



SafeSport
Pathways

SAFE CAREER DEVELOPMENT

Protection for Young Migrant Athletes



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Table of Contents

Introduction to the Safesport Pathways Practitioners Toolkit.....	05
Part 1: Foundations and Rights Framework.....	08
Part 2: Foundations and Rights Framework (Grassroots Orientation).....	09
 Chapter 1: The Migrant Youth Athlete Context.....	 11
1.1. Defining Vulnerability: Legal status and exploitation risk factors.....	12
1.2 The Continuum of Harm: From poor practice to human trafficking.....	20
1.3 The Trauma-Informed Lens: Recognising trauma and its impact on disclosure and trust.....	31
 Chapter 2: Legal and Ethical Duties.....	 38
2.1. Human Rights Foundation: Overview of the UNCRC and labour and athlete rights frameworks.....	39
2.2 Duty of Care and Liability.....	54
2.3 Organisational Integrity: Why policy and transparency prevent exploitation.....	65
 Part II: Ethics, Recruitment, Fraud and Coercive Practices.....	 70
 Chapter 3: Ethics and Red Flags in Recruitment.....	 72
3.1 Cross-Border and Transnational Safeguarding Risks.....	73
3.2 Unethical Agent Practices.....	79
3.3 Contractual Issues.....	92
3.4 Contract Verification: Non-Negotiable Clauses (Salary, Housing, Health, Education).....	103
3.5 Contract Red Flags.....	110
3.6 Exploitative Clauses: Identifying clauses that enable debt bondage.....	115

Table of Contents

Chapter 4: Risk Assessment, Agent Vetting Framework, Recruitment & Contract Checklist.....	122
Part III: Response, Intervention, Support.....	155
Chapter 5: Responding to Disclosure and Harm.....	158
5.1 Trauma-Informed Interviewing: Best Practice for Receiving a Disclosure.....	162
5.2 Behavioural Indicators	178
5.3 Mandatory Reporting versus Internal Reporting	180
Chapter 6: Case Management and Support Systems.....	185
6.1 Internal Reporting Protocol: Procedures for the Designated Safeguarding Lead (DSL) & Immediate Response Team.....	186
6.2 External Referrals: Connecting Athletes to Support Services in the European Union.....	198
6.3 Confidentiality and Documentation: Standards for Secure & Accurate Record-Keeping.....	202
Part IV: Prevention and Empowerment Tools.....	209
Chapter 7: Creating a Safe Environment.....	210
7.1 Ethical Boundaries: Power Imbalances & Professional Conduct in Sport.....	210
7.2 Integration Strategies: Ensuring access to language classes, school enrolment, and safe accommodation.....	220
7.3 Promoting Athlete Voice: Fostering an Inclusive and Non-Retaliatory Culture.....	225
Chapter 8: Essential Forms and Templates.....	232
Reference.....	251

INTRODUCTION TO THE SAFESPORT PATHWAYS PRACTITIONERS TOOLKIT



The globalisation of sport has created unprecedented opportunities for young athletes to pursue elite or professional careers across borders. At the same time, it has produced complex risk environments in which abuse, exploitation, and trafficking can occur, often hidden within legitimate systems of recruitment, training, and competition. Migrant youth athletes occupy a uniquely vulnerable position within this landscape. They are simultaneously children, developing athletes, and, in many cases, economic actors navigating unfamiliar legal, cultural, and institutional contexts.

The SafeSport Pathways Toolkit and accompanying microcredential training course have been developed to support SafeSport practitioners working with migrant youth athletes. It provides a structured, rights-based framework for understanding and addressing the risks faced by migrant youth athletes, while equipping practitioners with the knowledge and tools required to identify, prevent, and respond to maltreatment and exploitation amongst this population of athletes. The microcredential complements this by translating the Toolkit's content into a structured, competency-based learning pathway focused on applied safeguarding practice. A separate youth facing Toolkit is available for migrant youth athletes.

The SafeSport Pathways Practitioners Toolkit is grounded in three core principles. Firstly, vulnerability is not inherent but produced through the interaction of structural, social, and institutional factors, including legal status, power imbalances, and governance gaps within sport systems. Secondly, harm in sport exists along a continuum, ranging from poor practice and boundary violations to severe forms of abuse, exploitation, and trafficking. Early identification and intervention are critical. Thirdly, effective safeguarding requires a trauma-informed approach that recognises how past and ongoing experiences of harm shape behaviour, disclosure, and trust.

As the Toolkit is structured for a multidisciplinary audience, including coaches, grassroots educators, safeguarding officers, and social workers, with varying levels of technical and professional expertise, each chapter provides a detailed empirical foundation and a short layman's summation of key points and takeaways. The microcredential course simplifies these more complex topics into accessible, praxis-focused modules centred on identifying, preventing, and responding to maltreatment and exploitation.



The Toolkit is divided into four parts. **Part I** provides the foundation for protecting migrant youth athletes through a trauma-informed approach. It explains why migrant youth athletes may be vulnerable to maltreatment, outlines the different types of harm that can occur in sport, and describes the legal and ethical responsibilities and frameworks applicable to those involved in sport, with a key focus on the rights of young athletes.

Part II shifts from principles to practice. It focuses on recruitment processes as the primary entry point for risk, reviewing unethical agent practices, recruitment fraud, contract manipulation, and coercive control mechanisms. It provides practical guidance for identifying early warning signs, assessing risk, agent vetting and intervening effectively in real-world scenarios.

Part III provides a praxis-based, trauma-informed approach to responding to disclosure and harm, escalation strategy and case management support. Behavioural indicators and legal and reporting obligations are also surveyed.

Part IV focuses on preventing harm and empowering SafeSport practitioners and migrant youth athletes. The importance of ethical boundaries and professional conduct in sporting environments predicated on inherent power imbalances is explored. Integration strategies and the promotion of inclusive participation by migrant youth athletes are underscored as empowerment strategies. Lastly, essential tools and templates are provided for SafeSport practitioners.

The SafeSport Pathways Practitioners Toolkit functions as the core knowledge base and applied reference resource for the accompanying microcredential, Safeguarding Youth in Sport. While the microcredential is designed as a structured, competency-based learning pathway, the Toolkit provides the substantive, conceptual, and procedural foundation for all learning activities.

The microcredential is primarily targeted at coaches and grassroots sport practitioners, while also supporting safeguarding officers, social workers, and allied professionals. It is designed to build applied competencies in four core areas: identifying exploitation risks, preventing harm through safe recruitment practices, responding appropriately to disclosures, and managing safeguarding challenges, including those arising in cross-border contexts. The Toolkit underpins each of these competencies by offering both the evidence base and practical instruments required for real-world application.

Each module draws on specific chapters, tools, and case materials from the Toolkit, which are translated into scenario-based simulations, decision-mapping exercises, and problem-based learning tasks. Learners are required to engage with Toolkit content iteratively, applying it to progressively complex safeguarding scenarios that reflect the realities of practice. The structure of the Toolkit directly aligns with the modular design of the microcredential. Part I (Foundations of Vulnerability, Harm, and Rights) underpins Modules 1 and 2, which focuses on contextual understanding, ethical boundaries, and the identification of early indicators of risk. Part II (Recruitment Pathways and Risk Identification) supports Modules 3 and 4, which develops competencies in safe recruitment, due diligence, and agent vetting. Part III (Responding to Harm and Case Management) aligns with Modules 5 and 6, which focuses on recognising coercion and exploitation, handling disclosures, and executing reporting and referral protocols. Part IV (Prevention, Empowerment, and Institutional Practice) corresponds to Modules 7 to 9, which emphasises institutional compliance, cross-border coordination, and the application of safeguarding tools to support athlete protection and empowerment.

*The SafeSport Practitioners' Toolkit is intended for a multidisciplinary audience, including coaches, safeguarding officers, grassroots educators, and social workers. Its objective is not only to enhance awareness, but to strengthen institutional capacity, promote accountability, and support the development of safe, ethical, and rights-respecting sport systems. **As such, each chapter provides conceptual framing in accessible, practical language, while also delving deeper into concepts, technical terminology, and research. We encourage SafeSport Practitioners to read both parts in each section.***

Part I

FOUNDATIONS AND RIGHTS FRAMEWORK



Part I of the SafeSport Practitioners Toolkit establishes the framework for safeguarding migrant youth athletes. It examines the contextual drivers of vulnerability, the continuum of harm in sport, and the legal and ethical duties that govern actors within the sporting ecosystem. Drawing on international human rights law, labour standards, and sport governance frameworks, it defines the baseline obligations owed to young athletes and highlights the systemic conditions that enable exploitation.

Migrant youth athletes are positioned within intersecting systems, namely, sport, migration, labour, and child protection. Vulnerability is produced through structural inequalities, power imbalances, and regulatory gaps. Understanding these dynamics is essential for recognising threats, red flags and early safeguarding intervention.

Misunderstanding vulnerability leads to missed risk indicators. Structural risks often precede individual harm. Prevention depends on recognising systemic drivers, not just the incidents when they occur. Vulnerability is layered (age, migration status, and dependency all play a role). Power asymmetries define sporting relationships (whether athlete-coach or athlete-agent). Migration status can limit access to protection systems. And economic pressure increases the risk of exploitation.

Part I of the Toolkit reinforces the idea that SafeSport Practitioners must assess context, not just behaviour. It becomes imperative that practitioners are able to map power relationships around the athlete, identify structural constraints (legal, financial, social), and factor vulnerability into all safeguarding decisions. A contextual risk mapping framework is provided in Part IV, Chapter 8 of the Toolkit.

FOUNDATIONS AND RIGHTS FRAMEWORK (GRASSROOTS ORIENTATION)



Part I of the SafeSport Practitioners Toolkit lays the foundation for keeping migrant youth athletes safe. It looks at the bigger picture around the athlete – not just what happens on the field, but also their life situation (migration status, finances, family pressure, legal rights, and who has power over them). Young migrant athletes are not just “players.” They are also embedded within other systems that intersect with sport, including migration, labour/work, and child protection.

WHY IT MATTERS

If you only look at behaviour (such as a coach shouting or a bad contract), you will miss the real risks. Most harm doesn’t start with a single incident. It builds over time because of:

- Power imbalances (coach, agent, club control)
- Financial pressure (families relying on success)
- Weak oversight (no clear reporting systems)
- Migration issues (visas, legal insecurity)

If you don’t understand these factors, you may miss early warning signs, and athletes may stay in harmful situations longer. Abuse and exploitation can escalate unnoticed.

WHAT TO DO

Always look at the full context around the athlete, not just behaviour.

Ask:

Who makes decisions about this athlete’s future?

Who controls their money, documents, or movement?

What happens if they fail or get injured?

Map the athlete's support system

- Family access?
- Trusted adult?
- Safe reporting option?

Treat migration status, age, and dependency as risk factors in all decisions.

Build simple systems in your club

1. Clear reporting channels
2. Safeguarding lead person (known as a Designated Safeguarding Lead – this person undergoes safeguarding training)
3. Basic contract checks

WHAT THIS MEANS IN PRACTICE

If a young player seems fine on the surface but

- lives far from family,
- depends entirely on a coach or agent, and/or
- fears being sent home,

they are high-risk – even if no abuse has been reported yet.



Chapter 1

THE MIGRANT YOUTH ATHLETE CONTEXT



1.1 Defining Vulnerability: Legal status (refugee, migrant, asylum seeker) and exploitation risk factors; 1.2 The Continuum of Harm: From poor practice to human trafficking; 1.3 The Trauma-Informed Lens: Recognising trauma and its impact on disclosure and trust.

Introduction

Migrant youth athletes occupy a precarious position within the global sports ecosystem, shaped by intersecting dynamics of age, mobility, legal status, and unequal power relations. Aspirations for social mobility through sport often coexist with heightened exposure to abuse, exploitation, deception and various rights violations. It thus becomes necessary to understand youth migrant athletes in this context to effectively protect and empower them. This chapter firstly explores the vulnerability of migrant youth athletes defined by their legal status and other exploitation risk factors. It then examines how exploitation in sport occurs along a continuum of harm spanning from poor practice in recruitment to maltreatment and extending to human trafficking. Lastly, it advocates for a trauma-informed approach in understanding the experiences of migrant youth athletes and the challenges associated with identification, disclosure, trust and support.

1.1 Defining Vulnerability: Legal status and exploitation risk factors

CONCEPT

Vulnerability is not about labelling a young athlete as “weak” or “at risk.” It is about understanding how their situation makes them more exposed to harm or exploitation. For migrant youth athletes, vulnerability is created by a combination of factors, including:

- Their age and level of development
- Their dependence on adults (coaches, agents, clubs)
- Their legal status in a country
- Their financial and family pressures
- The structures of sport (hierarchies, selection systems, control)

These factors often overlap and reinforce each other. For example, a young athlete who is far from home, depends on a coach for selection, and has an uncertain visa status is far more at risk than someone without these pressures. Vulnerability is understood to be layered and contextual – it comes from the environment around the athlete, not just the athlete themselves.

WHY IT MATTERS

If vulnerability is misunderstood, coaches and grassroots practitioners may miss early warning signs, harmful situations may be normalised, and athletes may remain in unsafe environments.

- Most athletes experience some form of harm before age 18
- Very few report it
- Many do not recognise abuse or know their rights

This is especially serious for migrant youth athletes because:

i. Power imbalances are stronger

Coaches, agents, and clubs often control selection, contracts, living conditions and/or future opportunities. This makes it difficult for athletes to question or refuse decisions.

ii. Harm is often normalised

Practices like training through injury, verbal humiliation, and extreme control over lifestyle, are often seen as “part of the game,” making abuse harder to identify.

iii. Financial and family pressure increases risk

Many athletes see sport as a way to support their families and feel pressure to succeed at all costs. This can lead them to accept harmful conditions and stay silent about abuse.

iv. Isolation reduces protection

Athletes who live away from family, travel frequently, or train in closed environments often lack access to trusted support systems.

v. Weak systems allow harm to continue

Where there is poor oversight, no clear reporting process, or conflicts of interest, harm can continue unchecked.

vi. Legal status adds another layer of risk

Migration status directly affects access to protection, willingness to report harm, and dependence on clubs or intermediaries. For example, athletes with visas tied to a club may fear losing their status. Undocumented athletes may avoid reporting due to fear of deportation.

WHAT TO DO

i. Assess the full context – not just behaviour

When working with an athlete, ask:

1. Who controls their opportunities?
2. Who do they depend on financially or legally?
3. What happens if they are injured or not selected?
4. Do they have access to family or trusted adults?

ii. Identify layered risk factors

Pay close attention when multiple factors are present:

- Young age
- Migration status (especially insecure or unclear)
- Financial pressure
- Isolation from family
- Strong dependence on a single adult

The more factors present, the higher the risk.

iii. Understand legal status and its impact

Documented athletes may still be at risk if visas depend on contracts. Fear of losing status can prevent reporting.

Refugees and asylum seekers may depend on clubs for basic needs. They may fear authorities or legal systems, and may have experienced prior trauma.

Undocumented athletes represent the highest risk group. They may have limited access to services and protection, and fear of detection prevents reporting.

iv. Reduce dependency where possible

Ensure athletes have:

- Access to their documents
- Independent communication channels
- Avoid situations where one adult has total control
- Encourage involvement of parents/guardians (where possible)

v. Challenge harmful norms

Do not accept practices simply because they are common:

Question *“This is how it’s always done”*.

Prioritise athlete wellbeing over performance. Be cautious of:

- Training through injury
- Verbal humiliation
- Extreme control over diet or personal life
- “Sacrifice everything to succeed” messaging

vi. Strengthen safeguarding in your environment

- Establish clear reporting pathways
- Assign a safeguarding lead (should be trained/certified)

Ensure athletes know:

- Their rights
- Who to speak to
- Regularly “check in” with athletes

vii. Build awareness (athletes and families)

- Explain risks linked to recruitment and migration
- Ensure decisions are understood
- Encourage athletes to seek independent legal advice before signing a contract
- Encourage questions and second opinions

WHAT THIS MEANS IN PRACTICE

Two athletes may appear the same on the field – but one has family support, secure documents, and multiple options, while the other depends entirely on a club, coach or agent to stay in the country. The second athlete is at risk, even if they seem confident or successful.

Vulnerability is not always visible. Your role is to understand the pressures around the athlete – not just what you see in training.

Vulnerability

Vulnerability comes from a combination of pressures and dependencies, not just personal characteristics. If you focus only on the individual, you will miss the systems creating risk.

- Look at the athlete’s environment
- Identify overlapping risk factors
- Act early when risks combine

A youth migrant athlete is not automatically vulnerable – but becomes vulnerable when:

- They cannot safely say “no”
- They depend on others for basic needs or legal status
- They lack access to protection or support

DELVE DEEPER

Vulnerability among migrant youth athletes is overwhelmingly structurally produced through legal, social and economic conditions that shape their exposure to harm and exploitation. Maltreatment in sport is sadly endemic – occurring in many relational forms such as physical, sexual, and emotional abuse or neglect.[i] Maltreatment in sport also encompasses non-relational forms of harm, including systemic and organisational abuse, and psychological abuse or neglect at the mezzo and macro level, such as exploitation and sport trafficking.[ii] Internationally, 75%-85% of athletes have reported some form of interpersonal violence in sport before the age of 18.[iii] Up to 38% have reported sexual violence; up to 66% physical violence; and up to 75% psychological abuse or neglect.[iv] Male athletes reported significantly more experiences within sport than female athletes.[v] The prevalence of (migrant) youth athlete exploitation and trafficking is unknown, but estimates suggest that it is significant.[vi]

Moreover, athletes have poor situational awareness of the types and extent of maltreatment in sport. The vast majority of athletes (~78%) are unaware of athletes' rights declarations.[vii] This is amplified in the case of youth seeking elite pathways and may, in many cases, be extended to their parents or guardians. Excessive trust placed on agents and coaches by families and uncritical deference to their authority significantly raises a youth athlete's exposure to maltreatment.[viii] Even where maltreatment is encountered, elite and sub-elite athletes are less likely to disclose abuse or exploitation while actively engaged in sport.[ix] Between 3% and 16% of athletes who have experienced maltreatment report it.[x] Moreover, the very nature of sport may also be a barrier to reporting maltreatment (discussed later in this section). There are several interrelated factors that heighten migrant youth athletes' vulnerability and exposure to maltreatment. These intersecting risk factors are predicated on the asymmetrical relationships that define sport, developmental immaturity, and institutional cultures that often prioritise performance over profit:



i. Age and development: Young athletes are still developing cognitively, emotionally and socially. This developmental immaturity also means that they are more likely to defer to authority figures, such as coaches, agents, recruiters, and club officials. These authority figures wield power over these young athletes' futures. Their decisions directly impact selection, progression, and career prospects. This creates a relationship of dependency that can be manipulated and limits young athletes' capacity to question harmful practices or recognise abuse/exploitation.

ii. Power imbalances and structural hierarchy: Sport is characterised by rigid hierarchies in which coaches and organisations exercise significant control over training, housing, education, and mobility. Such hierarchies produce power imbalances that create conditions for maltreatment – particularly when success is framed as requiring obedience, sacrifice, or “toughening up”.

iii. Normalisation of harm: Certain forms of maltreatment, such as excessive training, verbal humiliation, playing despite injury, or restrictive control over diet or social life, are often normalised as part of elite athlete development. Blurring of boundaries makes it difficult for youth athletes to distinguish legitimate discipline from abuse or exploitation, ultimately discouraging reporting and disclosure.

iv. Socio-economic and aspirational pressure: Many youth athletes, particularly those from disadvantaged backgrounds or developing countries, view sport as a primary pathway to social mobility. Family expectations and financial pressure increase tolerance for exploitative conditions and reduce willingness to withdraw from harmful environments, even where maltreatment is evident.

v. Limited safeguarding: Intensive training schedules, residential academies, and travel can isolate youth athletes from family, peers, and support systems. In many cases, safeguarding mechanisms are weak, reporting procedures unclear, and/or trusted/safe reporting channels entirely absent.

vi. Inadequate governance and accountability: Regulatory frameworks governing youth sport are unevenly enforced, particularly in high mobility sports. Weak monitoring, conflicts of interest, and opaque recruitment systems reduce accountability and allow maltreatment to persist – creating self-reinforcing feedback loops of harm.

In the case of migrant youth athletes, legal status can add yet another layer of vulnerability. The legal status of migrant youth athletes affects their access to rights, protections, and resources. Moreover, their identity as a ‘migrant’ can also lead to isolation and exclusion within teams, which may also reinforce the vulnerability of some athletes. There are various categories of migrants. However, we will focus on three: documented, irregular/undocumented, and forced migrants.

Documented migrants are those who have followed legal migration channels and hold the requisite visas that facilitate entry and stay in a third country. While athletes who follow this migration pathway may appear protected, they often face conditional rights tied to a specific employer, club, or institution. Termination of contracts or unsuccessful trials can result in loss of legal status or repatriation. As discussed later, migrant youth athletes may be deceived by recruiters or agents and travel to Europe on incorrect visas, such as tourist visas. When these expire, or their documents are confiscated by unscrupulous intermediaries, their legal status becomes precarious. Youth athletes in this category may be excluded from mainstream safeguarding mechanisms if their status places them outside conventional protection or labour frameworks. In such instances, their vulnerability is tied to their legal conditionality.

Youth athletes with refugee status have formal recognition and protection under international law. Their vulnerability stems from displacement-related trauma, disrupted education, and limited social capital in host countries. Youth athletes in this category may experience dependency on clubs or sponsors for housing, documentation support, and livelihood opportunities, creating risks of exploitation. Language barriers, unfamiliarity with legal systems, and fear of jeopardising hard-won status can inhibit disclosure of abuse.^[i] Asylum seekers occupy a particularly precarious position due to the temporary and uncertain nature of their status.

Prolonged asylum processes restrict access to employment, travel, and education, increasing reliance on informal sport pathways and intermediaries. In elite or semi-elite sport, this uncertainty can be exploited through unpaid labour, unstable contracts, or coercive “trial” arrangements. Fear of negative asylum outcomes discourages reporting of maltreatment, while frequent relocation and bureaucratic delays disrupt safeguarding oversight and continuity of care.



Undocumented youth athletes experience the highest levels of structural vulnerability. Lack of legal status severely restricts access to healthcare, education, legal remedies, and protection services. In sport, this invisibility enables exploitation, including unpaid labour, threats of denunciation, and trafficking. Fear of detection or deportation significantly deters reporting, while age-related protections are often inaccessible in practice.

When considering the vulnerability of migrant youth athletes, or any young athlete, we need to examine various intersecting factors. Combinations of which may further heighten vulnerability to maltreatment and exploitation.

Defining Vulnerability

Vulnerability is a term often applied to populations that require special protection. However, it is important to understand the concept of vulnerability as contextual, rather than paradigmatic. Traditional understandings of vulnerability result in stereotyping (labelling), whilst ignoring contextual factors. Rather, vulnerability is layered – meaning that manifold intersecting factors (social, economic, environmental, structural or personal) increase an individual's or group's risk to harm or exploitation. This also means that vulnerability does not arise from a single factor – e.g., simply being a migrant, youth, or athlete. Rather, it is the manner in which these multiple, overlapping factors interact to heighten risk and constrain agency that is of interest and importance to us. This also means that we need to move beyond merely looking at individualised or deficit-based explanations by locating harm within broader systems of (sport) governance, labour markets and cultural norms. Vulnerability is produced and reproduced through these interactions and intersections, which operate across all levels (micro, mezzo, macro: individual and interpersonal; organisational and institutional; broader structural, political, economic, and legal systems).[xii]



WHY MIGRANT YOUTH ATHLETES ARE VULNERABLE

Migrant youth athletes are not just “at risk” because they are young or migrants. It’s the combination of factors that creates vulnerability.

Key Reasons

1. **They are young.** Most migrant youth athletes are minors (i.e. children under the age of 18). This means that they are still developing and more likely to trust authority figures like coaches or agents. That makes them easier to groom and manipulate. It also means that they are less likely to ask questions or report harm.
2. **Power imbalances.** Coaches, clubs, academies and agents control opportunities, careers, and sometimes housing or documents. Their entire future can lie in the hands of one person. The perceived risks can be significant if they don’t comply or are seen as “difficult”.
3. **Pressure to succeed.** Families may depend on them financially, so they tolerate poor conditions (out of guilt or a sense of obligation to their family, which might have sacrificed a lot to get them where they are).
4. **Harm is normalised in sport.** Harsh training, humiliation, pain, or playing through injury can be seen as “part of sport.”
5. **Weak protections.** Poor safeguarding systems and unclear reporting channels.
6. **Lack of awareness.** Many athletes don’t know their rights or what counts as abuse. Athletes may also not understand the professional “jargon” (language) used to legally describe maltreatment, abuse, exploitation or harm in general. This can be quite pronounced with migrant youth athletes, where such terminology doesn’t really exist in their everyday language.
7. **Legal status can make things worse.** Documented athletes may lose their visa if their contracts end. Refugees and asylum seekers often depend heavily on clubs or agents and fear losing protection. Undocumented athletes are most at risk – they may avoid reporting abuse due to fear of deportation.

