevant national systems and legislation. **Your policy should clarify the reporting processes for all adults.**

Why — For safeguarding to be effective, procedures have to be credible for **adults**. Procedures help to ensure a prompt response to concerns about an **adult's** safety or well-being. They also take account of specific factors that may make some **adults** contextually more vulnerable to abuse where their needs for protection are not identified or met. Effective safeguarding procedures also help you to comply with and implement legislation and guidance. Violence against **adults** is distressing and can be difficult to deal with.

There are clear procedures in place that provide step-by-step guidance on what action to take if there are concerns about an **adult's** safety or well-being, both within and external to the organisation

Your organisation has arrangements in place to provide support to **adults**, volunteers and staff during and following an incident, allegation or **claims**

There is an identified member of staff in your organisation responsible for leading on safeguarding

Your organisation provides **every adult** with information about their rights and about who they can turn to if they are worried, in a process which empowers them

Your organisation has made information available to **all adults** about what is likely to happen following a disclosure, in a format and language that can be easily understood by everyone

Your organisation has a process for dealing with safeguarding concerns and **allegations** in a fair and transparent way, that includes an appeals process

All safeguarding concerns, incidents and **allegations** are recorded, monitored, and stored securely

Your organisation has consulted with **adult stakeholders**, carers, and staff as part of the initial development and/or ongoing review of your response system

Your organisation has a system to protect the rights of whistle-blowers.

Your organisation consistently works towards and maintains a culture that allows for the open discussion of the welfare, well-being, and safeguarding of all individuals

Your organisation has a system to report and respond to non-recent safeguarding concerns

SAFEGUARD 03

Advice and Support

What — Arrangements made to provide essential information and support to those responsible for safeguarding **adults**. **Adults** are advised on where to access help and support

Why — You have a duty to ensure advice and support is in place to help people to play their part in safeguarding **adults** such that they know who they can turn to for help.

Contacts are established at a national and/or local level with relevant **adult** protection agencies, NGOs and community groups providing support on **adult** protection **and how a safe culture can be created and maintained**

Your organisation ensures that staff members with special responsibilities for keeping **adults** safe have engagement with specialist advice, support and information

Adults are provided with advice and support on keeping themselves and one another safe

Your system acknowledges that **adults** with additional vulnerabilities (for example, a disability) may face extra barriers to getting help

Your organisation has a review system to learn from safeguarding cases that have occurred within the organisation to further develop the implementation and practice of policy

Your organisation has support for all individuals involved in a safeguarding concern or case

SAFEGUARD 04

Minimising Risks to Adults

What — Measures to assess and minimise the risks to adults of non-accidental violence or harm

Why — Some people, who work or seek to work in sport in a paid or voluntary capacity, pose a risk to **adults**.

Adults are also at risk when placed in unsuitable places or asked to participate in unsuitable activities, including over-training and through unrealistic expectations being placed on them. It is possible to minimise these risks by putting safeguards in place.

Risk assessments are available and conducted for activities, transport, accommodation, and spaces

Steps are taken to minimise any risks identified through a risk assessment **and actively manage identified risks**

If the risks are assessed to be too significant then the activity does not go ahead

Training is available to help staff and volunteers recognise the risks some **adults** are exposed to, because of their race, gender, age, religion, disability, sexual orientation, social background, or culture

Risks that are specific to any group of participants are recognised and responded to accordingly

SAFEGUARD 05

Guidelines on Behaviour

What — Codes of conduct to describe what an acceptable standard of behaviour is and promote current best practice.

Why — Adult sport should be carried out in a safe, positive, and encouraging atmosphere. Standards of behaviour set a benchmark of what is acceptable for all.

Your organisation has written guidelines for behaviour (codes of conduct) which contain statements about treating people with dignity, respect, sensitivity, and fairness

Your organisation has guidance and expectations around activities that include time spent away from home, including placing **vulnerable adults** in the care of others and overnight stays

Where organisations are involved in placing **vulnerable adults** in the care of others, frequent meetings are held with the **adult** to discuss their experiences

Your organisation has guidance around working with **adults** who have a disability

Your organisation has guidance around the appropriate use of information technology and social media

Your organisation has guidance on **treating all adults in sport with respect and dignity**

Your organisation has guidance on expected and acceptable behaviour of **adults** towards others, **including children** (for example, a code of conduct)

There are clear consequences for not following the guidelines on behaviour that are linked to organizational disciplinary procedures

The highest level of the organisation has the responsibility to ensure that the guidelines are followed

Your organisation has consulted **athletes, staff, and all relevant stakeholders** as part of the initial development and/or on-going review of your organisation's guidelines on behaviour

Your organisation has clear guidelines on intimate relationships between staff and athletes and other adults within the sporting organisation

SAFEGUARD 06

Recruiting, training and communicating

What — Recruiting appropriate members of staff, creating opportunities to develop and maintain the necessary skills and communicating regarding safeguarding.

Why — Everyone in contact with **adults** has a role to play in their **safety and well-being**. They can only do so confidently and effectively if they are aware, have the necessary understanding of, and the opportunity to develop, practice and implement key skills. Organisations providing sporting activities for **adults** have a responsibility to provide training and development opportunities for staff and volunteers. **Organisations also have the responsibility to recruit individuals who will treat others with respect and dignity and not engage in any form of behaviour that exploits, abuses, harasses, or neglects an individual.**

Job descriptions contain statements about treating people with dignity, respect, sensitivity, and fairness.