Key Takeaway: Vulnerability is not one thing. It’s layered, created by overlapping social, legal, and economic pressures.

1.2 The Continuum of Harm: From poor practice to human trafficking

CONCEPT

Harm in sport does not usually start with (extreme) abuse. It develops step by step, often beginning with practices that seem normal or minor. This progression can look like:

- Unethical recruitment (false promises, unclear contracts, hidden costs)
- Poor practice (boundary issues, favouritism, lack of oversight)
- Abuse and exploitation (financial, physical, or sexual)
- Trafficking (serious exploitation, including forced labour or sexual exploitation)

Unethical recruitment is often the entry point. This includes:

- Misleading athletes about opportunities (trials, contracts, visas)
- Charging high or hidden fees and/or commissions
- Running informal trials without agreements or safeguards
- Agents or coaches acting in their own interests instead of the athlete's interests
- Controlling documents (passports, visas) or movement

These practices create dependency and loss of control, which can escalate into exploitation.

At later stages, harm may include:

- Financial exploitation (debt, unpaid labour)
- Sexual coercion (including sextortion – where opportunities are exchanged for sexual compliance)
- Trafficking within sport or using sport as a lure into other forms of exploitation

WHY IT MATTERS

Most serious cases of abuse or trafficking do not start as obvious abuse. They develop because:

- Early warning signs are ignored or normalised
- Harmful practices are seen as “part of sport”
- Athletes are dependent on those in power (coaches, agents, clubs)
- Families and athletes trust intermediaries without verification

Key risks include:

- Debt and financial pressure, which trap athletes in exploitative situations
- Loss of control over documents or movement, increasing vulnerability
- Isolation, especially during travel or residential training
- Fear of losing opportunities, which prevents athletes from speaking out

Poor practice plays a critical role. Even when not immediately harmful, it weakens boundaries, tests what is tolerated, and creates opportunities for grooming and exploitation. Grooming often starts with everyday actions (extra attention, favours, informal arrangements) and gradually becomes exploitative.

At the extreme end, trafficking occurs:

- In sport (exploitation within clubs or academies)
- Through sport (false promises leading to exploitation outside sport)

Because reporting is low and awareness is limited, coaches are often the first line of defence.

WHAT TO DO

Key safeguarding interventions are needed at the club/academy level. Even if you belong to a grassroots team, the same principles apply.

i. Strengthen recruitment oversight

Before any opportunity is accepted, encourage athletes to:

- Verify the agent, club, or academy
- Ensure there is a written agreement (contract)

Confirm:

- Who pays for travel, accommodation, and trials
- What happens if the athlete is not selected
- Involve parents/guardians in all decisions

ii. Identify high-risk recruitment practices

Treat the following as red flags:

- Promises of guaranteed contracts or success
- Pressure to make quick decisions
- Requests for upfront payments or “placement fees”
- Trials without contracts, insurance, or supervision
- Agents representing both the athlete and the club
- Use of tourist visas for sport-related activities

iii. Protect athlete independence

Athletes should always have access to their own documents (passport, visa), and independent communication with family. No one should hold documents, restrict movement, or link basic needs (housing, food) to performance.



iv. Respond to signs of exploitation

Take action if you notice:

- Debt or financial pressure tied to participation
- Threats linked to selection or contracts
- Signs of coercion (including sexual pressure)
- Athletes being abandoned or stranded after trials

Follow safeguarding and reporting procedures immediately. If you feel the athlete is in imminent danger, contact local law enforcement immediately.

v. Build safe systems in your club

Champion:

- Clear reporting pathways
- Named safeguarding lead
- Basic contract and recruitment checks
- Education for athletes and parents

WHAT THIS MEANS IN PRACTICE

A situation may begin with an enticing “opportunity.” This can lead to unclear terms, followed by financial pressure or control, and swiftly escalate into exploitation.

If you wait for clear abuse, you may be too late. Your role is to recognise and act on early warning signs.



DELVE DEEPER

A continuum of harm exists within sport that enables the maltreatment of migrant youth athletes, extending from unethical recruitment to human trafficking. Unethical recruitment practices in sport refer to those actions by scouts, agents, clubs, academies, or intermediaries that violate legal standards, ethical norms, or the best interests of athletes during the identification, selection, and placement of athletes at various levels of competition. They include predatory recruitment practices, deception and misrepresentation, informal and unregulated trials, excessive or illegal fees, recruitment/transfer of children in violation of established regulations, informal guardian arrangements, conflict of interest and dual representation, control over mobility and documentation, lack of informed consent, and absence of welfare and safeguarding provisions. Predatory, unethical recruitment practices (such as recruitment models that target athletes from economically marginalised communities and conflict-affected regions whilst externalising costs, or systematically produce surplus athletes, discard athletes without support, or channel them into irregular migration or labour pathways) can heighten an athlete's vulnerability and exposure to maltreatment and exploitation.

Misrepresentation, deception and fraud by scouts, agents, and other intermediaries are prevalent issues in sport, particularly football.^[xiii] Deception and misrepresentation may range from agents providing false or misleading information about contracts, salaries, trials, visas, education, living conditions, to pathways to professional status and success. This includes exaggerating an athlete's chances of selection or concealing risks and costs. In high mobility sports, contractual fraud, exploitative contracts, and upfront fees are not uncommon. Debt-based recruitment practices, such as recruitment, placement, or development fees, significantly increase the risk of exploitation by increasing the athlete's (and their family's) dependency. Another issue linked to this is the poaching of young talent by unscrupulous agents via financial inducements. This can also be used to pressure athletes and families to make hasty decisions by prioritising short-term financial gain at the expense of long-term development and well-being. Failing to ensure that youth athletes and their guardians fully understand contractual terms, legal implications, and risks, particularly when language barriers or low literacy exist, may lead to contracts and other agreements being entered into without informed consent and to the financial exploitation of the athlete.

Similarly, where agents, coaches, or scouts simultaneously represent the athlete and the club, academy, or third-party investors, they undermine informed consent and fair negotiation. Such practices can also lead to athletes being "traded" like livestock, and breaches of contract, which can have negative financial and career impacts on athletes. Predatory agents and academies may also organise trials and tournaments without written agreements, thereby sacrificing oversight, insurance, and clear terms, often shifting financial and physical risk onto athletes and their families. In some cases, this is contracted out to third parties who, to circumvent visa requirements, book flights and obtain visas on "dummy tickets", leaving athletes stranded when seeking to return home after trials or tournaments.

WHY ABUSE IS OFTEN HIDDEN

Even when harm occurs, most athletes do not report it. Reasons include fear of losing their career or opportunities; belief that abuse is “normal” in sport; lack of trust in authorities; not recognising that what they experienced is abuse; and/or isolation from family or support systems.

Many disclosures happen slowly, informally, or not at all.

Moreover, retaining passports or visas, restricting movement, or conditioning documentation support on compliance or performance may escalate into maltreatment or trafficking. Even where the formal, legal requirements of recruitment have been met, recruitment practices that ignore education continuity, health care, psychosocial support, or child protection obligations, and prioritise performance outcomes are equally problematic. Such practices can undermine career prospects and impose significant financial hardship on athletes and their families. In Part II of the toolkit, we will delve more deeply into these points and discuss how to spot common red flags.

Further exposure to harm may be inflicted on athletes due to poor practice. Poor practice refers to the behaviour of an individual in a position of authority/responsibility that falls below the required standard of a sporting organisation’s code of conduct and safeguarding policy. Poor practice may not be immediately dangerous or intentionally harmful to an athlete, but it can have a multiplier effect. When organisations fail to receive, recognise, or appropriately manage reports of poor practice, early warning signs remain unaddressed, increasing the risk of harm and allowing situations to escalate. While some poor practice arises from misunderstanding or lack of safeguarding awareness, other behaviours are deliberate and function as grooming strategies, involving the manipulation of contexts and the incremental erosion of boundaries through minor rule-breaking to test institutional and individual safeguards. Over time, this normalisation of boundary violations can create an environment conducive to more serious abuse. The grooming process may involve everyday activities that start off as innocuous but become progressively more inappropriate over time, such as providing (unsupervised) transport, giving disproportionate attention to a particular athlete or athletes, or engaging in unnecessary physical contact.



In some cases, this can lead to the maltreatment, exploitation and trafficking of migrant youth athletes. Sextortion is increasingly being reported in numerous sports, including at the elite level (such as those competing at the national or Olympic level). Sextortion refers to the corrupt practice in which those in positions of authority exploit their power for sexual benefit.[xv] Although sextortion overlaps with other forms of sexual abuse, including harassment and assault, it is distinguished by the use of authority and power asymmetries as the primary means of coercion. Rather than relying on overt force, sextortion typically operates through implicit or indirect threats, whereby sexual compliance is framed as a condition for access to opportunities, protection, or advancement within the sporting environment.[xvi] Disclosure and reporting of this form of maltreatment is low – with less than 1 in 5 formally reporting.

Differentiated risk factors are also observed between the Global North and Global South, and within marginalised communities.[xvii] The Larry Nassar case exposes how sexual abuse in sport is enabled by profound power imbalances and sustained institutional failure: over decades, Nassar abused more than 300 gymnasts, ranging from amateur athletes to Olympic medallists, while athletes felt unable to refuse or report abuse for fear of losing selection, funding, or their careers. Despite complaints dating back to 1997, Michigan State University and USA Gymnastics failed to act, actively dismissing or suppressing reports and prioritising performance, medals, and organisational reputation over athlete safety. [xviii]

Comparable patterns have been documented globally, including allegations against the president of the Haiti Football Federation for coercing players with threats of expulsion, and the long-term concealment of sexual abuse by officials within Mali's national basketball federation. Evidence from Europe further underscores the scale of the problem, with studies indicating that one in three elite athletes in Germany has experienced sexual violence, often involving abuse of authority.[xiv] Sextortion and sexual abuse in sport are systemic, undermining the right to safe participation and eroding sport's capacity to function as a positive social and developmental institution. This is particularly salient when considering the precarity and vulnerability of migrant youth athletes – some of whom may have been exposed to similar harm prior to their migration journeys – which multiplies their risk for future abuse or exploitation.

At the extreme end of the continuum is the trafficking of athletes. Sport has not been spared from such exploitative practices. There is a growing recognition amongst the sporting fraternity that "sport trafficking" is a pervasive problem robbing thousands of young, aspiring athletes of their dreams. Sport trafficking is conceptualised as constituting three subsets: "trafficking in sport", "trafficking through sport", and "trafficking around sport".[vi] The former two affect athletes directly.

TYPE	DEFINITION	VICTIM PROFILE	NATURE OF EXPLOITATION	LINK TO SPORT
Trafficking in Sport	Exploitation happens within sport itself (e.g. football, athletics, basketball, combat sports).	Athletes (often minors)	Forced labour, debt bondage, or exploitative contracts within sport. May include sexual exploitation.	Sport is the site of exploitation.
Trafficking through Sport	Sport is used as a lure for trafficking into non-sport industries.	Aspiring athletes	Sex trafficking, forced labour, criminal exploitation.	Sport is the recruitment tool.
Trafficking around Sport	Trafficking occurs on the fringes of sport (major events, supply chains).	Non-athletes, event-related workers	Construction, hospitality, manufacturing, sex trade.	Sport creates demand for exploitation.

Trafficking in sport refers to exploitation within sport itself, as athletes are commodified. Their labour is extracted by predatory agents, coaches and academies, which often use debt bondage or exploitative contracts to bind them. Coercion is typically psychological or financial. Like with sextortion, selection to compete or be part of the team is used to ensure compliance. In some cases, systematic sexual exploitation of (elite) athletes has also been observed. For instance, the USA Taekwondo case illustrates how coaches leveraged their authority to groom and sexually exploit female athletes, including minors, while also subjecting them to forced labour through intimidation and threats of exclusion from Olympic pathways. In the case of major league baseball, restrictive migration regimes and geopolitical tensions have channelled Cuban athletes into smuggling routes via third countries, where organised criminal networks extract significant portions of future contracts, exposing players to coercion, debt bondage, and extortion. Likewise, football is replete with cases of migrant youth athletes falling prey to traffickers. Unregulated football academies frequently separate children from their families and impose harsh training regimes that prioritise profit over athlete welfare, obscuring the line between talent development and trafficking (often resulting in abandonment when players are injured out of the sport).



Trafficking through sport refers to the insidious use of sport as a lure to exploit aspiring athletes in sectors outside of sport. In such cases, victims are rarely, if ever are able to achieve their sporting goals as their formative sporting years are spent elsewhere engaged in forced labour, forced prostitution and other forms of sexual exploitation, and even forced criminality. In such instances, predatory actors (such as scouts, agents, intermediaries or those posing as them) use the dream of a sporting career to recruit and exploit youth athletes, either through financial exploitation and abandonment once their resources have been extracted or exploitative labour. For instance, there have been numerous cases where West African and South American footballers promised trials in Europe only to be abandoned and later trafficked into sexual exploitation, forced labour or forced criminality.



As with other forms of maltreatment within sport, victims rarely disclose exploitation – particularly while they are active in the sport. Some victims are able to compete at elite levels despite horrific abuse and exploitation, whilst others drop out of sport entirely – their potential never met. Athletes are well-known for their ability to mask pain and discomfort, and harsh training regimes, which further cloud our ability to readily recognise signs of maltreatment. Coupled with significant underreporting and a lack of awareness of what constitutes maltreatment by athletes or their rights, it is thus imperative that those working directly with migrant youth athletes are able to spot early warning signs and recruitment-related “red flags”. Part II of the toolkit provides a detailed examination of indicators and case studies associated with unethical recruitment and exploitation.

HARM IN SPORT HAPPENS ON A SPECTRUM

Abuse and exploitation in sport rarely begin with obvious or extreme acts. Instead, they develop gradually over time, often starting with behaviours that seem minor or are easily dismissed. This progression is known as the “continuum of harm” – an escalation from poor practice to serious exploitation.

Grooming plays a central role in this process, and both grooming and abuse are increasingly occurring online (through social media, messaging apps, and digital recruitment platforms).

- 1. Poor Practice.** This refers to behaviour that falls below acceptable standards but may not immediately appear harmful. And in many cases, doesn't progress any further. However, they may signal the need for more vigilance and surveillance from the safeguarding team. Examples include favouritism, excessive control, inappropriate communication, or “boundary crossing” (where adults blur professional boundaries, such as non-sport-related private messaging or spending unsupervised time with an underage or vulnerable athlete). These behaviours are often normalised or ignored, but they create opportunities for further harm. Poor practice should be regarded as an early warning sign for potential future abuse.
- 2. Grooming.** Grooming is a deliberate process where an individual builds trust with an athlete in order to manipulate, exploit, or abuse them later. This person can be a coach, another athlete, a member of staff, a volunteer, an agent, a recruiter, or even a parent or journalist. It often begins during the poor practice stage and develops gradually if at the club or academy level. Strategies may include giving special attention, gifts, or opportunities; isolating the athlete from peers or family; gradually breaking down boundaries (moving from professional to personal communication, touching the athlete outside of training, or unnecessarily); and testing compliance (obedience/submissiveness/willingness) through small rule-breaking behaviours. Grooming increasingly takes place online. This may include private messages on social media, requests for photos, or personal information, promises of trials or contracts via informal digital channels. Grooming is often hidden and difficult to detect, but it is a key pathway to more serious abuse.
- 3. Unethical Recruitment.** This stage involves the use of unfair or dishonest practices in recruiting athletes. Examples include false promises about contracts or opportunities; charging illegal fees or creating debt; a lack of informed consent (not fully understanding agreements); and conflicts of interest (agents representing both the athlete and the club). Online recruitment has increased risks, including fake agents, clubs or academies contacting athletes through social media, informal “offers” without contracts, or digital deception about visas, travel, or opportunities. These practices create dependency, financial pressure, and vulnerability to exploitation.

4. Abuse and Exploitation. Forms of abuse include:

a. Physical abuse (harm to the body). It can involve kicking, punching, hitting, pushing, shaking, or burning an athlete; forcing someone to train or compete when injured, sick or exhausted; using excessive or dangerous training as a punishment. Physical abuse is often hidden in sport and categorised as “discipline” or “tough training”, which can make it difficult to recognise.

b. Emotional/psychological abuse (shaming, threats, control). Emotional abuse harms a person’s self-worth, confidence and mental well-being. It can include constant criticism, humiliation or shouting; threats (such as losing a place on the team, selection or being sent home); ignoring or isolating an athlete; controlling behaviour (when and what an athlete can eat or sleep; restricting friendships or communication); bullying, intimidation or manipulation.

c. Sexual abuse (where someone is forced, pressured or manipulated into sexual activity). It often involves grooming and a misuse of power by a person in authority (such as a coach, agent, support staff, or older athlete). Sexual abuse is not limited to physical violence. It includes physical acts such as unwanted touching and groping, forced kissing, sexual assault (sexual contact without consent), rape, or penetration with an object; non-contact acts such as sexual comments, jokes, exposure of genitals, showing pornographic material or child sexual abuse material; online abuse such as requesting or sending sexual texts, images, or videos.

d. Sextortion: a form of exploitation where someone in power demands sexual acts or images in exchange for opportunities. This is increasingly facilitated online (through coercive image-sharing or threats to expose private content, images and videos are used as blackmail to further the abuse and ensure compliance/non-reporting).

e. At the extreme end is human trafficking, where athletes are treated as commodities. Human trafficking is where a person is recruited, moved, or controlled through deceptive or coercive means (fraud, force, threats, abuse of power, abuse of vulnerability) for the purpose of exploitation (e.g. forced labour, sexual exploitation, forced criminality). Human trafficking may also involve debt bondage. Trafficking in sport often begins with false promises. Offers of trials, contracts, scholarships, or professional careers, and assurances about visas, salaries, or living conditions. However, once the athlete is recruited or moved, the reality may be very different. Exploitation can involve being forced to train or compete without fair pay; having wages withheld or controlled; being trapped in debt (owing money for travel or “placement fees”); confiscation of passports or documents; threats of being reported to immigration authorities; or sexual exploitation or organised abuse. Athletes may feel unable to leave due to fear, dependency, or lack of alternatives. Three common forms have been identified in sport: trafficking in sport – where exploitation happens in sport itself; trafficking through sport – where sport is used as a lure or false promise, and athletes are recruited but exploited outside of sport; trafficking around sport – exploitation linked to the wider sporting industry. Migrant youth athletes may be at higher risk than the general athlete population due to their unique vulnerabilities.

Key Takeaway

Harm in sport often begins with small, easily overlooked behaviours, which may develop into grooming, abuse, exploitation, and even trafficking. Recognising early warning signs, both offline and online, is essential to preventing serious harm.

1.3 The Trauma-Informed Lens: Recognising trauma and its impact on disclosure and trust

CONCEPT

A trauma-informed approach means understanding that past experiences, such as violence, displacement, loss, or exploitation, affect how young athletes behave, trust others, understand risk, and decide whether to speak up.

Trauma can change how the brain processes memory, emotions, or threat. This means athletes may:

- Struggle to explain what happened
- React strongly to small triggers
- Appear withdrawn, angry, or overly compliant
- Continue performing at a high level while experiencing harm
- Importantly, trauma is not always visible.

WHY IT MATTERS

Without a trauma-informed approach, coaches and other grassroots Safesport practitioners may misinterpret behaviour as attitude or discipline issues. Signs of abuse may be missed, and athletes may feel unsafe to disclose.

Key challenges:

- Disclosure is often delayed, partial, or indirect
- Athletes may not recognise abuse due to normalisation in sport
- Fear of losing selection, income, or status prevents reporting
- Sport culture can make this worse:
- Emphasis on toughness and obedience
- Pressure to perform despite harm
- Silence around abuse

Adult responses are critical. If a coach or other SafeSport practitioner dismisses concerns, minimises harm, or encourages “toughness”, this can:

- Shut down future disclosure
- Reinforce harm
- Increase long-term trauma

WHAT TO DO

i. Recognise different trauma responses

Do not expect obvious signs. Athletes may:

- Withdraw or disengage
- Show anger or irritability
- Become overly compliant
- Focus intensely on performance
- Show no visible distress

ii. Create conditions for trust

- Check in regularly with athletes
- Provide private (but not isolated), safe spaces to talk
- Be consistent and reliable
- Practice active listening

Avoid:

- Public confrontation
- Dismissive language
- Immediate judgement

iii. Respond appropriately to disclosure

When an athlete speaks up:

- Listen carefully
- Stay calm
- Take it seriously
- Do not investigate yourself
- Follow reporting procedures
- Your response should support the athlete and protect them from further harm.

iv. Understand barriers to reporting

Athletes may not report because:

- They depend on the person causing harm
- They fear losing opportunities or retaliatory harm to themselves or their family
- They think nothing will change
- They do not fully understand the harm

v. Apply four core trauma-informed principles

Realise: Understand trauma affects behaviour.

Recognise: Identify possible signs of trauma.

Respond: Act appropriately and follow procedures.

Resist re-traumatisation.

Avoid actions that shame, pressure, or remove control.

vi. Build trauma-informed environments

At the club level, this means that:

- All staff and volunteers should be trained
- Clear safeguarding procedures should be established
- Access to support services be provided
- Consent-based approaches be followed (e.g. physical contact, medical care)
- Athlete voice in decision-making is included

WHAT THIS MEANS IN PRACTICE

An athlete may keep performing, say nothing and appear “fine”, and still be experiencing harm. If they do speak and are dismissed, they may never speak again. Your response is often the turning point between protection and continued harm.



DELVE DEEPER

Understanding vulnerability and harm in sport requires more than identifying abusive practices; it also demands attention to how trauma shapes athletes’ behaviour, decision-making, and willingness to seek help. A trauma-informed lens recognises that migrant youth athletes may have prior experiences of violence (e.g. adverse childhood experiences), displacement, loss, or exploitation, which can be compounded by abuse within sporting contexts. These experiences affect how trauma is processed and expressed, often influencing memory, communication, trust in authority, and perceptions of risk. A trauma-informed approach to safeguarding is thus imperative, as disclosure may be delayed, fragmented, or absent, and responses grounded in safety, empathy, and empowerment are essential for building trust and preventing further harm or revictimisation.

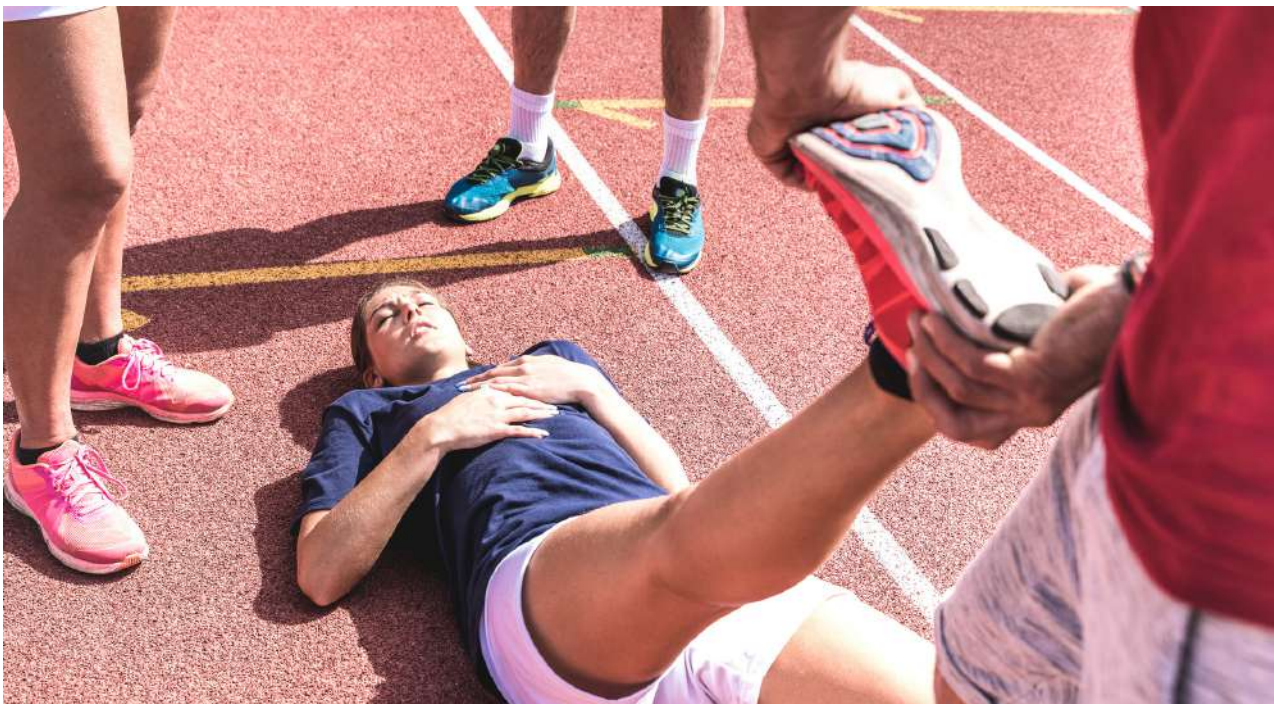
TRAUMA AFFECTS

1. **Memory:** accounts may seem inconsistent (unreliable).
2. **Behaviour:** anger, withdrawal, or perfectionism.
3. **Trust:** reluctance to speak to authority figures.
4. **Decision-making:** fear-based responses.