The recruitment process includes an interview, character/employment references and a background check in line with local legislation

All staff, volunteers, **athletes** and other relevant people and **stakeholders** have been trained on safeguarding and **adult** protection, including how to report concerns

The highest level of the organisation has the responsibility to oversee the implementation of the training

<p>All staff, volunteers, athletes and relevant people and key stakeholders with special responsibilities for safeguarding have access to regular additional training and specialist support</p>
<p>Your organisation has consulted with athletes, carers, key stakeholders, and staff as part of the initial development and/ or on-going review of your organisation's recruitment, training, and development</p>
<p>Your organisation has training for bystanders as well as protection for whistle-blowers</p>
<p>Your organisation has relevant education and training made widely available to all those involved</p>
<p>Your organisation's stance on safeguarding is communicated to the wider public, for example, all fans and spectators</p>
<p>Your training meets the levels of existing safeguarding in sport standards as outlined in this framework</p>
<p>Procedures and policies relating to all safeguarding concerns and reporting are accessible by all individuals</p>

SAFEGUARD 07

Working with partners

What — Action taken by the organisation to influence and promote the adoption and implementation of measures to safeguard **adults** by partner organisations.

Why — Several sports organisations have both a strategic and a delivery role in relation to children and young people. Where organisational partnership, membership, funding or commissioning relationships exist or develop with other organisations, the organisation should use its influence to promote the implementation of safeguarding measures. The organisation should provide or signpost support and resources in relation to implementing adequate safeguarding measures. **The organisation should actively promote the adoption of the International Safeguards for All in Sport [i.e., both the child and adult versions].**

Your organisation has worked with partners/members to ensure that there are shared expectations around safeguarding

Your organisation has worked with partners/members to agree how to share learning about making sport safer for **adults**

Your organisation has shared written guidance on current best practice in relation to working with **adults (for example sharing the International Safeguards for All in Sport [i.e., both the child and adult versions])**

Your organisation's safeguarding policy represents an essential part of any partnership/membership agreements

Your organisation publicises information about your policy to your community, partners, and members

Your organisation works to sensitise your communities to the importance of safeguarding **adults**

You actively collaborate with survivor groups and advocacy groups to help create safe sport environments

SAFEGUARD 08

Monitoring and evaluation

What — The on-going monitoring of compliance and effectiveness, involving all relevant groups.

Why — Organisations need to know whether safeguarding is effective and where improvements and adaptations are needed or recognise patterns of risk.

— There are systems in place to monitor and evaluate the effectiveness of your organisation's:

- policy
- system for responding to safeguarding concerns
- advice and support
- systems to minimise the risks to **adults**
 - guidelines for behaviour
 - recruitment, training, and communication
 - work with partners to safeguard **adults**

The highest level of the organisation has the responsibility to oversee the implementation of the monitoring and evaluation system

Your organisation has consulted with **adults**, parents/ carers, staff, and **all relevant stake holders** as part of the initial development and/or on-going review of your monitoring and evaluation system

Addressing the transition from childhood to adulthood

In addition to the development of the adult safeguards, participants highlighted the importance of considering the transition between childhood and adulthood. As one participant said, “children do not turn into adults overnight.” It should be a gradual and seamless transition between the child and adult versions as opposed to an overnight wholesale change. As another participant explained:

“Safeguarding policies should address the transition from childhood to adulthood. Young people with limited life experience are vulnerable to non-accidental harm as they may not have sufficient life experience to see harm coming [their] way or have the skills to deal with it.”

What — When creating and implementing safeguards for adults in sport there are special considerations that need to be taken in to account to manage the transitions between childhood and adulthood

The safeguards need to consider any changes of legislation and duty of care from childhood to adulthood in the given context.

The safeguards need to be coherent and adaptable to varying ages and developmental stages.

The highest level of the organisation has the responsibility to oversee the implementation of the monitoring and evaluation system

Although separate, child safeguard and adult safeguard policies need to be aligned with one another.

Discussion

This paper attempts to develop the first set of international Safeguards for adults in sport. Adults in sport can be subjected to all forms of maltreatment just like children and adults at risk and thus deserve the same protections. This set of safeguards aims to protect such adults while also recognising their key differences from children such as their ability to consent and their right to self-determination. The implications of this research shapes safeguarding at all levels of sport and cements the right for safe sport for all. All groups and identities in sport need safeguards to ensure that sport can be experienced free of harassment, abuse, exploitation, and harm.

Like all research, this study is not without its limitations. These include the fact that the data relies on people's perceptions. We focused on engaging with experts representing various stakeholder groups. There is a need to now gain feedback from a diverse range of perspectives across global sport. There is also a strong rationale to pilot these Safeguards with a representative group of organisations to assess their effectiveness, efficacy and feasibility in practice. This would further inform the development of resources and training to facilitate the implementation of these Safeguards to ultimately optimise the experiences of everyone in sport.

The combination of the International Safeguards for Children in Sport (Rhind & Owusu-Sekyere, 2020) and the safeguards for adults in sport now represent the Inclusive Safeguards. Having two separate but complementary sets of safeguards for children and adults in sport allows for a comprehensive but tailored approach to safeguard everyone.

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