This means that not speaking up does not mean nothing is wrong, and behaviour that seems “difficult” may actually be a coping mechanism.

As a social worker, educator, or coach, reporting possible maltreatment of youth and children under the age of 18 years is, in most member states, a statutory requirement (legal obligation). Due to the very nature of sport and the sporting ecosystem, recognising trauma and maltreatment, however, is challenging, often resulting in underreporting. Moreover, reporting practices are shaped by an individual’s attitudes, beliefs and level of knowledge. Inconsistent reporting invariably leaves youth athletes exposed to continuing harm, increasing the likelihood of suffering the cumulative effects of long-term trauma.(xxi)

Trauma can alter brain structure and functioning, shaping behaviour, memory, emotions, judgement, and physical health. Key brain regions affected include the amygdala, which becomes hypervigilant and primes the body for threat responses; the hippocampus, which supports memory and emotional processing but may struggle to distinguish past from present following trauma; and the medial prefrontal cortex, which is responsible for evaluating situations and regulating responses. Trauma disrupts the connection between these systems, often resulting in fragmented or incomplete memories and automatic, protective reactions that are not consciously controlled. As a result, individuals may respond intensely to seemingly minor cues, such as smells or environmental changes, that trigger traumatic associations, leading to reactions that can appear disproportionate but reflect the brain's attempt to ensure safety.(xxii)



Elite sport environments differ fundamentally from recreational settings, as high-performance cultures often normalise the sacrifice of athletes' health and well-being in pursuit of success. Within these contexts, maltreatment may be tolerated or reframed as an acceptable cost of elite achievement. Athletes who challenge such norms risk social and professional repercussions, including criticism from coaches, exclusion from teams, stalled progression, or contract termination. The intense emphasis on performance outcomes fosters cultures of silence and secrecy, where fear of losing selection or status discourages reporting, rendering the endurance of maltreatment a perceived lesser risk than speaking out.[xxiii] Moreover, athletes may exhibit symptoms of maltreatment differently from the general population due to the culture of sport, predicated on obedience and the suppression of emotion.[xxv] It is important to remember that every individual experiences trauma differently, nor is there a single trauma response. Trauma responses may be physical and/or emotional.[iii] Athletes may exhibit no outward signs of how we expect trauma to manifest, such as emotional turmoil, regressive behaviours or anxiety, but may instead become hyper-focused on perfectionism.

Following experiences of maltreatment and exploitation, youth athletes weigh multiple factors when deciding whether to disclose, including their relationship with trusted adults, anticipated responses, perceived consequences, and their own interpretation of the harm experienced. Disclosure is most often directed to parents and, less frequently, to coaches, with decisions shaped by expectations of support or fear of dismissal, particularly when authority figures are implicated.[xxvi] Many athletes struggle to recognise maltreatment due to its normalisation within sport cultures or limited understanding of its forms, leading them to remain silent or minimise their experiences. Disclosure is rarely a single event; rather, it unfolds through ongoing, informal conversations that are often met with normalisation, dismissal, or encouragement to “toughen up,” reinforcing silence and self-blame. Even supportive responses frequently functioned as stress buffers, providing short-term emotional relief without action, thereby preventing escalation to formal reporting and leaving children in harmful environments. Overall, adults’ initial responses to disclosure are pivotal, with normalising or dismissive reactions consistently undermining trust, discouraging future disclosure, and perpetuating cycles of unaddressed harm within sport.[xxvii]

Psychological safety is known to facilitate authentic self-expression, open communication with coaches, and engagement in difficult conversations within teams. Although educational programmes can improve awareness of safeguarding and reporting maltreatment and exploitation, they are often developed without sufficient consideration of athletes’ lived experiences and needs.[xxviii] Co-creation approaches are therefore essential to design educational materials, fostering psychological safety and creating conditions that support disclosure and speaking out about maltreatment. One approach to addressing this challenge is the use of hypothetical scenarios or vignettes, which allow athletes to consider how they might respond to incidents of maltreatment and indicate their reporting intentions in a controlled setting.[xxix] This is an important exercise for social workers working with athletes and in sporting environments to perform, create a baseline for reporting, and establish relationships of trust and psychological safety.



There are four core assumptions of a trauma-informed approach in sport:

i. Realise: understanding how trauma affects athletes' behaviour and recognising that actions often labelled as "problematic," such as hyperarousal (outbursts of anger or irritability) or non-compliance, may in fact be adaptive coping responses developed to survive earlier harm and can resurface when athletes are triggered or re-traumatised.

ii. Recognise: identifying signs of trauma through education, screening, and assessment, while acknowledging that trauma may manifest differently in athletes, for example, through somatic symptoms or disengagement from rehabilitation.

iii. Respond: organisational responsibility to integrate this understanding into practice by training staff, clarifying reporting duties, and ensuring access to appropriate supports, ranging from psychoeducation to specialist mental health services.

iv. Resist: preventing re-traumatisation by acknowledging that sport environments can be coercive or triggering and by deliberately embedding trauma-informed principles, such as transparency, consent, and clear rationales for practices and decisions.[xxx]

It is thus imperative that coaches and sport organisations create trauma-informed institutions with clear safeguarding policies, transparent and safe reporting mechanisms, mandatory trauma-informed training for all staff and volunteers working with youth athletes, team culture audits, athlete-centred decision making, proactive wellness initiatives, and consent-based coaching and support services (e.g. physiotherapists, doctors). [xxxi]

FOUR KEY ACTIONS IN A TRAUMA-INFORMED APPROACH

1. **Understand (Realise)** how trauma affects behaviour
2. **Identify (Recognise)** signs of harm
3. **Act (Respond)** with proper support and reporting systems
4. **Prevent (Resist)** further harm by creating safe environments

What this looks like in practice:

- Safe and clear reporting systems
- Trained staff who understand trauma
- Athlete-centred decision-making
- Environments built on trust, transparency, and consent



Conclusion

Effective protection of migrant youth athletes requires systemic accountability, ethical recruitment practices, robust governance, and trauma-informed institutions that recognise vulnerability as contextual and layered. Exploitation in sport rarely emerges in isolation. Rather, it evolves through tolerated boundary violations, weak governance, and institutional failures that prioritise performance, profit, or reputation over athlete welfare. Early warning signs are frequently missed or dismissed, allowing harm to escalate and become entrenched within sporting systems.

Safeguarding responses must be grounded in a trauma-informed understanding of migrant youth athletes' lived experiences. Trauma shapes how harm is experienced, interpreted, and disclosed, and sport-specific cultures of obedience, silence, and endurance further suppress reporting. Without psychological safety, trust, and informed adult responses, disclosure remains limited and protection mechanisms ineffective.



Chapter 2

LEGAL AND ETHICAL DUTIES

2.1 The Rights Foundation: Overview of the UNCRC and labour and athlete rights frameworks; 2.2 Duty of Care and Liability; 2.3 Organisational Integrity: Why policy and transparency prevent exploitation.

Introduction

As a SafeSport practitioner, it is integral that you are knowledgeable of the normative and institutional foundations that govern the protection of migrant youth athletes. Sport is situated within broader international human rights, labour, and safeguarding frameworks. The vulnerability of youth in sport arises where rights frameworks are poorly understood, professional duties are weakly articulated, and organisational governance lacks transparency. By mapping these foundational elements, the chapter provides the legal and ethical baseline against which exploitative practices in sport can be identified, assessed, and prevented.



The chapter is divided into three parts. Firstly, it surveys the rights-based frameworks applicable to migrant youth athletes, beginning with the United Nations Convention on the Rights of the Child (UNCRC) as the primary international legal instrument. It situates children and youth in sport simultaneously as rights-holders, workers-in-waiting, and developing athletes, and observes how international labour standards, the European Union regional framework, and sport federation regulations intersect, overlap, and at times conflict. Where rights frameworks are fragmented or selectively applied, this can create regulatory blind spots that facilitate maltreatment and exploitation

Secondly, the chapter explores the concept of duty of care and associated liabilities in professional sporting contexts. It interrogates the responsibilities of coaches, agents, clubs, academies, and sport governing bodies when exercising authority over minors, especially in transnational and residential sport environments. Lastly, the chapter reviews organisational integrity as a preventative mechanism, examining why robust policy frameworks, procedural clarity, and institutional transparency are essential to reducing the risk of maltreatment and exploitation.

2.1. Human Rights Foundation: Overview of the UNCRC and labour and athlete rights frameworks

CONCEPT

There is no single law that protects migrant youth athletes. Instead, their rights come from a combination of systems, including:

- Children's rights (for those who are under 18)
- Human rights (basic rights for all people)
- Labour laws (because sport can involve work and money)
- Migration laws (because they move across borders)
- Sport rules and policies

This means migrant youth athletes are protected in different ways at the same time, but also that gaps can exist.

The most important foundation is the child rights framework if the athlete is under the age of 18. Every decision involving a child must prioritise their safety, development, and well-being.

WHY IT MATTERS

Because there is no single system, responsibilities are often unclear or avoided, athletes can fall between systems (sport, labour, migration), and/or clubs or agents may prioritise performance or profit over welfare.

Key risks:

- Athletes under 18 are treated as assets instead of children
- Education and health are ignored
- Contracts that benefit others more than the athlete
- Lack of accountability when harm occurs

A major issue is legal classification. Many athletes are not seen as "workers". This limits access to labour protections (fair pay, working conditions). For migrant youth athletes, this creates a high level of dependency on agents for opportunities, on clubs for visas, and on systems they do not fully understand.



WHAT TO DO

i. Use a “child-first” approach in all decisions concerning minor athletes

Always ask:

Is this in the best interests of the child?

- Does this support their development, health, and education?
- Sport success must never override these.

ii. Understand the core rights you must protect

Best interests of the child: Every decision must prioritise the athlete’s wellbeing over performance or profit.

Right to development: Athletes need education, health care, and life skills beyond sport.

Right to be heard: Athletes must be consulted, understand decisions affecting them, and be able to say no.

Right to protection from harm: Protection from abuse (physical, emotional, sexual), exploitation (financial or labour), and trafficking.

Right to health: Safe training, proper injury care, and mental health support.

Right to education: Schooling must continue alongside sport. Training must not replace education.

Protection from economic exploitation: No unfair contracts, no excessive financial pressure, and no situations where athletes are treated as commodities

iii. Check recruitment and development systems

Ensure:

- Education is included in training programmes
- Living conditions are safe and appropriate
- Guardianship arrangements are clear
- Athletes are not isolated from family without proper safeguards

iv. Strengthen informed consent

Before any decision, explain risks and expectations.

Check understanding: Use simple language and account for language barriers. Involve parents/guardians.

Consent must be:

- Appropriate for age
- Informed (they understand)
- Voluntary (no pressure)

v. Recognise trafficking risks in sport

A situation may involve trafficking if the athlete is recruited or moved à through deception, pressure, or abuse of power à for the purpose of exploitation. For children under 18, even without force or coercion, it may still be trafficking.

vi. Do not rely only on contracts or legal status

Even if a contract is signed or a visa is valid – this does not mean the situation is safe or fair.

Always assess real conditions, power dynamics, and the athlete's well-being.

vii. Build accountability in your organisation

Club policies should be aligned with child rights standards. This means that there must be clear safeguarding procedures, reporting mechanisms and independent oversight where possible. Avoid conflicts of interest (e.g. agents acting for both sides).

viii. Coordinate with other systems

Where possible, work with schools, social and child protection services, and migration authorities. Ensure athletes are not “invisible” to protection systems. This also means that migrant athletes should register with their country of origin's embassy upon arrival in the country, as well as complete any other statutory residence registration processes.



WHAT THIS MEANS IN PRACTICE

A young athlete can have a contract, be training at a high level, be legally in a country, and still have their rights violated. If:

- Their education is ignored
- Their health is compromised
- They cannot speak freely
- They depend entirely on one organisation or individual

then their rights are not being protected.

Your role is to look beyond performance and ensure the minor athlete is treated as a child first, not a commodity. Similar concerns apply for youth athletes.

DELVE DEEPER

There is no standalone legal regime dedicated exclusively to the rights of migrant youth athletes. Similarly, there is no single, standalone legal instrument codifying athletes' rights as a discrete legal category. Instead, their protection derives from the intersection of international children's rights law, labour standards, migration governance frameworks, EU law, and sport-specific policy instruments. Migrant youth athletes occupy a particularly vulnerable position at this intersection: they are simultaneously children, developing athletes, and often also economic actors within a globalised sport industry.

At the international level, the foundational sources of athletes' rights are the Universal Declaration of Human Rights (UDHR 1948), the European Convention on Human Rights (ECHR 1950), the International Covenant on Economic, Social and Cultural Rights (ICESCR 1966), and the International Covenant on Civil and Political Rights (ICCPR 1966). These instruments collectively enshrine a broad spectrum of civil, political, economic, social, and cultural rights directly relevant to athletes, including non-discrimination, freedom of expression and association, the right to privacy, the right to health, just and favourable conditions of work, and access to effective remedies. Although these treaties are not sport-specific, their provisions apply fully to athletes, including in high-performance and elite sport contexts. Importantly, they impose positive obligations on States to protect individuals from rights violations by third parties, including private actors such as sport clubs, federations, event organisers, and commercial partners. Migrant youth athletes' rights must therefore be assessed through a composite legal lens, with the United Nations Convention on the Rights of the Child (UNCRC 1989) serving as the primary normative foundation.

HUMAN RIGHTS, CHILD RIGHTS, AND ATHLETE PROTECTION

There is no single law protecting migrant youth athletes. Their rights come from a mix of child rights, human rights, and labour laws:

- Human rights law (basic rights for all people)
- Children's rights law (extra protection for under 18s)
- Labour law (rules about work and exploitation)
- Migration law (rules about moving across borders)
- Sport rules and policies (set by federations and organisations).

The most important rule is: the child's well-being must always come first. Gaps in the system mean young migrant athletes are at high risk of exploitation.

United Nations Convention on the Rights of the Child

The UNCRC provides the overarching framework for guiding all decisions affecting migrant youth athletes under 18 in sport, including recruitment, representation, training, cross-border transfers, residence in academies, and contractual arrangements. Its core principles, non-discrimination (Article 2), best interests of the child (Article 3), survival and development (Article 6), and the right to be heard (Article 12), apply irrespective of nationality, migration status, or economic value.

For migrant youth athletes, the “best interests” principle must be the primary consideration in any decision affecting them. Commercial or sporting priorities cannot lawfully override developmental and protective considerations.

Right to Life, Survival and Development (Article 6)

Article 6 requires that all decisions affecting young athletes promote their holistic development, encompassing physical health, mental well-being, social integration, and educational progression. In high-performance sport systems, risks such as overtraining, early specialisation, psychological pressure, and social isolation are amplified for migrant youth who may be separated from familial support structures. A rights-compliant model of athlete development must therefore adopt a holistic talent development approach, integrating:

- Athletic skills development (technical, tactical, physical, and psychosocial competencies);
- Health and well-being safeguards (physical, mental, and social protection);
- Life readiness preparation, including educational attainment and transferable skills beyond sport.



Failure to provide such integrated developmental pathways may constitute neglect of the child's developmental rights under international law.

Right to Protection from Separation (Article 9)

Cross-border recruitment frequently entails the relocation of minors away from their families. Under Article 9, separation from parents is permissible only when consistent with the child's best interests. Migrant youth athletes placed in residential academies, particularly in foreign jurisdictions, require careful assessment of guardianship arrangements, living conditions, and access to familial contact. Where recruitment mechanisms result in abandonment, irregular migration status, or effective social isolation, such practices may contravene the Convention's protections and potentially engage trafficking or exploitation frameworks.

Right to Be Heard (Article 12)

Article 12 guarantees children capable of forming their own views the right to express those views freely in all matters affecting them, with due weight given according to age and maturity. In the context of migrant youth sport, this provision is critical in addressing structural power asymmetries between minors and powerful institutional actors such as clubs, agents, sponsors, and federations.

Migrant youth athletes must be meaningfully consulted regarding:

- International transfers;
- Contractual commitments;
- Training schedules and performance expectations;
- Living arrangements in residential academies;
- Educational pathways.



Consent must be informed, voluntary, and developmentally appropriate. Procedural safeguards must ensure that young athletes can raise concerns about mistreatment, exploitation, or unfair dismissal, either directly or through independent representation.

Protection from Violence, Abuse and Exploitation (Articles 19, 34, 35)

High-pressure elite sport environments present documented risks of physical, psychological, and sexual abuse, particularly where hierarchical authority structures remain unchecked. Migrant youth athletes may be especially vulnerable due to language barriers, dependency on intermediaries, immigration insecurity, and limited access to reporting mechanisms.

Article 19 obliges States to protect children from all forms of physical or psychological violence, injury, abuse, neglect, maltreatment, or exploitation. Article 34 addresses sexual abuse, and Article 35 prohibits the abduction, sale and trafficking of children. Moreover, where recruitment practices involve deception, coercion, document confiscation, debt arrangements, or abandonment, such conduct may meet international trafficking thresholds under the UN Protocol to Prevent, Suppress and Punish the Trafficking in Persons, Especially Women and Children (2000).

Right to Health (Article 24)

Article 24 recognises the right of every child to the highest attainable standard of health. For migrant youth athletes, this entails:

- Access to quality medical care;
- Safe training conditions;
- Protection from overtraining and premature return-to-play decisions;
- Adequate nutrition and living conditions;
- Access to mental health support.

Given the physical intensity of competitive sport, neglect of injury recovery or coercive performance expectations may constitute a violation of health rights. Cross-border recruitment arrangements must ensure continuity of healthcare regardless of economic or regional disparities.



Right to Education (Article 28)

The right to education cannot be subordinated to sporting performance objectives. Migrant youth athletes frequently face disruptions to schooling due to international transfers or intensive training schedules. Academies and clubs must therefore guarantee structured educational provision consistent with national law and international standards. The absence of educational programming not only undermines long-term life prospects but may also indicate exploitative prioritisation of short-term sporting gain over developmental welfare.



Protection from Economic Exploitation and Hazardous Work (Article 32)

Article 32 protects children from economic exploitation and from performing work likely to be hazardous or harmful to their development. Where youth athletes generate commercial value through contracts, sponsorships, or prize incentives, safeguards must ensure that financial arrangements prioritise long-term welfare rather than immediate commercial gain.

Premature professionalisation, unfair contractual clauses, excessive performance-linked incentives, or exploitative sponsorship arrangements may infringe Article 32. In severe cases, Article 35 (prohibition of the sale of children) may also be engaged.

The United Nations Convention on the Rights of the Child is built on four core principles:

- 1. Non-discrimination** – all children must be treated equally
- 2. Best interests of the child** – decisions must prioritise the child, not profit or performance
- 3. Right to develop** – physically, mentally, socially, and educationally
- 4. Right to be heard (participation)** – children must have a say in decisions affecting them

Key Rights of Migrant Youth Athletes

1. Right to Healthy Development

Sport organisations and systems must support physical and mental health, education and life skills beyond sport. Risks associated with sport include overtraining, pressure, isolation, and dropping out of school.

2. Right to Family and Care

Young athletes should not be separated from their families unless it is truly in their best interests. Risks associated with high-mobility sports include being sent abroad alone, poor living conditions, and abandonment.

3. Right to Have a Voice

Young athletes must be consulted on contracts, transfers, and training, and be able to give informed and voluntary consent. Power imbalance with coaches, agents, and clubs risks suppressing their voices.

4. Protection from Abuse and Exploitation

Athletes must be protected from physical, emotional, or sexual abuse, exploitation or trafficking. In the case of children, exploitation can count as trafficking even without force or coercion.

5. Right to Health

Athletes must have access to medical care, safe training conditions, and mental health support. This right may be violated when athletes are forced to play injured or train excessively.

6. Right to Education

Sport must not replace schooling. Clubs and academies must not only focus on performance, leaving athletes with no future outside of sport.

7. Protection from Economic Exploitation

Children must not be treated as profit-generating assets through unfair contracts, early professionalisation, or financial exploitation.

8. Labour and Anti-Trafficking Protections

Additional protections come from labour standards like those of the International Labour Organization, which prohibit forced labour, hazardous child labour, and exploitative working conditions.

However, a major problem with protecting athletes' rights is that many are not legally classified as workers, so they may miss out on labour protections. More needs to be done to protect their rights – especially if they are still children or youth.

Broader International and EU Frameworks

In addition to the UNCRC, migrant youth athletes are protected under broader human rights instruments, including the UDHR, ICCPR, ICESCR, and relevant ILO Conventions on child labour and forced labour. Within the EU context, the Charter of Fundamental Rights, labour directives, anti-trafficking legislation, and data protection regulations provide complementary protections.

The UN Protocol to Prevent, Suppress and Punish the Trafficking in Persons, Especially Women and Children (2000) establishes a comprehensive international legal definition of trafficking through a tripartite test: the act (recruitment, transportation, transfer, harbouring, or receipt), the means (coercion, fraud, deception, abuse of power), and the purpose (exploitation). Although not sport-specific, its broad definition clearly encompasses scenarios in which athletes are recruited or transported through deception or coercion for exploitative purposes disguised as professional opportunities. Crucially, in the case of children under 18, the “means” element is not required, significantly lowering the evidentiary threshold and strengthening protection for trafficked child athletes.[xxxii]

The Protocol imposes binding obligations on states to criminalise trafficking, provide victim protection (including accommodation, healthcare, legal assistance, and compensation), and adopt preventive measures addressing structural vulnerabilities. However, its criminal justice orientation, sector neutrality, evidentiary complexities surrounding consent, and inconsistent national implementation create protection gaps, particularly where trafficked athletes are misidentified as irregular migrants and deported rather than recognised as victims.[xxxiii]



In contrast, the International Labour Organization (ILO) framework adopts a labour-rights-based approach, targeting exploitation through binding conventions on forced labour, child labour, discrimination, and equality. Core instruments, including the Forced Labour Convention (No. 29), the Abolition of Forced Labour Convention (No. 105), and the Worst Forms of Child Labour Convention (No. 182), require states to eliminate coercive labour practices, hazardous child exploitation, and discriminatory employment conditions, obligations that extend in principle to athletes. Equality conventions further address structural discrimination affecting migrant athletes in exploitative recruitment systems. However, athletes are often classified as independent contractors rather than workers, excluding them from labour protections. Labour inspectorates rarely scrutinise sport, and child athletes' worker status is frequently unrecognised.(xxxiv)

At the European level, the Charter of Fundamental Rights of the European Union (CFREU 2000) constitutes the primary binding human rights instrument applicable to athletes whenever EU law is engaged. The Charter protects, inter alia, human dignity, equality, freedom of expression, privacy and data protection, fair working conditions, and the rights of the child. These protections are directly relevant to athletes' participation in training, competition, selection, employment, and commercial activities within the European Union. While the Treaty on European Union (TEU) and the Treaty on the Functioning of the European Union (TFEU) are formally addressed to Member States rather than individuals, they nonetheless shape the regulatory environment in which athletes operate. Provisions relating to free movement, non-discrimination, and EU competence in sport (Article 165 TFEU) indirectly structure athletes' rights as EU citizens and economic actors.

In addition, EU labour and social legislation provides important protections for athletes who qualify as workers or employees, particularly those under professional contracts. Relevant instruments include the Directive on Transparent and Predictable Working Conditions (2019), the Working Time Directive (2003), and the Work-Life Balance Directive for Parents and Carers (2019). These instruments regulate working hours, rest periods, contractual transparency, and social protections, and are especially pertinent in relation to training loads, competition calendars, and dual-career challenges.

However, the application of labour protections to athletes is neither uniform nor automatic. The employment status of athletes varies significantly across Member States and sporting disciplines, and is determined by national law on a case-by-case basis. As comparative research demonstrates, elite athletes may be treated as employees in some jurisdictions, while in others they are classified as stipend recipients or beneficiaries rather than workers.[xxxv]

Moreover, while professional athletes often enjoy stronger labour protections, the majority of elite and non-professional athletes operate outside formal employment relationships, which can result in structural gaps in labour and social protection. Nevertheless, irrespective of contractual status, all athletes retain fundamental human rights that must be respected throughout their sporting careers, including during major sporting events.

Sport-specific human rights policy standards

Alongside binding legal instruments, a growing body of sport-specific international policy standards has emerged over the past decade, explicitly articulating athletes' rights within the sporting context. These instruments build upon core international labour and human rights frameworks, notably the ILO Declaration on Fundamental Principles and Rights at Work (1998) and the UN Guiding Principles on Business and Human Rights (2011), which clarify the responsibilities of employers and business actors, including those operating in sport. Key sport-related policy standards include:

- Council of Europe's Code of Sports Ethics (2010);
- International Declaration on Human Rights and Sport (Tbilisi Declaration of 2018);
- Revised European Sports Charter (2021);
- Universal Declaration of Player Rights adopted by the World Players Association (FIFPRO 2017);
- Safe Sport International Declaration and Principles (2014);
- Sporting Chance Principles of the Centre for Sport and Human Rights;
- Olympic Charter (2023), the IOC Code of Ethics (2024), and the IOC Athletes' Rights and Responsibilities Declaration (2018).

The protection of athletes' rights has also been embedded within the broader policy orientation of European institutions (see [a](#)). The EU Work Plan for Sport 2021-2024 and the European Sport Model emphasise a values-based approach to sport, grounded in integrity, inclusion, well-being, and respect for fundamental rights. In addition, athletes' rights and working conditions in and around major sporting events are identified as a priority area for safeguarding the integrity and social legitimacy of sport.(xxxvi)

Other RIGHTS FRAMEWORKS

In Europe, additional protections come from:

- EU human rights laws
- Labour directives (working hours, contracts, etc.)
- Anti-trafficking laws

Sport organisations (like FIFA, UEFA, IOC) also have their own safeguarding rules. These systems are fragmented and inconsistent, especially when applied to migrant youth athletes and non-professional players.

Because there is no single legal system for athlete rights, some athletes are not treated as workers, child protections are not always enforced in sport, and migrant athletes may fall between legal systems.

Both governments and sport organisations must regulate recruitment and transfers; ensure safe living and training conditions; provide reporting systems for abuse and exploitation; and protect migrant athletes across borders.

However, the effectiveness of these frameworks depends significantly on the classification of the athlete's legal status. Many migrant youth athletes fall outside formal employment relationships, limiting access to labour law protections. This regulatory fragmentation can create governance gaps that heighten vulnerability to exploitation.

Sport Governance and Institutional Responsibility

Sport governing bodies and national governments bear shared responsibility for ensuring that recruitment systems, transfer regulations, academy licensing frameworks, and competition rules are aligned with international child rights obligations. The Kazan Action Plan, European Sports Charter, and various IOC and players' association declarations reinforce the expectation that sport governance must integrate human rights due diligence, safeguarding mechanisms, athlete representation structures, and independent grievance procedures. (xxxvii)

For migrant youth athletes in particular, rights protection requires:

- Transparent cross-border transfer regulations;
- Independent guardianship and oversight mechanisms;
- Accessible reporting and remedy channels;
- Coordination between sport authorities and migration authorities.

Below is a selection of the most practised sports in the European Union and their applicable safeguarding and anti-trafficking frameworks:

Football

Governing Frameworks and Bodies

Union of European Football Associations (UEFA) safeguarding and integrity policies focus on violence prevention, protection of minors, fair player movement, and anti-corruption.

Fédération Internationale de Football Association regulations (Statutes, Code of Ethics, RSTP, and intermediary rules) address player welfare, transfers, and exploitation risks, particularly for minors.

Anti-Trafficking Measures

Directive (EU) 2024/1712 strengthens victim protection, mandates data collection, and requires the implementation of prevention strategies, including during major sporting events. Campaigns such as It's a Penalty raise awareness of trafficking risks linked to international tournaments.

Swimming

Governing Frameworks

Operates under EU-wide child protection standards, particularly the Council of Europe safeguarding frameworks for sport, which require the prevention of abuse and mandatory safeguarding policies in sporting bodies.



Tennis

Governing Frameworks

Regulated within EU sport integrity systems covering athlete mobility, anti-doping, corruption prevention, and safeguarding obligations.

Anti-Trafficking Measures

Cross-border player movement is governed by EU human rights and anti-trafficking laws, ensuring safeguards against exploitation in training, transfers, and representation arrangements.

Gymnastics

Governing Frameworks

Subject to strict EU safeguarding requirements, including mandatory child protection standards across sport organisations, and human rights protections addressing abuse, coercion, and discrimination, supported by Parliamentary Assembly of the Council of Europe resolutions.

Anti-Trafficking Measures

Protection is reinforced through EU trafficking directives and monitoring mechanisms such as the Group of Experts on Action against Trafficking in Human Beings (GRETA).

5. Golf

Governing Frameworks

Falls under EU sport governance principles promoting integrity, safeguarding, and prevention of violence, applicable across all organised sport structures.

Anti-Trafficking Measures

Covered by horizontal EU legal instruments, including Directive 2011/36/EU and Directive (EU) 2024/1712, ensuring protection across athlete mobility and employment pathways.

Basketball

Governing Frameworks

Fédération Internationale de Basketball establishes global standards for safeguarding, integrity, and player welfare. Key instruments include:

- [FIBA Safeguarding Policy](#)
- [FIBA Integrity Framework](#)
- [Regulations on International Transfer and Protection of Players](#)

Anti-Trafficking Measures

FIBA regulations on international transfers and agent conduct reduce risks of exploitation, particularly among young athletes, and align with EU anti-trafficking legislation where applicable.

HUMAN RIGHTS IN PRACTICE

Athletes' rights come from multiple systems – but child rights come first. Without a clear understanding of rights, exploitation can be disguised as opportunity, and responsibility can be avoided. In the case of minors, apply a child-first approach. Check development, health, and education. Ensure informed consent. Monitor recruitment and living conditions. If a decision benefits performance but harms education, well-being, or safety, it is not compliant with basic rights standards.



2.2 Duty of Care and Liability

CONCEPT

Duty of care means you have a legal and moral responsibility to take reasonable steps to keep athletes safe from harm. For migrant youth athletes, this responsibility is higher than usual because some may be children far from home and family, and may depend on the club for housing, documents, and opportunities. In many cases, coaches and clubs act “in place of a parent” (*in loco parentis*). This means your responsibility goes beyond coaching skills. It includes safety, well-being, development, and protection from exploitation. If something goes wrong and it could have been reasonably prevented, you may be held legally responsible.

WHY IT MATTERS

Duty of care is not optional. If you fail to meet this duty, athletes can be harmed physically or psychologically, sport organisations can face legal claims (negligence), disciplinary action, criminal consequences (in serious cases) and/or reputational damage. For migrant youth athletes, the risks are higher because they may lack parental oversight, may not understand systems or their rights, and may depend entirely on the club. This creates power imbalances, which increase the risk of abuse, neglect and exploitation.

Importantly, being a volunteer does not reduce your responsibility. The standard is based on what a reasonably competent coach should do – not just good intentions.



WHAT TO DO

Apply a “best interests of the child” standard

In every decision, ask:

- Does this protect the athlete’s safety and well-being?
- Does this support their development beyond sport?

Never prioritise performance over welfare.

Understand your safeguarding responsibilities

Your sport organisation (club/academy/team) must have:

- Safe recruitment (background checks where possible)
- Clear safeguarding policies
- Reporting and referral procedures
- Links to child protection/social welfare services

You must actively prevent abuse (physical, emotional, sexual), neglect, or exploitation (financial or labour) by adhering to safe sport practices and reporting any concerns.

Supervise actively (not passively)

Supervision must cover training sessions, matches, travel and accommodation.

Ask:

- Where is the athlete?
- Who is responsible at all times or in shifts?
- Are there any unsupervised situations?
- Am I satisfied that all reasonable precautions have been taken?

Coach safely and competently

- Use age- and ability-appropriate training, progress training gradually
- Match athletes safely (size, strength, skill)
- Stay updated on safety standards
- Explain rules, risks, and expectations clearly
- Check understanding (language barriers)

Manage health and injury properly

- Screen for injuries and health issues
- Stop participation when necessary
- Never pressure athletes to play injured
- Follow medical advice for return-to-play

Have:

- First aid available
- Emergency action plans
- Concussion protocols

Ensure safe environments

Check regularly: equipment (safe, maintained, appropriate); facilities (including accommodation where relevant); weather and environmental risks.

Communicate risks clearly

Athletes (and parents/guardians) must understand risks of the sport, expectations and safety rules. This must be ongoing (not a once-off conversation), age-appropriate, and clearly explained.

Keep proper records

Maintain:

- Attendance registers
- Medical information
- Incident reports
- Training plans
- Risk assessments
- These protect the athlete, you and your sport organisation.

Plan for foreseeable risks

Ask: What could go wrong here? How would we respond?

Prepare for injuries, emergencies, safeguarding concerns, and travel-related risks

Understand legal liability (simple test)

You may be liable if:

- You had a duty to protect the athlete
- You failed to meet the expected standard
- Harm occurred
- The harm could have been prevented

Strengthen organisational responsibility

Clubs and academies should have:

- Safeguarding policies
- Emergency procedures
- Insurance
- Clear supervision ratios
- Ongoing staff/volunteer training

Recognise higher duty for migrant youth athletes

Extra care is required when athletes live away from family, depend on the club for housing or legal status, or are in unfamiliar environments. You should monitor their living conditions, access to education, emotional well-being, and any external influences (agents, intermediaries).

WHAT THIS MEANS IN PRACTICE

If an athlete is harmed and it can be shown that you should have seen the risk, and you could have acted, then you may be held responsible – even if you did not intend harm.

For migrant youth athletes, you are not just a coach; you are part of their support system and protection structure.

Duty of care means actively preventing harm – not just reacting to it.

DELEVE DEEPER

Duty of care in sport is both a legal obligation and a moral responsibility to take reasonable steps to protect participants from foreseeable harm. In the context of migrant youth athletes, this obligation is heightened by their dual vulnerability: they are children, and they are migrants, often separated from primary caregivers, embedded in unfamiliar legal, linguistic and cultural environments.

Under the law of negligence, liability arises where four elements are established:

- a. A duty of care is owed;
- b. The applicable standard of care is breached;
- c. The breach causes harm; and
- d. The harm is legally compensable.



DUTY OF CARE

Duty of care means that people responsible for athletes (like agents, coaches, clubs, academies, schools, and sport organisations) must take reasonable steps to keep them safe from harm.

It is both a legal obligation (you can be sued or prosecuted if you fail) and a moral responsibility (it's the right thing to do). For migrant youth athletes, this duty is stronger because they are children; they are far from home, often without parents; they may not understand the language, laws, or systems around them.

Sporting contexts do not displace these ordinary tort principles. The “neighbour principle” applies to coaches, clubs, academies, schools, agents, and governing bodies, who must exercise reasonable care to avoid foreseeable injury to those who may be affected by their acts or omissions.(xxxviii) Where a participant sustains personal injury as a result of coaching techniques that display a reckless disregard for their well-being and safety, there are strong grounds for liability in negligence, as such conduct reflects a serious departure from accepted standards of safe practice and a failure to manage foreseeable risk. This accountability applies equally to volunteer and professional coaches, since the standard of care derives from the responsibilities assumed rather than remuneration status. Ensuring that participants retain the right to seek redress for injury is fundamental to an effective duty-of-care framework, reinforcing professional standards, promoting risk-conscious practice, and affirming that athlete welfare must never be subordinated to performance objectives. Where minors are involved, the relationship unevenly engages the legal doctrine of *in loco parentis* – acting “in place of a parent.” Courts have used the benchmark of the “reasonable and prudent parent,” modified to reflect professional expertise and the specific risks inherent in sport. For qualified coaches and sport professionals, this standard represents an enhanced professional standard of foresight and competence, reflecting the specialised knowledge required in high-performance sport environments.(xl)

For migrant youth athletes, particularly those in residential academies, cross-border talent pathways, or private guardianship arrangements, this parental substitution function becomes an important consideration. Where parents are geographically absent or lack meaningful oversight capacity, clubs and associated personnel assume *de facto* supervisory authority and corresponding legal responsibility. (xli)

Where migrant youth athletes are classified as employees (which varies by Member State jurisdiction), injuries sustained in training or competition may fall within workers’ compensation regimes. In such cases, compensation systems may limit civil claims in negligence against employers. However, many youth athletes, especially those in academies, scholarship programmes, or pre-professional pathways, are not recognised as employees. In these circumstances, negligence claims remain a primary legal route for redress. The absence of formal employment status does not diminish the duty of care.

ACTING “LIKE A PARENT” (IN LOCO PARENTIS)

When working with children, especially those far from home, sport organisations often act “in place of a parent” (*in loco parentis*).

This means they must act in the best interests of the child; protect their well-being, not just performance; provide care, supervision, and guidance.

For migrant youth athletes, this role is even more important because parents are often absent.

Core Areas of Legal Duty



Judicial decisions and legal scholarship identify several core domains of coaching and organisational responsibility.

Supervision

Proper supervision is the most litigated aspect of sport liability. Passive presence is insufficient. Active oversight is required before, during, and after activities, including:

- Training sessions
- Competitions
- Residential accommodation
- Transport
- International travel

For migrant youth athletes, supervision extends beyond the playing field to encompass welfare monitoring in housing, nutrition, schooling, and social integration. Failure to provide adequate supervision, particularly where power imbalances exist, may constitute negligence and, in some cases, criminal nonfeasance.

Instruction and training

Coaches must:

- Provide competent, evidence-based instruction;
- Assign drills appropriate to age, size, physical maturity, and skill level;
- Progress training incrementally;
- Match athletes safely in contact and competitive scenarios;
- Remain up to date with evolving safety and safeguarding standards.

For migrant youth athletes, additional considerations include language comprehension, cultural adjustment, and understanding of rules and risks. Instruction that fails to account for comprehension barriers may fall below the required standard of care.

Facilities and equipment

Organisations must ensure that facilities and equipment are reasonably safe and appropriate. This includes:

- Regular inspection systems;
- Maintenance and replacement of defective equipment;
- Safe spectator and residential environments;
- Consideration of weather and environmental risks.

In residential academies hosting migrant minors, safety obligations extend to living quarters and safeguarding measures.

Warning of inherent risks

Participants and, in the case of minors, their parents or guardians must be informed of inherent and specific risks. This is not a one-time disclosure but an ongoing educational process. Reliance on “assumption of risk” defences is increasingly limited in youth sport. A child’s voluntary participation does not absolve organisations from exercising reasonable care.

Medical care and return-to-play decisions

Medical-related duties include:

- Pre-participation screening;
- Inquiry into illness or injury;
- Prohibition of participation when medically indicated;
- Immediate first aid provision;
- Activation of emergency action plans;
- Proper documentation of injuries;
- Deference to qualified medical clearance in return-to-play decisions.

Coercing or pressuring a minor to train or compete before medical clearance may constitute negligence and potentially aggravate liability. Concussion management and catastrophic incident preparedness are now recognised as central components of reasonable care. Migrant youth athletes may face additional barriers to healthcare access, including insurance coverage, documentation status, and language obstacles.

Institutional obligations

Duty of care extends beyond individual coaches to the governing structure of sport organisations. Reasonable risk management includes:

- Formal safety plans;
- Emergency action protocols;
- Insurance coverage;
- Written policies on supervision ratios;
- Record keeping systems (attendance, medical data, incident reports);
- Compliance with published standards and governing body regulations;
- Ongoing training for staff and volunteers.

Key Areas of Responsibility

Supervision

Athletes must be actively supervised. This applies to:

- Training and matches
- Travel and transport
- Accommodation and daily life
- Living conditions, schooling, and welfare

Safe Coaching and Training

Coaches must:

- Use appropriate and safe training methods
- Match training to age, ability, and physical development
- Progress training gradually

They must also consider language barriers, cultural differences, and whether the athlete truly understands instructions.

Safe Facilities and Equipment

Organisations must ensure:

- Equipment is safe and well-maintained
- Facilities are secure
- Living environments (e.g. academies) are safe

Explaining Risks

Athletes (and their parents) must be informed about the risks. This is not a one-time thing – it must be ongoing. Saying “they chose to play” does not remove responsibility.

Medical Care and Safety

This includes:

- Health checks before participation
- Not allowing injured athletes to play
- Providing first aid and emergency plans
- Only allowing return to play with proper medical clearance
- Pressuring an injured athlete to compete can be negligence

Organisational Responsibility

Clubs and organisations must have:

- Safety and emergency plans
- Insurance
- Clear policies and procedures
- Staff training
- Proper record keeping

Safeguarding and Protection from Maltreatment and Exploitation



For migrant youth athletes, especially those living away from family, sport organisations frequently assume responsibilities functionally equivalent to guardianship. Acting in loco parentis entails:

- Acting in the best interests of the child;
- Ensuring welfare beyond performance outcomes;
- Maintaining appropriate boundaries and safeguarding structures;
- Ensuring educational access;
- Protecting against economic exploitation;
- Preventing trafficking or improper third-party influence.

Safeguarding is a legal requirement, not a discretionary (optional) policy choice, when it comes to children. Duty of care encompasses:

- Safe recruitment and background checks;
- Clear safeguarding policies;
- Reporting and referral mechanisms;
- Collaboration with child protection authorities;
- Prevention of sexual abuse, neglect, discrimination, harassment, and exploitation

Given documented patterns of maltreatment and exploitation in youth sport, failure to implement safeguarding systems where risk is foreseeable may ground liability. For migrant youth athletes, risk factors are exacerbated by their dependence on club structures for housing, legal status, and livelihood prospects. This asymmetry of power reinforces the necessity for robust safeguarding frameworks.

Holistic Duty of Care

As coaching requires specialised skill, liability is assessed through the lens of professional competence. The relevant question is not whether the coach acted as an average parent would, but whether a reasonably competent coach with appropriate training would act in comparable circumstances. This includes:

- Anticipating foreseeable harm;
- Planning for emergency scenarios;
- Matching athletes appropriately;
- Maintaining proper conditioning programmes;
- Protecting athletes' rights;
- Reporting suspected abuse.

The “reasonable and prudent parent” standard is modified by scale (larger groups), expertise (professional knowledge), and risk (high-intensity sport environments). Courts recognise that sport settings may involve hazards, but this does not excuse failure to manage foreseeable risk.

Duty of care applies across elite talent pathways and grassroots sport. However, elite migrant pathways introduce additional complexity:

- Anti-doping and anti-corruption education;
- Mental health support;
- Career transition planning;
- Support upon exit from talent systems (including injury or non-selection);
- Governance transparency and athlete representation.



Grassroots contexts require:

- Safeguarding systems;
- Health screening;
- Concussion (traumatic brain injury) management;
- Incident review mechanisms.

In both domains, the overarching objective is enabling safe participation while protecting long-term welfare. Accurate documentation is critical. Coaches and organisations should maintain:

- Attendance records;
- Medical disclosures;
- Incident reports;
- Training logs;
- Risk assessments;
- Certification records.

Given extended limitation periods for claims involving minors, records should be retained beyond the age of majority, consistent with national statutes of limitation.

Migrant youth athletes occupy a uniquely vulnerable position. Their legal minority status, geographic separation from family, dependency on sport institutions for housing and advancement, and exposure to intense performance pressures create a context marked by significant power asymmetries. In such circumstances, the standard of care owed by coaches, clubs, academies, agents, and governing bodies must be correspondingly heightened. Enhanced supervision is required, extending beyond the field of play to encompass living arrangements, education, travel, and welfare oversight.

Professional competence is essential, requiring those responsible for training and managing migrant youth athletes to possess not only technical sport expertise but also safeguarding literacy and cultural awareness. Robust safeguarding systems must be embedded institutionally, with clear reporting mechanisms, preventative education, and protection against abuse and exploitation. Transparent governance structures are necessary to counterbalance structural inequalities and ensure accountability in decision-making processes affecting young athletes' careers and well-being. Comprehensive risk management must be operationalised through systematic assessment, planning, documentation, and regular review of foreseeable harms. Failure to discharge these interrelated obligations carries legal and regulatory consequences. Breaches of duty of care may give rise to civil liability in negligence, trigger disciplinary or regulatory sanctions by sport authorities, generate reputational damage, and, in cases involving serious harm, abuse, or exploitation, result in criminal accountability. Duty of care is an important, legally enforceable standard that underpins the protection of migrant youth athletes within contemporary sport systems.

If sport organisations and staff fail in their duty of care, they may face:

- Legal action (lawsuits)
- Disciplinary action from sport bodies
- Reputational damage
- Criminal charges (in serious cases)

Duty of care in sport means actively protecting athletes from harm, not just reacting when something goes wrong. For migrant youth athletes, this responsibility is heightened due to their vulnerability and dependence on sport systems. Safe sport requires proper supervision, strong safeguarding systems, and organisations that prioritise athlete welfare over performance.

2.3 Organisational Integrity: Why policy and transparency prevent exploitation

CONCEPT

Organisational integrity means your club or sport organisation does what it says it will do, makes decisions openly and fairly, and has clear rules that are actually followed. It is about how your organisation is run, not just how individuals behave.

In sport, integrity operates at three levels:

Personal integrity (how individuals behave, such as coaches and officials)

Competition integrity (fairness in the game)

Organisational integrity (how the club or system is governed)

For safeguarding, organisational integrity is critical. When systems are weak, unclear, or when power is concentrated, decisions go unchallenged, enabling abuse and exploitation to occur more easily.

When systems are clear and transparent, people understand the rules, problems are easier to detect, and accountability is possible.

WHY IT MATTERS

Most abuse and exploitation in sport are not just individual failures – they are system failures. They happen when there are no clear policies, reporting systems are unclear or unsafe, leaders are not held accountable, and decisions are made behind closed doors.

Common risks in weak systems:

- Abuse of authority (“do this or you won’t be selected”)
- Financial exploitation (hidden fees, misuse of funds)
- Conflicts of interest (agents or coaches benefiting personally)
- Nepotism or favouritism
- Silencing of complaints

In these environments, harmful behaviour becomes normalised, athletes fear speaking up, and problems continue unchecked. Transparency is a protective tool. It helps expose wrongdoing, prevent abuse, and build trust.

WHAT TO DO

Have clear policies in place

At a minimum, your sport organisation should have a:

- Safeguarding policy
- Code of conduct
- Reporting and complaints procedure
- Anti-corruption / financial controls (even basic ones)

These must be written down, accessible, and explained to staff, volunteers, athletes, and parents.

i. Make decision-making transparent

Ensure people understand how selections are made, how opportunities are allocated (trials, travel, teams), and how money is used (fees, funding, sponsorships).

Avoid informal or “closed-door” decisions and unclear criteria.

ii. Create safe reporting systems

Athletes and others must be able to report concerns confidentially, know who to contact, and trust that something will be done. Good practice includes a named safeguarding lead, clear reporting steps, and protection from retaliation.

iii. Manage conflicts of interest

Be alert when one person holds multiple roles (e.g., coach and agent) or makes decisions that personally benefit individuals. Your sport organisation should ensure simple disclosure rules and independent decision-making where possible.

iv. Share responsibility (avoid concentration of power)

Do not allow one person to control everything. Separate roles where possible (e.g. coaching, finance, safeguarding). Use committees or oversight structures, even if informal.

v. Involve athletes and parents

Give athletes a voice in decisions affecting them. Encourage feedback and create open communication channels.

vi. Keep basic records and documentation

Maintain:

- Financial records
- Selection decisions
- Incident reports
- Meeting notes

This creates accountability, protects the organisation, and provides evidence if concerns arise.

vii.Promote an ethical culture (“tone at the top”)

Leaders must model appropriate behaviour, take concerns seriously and enforce rules consistently. If leaders ignore issues, others will too.

viii.Work with external systems when needed

Where appropriate, report serious concerns to the relevant authorities; engage with sport governing bodies; and cooperate with safeguarding organisations. This is especially important for cases involving abuse, trafficking, or other forms of exploitation.

ix.Regularly review how your team/club/academy operates

Ask:

1. Are our systems clear and understood?
2. Do athletes feel safe to speak up?
3. Are decisions fair and transparent?

WHAT THIS MEANS IN PRACTICE

If your sport organisation has unclear rules, makes decisions informally, or lacks reporting systems, it creates space for abuse, exploitation and poor practice to exist. Strong policies and transparency are your first line of protection.

DELVE DEEPER

The integrity of sport is a central governance issue affecting the legitimacy, credibility, and social licence of sports organisations globally. As sport has become increasingly commercialised, professionalised, and politically visible, its governing structures have come under sustained scrutiny.[xliii] Scandals involving corruption, match-fixing, doping, bribery, abuse of authority, and financial mismanagement have demonstrated that weak governance environments create conditions in which exploitation can flourish. In this context, organisational integrity, understood as the alignment of values, decision-making processes, accountability mechanisms, and institutional conduct, is fundamental to preventing harm to athletes.

Sport integrity operates across multiple dimensions: (i) personal integrity (the conduct of individuals), (ii) competition integrity (the fairness of contests), and (iii) institutional integrity (the governance and accountability of organisations).[xliv] Organisational integrity is most directly implicated in preventing exploitation. Where governance systems lack transparency, oversight, or effective checks and balances, power concentrates in opaque structures. Such concentration heightens risks of abuse, financial misconduct, conflicts of interest, and regulatory capture. Conversely, transparent and well-structured governance disperses power, subjects decision-making to scrutiny, and reduces opportunities for wrongdoing. [xlv]

Transparency in sport has been defined as clarity in processes and decision-making, particularly regarding resource allocation and authority.[i] It requires that information be made readily available to those affected by organisational decisions, presented clearly and accessibly. Transparent governance thus serves as a protective mechanism. Publicly accessible policies, bylaws, disciplinary processes, safeguarding procedures, and financial disclosures enable stakeholders to better detect irregularities, challenge unfair practices, and hold decision-makers accountable.

Corruption, abuse and exploitation in sport rarely occur in isolation. Financial misconduct often intersects with other forms of irregularity, including nepotism, electoral manipulation, procurement abuses, and conflicts of interest. High-profile scandals in international sport have revealed how governance failures permit systemic abuses.[ii] In some instances, autonomy has been invoked to justify minimal external scrutiny. However, autonomy cannot operate as a shield against accountability.[iii] International bodies have increasingly emphasised that autonomy implies responsibility and must be conditioned upon demonstrable adherence to transparency, integrity, democracy, and effective control mechanisms. [xlix]



Athlete exploitation is often embedded within broader integrity failures. Abuse of authority may be rationalised as being “for the good of the athlete” or “necessary for success.” Normalisation of unethical conduct, whether in relation to overtraining, coercive coaching, sexual misconduct, or financial exploitation, thrives in cultures lacking oversight. As indicated earlier in the Toolkit, where reporting mechanisms are absent, opaque, or unsafe, victims may fear retaliation. Without independent ethics offices (integrity officers), confidential whistleblowing channels, and survivor-centred investigative processes, abusive practices can remain concealed for prolonged periods. Effective governance frameworks require:

- Independent ethics and compliance committees with visible mandates and contact mechanisms;
- Survivor- and child-sensitive reporting systems;
- Clear anti-bribery and corruption (ABC) policies;
- Conflict-of-interest rules;
- Term limits and leadership rotation;
- Separation of powers within organisational structures;
- External auditing and benchmarking;
- Multi-stakeholder representation, including athlete voices;
- Transparent procurement and event allocation processes.

Leadership plays a critical role in institutionalising these standards. Ethical tone at the top signals whether integrity norms are substantive or merely symbolic. Leaders are responsible for embedding governance standards into organisational culture, modelling ethical conduct, and ensuring that compliance mechanisms are not subordinated to commercial imperatives. Integrity cannot rely solely on internal regulation. Cooperation between sport organisations, governments, law enforcement authorities, and civil society is essential. Cross-border issues such as match-fixing, doping networks, trafficking, and abuse require coordinated international responses.[liii] Without such coordination, perpetrators may exploit jurisdictional gaps and regulatory arbitrage.

Organisational integrity in sport means running organisations in a transparent, accountable, and ethical way. When governance is weak (lacking oversight, clear rules, or accountability), power becomes concentrated, increasing the risk of corruption, abuse, and athlete exploitation.

Transparency (openness in decisions and processes) helps prevent harm by allowing stakeholders to see, question, and challenge wrongdoing. Effective systems, such as independent oversight, safe reporting channels, and clear policies, are essential to protect athletes.

Leaders set the tone for the entire organisation. If leaders act ethically, integrity becomes part of the culture. If leaders ignore wrongdoing, abuse becomes normalised.

Conclusion

Sport is both a cultural institution and a significant economic enterprise. As such, it bears responsibilities comparable to those of corporate entities, including fiduciary responsibility, compliance obligations, and social accountability. Good governance in sport requires the integration of performance, accountability, transparency, integrity and the protection of athletes' rights. When these elements are aligned, sports organisations not only enhance their legitimacy and public trust but also materially reduce the structural risks that enable athlete exploitation.

Part II

Ethics, Recruitment, Fraud and Coercive Practices



Introduction

Part I of this Toolkit established the structural and normative foundations for safeguarding migrant youth athletes. It demonstrated how vulnerability emerges from intersecting factors such as age, migration status, power asymmetries, and weak governance structures, and how international human rights and labour frameworks define the duties owed to young athletes. Building on these foundations, Part II shifts focus from principles to practice. It examines the environments in which exploitation most commonly arises.

Recruitment represents the primary gateway through which migrant youth athletes enter transnational sport systems. While many recruitment processes operate legitimately and provide pathways for talent development and social mobility, the globalisation and commercialisation of sport have also created conditions in which predatory actors can operate. Information asymmetries between athletes, families, and intermediaries, combined with uneven regulatory enforcement and cross-border jurisdictional complexity, enable fraudulent schemes, exploitative contracts, and coercive control mechanisms to proliferate. These risks are particularly acute for youth athletes who lack legal literacy, bargaining power, or access to independent advice.

Part II equips SafeSport practitioners with the tools required to identify, assess, and respond to recruitment-related risks. It explores the ethical and regulatory expectations governing agents and intermediaries, common forms of recruitment fraud and misrepresentation, and the contractual mechanisms through which dependency and exploitation can develop. Attention is given to early warning indicators, or “red flags,” that may signal predatory practices. Chapter 4 introduces structured risk-management approaches designed to prevent exploitation. These include ethical recruitment flowcharts, agent vetting protocols, and a typological framework based on case studies.

IMPORTANT

Understanding how unethical agent practices operate and being able to spot the warning signs are essential to safeguarding migrant youth athletes. Coaches and grassroots educators are often the first point of trust, which means they are well placed to notice when something does not seem right. However, it is equally important to be clear about your role.

You are not expected to provide legal advice on contracts, visas, or immigration status; investigate agents or recruitment networks; or resolve complex disputes between athletes and intermediaries. Your responsibility is to recognise risk and respond appropriately, not to manage it alone.

If you become aware of potential fraud, unfair contracts, or visa concerns, refer the athlete to a qualified lawyer or legal support service. Safeguarding concerns (whether they relate to abuse, grooming, exploitation or poor practice) must be reported to your organisation’s safeguarding officer or designated lead in the first instance. Serious harm, trafficking, or criminal activity must always be escalated to law enforcement and relevant protection services immediately. At all times, ensure you prioritise the athlete’s safety and well-being; follow your organisation’s safeguarding procedures; document concerns; and act early rather than waiting for tangible proof. You don’t need to have all the answers – but you do need to act when something feels wrong.

Chapter 3

ETHICS AND RED FLAGS IN RECRUITMENT



3.1 Cross-Border and Transnational Safeguarding Risks; 3.2 Unethical Agent Practices; 3.3 Contractual Issues; 3.4 Contract Verification: Non-Negotiable Clauses (Salary, Housing, Health, Education); 3.5 Contract Red Flags; 3.6 Exploitative Clauses

Introduction

Migrant youth athletes are exposed to multiple risk vectors within contemporary sport recruitment markets. While regulatory frameworks, such as the FIFA Football Agent Regulations (as in the case of football), seek to formalise agent conduct, implementation gaps, information asymmetries, and transnational jurisdictional complexities continue to create vulnerabilities. As a result, it is important that, as a sport safeguarding practitioner, you are able to identify patterns of unethical conduct, unpack the mechanics of fraudulent offers, contractual manipulation and financial control, and be conversant with institutional safeguards, such as structured recruitment and vetting protocols.

3.1 Cross-Border and Transnational Safeguarding Risks

CONCEPT

Cross-border safeguarding risks are vulnerabilities that arise when a young athlete moves between countries, including those related to immigration status, recruitment processes, financial arrangements, and legal protections. Youth athlete migration typically involves three stages: (i) country of origin (recruitment and decision-making), (ii) transit or migration pathway, and (iii) destination (club, academy, or training environment). Safeguarding risks often originate in earlier stages but only become visible later. It is important to understand that:

- Exploitation often does not start at the club
- It may begin in the country of origin or during the migration journey
- It can continue in less visible forms after arrival (e.g. financial control, documentation dependency)

WHY IT MATTERS

Even where a club environment appears safe and professional, a migrant youth athlete may still be dependent on a third party, insecure in their legal status, under pressure due to family expectations or migration-related debt, reluctant to report harm due to fear of deportation or contract termination. Cross-border factors can silence disclosure, mask exploitation, and increase dependency.

Early Warning Signs

You are not expected to be an immigration or legal expert. However, certain patterns and inconsistencies should prompt concern:

1. Legal and documentation red flags

Youth athletes may enter the European Union under student visas, family reunification, or limited athlete/talent pathways (sport visas). A key risk involves a mismatch between legal status and actual activity. Examples include:

- Student visa used for full-time elite training
- The athlete is dependent on a club that cannot legally employ them
- Short-term visas used for long-term development pathways

Such misalignment creates legal insecurity, dependence on intermediaries, and increased vulnerability to coercion. Warning signs include:

- Athlete is unclear about their visa or legal status
- Their daily reality (e.g. full-time training) does not match stated purpose (e.g. "student")
- Sudden anxiety around paperwork, renewals, or authorities

2. Dependency and control indicators

Where families migrate with the athlete, residence rights may depend on the athlete's sporting status. This means that parents may be unable to work, and the entire household's stability may depend on the athlete's success. This produces performance pressure, reduced ability to exit harmful situations, and heightened vulnerability to exploitation. Look out for:

- An athlete's ability to stay in the country depends entirely on one club or individual
- Family's residence is tied to the athlete's performance
- An athlete expresses fear of being "sent back"

3. Financial concerns

- An athlete does not control or understand their own income
- Payments are made through intermediaries
- Mention of "owing money" for travel, trials, or opportunities

4. Mobility and recruitment concerns

- The athlete has moved through multiple countries or clubs in a short period
- Unclear pathway into the current club (e.g. "someone arranged everything")
- Previous trials or moves were informal or undocumented

5. Transition at Majority (18+)

Turning 18 introduces new visa requirements, work permit thresholds, and eligibility conditions tied to performance. It represents a high-risk period for:

- Contract manipulation
- Coercive agreements linked to residency
- Loss of child safeguarding protections

WHAT TO DO

Practitioners should not attempt to resolve legal or immigration issues themselves.

Step 1: Ask safe, non-intrusive questions

1. "Do you know what type of visa you are on?"
2. "Who helped arrange your move?"
3. "Who supports you if something goes wrong?"
4. Focus on understanding, not investigating.

Step 2: Observe patterns, not isolated issues

- One issue may not indicate harm, but clusters of concerns do.

Step 3: Record and escalate

- Document concerns clearly
- Share with your Designated Safeguarding Lead (DSL)
- Follow existing safeguarding and reporting protocols

DELVE DEEPER

Cross-border migration in sport does not occur in a vacuum. It is shaped by overlapping systems, immigration law, sport regulation, labour markets, and global talent pipelines, which do not always align. While these systems are designed to facilitate mobility and regulate conduct, in practice, they can create gaps, ambiguities, and dependencies that foster conditions for exploitation to emerge and persist. Risk is rarely the result of a single failure. Rather, it is produced through the interaction of multiple systems operating across jurisdictions, often with limited coordination and varying levels of oversight.

Migration Pathways as Layered Risk Environments

The migration of a youth athlete typically unfolds across three interconnected stages: the country of origin, the migration pathway, and the destination environment. Each stage introduces distinct actors, decision-making processes, and power dynamics.

In the country of origin, recruitment decisions are often shaped by information asymmetry. Families may rely heavily on agents, intermediaries, or informal networks to access opportunities abroad, frequently without the capacity to verify claims or assess long-term implications. Promises of education, professional contracts, or financial stability can carry significant weight, particularly in contexts where sport is viewed as a pathway for socio-economic mobility.

As the athlete moves across borders, the migration pathway may involve short-term stays, trials, or representation arrangements that are only partially regulated. During this phase, documentation may be incomplete, responsibilities may be unclear, and oversight of safeguards may be minimal. By the time the athlete reaches the destination club or academy, key decisions have already been made, and patterns of dependency may already be established. The visible environment may appear compliant and well-managed, while underlying vulnerabilities remain embedded in earlier stages of the migration process.

Recruitment Pathways and Informal Practices

A significant proportion of safeguarding risk arises not within formal transfer systems, but in the earlier stages of recruitment: identification, approach, and trial processes. Digital technologies have expanded scouting's reach, enabling clubs and intermediaries to identify players across borders with minimal direct oversight. At the same time, they have created opportunities for informal or unregulated contact, including direct approaches to minors via social media.^[liv]

Trials and short-term stays present additional risks, particularly where immigration rules are not fully understood or observed. Players may travel on inappropriate visas, lack insurance coverage, or be placed in environments without clear safeguarding structures. Offers may be presented under time pressure, with limited opportunity for independent advice or verification. These early-stage interactions are critical, as they often establish the terms of engagement, expectations, and dependencies that shape the remainder of the athlete's pathway.

Intermediaries and Transnational Power Dynamics

Agents and intermediaries play a central role in facilitating cross-border movement, but their position within the system can create significant power imbalances. Operating across jurisdictions, they may control access to opportunities, information, and key decision-makers. While regulatory frameworks seek to professionalise and standardise this role, risks remain, particularly regarding the representation of minors, conflicts of interest, and fee structures. Where agents simultaneously maintain relationships with clubs and players, the potential for divided loyalty is significant.^[iv] Reliance on intermediaries can be both enabling and constraining. It may open pathways that would otherwise be inaccessible, while also creating dependencies that limit autonomy and increase exposure to exploitation.

Immigration Status and the Production of Dependency

Immigration status is one of the most significant, yet often least understood, determinants of vulnerability in cross-border sport migration. Youth athletes may enter destination countries under various legal categories, most commonly as students, dependents, or under athlete-specific provisions. Each category has distinct rights and limitations that may not align with the athlete's actual daily activities.

A recurring issue is the misalignment between formal legal status and lived reality. For example, a player admitted on a student visa may, in practice, be engaged in intensive, full-time training within a professional academy structure. While such arrangements may initially appear administratively convenient, they can create legal ambiguity, placing the athlete in a precarious position. If the arrangement is challenged by authorities, changes in club circumstances, or a breakdown in relationships, the athlete may have limited legal protection. This misalignment also creates opportunities for coercive control. Where an athlete's right to remain in the country is tied, formally or informally, to a specific club, agent, or sponsor, that dependency can be leveraged to discourage complaints, suppress disclosure, or enforce compliance with exploitative conditions. Importantly, perceptions of risk (e.g. fear of deportation) can be as influential as the legal reality itself.^[vi]

Family Migration and Shared Vulnerability

When youth athletes migrate with family members, safeguarding considerations extend beyond the individual athlete to the household as a whole. In many cases, the family's legal status, economic stability, and access to services are directly or indirectly linked to the athlete's sporting trajectory. This creates a form of shared vulnerability, where the consequences of sporting failure, such as release from a club, may extend to loss of residence rights or financial insecurity for the entire family unit. Parents who are unable to work due to visa restrictions may become economically dependent on the club or on the athlete's anticipated success. Siblings may face disruptions in education or access to services.^[vii]



Within this context, the athlete's role shifts subtly but significantly from a developing young person to a central economic actor within the family system. This dynamic can intensify pressure, reduce the athlete's ability to make autonomous decisions, and increase tolerance for perceived necessary but exploitative conditions.

Transition at Majority

The transition from minor to adult status represents a critical inflexion point in the migration pathway. At 18, athletes often move from protective regulatory frameworks into more market-driven environments governed by employment law, contract negotiation, and performance-based evaluation. This transition is not always accompanied by adequate preparation. Visa categories may need to change, new eligibility criteria may apply, and financial arrangements may become more complex. In some jurisdictions, work permits are contingent on meeting specific sporting thresholds, such as national team participation or minimum salary levels.[lviii]

Where planning is insufficient, this transition can create a window of vulnerability, during which athletes may be pressured into signing contracts that prioritise immigration security over long-term welfare. The loss of minor-specific protections, combined with increased financial stakes, can make this a particularly high-risk period for contract manipulation and coercive practices.

Financial Flows, Informality, and Economic Exploitation

Cross-border athlete migration introduces multiple streams of income and financial relationships, including club payments, sponsorship arrangements, and, in some cases, image rights structures. While these arrangements are not inherently problematic, they can become sources of risk when characterised by opacity, informality, or imbalance of control. Youth athletes and their families may have limited understanding of how income is structured, taxed, or distributed. Payments may be routed through intermediaries or supplemented by informal bonuses and allowances that are not formally documented. In some cases, athletes may incur debts linked to recruitment, travel, or representation, creating financial obligations that extend beyond the initial migration. These dynamics can give rise to forms of economic exploitation, including underpayment, unauthorised deductions, or debt-based control.

The complexity of cross-border taxation and withholding regimes can further obscure the athlete's financial position, particularly where obligations exist in both the country of origin and the destination country.

Social Protection Gaps and Welfare Uncertainty

Unlike adult professional athletes, youth athletes often occupy ambiguous positions within social protection systems. Their status may fall somewhere between student, amateur, and employee, with corresponding uncertainty regarding access to healthcare, insurance, and social security. Responsibility for welfare provision may be distributed across multiple actors (families, clubs, schools, and national systems) without clear coordination. This can result in coverage gaps, particularly for injuries, disabilities, or long-term support.[ix]

The consequences of these gaps are most visible when something goes wrong. An injured player who is no longer able to train may find themselves without adequate medical coverage, financial support, or legal status to remain in the country. In such cases, the absence of clear welfare structures can lead to rapid deterioration in the athlete's situation, including abandonment or forced return.

Regulatory Frameworks: Protection, Compliance, and Circumvention

International sport governing bodies, most notably FIFA, have established regulatory frameworks intended to protect minors in cross-border transfers. The restrictions contained in the Regulations on the Status and Transfer of Players (RSTP) reflect well-documented concerns about trafficking and exploitation. However, regulation does not eliminate risk. Instead, it reshapes how risk is managed, and, in some cases, how it is concealed. Attempts to comply with or circumvent these regulations can generate new forms of vulnerability. For example, parental relocation may be formally presented as unrelated to football, while in practice being closely linked to the athlete's recruitment. Similarly, informal academies or intermediary arrangements may be used to delay or avoid formal registration processes. Regulatory compliance should not be assumed to equate to safeguarding integrity. A pathway may meet formal requirements while still involving coercion, misinformation, or unequal power relations. [lxi]

Systems such as FIFA's Transfer Matching System (TMS) are designed to increase transparency and traceability in international transfers. By requiring documentation and standardised procedures, they reduce the likelihood of entirely unrecorded movements. However, these systems depend on the accuracy and completeness of the information provided. Where documentation is inconsistent, incomplete, or controlled by third parties, the system may create an illusion of transparency without fully capturing the underlying reality.[iii] For youth athletes and their families, access to and understanding of submitted documentation is often limited. This can result in situations where key aspects of the migration process are effectively managed on their behalf, without full visibility or informed consent.

Financial Incentives and the Commodification of Youth Talent: The Case of Football

The global football economy assigns significant financial value to player development, particularly through mechanisms such as training compensation and solidarity payments. While these mechanisms are intended to reward investment in youth development, they also reinforce the perception of young athletes as economic assets within a transnational market.[ixiii] This economic dimension can influence decision-making at multiple levels. Origin clubs may seek to maximise future returns, while destination clubs may weigh long-term value against short-term costs. Intermediaries may prioritise transactions that generate fees, regardless of their suitability for the athlete.[ixiv] Safeguarding risks arise when economic considerations outweigh developmental and welfare considerations, particularly in decisions involving early international movement.



3.2 Unethical Agent Practices

CONCEPT

Agents and intermediaries are supposed to help athletes find opportunities, negotiate contracts, and manage careers. But in reality, not all agents act in the athlete's best interest. Some agents are predatory, prioritising profit over the athlete's welfare. There are also people who pose as agents in order to profit from the hopes and dreams of young athletes, running complex scams and/or trafficking them. As a result, predatory or fake agents may mislead athletes and families about opportunities, charge illegal or excessive fees and commissions, and use pressure, deception, or false promises to capitalise on young, aspiring talent. In the worst cases, these practices can lead to serious exploitation or even trafficking.

For migrant youth athletes, this poses a high risk, as they and their families may not understand the complexities of sport contracts or legal systems, depend heavily on agents for opportunities abroad, and/or come from families under financial pressure who expect them to succeed at all costs.

WHY IT MATTERS

Unethical agent behaviour is often the starting point of harm. This also means that the conditions for harm and/or exploitation may begin in the athlete's country of origin and throughout their migration journey. Abuse and exploitation may occur once they join a club or academy. If missed early, it can lead to:

- Financial loss (families paying large upfront fees)
- Abandonment in foreign countries
- Exploitative or fake contracts
- Loss of education and career pathways
- Mental health harm and trauma
- Exposure to forced labour or trafficking

For coaches and sport organisations, allowing unsafe agents access to athletes creates a direct safeguarding risk, and failure to act can lead to legal liability and reputational damage. Athletes may trust agents more than coaches, as many create dependence upon them. Sadly, this also means that risks may go unnoticed. As grassroots coaches or educators, you may only encounter the athlete and their agent or intermediary once they've migrated and joined your club/academy/team. However, knowing the warning signs and how to refer at-risk athletes can make a world of difference for them. You can help by raising awareness amongst the athletes under your care as to what ethical and unethical agent and recruitment practices look like.

WHAT TO DO

i. Verify every agent before engagement

Coaches and sport organisations should not rely on what the agent says. If they are unknown to you, check:

1. Is the agent licensed with the relevant federation?
2. Can they provide a registration number?
3. Do they have a verifiable track record?

If you cannot verify them, proceed with caution. It should be noted that not all agents are licensed – the level of regulation varies across different sporting codes. Not all unregistered agents are necessarily predatory or fake (unless otherwise required by the relevant federation or sport governing body). However, a cautious approach and due diligence are required, and the agent's reputation and track record should be checked (by contacting other clubs/academies/athletes or by checking whether any disciplinary measures have been levelled against them).



ii. Never allow upfront payment demands

Treat this as a major red flag. Examples include trial fees, visa processing fees, and guaranteed placement payments.

Legitimate clubs do not charge for trials, and legitimate agents are usually paid after a contract is secured.

Upfront payments are often a point of contention, as young athletes from developing regions are expected to fund their trials (visas, passports, travel, and accommodation), which are often exorbitantly costly for them and their families. Unscrupulous agents, clubs, and third parties arranging travel may use this as a leverage to scam athletes. Opportunities and conditions for trials should always be well-scrutinised. If the costs outweigh the perceived benefits (e.g. an athlete is unlikely to be placed, whilst the family may become indebted to send them), then the realities need to be explained to them. Pay-to-play (trial) scams are common in high mobility sports like football.

iii. Require formal, written agreements

No athlete should rely on verbal agreements; agree to contractual terms via WhatsApp or social media; or accept the terms in documents they don't understand. Contracts in foreign languages without translation are another red flag. Legal advice should be the standard regarding any contractual arrangement before agreeing to the terms. Checklist:

- Written contract (in a language understandable to the athlete)
- Clear terms (fees, duration, responsibilities)
- Parent/guardian consent (for minors)
- Independent review (lawyer or trusted adult)

iv. Watch for pressure tactics

Predatory agents often create a sense of urgency to get athletes to sign without considering the ramifications. Red flags include: "This offer expires in 24 hours"; "Don't tell your parents"; "This is a once-in-a-lifetime opportunity". Legitimate opportunities allow time for review.

v. Control communication channels

Recruitment should not be done in secret. Encourage athletes to include parents/guardians in all discussions and avoid deals negotiated via social media only. Legitimate agents will have formed relationships with clubs and meet in person.

vi. Educate athletes and parents

Most exploitation happens because of a lack of awareness. Coaches and safeguarding officers have a role to play in raising awareness by explaining how real, legitimate recruitment works, and what agents can and cannot do/promise. Athletes and their parents should be educated on common scams (e.g. pay-to-play, fake trials, fake scholarships).

vii. Travelling on the right visa

Watch for attempts to bypass official transfer rules. In organised sport, especially in football, there are clear rules for international transfers and trials, particularly for players under 18. These rules are there to protect young athletes. Unethical agents often try to work around these systems to avoid scrutiny. When official processes are bypassed, the athlete loses key protections. Treat the following as serious red flags:

Being told to travel on a tourist visa for a trial or contract. Athletes from non-Schengen states must have a Schengen Sports Visa. A Schengen C-visa is for trials only. If successful and offered a professional contract requiring a long-term stay, an athlete will likely need to apply for a separate National (Type D) visa or a work permit for that country before starting work.

- Being asked to lie about age, purpose of travel, or playing status
- Offers that promise to “handle things informally” or “avoid paperwork”
- No mention of official registration systems (e.g. transfer clearance processes)

viii. Look for documentation fraud

Encourage athletes to be cautious of “official-looking” letters that can’t be verified (with the actual club or academy) or fake club logos or email addresses (using a generic Gmail or Yahoo address and the official domain address that can be found on the club or academy’s actual website). While it is understood that amateur clubs, academies, or grassroots teams may not have dedicated domain-linked email addresses, most scams and frauds are linked to those purportedly linked to elite teams or clubs. Always confirm directly with the club or federation.

ix. Identify conflicts of interest

Be alert if an agent represents multiple players competing for the same spot; represents both the player and the club; or pushes one athlete’s deal using another’s leverage. This can harm the athlete’s best interests.

x. Monitor for isolation tactics

Regularly check-in with athletes in order to monitor for any high-risk behaviour, including agents asking athletes to keep secrets, cutting off family involvement, or discouraging legal advice. Isolation is a key marker for increased risk of exploitation.

xi. Report concerns early

If something feels wrong, report to your safeguarding officer or sport governing body; document all interactions; do not “wait and see”. Early action prevents escalation.

WHAT THIS MEANS IN PRACTICE



If a pathway is safe, it will stand up to scrutiny.

DELVE DEEPER

The rapid commercial growth of professional sport has transformed athlete representation into a highly lucrative industry. As broadcasting revenues, sponsorship deals, and transfer markets have expanded, so too have elite, professional athlete salaries, intensifying competition among agents and intermediaries. The very commercialisation of sport has generated incentives for misconduct. Heightened competition among agents has normalised aggressive tactics, conflicts of interest, and, in some contexts, outright fraud.

Conflicts of interest are endemic within athlete representation. Agents may simultaneously represent multiple players on the same team, both players and coaches within the same league, or athletes competing for the same sponsorship opportunities. In salary-capped systems or tightly regulated markets, such overlapping representation can distort bargaining dynamics, privilege certain clients, and compromise fiduciary duties. The problem is exacerbated when agents leverage one client's market value to secure contracts for others, or when commercial incentives outweigh the athlete's long-term developmental interests. What should be a fiduciary relationship grounded in loyalty and confidentiality can instead become transactional and extractive. [lxv]

Professional sport involves a lot of money, which has led to increased unethical behaviour, especially in the management and recruitment of athletes.

One major problem is predatory/fake sports agents. Some agents represent several athletes competing against each other, or they focus more on making money than on protecting the athletes' best interests. This can result in unfair deals and bad career choices for athletes.

The pressure to perform can also harm athletes' health. Injuries may be ignored or rushed, and some athletes take strong painkillers or even banned substances just to keep playing, which can damage their health in the long run.

Another serious issue is exploitation during recruitment. Dishonest agents and fake training academies often target young or vulnerable athletes by promising contracts, scholarships, or opportunities overseas that are not real. They may ask for money upfront, use fake documents, or give misleading information. In the worst cases, athletes are taken to other countries and then abandoned, left without pay, or placed in unsafe situations.

Beyond representation, ethical risk permeates the broader sport ecosystem. Modern sport is governed not only by formal rules but by ethical codes that regulate conduct across administrative, medical, commercial, and performance domains. Commercial pressures frequently erode these safeguards. Team physicians and healthcare staff may experience institutional pressure to accelerate an athlete's return from injury, sometimes encouraging excessive reliance on analgesics or risky recovery methods. Athletes themselves, motivated by contract security, selection pressures, or peer expectations, may conceal injuries or request interventions that compromise long-term health. Performance enhancement presents a further ethical fault line. The pursuit of competitive and financial success has historically driven athletes to use prohibited substances, as illustrated by high-profile cases involving figures such as Lance Armstrong and Maria Sharapova. While anti-doping regimes seek to protect competitive integrity and athlete health, the persistence of doping underscores how financial incentives and reputational pressures can override ethical commitments.[lxviii]

Labour practices represent a significant dimension of ethical governance. Exploitative contracts, inequitable compensation structures, and inadequate injury protections expose athletes to financial dependency and long-term insecurity. Disparities persist across gender, geography, and level of competition, particularly affecting migrant youth athletes.

Unethical recruitment practices represent the most acute manifestation of these vulnerabilities. Unlicensed agents and unregulated academies frequently target economically disadvantaged regions, charging substantial upfront fees for fictitious trials or overseas placements. In extreme cases, such practices amount to human trafficking. Young athletes are transported abroad under false pretences, abandoned without legal status or support, and exposed to forced labour or abuse. Even where trafficking thresholds are not met, financial exploitation, deceptive contracts, and misrepresentation can result in severe economic hardship, psychological trauma, and stalled career development.

The consequences extend beyond individual harm. Families incur debt based on fraudulent promises; players suffer mental health deterioration and reputational damage; and institutions face legal sanctions and regulatory strain. [lxx]

Unethical behaviour and recruitment fraud can lead to severe consequences for athletes and their families. Families go into debt trying to help migrant youth athletes achieve their goals; young athletes experience emotional trauma; and careers are damaged or never develop.



Fraud in Athlete Recruitment and Exploitation

Fraud in athlete recruitment constitutes a distinct yet overlapping category of misconduct within the broader ecosystem of sport-related crime. While sport trafficking and irregular migration for sport do not always fit neatly within traditional definitions of fraud in sport, they frequently rely on fraudulent practices as enabling mechanisms. These include forged passports, falsified contracts, and misrepresentation of employment conditions to facilitate the cross-border movement of young athletes. Such conduct can also be classified as employment fraud, insofar as victims are deceived into exploitative or non-existent employment opportunities.[lxxi] Young players, particularly from economically marginalised regions in Africa and Latin and South America, are often promised long-term contracts, elite training environments, and financial security in Western/European clubs, only to encounter precarious living conditions, unpaid wages, contract substitution, or abandonment upon arrival.(lxxii)

FRAUD

Recruitment fraud involves tricking athletes into believing they have real opportunities when they do not.

Recruitment fraud includes:

- Fake contracts or fake trial invitations
- Forged documents using club logos
- False promises of scholarships or professional contracts
- Misleading young athletes about job conditions abroad

This is especially common in football, but also affects other sports like rugby, athletics, and basketball.

Football is especially susceptible to recruitment-related fraud due to the volume of financial transactions between clubs, intermediaries, and players, and the relative ease of market entry for poorly regulated actors. Regulatory loopholes surrounding intermediaries and youth transfers have been repeatedly identified as structural vulnerabilities.[lxxiii] Aspects of the regulatory framework of FIFA are comparatively easy to circumvent, particularly in relation to international transfers of minors. Other sports are not immune to recruitment-related fraud. Athletics, rugby, baseball and basketball are also commonly cited. Weakly formulated criteria governing who may act as an agent, alongside ambiguous rules regarding remuneration and contract duration for underage players, create an enabling environment for abuse and exploitation. In contexts where club ownership structures are opaque or politically entwined, conflicts of interest and informal protection networks further diminish oversight capacity.[lxxiv] The absence of “capable guardians” at both elite and community levels facilitates impunity and allows criminal actors to exploit sport’s positive public image as a reputational shield.[lxxv] In trafficking-related cases, the primary target is not the sport institution itself but the athlete as an economically exploitable individual.

“Pay-to-Play” Scams and Fake Agents

A rapidly expanding modality of recruitment fraud involves so-called “pay-to-play” schemes. The International Centre for Sport Security (ICSS) has warned of individuals posing as licensed intermediaries, sometimes impersonating well-known agents, who contact young players via social media with fabricated offers of trials at prominent European clubs. Victims are typically asked to pay advance “administrative” or “visa” fees ranging from €500 to €3,000.lxxvi Fraudsters often forge club letterheads or logos to enhance credibility and request payments through international bank accounts or anonymous transfer services. Spain has emerged as a significant locus of such scams, although the phenomenon is transnational.(lxxvii)

Pay-to-PLAY SCAM

- A fake agent contacts a young athlete online.
- They claim to represent a major club or academy.
- They ask for money for “processing”, “visa”, or “trial” fees.
- The athlete pays, but no opportunity exists.
- Warning signs include:
 - Requests for upfront payment
 - Contact only through social media or messaging apps
 - Unrealistic promises from top clubs
 - Pressure to send money quickly

Legitimate clubs and agents do not ask athletes to pay to get trials or contracts.



Parallel warnings have been issued by FIFPRO, which identifies common red flags: demands for upfront payments, absence of written contracts, exclusive communication via social media, unrealistic offers from elite clubs, and requests for money transfers through services such as Western Union or MoneyGram.[lxxvii] Legitimate clubs generally cover trial-related expenses and do not solicit payments in exchange for contracts. Nor do bona fide agents operate without formal agreements or personal engagement. The persistence of these scams reflects both information asymmetries in global football markets and the intense aspirational pressures experienced by young athletes seeking upward mobility.

Fake Scholarship Offers and Recruitment Misrepresentation

Fraudulent recruitment practices are not confined to professional football. In the collegiate sport system, particularly within the United States, fabricated scholarship offers have become an emerging reputational and integrity risk.[lxxx] Social media platforms facilitate the rapid dissemination of unverified claims, including photoshopped offer letters, staged announcements, or the misrepresentation of informal interest as formal scholarship offers. In some cases, entirely fictitious recruits have been created online, misleading major recruiting databases and scouting services.

Identifying Recruitment Red Flags and Unlicensed or Predatory Agents

The recruitment phase is the primary entry point for exploitation in sport. Aspiring migrant youth athletes and their families often lack legal literacy, market knowledge, and bargaining power. The early stages of contact with an intermediary (scout or agent) are associated with heightened vulnerability. Identifying early warning indicators is central to disrupting fraudulent recruitment schemes and preventing athlete exploitation. Capacitating migrant youth athletes, as well as practitioners directly interacting with them (such as coaches, social workers, auxiliary medical staff, educators), is thus an important preventative function. Across documented cases involving trafficking, pay-to-play scams, fake agents, and fabricated scholarship offers, several recurring red flags emerge. In the section below, we will survey common recruitment red flags encountered across a range of high-mobility sports.

1. Licensing and Regulatory Verification Failures

The first and most objective screening mechanism is agent licensing verification. In regulated sports, agents must be licensed and registered with the relevant governing body. In football, for example, agents must be listed in the official registry maintained by FIFA or the applicable national association. This is currently an ongoing process (and not all legitimate agents may yet be licensed).^{*} It is thus important to familiarise yourself with your sporting code's regulations pertaining to agent licensing. Red flags include:

- Refusal or inability to provide a licence number or verifiable track record.
- Claims that registration is "pending" or "not necessary" for certain transactions.*

- Operating through informal titles such as “consultant,” “scout,” or “academy director” to avoid regulatory scrutiny.
- Requests to conduct business through third parties to obscure identity.

Legitimate intermediaries should have no hesitation in providing documentary proof of authorisation, references from clubs, and written representation agreements that comply with governing regulations. If you are concerned about an agent’s or other intermediary’s credibility, this should be reported to the club/national association, etc.

2.Lack of Personal Engagement

A legitimate agent will normally conduct in-depth discussions regarding the athlete’s development plan, contractual expectations, and career trajectory – often in person or via formal meetings. Fraudulent actors frequently avoid direct interaction and rely on scripted, generic communication. An unwillingness to meet, provide verifiable references, or disclose licensing credentials is a significant warning sign.

3.Exclusive Reliance on Social Media Communication

Imposters often initiate contact through Facebook, Instagram, TikTok, LinkedIn, or WhatsApp, presenting themselves as licensed agents or club representatives. Communication that occurs solely via social media, particularly from generic or newly created accounts, is highly suspect. Professional clubs do not issue contracts through direct messages, nor do they rely on generic email domains. Athletes should verify contact details through official club directories and independent channels.

4.Negative Digital Footprint or Inconsistent Identity

Basic due diligence, searching the intermediary’s name, checking regulatory registers, and reviewing comments from other athletes can reveal inconsistencies. Reports of prior misconduct, frequent name changes, absence from official intermediary/agent databases, or social media profiles featuring staged “selfies with stars” without verifiable professional links are indicative of reputational manipulation.

5.Forged or Manipulated Documentation

The use of falsified letterheads, forged signatures, and fabricated logos of reputable organisations, such as FIFA or prominent European clubs, is a recurrent tactic. Visual authenticity (official-looking PDFs, branded templates, digital signatures) does not guarantee legitimacy. Independent verification with the purported issuing organisation is essential.

6.Financial Demands Prior to Contract or Trial: Upfront Fees and “Pay-to-Play” Schemes

One of the most common indicators of predatory recruitment is the demand for substantial upfront payments. A primary warning sign is any request for upfront payment in exchange for a trial, contract negotiation, visa processing, or scholarship facilitation. These may be framed as:

- Trial fees
- Administrative or visa processing costs
- “Guarantee” payments for club placement
- Academy enrolment fees linked to promises of professional contracts

While certain development programmes may lawfully charge training fees, professional representation in most regulated systems does not require youth athletes to pay large advance sums to secure trials or contracts. Legitimate professional clubs do not charge athletes for trials, nor do bona fide agents collect fees before a contract is signed. Payments requested through foreign bank accounts unrelated to the purported club are an additional risk signal. When families are pressured to take loans, sell assets, or transfer funds urgently to secure an “opportunity,” the risk of fraud or trafficking increases significantly.

7.Unrealistic Promises and Time Pressure

Predatory agents frequently rely on exaggerated assurances to override critical scrutiny. Warning indicators include:

- Guaranteed contracts with elite clubs.
- Assurances of immediate first-team selection.
- Promises of unusually high salaries without a prior competitive track record.
- Statements that bypass standard scouting, trial, or transfer procedures.

Time pressure is a complementary tactic. Athletes may be told that an offer will “expire within 24/48 hours” or that disclosure to parents, clubs, or lawyers will jeopardise the opportunity. Legitimate recruitment processes, particularly those involving international transfers, are procedural and documented. Urgency combined with opacity is a high-risk signal.

8.Circumvention of Standard Transfer Protocols

In regulated sports systems, transfers and international registrations follow established compliance procedures. In football, for example, cross-border transfers must comply with the Transfer Matching System (TMS) overseen by FIFA, and special restrictions apply to minors. Red flags include:

- Proposals to travel abroad on a tourist visa for a “trial” or to join a club.
- Instructions to misrepresent age, purpose of travel, or contractual status.
- Offers that claim to “avoid paperwork” or “handle it informally”.

Any suggestion that regulatory processes should be bypassed signals elevated legal and safeguarding risk. Athletes entering the Schengen zone from countries in regions like Africa, South America and Asia, must acquire a Schengen Sports Visa. The application form can be found on the website of the relevant consulate or embassy of the country they intend to travel to.

9.Conflicts of Interest and Overlapping Representation

Predatory behaviour may also manifest through structural conflicts of interest. Warning signs include:

- An agent representing multiple athletes competing for the same contract without disclosure.
- Simultaneous representation of players and club management in the same negotiation.
- Pressure to sign long-term exclusive representation agreements at an early developmental stage.

Such arrangements may compromise fiduciary duties and reduce the athlete's autonomy.

10.Contractual and Documentation Irregularities

Vigilance is required when recruitment involves underage players. Warning signs include attempts to circumvent parental consent, unclear guardianship arrangements, unusually long contract durations, or ambiguous provisions concerning remuneration and accommodation. Weak oversight of youth transfers has been identified as a key structural vulnerability in global football governance, for instance, increasing the risk of trafficking and exploitative migration pathways. Documentation should be formal, transparent, and reviewable. Red flags include:

- Contracts presented verbally or via informal messaging platforms only.
- Refusal to allow independent legal review.
- Clauses that assign broad financial control or high commission percentages without explanation.
- Documents in a foreign language without a certified translation.

Legitimate contracts are written, structured, and open to scrutiny. Any resistance to review or translation increases the risk of exploitation. Agents are also expected to explain the terms of the contract in laymen's terms and at an age-appropriate level to youth athletes and their guardians. Another significant issue encountered in some sports is the lack of written contracts, affecting up to a quarter of professional footballers under the age of 18.(lxxxi)

11.Isolation Tactics and Information Control

Fraudulent and predatory intermediaries frequently avoid formal written contracts or present documents that are vague, incomplete, or legally incoherent. Athletes may be pressured to sign immediately without independent legal review. In legitimate recruitment processes, representation agreements are documented, transparent, and compliant with governing body regulations. A refusal to provide documentation or discouraging the athlete from seeking legal advice should trigger immediate caution. Indicators include:

- Advising athletes not to involve parents or guardians (particularly in the case of minors).
- Discouraging consultation with lawyers or federation officials.
- Insisting on private communication channels separate from family oversight.
- Isolation increases dependency and reduces the likelihood of external intervention.

COMMON WARNING SIGNS

1. No proof of registration

While registration depends on the sport governing body's rules, for the most part, real agents must be officially registered. Red flags include refusing to show licence details or claiming registration is "not needed" or trying not to allow you to contact the club/academy/federation directly.

2. Avoiding personal meetings

Scammers often refuse face-to-face or formal meetings. Although this is not always the case. Some scammers will meet in-person – so always be vigilant if there are other warning signs.

3. Only using social media

If all communication is through WhatsApp, Instagram, or similar platforms, this is suspicious (a red flag).

4. Fake or inconsistent identity

Look out for a lack of verified track record, conflicting information online, and suspicious social media profiles. Scammers often use photos of themselves with well-known elite athletes to create the impression that they know and work with them.

5. Fake documents

Forged contracts or club letters may look real but are not verified. This is why it is always important to check documents independently.

6. Asking for money up front

Any demand for payment before a contract or trial is a major warning sign.

7. Unrealistic promises

Be cautious if someone guarantees:

- Contracts with elite clubs
- Immediate success
- High salaries without evidence

8. Pressure and urgency

Scammers often say: "Act now or lose the opportunity"; "Don't tell your parents or coach".

Legitimate processes do not work this way.

9. Trying to bypass official rules

Any suggestion to travel on tourist visas for trials, avoid registration systems, and/or ignore formal transfer rules is a serious risk indicator.

10. Isolation tactics

A key manipulation method is isolating the athlete by discouraging contact with family or lawyers, keeping communication secret, and creating dependence on the agent.

3.3 Contractual Issues



CONCEPT

When a young athlete joins a club, academy, or programme, they often enter into agreements or contracts. These agreements can:

- Link the athlete to clubs, leagues, and even international bodies
- Affect future transfers, eligibility, and career opportunities
- Include rules about training, behaviour, movement, and income

For young athletes (especially migrants), contracts are often not fully understood, not properly explained, and signed under pressure or without support. Some athletes may not even have written contracts, which puts them at serious risk.

WHY IT MATTERS

Contractual issues are a major source of vulnerability in sport. Key risks include:

i. **No contract = no protection**

Without a written agreement, wages cannot be enforced, rights are unclear, and there is little legal protection. In the world of sport, verbal agreements are not enough.

ii. **Unfair or unclear contracts**

Even when contracts exist, they may favour the club or agent heavily to the disadvantage of the athlete, include hidden fees or long-term commitments, and limit the athlete's freedom to move or exit.

iii. **Financial insecurity**

Athletes may experience late or unpaid salaries, no pension or long-term financial support, and increased dependence on clubs or agents.

iv. Health risks and pressure

Contracts that do not protect recovery time from injury, medical independence, or safe return-to-play decisions may make athletes feel pressured to play while injured or to prioritise performance over health. This can cut short a promising career.

v. Education and future risks

Contracts that do not guarantee schooling or education (for minors) or support career transition after sport leave athletes vulnerable when they are injured, released from the club, or their career ends early.

iv. Additional risks for migrant youth athletes

Migrant youth athletes face added challenges, such as language barriers, lack of legal knowledge, dependence on clubs for housing and visas, and separation from family oversight. This creates strong power imbalances.

WHAT TO DO

i. Ensure every athlete has a written agreement

Minimum requirement: A written contract or agreement, signed by the athlete and the parent/guardian (for minors). No written agreement = do not proceed.

ii. Check that the athlete understands the contract

Ask:

- Has it been explained in simple language?
- Is it in a language they understand?
- Do the parents/guardians understand it?
- Has the contract been reviewed by legal counsel?

If not, pause the process and refer for proper explanation.

iii. Never allow signing under pressure

Contracts should always allow time for review.

iv. Refer for legal advice (do not interpret contracts yourself)

Coaches should not explain legal terms or give legal advice. If there are concerns, refer the athlete to a qualified lawyer or legal support service. There are numerous pro bono services available. This encompasses contracts, visa or migration issues, and financial obligations.

v. Check for basic safeguards in agreements

- Encourage athletes/parents to look for:
- Education provision
- Medical care and injury protection
- Safe accommodation (if relocating)
- Clear payment terms
- Reasonable contract length (check sport governing body rules)

vi. Monitor for risky practices

Watch for:

- No contract or verbal agreements only
- Contracts in a foreign language with no translation
- Long-term contracts for minors
- Financial penalties or unclear deductions
- Lack of parental involvement

vii. Protect health and welfare over performance

As a coach, do not support pressure to play injured or encourage medical clearance before return by an agent. Escalate concerns if health is being compromised.

viii. Keep basic records

At the grassroots level, maintain:

- Registration details
- Emergency contacts
- Medical disclosures
- Incident reports

This supports both safeguarding and accountability.

Important Role Boundaries for Coaches and Other Grassroots SafeSport Practitioners

Understanding contracts and spotting risks is part of safeguarding, but managing legal matters is not your role. You are not expected to interpret contracts, provide legal or financial advice, or negotiate agreements. Your role is to recognise when something is unclear or unsafe, pause the process if needed and refer the athlete to the right professionals.

If concerns arise:



Always prioritise the athlete's safety over the deal.

WHAT THIS MEANS IN PRACTICE

No contract = no protection

No understanding = no real consent

Pressure to sign = high risk

Coaches don't fix contracts à they flag and refer

If a contract cannot be clearly explained and safely reviewed, it should not be signed.



DELVE DEEPER

Joining a sports club creates a chain of contractual relationships that can extend all the way to international governing bodies. Most young athletes and parents/guardians do not experience this as signing a contract with the national federation, UEFA, FIFA or the IOC. Yet legally, that is what incorporation mechanisms achieve.[lxxxii] For most participants, these rules will never cause problems. But for those who progress to elite levels, the legal consequences of a childhood registration may become highly significant – particularly in relation to eligibility, transfers, discipline, or international competition.[lxxxiii] Understanding this vertical structure is essential when examining athlete rights, power asymmetries, and potential exploitation risks in organised sport.

Across ice hockey, rugby, handball, and basketball in various EU Member States, the lived experiences of professional players challenge the popular perception of sport as a uniformly lucrative and secure occupation.[lxxxiv] For many athletes, professional sport is characterised by contractual fragility, health risk, regulatory opacity, and limited long-term protection.

When a young athlete joins a sports club, they are not just joining a team; they are entering a legal system with many rules and contracts, often linked to international organisations. Most players and families don't realise this. It usually becomes important only later, especially if the athlete reaches an elite level, where rules on transfers, eligibility, and discipline can strongly affect their career.

Although sport is often seen as glamorous and well-paid, the reality for many athletes is very different. Jobs are often short-term and unstable; salaries may be late or unpaid; many athletes lack pensions or long-term financial security; and there is often little support for education or careers after sport. Being a professional athlete is often uncertain and risky, and not guaranteed success.

Contracts are important, but not always secure. Most athletes should have written contracts, but some don't. Without a contract, it is hard to claim unpaid wages, there is little legal protection, and benefits like insurance or social security may be lost. Even when contracts exist, athletes often don't have real power to enforce them.

Although the majority of players operate under written contracts, a concerning minority do not. The absence of a formal employment agreement immediately weakens legal certainty. Without a contract, enforcing wage claims, accessing social security entitlements, and relying on labour law protections become significantly more difficult. Under EU law, athletes who perform services for remuneration under the direction of a club qualify as "workers," as recognised by the Court of Justice of the European Union in the Bosman ruling. However, the practical ability to assert those rights depends heavily on contractual formalisation.

Even among players with contracts, wage security remains an issue. In several Member States and across various sports, late salary payments are reported as a recurring problem. Delays may range from occasional late transfers to systematic non-payment over extended periods. In conventional employment sectors, repeated late payment would typically constitute a serious contractual breach.^[lxxxv] In professional sport, however, athletes often tolerate these conditions due to the short duration of their careers, competitive pressures, and concerns about reputational consequences. This imbalance illustrates how formal contractual rights do not always translate into practical leverage.

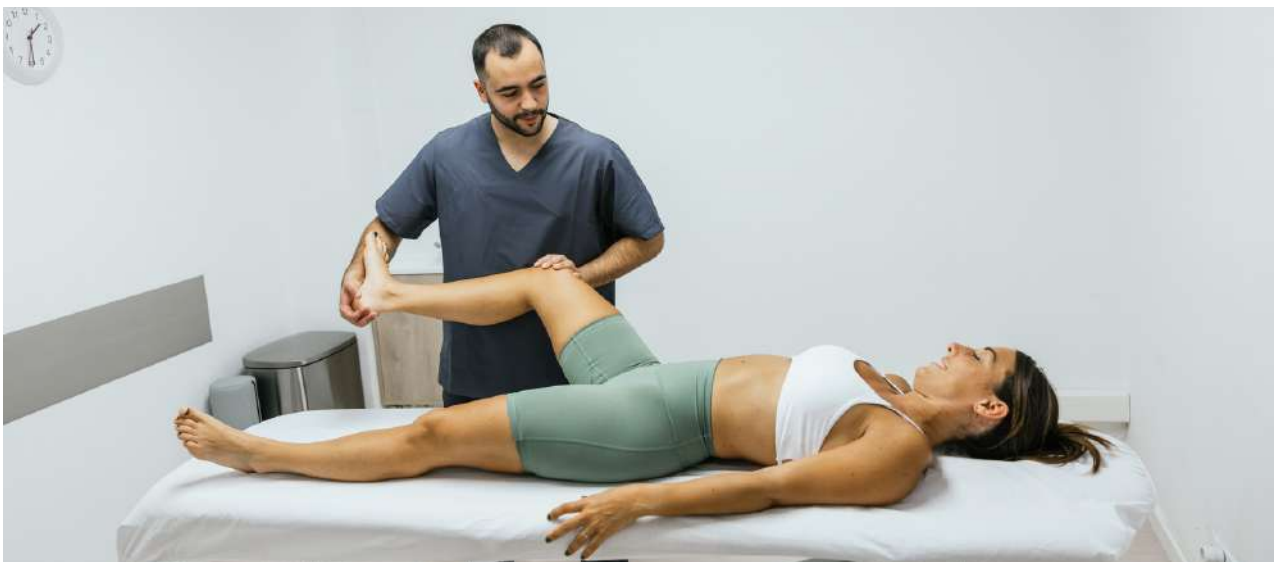
Moreover, many professional athletes lack adequate pension provisions, despite careers that are typically short and physically demanding. Retirement often occurs at an age when most workers in other sectors are still decades away from pension eligibility. Without mandatory or collectively negotiated pension schemes, athletes bear significant individual responsibility for long-term financial planning. This gap highlights the tension between labour law's traditional model of long-term employment and the inherently time-limited nature of sporting careers.

The sustainability of professional sport is further affected by limited employer support for education and career transition.[lxxxvii] While a number of athletes pursue academic or vocational training alongside their sporting careers, structured support from clubs is inconsistent. Schedule flexibility, financial assistance, and long-term planning mechanisms are frequently absent. As a result, players may approach retirement without adequate preparation for alternative employment. This lack of dual-career support not only affects individual welfare but also influences how younger athletes assess the risks of entering professional sport.

Health risks are a defining, but often underacknowledged, feature of athletic employment. A significant proportion of professional players report that their occupation poses a substantial risk to their physical and psychological well-being. Injuries such as ligament ruptures, concussions, spinal damage, dental trauma, and chronic fatigue are common. Unlike many professions, these risks are not incidental but inherent to performance. While EU occupational safety principles require employers to mitigate workplace risks, in sport, those risks cannot be eliminated. This reality places exceptional importance on medical safeguards, rehabilitation standards, and insurance coverage within contractual frameworks. Despite the high incidence of injury, insurance against career-ending harm remains insufficient. Many athletes lack comprehensive coverage that would protect them in the event of permanent incapacity. Given the abrupt and often irreversible nature of sporting injuries, the absence of mandatory insurance provisions leaves players economically vulnerable.[lxxxviii]

Medical and therapeutic support, although central to athlete welfare, varies significantly between clubs. Injured players often rely exclusively on club-appointed medical staff, raising potential conflicts of interest between performance objectives and long-term health. In some cases, athletes report pressure to return to competition prematurely . [lxxxix]

Without contractual guarantees of medical independence or the right to seek external opinions, players may find themselves navigating health decisions within structurally unequal relationships.



Workplace dignity concerns also emerge in the professional sports environment. Instances of bullying, intimidation, discrimination, and harassment have been reported across multiple sports and countries. Athletes are employees and are entitled to protection under EU anti-discrimination and workplace equality standards. However, the disciplinary and governance structures within sport are often internal and lack transparency.[xc] Where contracts incorporate league rules by reference rather than by explicit inclusion, players may lack clarity about their rights and remedies.

Working-time arrangements further illustrate the atypical nature of athletic employment. Professional athletes often report frequent last-minute changes to training schedules, match timings, and travel commitments. Evening and weekend work is routine, and seasonal peaks can be intense.[xci]

Disciplinary regimes represent another area of inconsistency. A notable proportion of players report limited familiarity with league or club disciplinary rules, often because the relevant documents were never formally provided to them. Financial penalties are commonly imposed, yet practices vary widely across sports and jurisdictions.[xcii]

Core Legal Characteristics of a Sport Contract

Under EU law, a sports contract is not a *sui generis* legal instrument. It is treated as a civil or employment contract governed primarily by:

- National contract law and labour law of the relevant Member State;
- EU internal market law (notably free movement and competition law);
- EU consumer protection law (in certain representation agreements);
- EU fundamental rights law (especially where minors are concerned).

The foundational jurisprudence is the Bosman ruling, in which the Court of Justice of the European Union (CJEU) held that professional footballers are “workers” under Article 45 TFEU. This established that player contracts fall within EU free movement law when they restrict cross-border employment. A sports contract in the EU is typically one of the following: (i) Employment contract (player-club relationship); (ii) Representation/agency contract (player-agent relationship); (iii) Training/development agreement (academy-minor athlete relationship); (iv) Transfer-related contractual arrangement (between clubs, with consequences for the player).

A valid sport contract requires:

- Offer and acceptance
- Legal capacity
- Consideration (or lawful cause, depending on civil law tradition)
- Intention to create legal relations
- Lawful object

Where the athlete is a professional player, the contract is usually classified as an employment relationship under national labour law, incorporating minimum wage protections, social security contributions, occupational health and safety standards, and protection against unfair dismissal. EU law intervenes when such contracts restrict free movement, distort competition, or undermine fundamental rights.



Sports Contracts and Minors (Youth 15-17 years old)

Minors are subject to heightened legal scrutiny because they lack full contractual capacity under Member State law. Across EU jurisdictions, the age of majority is generally 18. Sport contracts concluded by minors are typically voidable unless they are for beneficial employment or ratified by guardians. The classification of a youth sport contract depends on national law, but EU law overlays child protection obligations.

The protection of minors in sport must be read in light of Article 24 of the Charter of Fundamental Rights of the European Union (best interests of the child) and the United Nations Convention on the Rights of the Child (binding on all Member States). Article 24 CFR requires that the child's best interests must be a primary consideration in all actions relating to children. This principle affects:

- Length of contract duration
- Financial obligations imposed on minors
- Education guarantees
- Relocation decisions
- Income-sharing clauses with agent

The European Court of Justice has confirmed that contractual clauses affecting minors must be transparent, proportionate, and foreseeable in economic consequences.

Sports law functions as a *lex specialis* within the broader framework of labour law. While professional athletes are employees in the legal sense, their employment relationship is adapted to the structural realities of organised sport. In EU Member States, athletes enjoy the core protections of national labour law, remuneration, social security, health and safety, non-discrimination, but these rights are shaped by sector-specific legislation, federation regulations, and collective agreements. Understanding this hybrid structure is essential for clubs, athletes, agents, and federations.

Normative Framework Governing Professional Athletes

The employment status of professional athletes is regulated cumulatively by:

- National Labour Law
- National Sports Law
- Regulations of the competent national sports federation
- Regulations of the competent international federation
- Collective agreements (where applicable)
- Internal work rules (in the absence of collective agreements)
- The individual employment contract

This multi-layered structure distinguishes sport from ordinary employment sectors.



What makes sports contracts different?

Sports contracts are similar to normal jobs, but with special features:

- They are usually short-term (fixed contracts)
- Athletes may move frequently between clubs or countries
- Pay often includes bonuses, sponsorships, and performance rewards
- Work schedules are irregular (nights, weekends, travel)
- Disputes are also often handled outside normal courts, through sports bodies.

Extra protection is needed for young athletes. Young athletes (under 18) are especially vulnerable because they may not fully understand contracts, they rely on parents or guardians to approve decisions, and they can be tied into long or unfair agreements.



Key Aspects of an (Professional) Athlete's Employment Contract [xcv]

Parties to the Contract

In standard labour relations, the employer may be any legal or natural person. In sport, the employment relationship exists specifically between a professional sports organisation (club) and a professional athlete. Amateur athletes typically conclude a participation or engagement agreement rather than an employment contract. In individual sports (e.g. tennis, athletics), an elite-level athlete may operate independently as a self-employed professional.

Form and Validity

As in general labour law, the athlete's employment contract must be in written form. In many jurisdictions, failure to conclude the contract in writing renders it null and void. Amendments, annexes, and termination agreements must also be written. The competent national federation usually registers contracts and processes personal data relating to the athlete's engagement. While contract terminology varies by sport, the legal substance remains an employment relationship.

Content

Unlike standard employment contracts, sport contracts include sector-specific provisions such as type and level of competition, training obligations, participation in matches and tournaments, performance bonuses, disciplinary rules, transfer clauses, release clauses, image rights and sponsorship obligations, and anti-doping compliance.

Duration of Employment

Sports law typically prohibits professional athletes from entering permanent employment. Contracts are fixed-term, often capped (commonly up to five years). After expiration, the athlete may either renew with the same club or transfer to another club. Fixed-term limitation serves competitive balance and labour mobility objectives.

Place of Work

Unlike conventional employment confined to a fixed workplace, athletes perform duties across multiple locations, including club facilities, local competitions, international tournaments, training camps, and friendly matches. Mobility is inherent to the profession. If a club provides accommodation when the athlete relocates, this is generally not treated as salary but as a necessary condition of performance.

Working Time Regime

Traditional labour law concepts such as fixed weekly hours, overtime, and redistribution are often inapplicable in sport. Rather, athletes' schedules are structured around seasonal calendars, training cycles, match schedules, and international duties. Annual leave is typically taken during off-season periods. While working-time directives apply in principle within the EU, their practical adaptation in elite sport remains complex due to the atypical nature of athletic performance obligations.

Salary and Other Income

Remuneration in sport differs fundamentally from standard employment. A fixed salary establishes the employment relationship. In addition, athletes may receive performance bonuses, signing bonuses, match appearance fees, prize money, image rights compensation, housing and travel reimbursements. Unlike ordinary employment, remuneration reflects market value, commercial appeal, and sporting performance rather than formal qualifications. Equal pay principles under EU law apply, but assessing "work of equal value" is difficult in performance-driven contexts.

Termination of the Athlete's Employment Contract

Standard termination modes apply, including expiry of a fixed-term contract and by mutual agreement. However, sport-specific grounds also exist. These include disciplinary termination (e.g. doping violations, repeated absence from training), termination for just cause, and transfer to another club.

[1] In the case of football, under FIFA regulations, clubs that train young players are entitled to training compensation when a player signs their first professional contract or transfers internationally before a certain age. However, within the EU/EEA, this system was adjusted following the Bosman ruling. The Court of Justice of the European Union held that requiring transfer compensation after contract expiry violated the EU principle of free movement of workers. A club is entitled to training compensation only if it offers the player a new contract on terms at least equivalent to the current one. The offer must generally be made at least 60 days before expiry. The mechanism applies to both professionals and amateurs signing their first professional contract. This balances two objectives: (i) protecting the free movement of workers under EU law; (ii) recognising the legitimate interest of clubs in being compensated for developing talent. If a club no longer intends to retain a player, it cannot use training compensation as a barrier preventing the athlete from finding new employment.



3.4 Contract Verification: Non-Negotiable Clauses (Salary, Housing, Health, Education)

CONCEPT

When an athlete signs a contract, it should clearly spell out the basics needed for a safe and fair experience: how they will be paid, where they will live, what happens if they get injured, and whether they can continue their education. These are not “extra” benefits – they are essential protections. If these areas are unclear or missing, the athlete is at risk.

WHY IT MATTERS

In many cross-border sport pathways, especially involving migrant youth athletes, contracts are often unclear, poorly explained, or not properly enforced. This creates serious risks:

Financial exploitation: unclear or unpaid salaries, hidden deductions, or unfair agent commissions.

Unsafe living conditions: overcrowded housing, housing tied to performance, or lack of supervision for minors.

Health risks: no medical cover, pressure to play while injured, or no insurance if something goes wrong.

Educational harm: young athletes dropping out of school with no fallback if their career fails.

Entrapment: athletes unable to leave exploitative situations due to weak termination clauses.

Because legal systems and enforcement vary across countries, the contract itself often becomes the athlete's main form of protection. If it is weak, their protection is weak.

WHAT TO DO

If these clauses are unclear, missing, or not in writing, the athlete should be cautioned not to proceed without independent legal advice.

Salary and financial clarity

Check that the contract clearly states:

- Exact salary (amount, currency, and whether it is before or after tax)
- Payment schedule (e.g. monthly)
- How payment will be made (bank transfer, not cash)
- Bonus structure (clear and measurable conditions)
- All deductions (tax, agent fees, other costs)
- Whether income is guaranteed or conditional

Red flag: Vague terms like “market-related salary” or “to be decided later”.

Housing and living conditions

Confirm:

1. Who provides accommodation
2. Where it is located
3. Whether it is safe and suitable
4. How long housing is provided
5. Who pays for utilities and upkeep
6. For minors: who is responsible for supervision/guardianship

Red flag: Housing tied to performance or informal/overcrowded arrangements.

Health, medical care, and insurance

Verify:

1. Access to medical treatment for injuries
2. Who pays for rehabilitation
3. Insurance coverage (injury, disability, career-ending injury)
4. Whether salary continues during injury
5. Access to mental health support

Red flag: No provision of insurance

Education and development (for minor athletes)

Ensure the contract includes:

1. Continued access to schooling or education
2. Time allocated for studies
3. Academic support (tutoring or school placement)
4. A plan if the sporting pathway ends

Red flag: No mention of education in a youth contract

Duration, termination, and exit rights

Check that the contract clearly states:

- Start and end date
- Conditions for ending the contract (both sides)
- Notice periods
- What happens if salary is not paid
- Any buyout or release clauses
- Where disputes will be handled

Red flag: The athlete cannot exit even if conditions are not met

Minors and consent

For athletes under 18, a parent/guardian must co-sign and approve the contract. Terms must benefit the child. Long-term financial commitments must be reasonable.

Red flag: Pressure to sign without parental involvement

Plain language and understanding

Make sure that the contract is understandable, key terms are clearly explained, and that it is available in a language the athlete understands. Independent legal advice is offered or encouraged

Red flag: “Just sign, we’ll explain later”.

DELVE DEEPER

In contexts where legal enforcement is inconsistent and regulatory oversight remains fragmented, contract verification is an imperative for safeguarding. Unclear contractual drafting, weak enforcement mechanisms, and limited dispute-resolution avenues may expose athletes to exploitation by agents, clubs, and federations. Certain clauses are non-negotiable. They must be explicit, intelligible, and enforceable under the law of contract. Ambiguity in these areas creates vulnerability, particularly for migrant youth athletes.

1. Salary and Financial Transparency

Salary is the primary consideration in a sport contract. Without clear consideration, no binding contract exists. Verification must confirm:

- The exact base salary (gross and net, currency specified)
- Payment schedule (monthly, bi-weekly, lump sum)
- Method of payment (bank transfer details; no informal cash arrangements)
- Performance bonuses (objective metrics clearly defined)
- Signing bonuses and conditional incentives
- Deductions (tax, agent commission, pension contributions)
- Guaranteed vs conditional compensation

Contracts must avoid vague phrases such as “market-related remuneration” or “to be determined by management.” Courts consistently hold that once an athlete signs, it becomes difficult to contest unclear terms. The offeree’s duty is to seek clarification before acceptance; post-execution disputes face a high evidentiary threshold. Particular vigilance is required in representation agreements. The Latvian case referred to the Court of Justice of the European Union under Council Directive 93/13/EEC illustrates the risks of long-term income-sharing clauses for minors. Although the Court held that a 10% commission clause was not inherently unfair, it emphasised intelligibility, proportionality, and the best interests of the child under Article 24 of the EU Charter. Future income provisions must be foreseeable, proportionate, and market-aligned.[xcvi]

2. Housing and Living Conditions

Housing is a non-negotiable clause for migrant youth athletes. Verification must confirm:

- Who provides accommodation (club, academy, or athlete)
- Location and legal status of the residence
- Standards of safety and suitability
- Duration of housing provision
- Responsibility for utilities and maintenance
- Guardian or safeguarding arrangements for minors

Where contracts involve cross-border movement, accommodation arrangements intersect with immigration status, social security registration, and labour law compliance. Informal housing arrangements, such as shared overcrowded apartments, employer-controlled residences without tenancy rights, or housing conditional on performance, are red flags associated with exploitation patterns.

For minors, housing must align with child protection norms under the United Nations Convention on the Rights of the Child, particularly Articles 9, 10, and 32, which safeguard family life and protection against economic exploitation. Any separation from family must demonstrably serve the child's best interests.

3. Health, Medical Care, and Insurance

Professional sport carries inherent physical risk. A contract that fails to address medical care and insurance leaves athletes vulnerable to catastrophic financial losses. Non-negotiable provisions include:

- Comprehensive medical coverage (training and competition injuries)
- Responsibility for rehabilitation costs
- Disability insurance (temporary and permanent)
- Salary continuation during injury
- Coverage for career-ending injury
- Mental health support access
- Compliance with national workers' compensation law

Clubs often rely on boilerplate clauses limiting liability. These must be scrutinised. A clause shifting medical costs to the athlete, particularly in jurisdictions with limited public healthcare, creates a significant imbalance in bargaining power. In environments with weak enforcement, contractual clarity is the athlete's primary safeguard. Insurance certificates should be independently verified, not merely referenced.



4. Education and Development Guarantees

For youth and academy players, education is essential. Contracts must address:

- Continuation of formal schooling
- Minimum training hours consistent with educational obligations
- Access to tutoring or accredited educational institutions
- Exit pathways if a professional career does not materialise
- Recognition of qualifications across jurisdictions

Education clauses also serve as protective mechanisms against child labour and exploitative over-training. The absence of structured educational commitments can transform youth development into economic exploitation under Article 32 of the UNCRC.

5. Duration, Termination, and Exit Rights

Salary, housing, health, and education provisions must be read alongside duration and termination clauses. Verification must ensure:

- Fixed contract term clearly defined
- Conditions for early termination (by club and by athlete)
- Notice periods
- Buyout clauses (transparent formula)
- Release upon non-payment of salary
- Dispute resolution forum (arbitration, court jurisdiction)

In contexts where enforcement institutions are weak, athletes require contractual mechanisms allowing termination for non-payment or material breach. Without such clauses, athletes may be locked into exploitative conditions with limited recourse.

6. Minors and Capacity

Capacity is a foundational element of contract formation. In most jurisdictions, the age of contractual capacity is 18. Contracts involving minors are generally voidable at the minor's discretion, except where falling within recognised exceptions. Verification must include:

- Parental or guardian consent (documented)
- Confirmation that terms are for the minor's benefit
- Ratification upon reaching majority
- Proportionality of long-term financial commitments

7. Plain Language and Mutual Assent

The principle of mutual agreement requires that parties understand the contract "in the same sense." Complex clauses drafted in inaccessible legal language undermine genuine consent. Verification should assess:

- Whether terms are written in plain and intelligible language
- Whether financial consequences are foreseeable
- Whether translations are provided where cross-border recruitment occurs
- Whether the athlete had access to independent legal advice

Undue influence, duress, misrepresentation, or mistake can invalidate agreements, but litigation is costly and uncertain. Preventive scrutiny is therefore essential.

Key Things Every Athlete Must Check in a Contract

Some parts of a contract are non-negotiable and must be clear:

1. Salary

- Exact amount and payment schedule
- Bonuses and deductions are clearly explained
- No vague terms like “market-related pay”

2. Housing

- Who provides accommodation
- Is it safe and suitable
- Who pays for living costs

3. Health and insurance

- Who pays for medical care
- Injury and disability insurance
- What happens if the athlete cannot play

4. Education (especially for young athletes)

- Schooling or training opportunities
- Plans for life after sport

5. Contract length and exit options

- How long the contract lasts
- When and how the athlete can leave
- What happens if the club doesn't pay



3.5 Contract Red Flags



CONCEPT

Contracts in sport are meant to protect both the athlete and the organisation. But when contracts are unclear, unfair, or rushed, they can create serious problems. Many disputes in sport happen because terms are vague or confusing, one side has too much control, or key details are missing. For migrant youth athletes, this risk is even higher because they may not understand legal language, feel pressured to sign and/or trust verbal promises. A bad contract doesn't just cause disagreements, it can trap an athlete in an unsafe or exploitative situation.

WHY IT MATTERS

Contract red flags are often early warning signs of deeper problems. If missed, they can lead to being locked into unfair or long-term agreements, loss of income or unpaid wages, limited ability to leave a club or agent, confusion about rights and responsibilities, and an increased risk of exploitation. For migrant youth athletes:

- Contracts may affect visa status and ability to stay in a country
- Leaving a contract may mean losing housing or support
- Power imbalances make it harder to challenge unfair terms

For coaches and sport organisations, allowing unsafe contracts can lead to safeguarding failures, and disputes can escalate into legal or reputational risk.

WHAT TO DO

i. Watch for vague or unclear language

Red flags include:

- “Performance-based bonuses” with no clear criteria
- “Best efforts” or “sporting reasons” without explanation
- “Disciplinary action” with no process

All key terms should be clear, measurable, and specific.

ii. Identify one-sided clauses

Be cautious if the contract allows only the club/agent to terminate, lets the club renew the contract without consent, gives broad punishment powers without fair process, or shifts all risk onto the athlete. Contracts should protect both sides, not just one.

iii. Check exit and termination terms

Every contract should clearly explain how the athlete can leave, notice periods, what happens if payments stop, and conditions for ending the contract. If there is no exit clause, the contract is high risk.

iv. Look for missing dispute procedures

Contracts should state which country’s law applies, where disputes will be handled, and whether arbitration is required. Without this, disputes can become complicated and costly.

v. Clarify performance expectations

Watch for unclear terms like “regular selection”, “good conduct”, and “participation”. Ask: What exactly does this mean? Who decides?

vi. Be cautious of automatic renewals

Red flags include contracts that renew automatically without clear notice and extensions triggered without the athlete’s explicit agreement. Youth athletes should never be locked in without clear consent.

vii. Check payment terms carefully

Ensure the contract clearly states the salary amount (gross or net), payment schedule, bonuses and conditions, and any deductions (e.g. agent commission). Unclear payment terms often lead to disputes.

viii. Watch for excessive restrictions

Be cautious of clauses that limit movement to other clubs, control image or personal rights too broadly, or restrict opportunities after the contract ends. Overly restrictive clauses can limit an athlete’s future.

Relationship Red Flags (before signing)

- Delays without explanation
- Signing is repeatedly postponed
- Details remain unclear
- Pressure to sign quickly
- No time to review
- Verbal promises not in the contract

If it's not written down, it does not exist.

WHAT IT MEANS IN PRACTICE



DELVE DEEPER

Poorly drafted contracts are often a source of dispute in sport. Whether between an athlete and a club, an athlete and an agent, or a club and a federation, unclear agreements are one of the primary causes of conflict. Because sporting relationships are embedded in a broader regulatory structure (national federations, international bodies, arbitration systems), a poorly drafted contract can have consequences that extend far beyond a simple commercial disagreement.[xcvii]

Common Deficiencies in Sports Contracts

1. Vague or Ambiguous Language

Ambiguity is a leading trigger of sports disputes. Problematic phrases include: “performance-based bonuses” without objective metrics; “best efforts” to rehabilitate an injury; “sporting reasons” for termination; “reasonable disciplinary measures”.

In professional sport, performance must be measurable. Goals scored, matches played, rankings achieved, and fitness standards must be objectively defined. Without measurable criteria, disagreements become inevitable.

2. One-Sided Clauses

Sport contracts often reflect power asymmetry. Warning signs include:

- Club-only termination rights
- Unilateral renewal options
- Broad disciplinary powers without procedural safeguards
- Unlimited indemnity in favour of the club or federation

3. Lack of Clear Exit or Termination Provisions

Athletic careers are volatile. Injury, coaching changes, relegation, financial instability, or personal circumstances can radically alter a relationship. Contracts should clearly define:

- Grounds for termination (by both parties)
- Notice periods
- Consequences of non-payment
- Buy-out or release clauses
- Termination for just cause

Without clear exit mechanisms, parties may resort to breach simply to escape an unsustainable arrangement.

4. Missing Dispute Resolution Clauses

Sport operates within a specialised dispute framework. Contracts should clearly state:

- Governing law
- Jurisdiction or arbitration forum
- Appeal mechanisms

Many sports disputes ultimately proceed through arbitration mechanisms linked to international governing bodies such as FIFA or World Athletics. Failure to specify the applicable dispute mechanism can result in parallel proceedings, jurisdictional confusion, and significant cost escalation.

5. Undefined Performance Metrics

Performance-linked compensation is common in sport. However, bonuses tied to “selection”, “regular participation”, and “professional conduct” must be clearly defined. Is “selection” bench inclusion or active play? What constitutes “regular”? Who determines “professional conduct”?

6. Automatic Renewal Clauses

Evergreen clauses, automatic contract extensions unless notice is given, are major red flags. Evergreen clauses may unexpectedly extend youth contracts, lock athletes into additional seasons, and affect transfer timing and eligibility. Contract renewals require affirmative consent and clear notice procedures.

7. Poorly Defined Payment Terms

Salary disputes are among the most frequent sources of litigation in professional sport. Contracts must clearly state:

- Gross vs net salary
- Currency
- Payment schedule
- Tax obligations
- Bonus triggers
- Agent commission deductions

8. Overbroad Restrictive Covenants

Non-compete clauses, image rights restrictions, and post-termination restraints must be proportionate. In the EU context, excessive mobility restrictions may raise concerns under the principles established in the Bosman ruling. Restrictions that extend beyond legitimate sporting objectives are vulnerable to challenge.

Red Flags Before Signing: Relationship Warning Signs

1. Unexplained Delay

If a club or agent repeatedly postpones signing without justification, this may indicate internal financial instability, a lack of authority to conclude the agreement, or hidden, unresolved terms. In professional sport, delays can affect registration windows and eligibility. Hesitation without transparency warrants caution.

2. Pressure to Sign Immediately

Urgency is common during transfer windows. However, pressure to sign without legal review or due diligence is a serious red flag. It may indicate concealed unfavourable clauses, financial distress, or regulatory non-compliance. In youth recruitment, pressure tactics are particularly concerning given the power imbalance.

3. Verbal Assurances That Contradict Written Terms

Athletes are often reassured informally about playing time, development pathways, or release flexibility. If those assurances do not appear in the written contract, they are legally fragile. ***Always assume: If it is not in writing, it does not exist.***

Should an Athlete be Counselling to Walk Away Before Signing?

Consider stepping back if:

- The other party resists independent legal review.
- Key financial or regulatory terms are opaque.
- Termination rights are entirely unilateral.
- There is inconsistency between oral promises and written clauses.
- The club or agent has a history of disputes or regulatory sanctions.

3.6 Exploitative Clauses: Identifying clauses that enable debt bondage



CONCEPT

Some contract terms don't just disadvantage athletes – they trap them. These are clauses that force athletes into debt, make it very hard to leave a club or agent, or give others control over their movement, money, or documents. For migrant youth athletes moving across borders, these clauses can create situations that closely resemble debt bondage or even trafficking. In simple terms: if a contract creates debt, removes freedom, or makes exit impossible, it is unsafe.

WHY IT MATTERS

Exploitative clauses are rarely obvious. They are often hidden in complex legal language or presented as “standard practice.” But their real-world impact is severe:

Debt traps: athletes (or their families) owe money before they even start earning.

Loss of freedom: athletes cannot leave without paying unrealistic penalties.

Control and dependency: clubs or agents control housing, documents, and income.

Psychological pressure: performance targets tied to debt or survival.

Trafficking risk: when combined with deception, coercion, or document retention.

In many documented cases, athletes have been abandoned in foreign countries with no money or legal status, forced to continue under abusive conditions because they “owe” money, and prevented from returning home due to withheld passports or threats.

WHAT TO DO

Any clause that creates debt, limits freedom, or blocks exit = stop and seek independent help immediately. As detailed earlier in the chapter look out for:

i. Recruitment fees and upfront charges

- Fees to secure trials or contracts
- Payments for visas, travel, or “processing”
- Vague “administrative” deductions
- Non-refundable trial payments

Red flags

- Paying before a contract exists
- Excessive agent commission
- Payments to individuals not linked to a verified club
- Pressure to borrow money or sell assets

ii. High exit fees and restrictive clauses

- High buy-out or release fees
- Financial penalties for leaving (even if the club is at fault)
- Contracts that renew automatically without consent
- Restrictions on moving to another club

Red flags

- Exit cost higher than the athlete’s earnings
- Athlete cannot leave even if not being paid
- One-sided termination rights

iii. Debt-inducing loans and deductions

- Advances that must be repaid from future earnings
- Deductions for housing, food, or equipment
- High-interest repayment terms
- Debt linked to performance targets

Red flags

- Athlete starts owing money
- Salary reduced heavily without explanation
- Debt passed on to family

iv. Contract substitution and deception

- Changes to the contract after arrival
- Pressure to sign a new agreement immediately
- Different salary, role, or conditions than originally promised

Red flags

- No translation provided
- No time to review changes

v. Coercive control clauses

- Passport or ID held by club/agent
- Broad “morality” clauses allowing arbitrary punishment
- Conditional access to housing or visa based on performance
- Termination if injured
- Restrictions on speaking to others (NDAs)

Red flags

- Documents held “for safekeeping”
- Threats of deportation
- No right to contact a lawyer, union, or family
- No clear exit clause

vi. Welfare and Safeguarding Gaps

- No provision for education (for minors)
- No guardian arrangements for unaccompanied minors
- No healthcare or insurance coverage
- No safeguarding or reporting mechanisms

WHAT THIS MEANS IN PRACTICE

If a contract creates debt, limits freedom, or makes it hard to leave, it is a serious safeguarding concern, not just a legal issue. Refer the athlete to a qualified lawyer (contracts, visas, legal advice). Report safeguarding concerns to the appropriate officer or authority. Prioritise the athlete’s immediate safety and well-being.



DELVE DEEPER

Exploitative contractual clauses in sport can function as mechanisms of debt bondage, coercive control, and trafficking, particularly where youth athletes migrate across borders. These clauses mirror abusive labour migration practices documented in international frameworks such as the UN Sustainable Development Goals (Target 10.7) and the Global Compact for Safe, Orderly and Regular Migration (Objective 6), both of which call for the elimination of recruitment fees charged to workers.

Exploitative provisions are often embedded in representation agreements, academy contracts, trial agreements, and professional playing contracts. The presence of such clauses, especially when combined with deception, contract substitution, document retention, wage withholding, or threats, aligns with recognised indicators of forced labour, including debt bondage. The opportunity to work and compete for migrant youth athletes must not create debt or be leveraged for exploitation. Any clause that makes exit financially impossible, transfers recruitment costs to the athlete, or restricts freedom of movement should be treated as a high-risk trafficking indicator.

1. Recruitment Fees and Upfront Charges

Recruitment fees shift the employment costs from the hiring entity to the athlete. This is incompatible with ethical recruitment standards and can generate immediate indebtedness.

Common Exploitative Clauses

CLAUSE TYPE	HOW IT OPERATES	TRAFFICKING RISK
Finder's Fee / Placement Fee	Athlete required to pay an agent to secure a trial or contract.	Creates debt prior to employment; binds athlete to agent.
Visa / Travel / Processing Fees	Athlete pays migration-related costs that should be borne by the club/employer.	Leads to borrowing from lenders; debt dependency.
"Administrative" or "Management" Charges	Vague service charges are deducted from the salary.	Lack of transparency; hidden profit extraction.
Non-refundable Trial Fees	Payment is required to participate in the trial abroad.	Often linked to fake academies or fraudulent clubs.

Examples

Below are some examples of what such clauses may look like in an exploitative contract:

Placement Fee

"The Player agrees to pay the Agent a placement fee of €_____ for securing this contract opportunity, payable immediately upon signing. Failure to pay shall constitute breach and may result in contract termination and recovery proceedings."

Non-refundable Trial Fee

"The Player acknowledges that the €8,000 international trial fee is non-refundable regardless of trial outcome."

Risk Analysis

- Common in fake academy schemes.
- No employment guarantee.
- Athlete may incur debt for speculative opportunity.

Red Flags

- Payment is required before a written contract exists.
- Unclear breakdown of fees.
- Fees payable to third parties unrelated to the club.
- Athlete required to borrow from a recruiter-linked lender.
- Family pressured to sell assets to fund opportunity.

2.High Exit Fees and Restrictive Transfer Clauses

Excessive buy-out or termination clauses can function as modern forms of bonded labour, preventing athletes from leaving exploitative environments.

CLAUSE TYPE	HOW IT OPERATES	TRAFFICKING RISK
Prohibitive Buy-Out Clause	Athlete must pay a sum vastly exceeding earnings to terminate contract.	Effectively prevents exit.
Penalty for Early Termination	Athlete penalised financially even if club breaches contract (e.g., wage non-payment).	Coercive retention.
Unilateral Renewal Option	The club can extend the contract without the athlete's consent.	Entrapment in low-salary conditions.
Automatic Compensation Claims	Excessive training compensation or "development fees" is used to block movement.	Restricts labour mobility.

Red Flags

- Exit fee exceeds total annual salary or market value.
- Termination rights are asymmetrical (club may terminate easily; athlete cannot).
- Contract duration extended automatically without written consent.
- Athlete cannot terminate despite unpaid wages.

3.Debt-Inducing Loan and Advance Structures

Agents or clubs provide advances for accommodation, training, or "marketing guarantees," structured as recoverable debt – often with interest – thus creating dependency.

CLAUSE TYPE	HOW IT OPERATES	TRAFFICKING RISK
Advance Against Future Earnings	Agent loans money recoverable from uncertain future income.	Long-term dependency.
Mandatory Cost Deductions	Accommodation, food, and uniforms are deducted from wages.	Leaves the athlete with little income.
High-Interest Repayment Clause	Loan repayment is tied to a high percentage of earnings.	Debt becomes unpayable.
Performance-Linked Debt	Debt is forgiven only if the athlete meets unrealistic performance targets.	Psychological coercion.

Red Flags

- Athlete begins contract already “owing” money.
- Salary heavily reduced by unexplained deductions.
- No cap on repayment percentage.
- Debt transferable to family members.

4.Contract Substitution and Deception

Athletes sign one contract before migration, but are required to sign a different, less favourable version upon arrival.

Indicators

- Salary reduced upon arrival.
- Contract language changed.
- Position, duration, or club differs from the original agreement.
- Athlete pressured to sign immediately without translation.

This practice aligns with recognised trafficking indicators: deception + debt + vulnerability. There should be no contract amendments without independent legal review coupled with a mandatory cooling-off period after arrival. As previously indicated, contracts must be provided in a language the athlete understands.

5.Coercive Control Clauses

These provisions enable psychological or physical control over the athlete.

CLAUSE TYPE	HOW IT OPERATES	TRAFFICKING RISK
Document Retention	Passport held by club or agent.	Restricts freedom of movement.
Broad “Morality” Clauses	The club may terminate or withhold pay if the athlete brings “disrepute.”	Arbitrary punishment.
Termination for Injury	The club may terminate if the athlete is injured.	Extreme precarity.
Non-Disclosure Agreements (NDAs)	Athlete barred from discussing salary or conditions.	Silences abuse reporting.

Red Flags

- Passport kept “for safekeeping.”
- Threats of deportation if contract terminated.
- Injury leads to immediate wage suspension.
- Athlete prohibited from contacting union or legal counsel.

Conclusion

Unscrupulous agents and academies exploit minors and families by promising overseas contracts in exchange for substantial fees. Families may sell land, borrow at high interest, or incur community debt. When contracts collapse, athletes are stranded abroad undocumented and unsupported. This pattern mirrors classic bonded labour dynamics (i) upfront payment/debt, (ii) deception regarding employment, (iii) restricted mobility, and (iv) psychological coercion.

Recognising recruitment-related risks requires attention to patterns rather than isolated events. Red flags such as demands for upfront payments, unrealistic guarantees of contracts or trials, informal communication channels, and the absence of verifiable licensing credentials frequently occur together. When these indicators appear simultaneously, they may signal recruitment fraud, financial exploitation, or the early stages of trafficking schemes. Other multiple indicators, such as the combination of recruitment fees, debt, contract substitution, document retention, threats of deportation, and withholding of wages, may meet international indicators of forced labour and trafficking. In such instances, you should counsel the athlete to pause contract execution; refer to safeguarding and legal authorities; document all financial flows; and ensure a safe exit pathway for the athlete if needed.



Chapter 4

RISK ASSESSMENT, AGENT VETTING FRAMEWORK, RECRUITMENT AND CONTRACT CHECKLIST



Introduction

Chapter 4 provides practical guidance to assist in the identification of potential trafficking and exploitation risks in sport. It focuses on the warning signs that may emerge during athlete recruitment, contracting, travel arrangements, accommodation, and financial management. While many recruitment processes appear routine, they can conceal exploitative practices when proper oversight, transparency, and safeguarding procedures are absent. It provides an ethical recruitment flowchart, an agent and intermediary vetting protocol, a sport recruitment red flag checklist, a contract red flag checklist, and a case-study-based typology to illustrate safeguarding issues and identify intervention points.

Recruitment risk should be assessed cumulatively rather than in isolation. A single irregularity, for instance, may reflect an administrative error. Multiple indicators, such as unlicensed status, upfront fees, secrecy, and procedural circumvention, however, suggest systemic predation. Effective safeguarding requires:

- Mandatory licence/functionary verification (where applicable) before engagement.
- Written documentation of all recruitment communications.
- Independent legal review of representation agreements.
- Direct confirmation with the purported club or federation.
- Education of athletes and families regarding standard recruitment pathways.

Ethical Recruitment Flowchart

The ethical recruitment protocol (see flowchart below) operationalises ethical recruitment into a sequential control pathway. It is designed to ensure regulatory compliance, financial transparency, safeguarding integrity, and athlete autonomy. The structure aligns with international transfer governance standards and general principles of due diligence, fiduciary responsibility, and anti-trafficking risk mitigation.

Stage 1: Initial Contact Registration	
Objective	Eliminate informal or undocumented recruitment channels.
Action	Log all first contact details in a central recruitment registry.
Record	Agent name and licence number; Club/entity represented; Athlete profile targeted; Method of contact (email, platform, intermediary).
Check	No recruitment discussion proceeds without formal logging.
Any approach via unofficial channels (e.g. social media direct messages requesting payment) triggers a preliminary risk review.	
Stage 2: Agent and Intermediary Verification	
Objective	Confirm legal authority and representation legitimacy.
Action	Verify agent licence in the governing body registry; Confirm validity of representation agreement; Conduct conflict-of-interest screening; Require disclosure of commission structure.
Escalation	Licence unverifiable → Immediate suspension of process.
Stage 3: Preliminary Risk Screening	
Objective	Identify early red flags before athlete engagement escalates.
Screen	Upfront fees ("trial payments," "processing fees"); Guaranteed contracts or unrealistic salary promises; Visa irregularities; Pressure tactics ("offer expires today/this week");
If two or more risk indicators appear → escalate to compliance review before proceeding.	
Stage 4: Club and Opportunity Verification	
Objective	Confirm the existence and legitimacy of the opportunity.
Action	Verify club registration with the national federation; Confirm league status and competitive level; Validate facility and infrastructure claims; Confirm employment structure (professional vs academy); Cross-border recruitment must follow formal transfer systems where applicable (e.g. international transfer compliance under FIFA in football).
Stage 5: Athlete and Family Disclosure Meeting	
Objective	Ensure informed consent.
Mandatory Disclosure	Contract duration; Salary structure and payment schedule; Housing and welfare provisions; Education (if minor); Termination conditions; Agent commission details
Safeguard	The athlete must be encouraged to seek independent legal advice. No contract is signed on the same day as the first presentation.

Stage 6: Financial Transparency Audit	
Objective	Eliminate exploitative financial structures.
Audit checklist	Who pays the agent? Any deduction from the athlete's salary? Exit fees or liquidated damages clauses? Debt-linked obligations? Currency clarity and payment method?
Any clause enabling debt bondage or disproportionate exit penalties à mandatory legal review.	
Stage 7: Safeguarding and Welfare Assessment	
Assess	Housing arrangements; Guardianship provisions; Medical insurance; Educational continuity; Travel documentation handling
Retention of passport or control over bank accounts = automatic halt.	
Stage 8: Independent Legal Review	
Objective	Guarantee informed contractual consent.
Requirement	Contract translated into the athlete's primary language; External legal advisor review; Written confirmation of understanding; No waivers of independent advice permitted.
Stage 9: Final Compliance Sign-Off	
Before contract execution, obtain:	
	Compliance officer approval
	Financial department clearance
	Safeguarding officer confirmation
	Governing body documentation submission (if required)
Stage 10: Contract Execution and Registration	
Action	Sign the contract in the presence of an authorised representative; Provide the athlete with a complete signed copy; Register the contract with the governing body (where applicable); Confirm payment method and schedule in writing.
Stage 11: Post-Signing Monitoring (First 90 Days)	
Ethical recruitment does not end at signing.	
Monitor	Salary payment compliance; Housing conditions; Freedom of movement; Ongoing agent conduct; Early reporting mechanism must be available to the athlete.



Agent/ Scout/ Intermediary/ Third Party Vetting Protocol

Phase 1: Identity and Licensing Verification

Legal Identity Confirmation	Obtain full legal name, registration number, and business address.
	Verify government-issued identification (if individual).
	Confirm corporate registration (if agency).
Licence Authentication	Cross-check the licence in the relevant governing body registry.
	Confirm licence status (active, suspended, expired).
	Record licence number in compliance database.
Automatic Disqualification	Unlicensed representation where a licence is mandatory.
	Refusal to provide documentation.
	Has a criminal record (any serious offence: registered as committing sexual offences or offences against children).

Phase 2: Regulatory and Disciplinary History Review

Governing Body Checks	Litigation and Bankruptcy Screening
	Civil claims history (fraud, contract disputes).
	Insolvency filings or financial irregularities.
Media and Reputation Scan	Document credible allegations of exploitation.
	Review patterns of complaints from athletes.
Escalate	Any substantiated history of fraud, trafficking indicators, or repeated regulatory breaches requires compliance committee review.

Phase 3: Financial Transparency Assessment

Commission Structure Review	Require written disclosure of commission percentage.
	Confirm compliance with governing body limits.
	Identify dual representation arrangements.
Fee Flow Mapping	Who pays the agent (the club or the athlete)?
	Are third-party payments involved?
	Any upfront or “processing” fees?
Banking and Payment Integrity	Verify bank account ownership.
	Ensure no payments are directed to personal accounts where a corporate structure exists.
High-Risk Indicator	Requests for urgent wire transfers or informal payment channels.

Phase 4: Conflict of Interest and Relationship Mapping	
Representation Portfolio Analysis	List all currently represented athletes.
	Identify competing or overlapping interests.
Club Relationships	Disclose financial or advisory roles with clubs.
	Identify informal “preferred agent” arrangements.
Third-Party Influence	Identify scouts, sub-agents, or referral intermediaries.
	Confirm written agreements governing those relationships.
Phase 5: Safeguarding and Anti-Trafficking Screening	
Recruitment Practices Review	Does the agent request payment for trials?
	Are travel arrangements compliant with visa law?
	Is documentation handled transparently?
Control Indicators	History of retaining passports?
	Control of athlete bank accounts or finances?
	Restriction of athlete movement?
Minor Protection Compliance	Evidence of parental consent protocols.
	Education and welfare planning in prior transfers.
Any document retention or debt-linked recruitment practice = immediate suspension of engagement.	

Phase 6: Contractual Governance Review

Representation Agreement Audit	Duration limits
	Termination rights
	Dispute resolution mechanism
	Clear scope of services
Prohibited Clauses Check	Excessive exclusivity without performance criteria.
	Commission stacking.
	Automatic renewal without athlete consent.
Champion a mandatory independent legal review before approval.	

Phase 7: Structured Interview and Declaration

Conduct a formal vetting interview	Recruitment methodology
	Safeguarding philosophy
	Fee transparency
	Cross-border compliance procedures
Require a signed declaration	No undisclosed conflicts
	No pending sanctions
	Accuracy of information provided
A false declaration clause should permit immediate termination.	

Phase 8: Risk Scoring and Approval

Risk Score	Category	Action
Low	Approved	Standard monitoring
Moderate	Conditional	Enhanced monitoring and annual review
High	Restricted	Compliance oversight required
Critical	Rejected	No engagement / Reporting to authorities if applicable
Approval should require	Compliance officer sign-off	
	Safeguarding confirmation	
	Legal department clearance	

Phase 9: Ongoing Monitoring and Revalidation

Vetting is not a one-off event. A vetting cycle may be annual or every 2-5 years, depending on the sport's risk profile, the agents within it, and institutional compliance requirements. However, for safeguarding purposes, an annual review is encouraged where parties are dealing with minors or other vulnerable groups.

Annual Requirements	Licence re-verification
	Updated conflict of interest disclosure
	Commission audit
	Complaint review
Trigger immediate review if	Athlete complaint filed
	Regulatory investigation initiated
	Financial irregularity detected
Documentation and Audit Trail	
Maintain	Full due diligence file
	Verification screenshots or registry extracts
	Signed declarations
	Risk scoring matrix
	Approval documentation

The retention period should align with the organisation's compliance policy.



Sport Recruitment Red Flag Checklist

1. Recruitment and Talent Identification Risks
The athlete was recruited through informal or unverifiable channels (social media messages, WhatsApp groups, unregistered scouts).
The recruiter cannot provide proof of licensing or affiliation with a recognised federation or club.
The athlete or family was asked to pay large upfront fees for trials, contracts, or recruitment.
The recruiter promises guaranteed contracts, scholarships, or professional careers.
The athlete was pressured to make a quick decision about travel or signing an agreement.
The athlete signed a contract without legal advice or translation.
The contract includes high commission percentages or future earnings claims.
The recruitment process excluded or discouraged parental involvement.
Multiple athletes from the same region were recruited at the same time with identical promises.
2. Migration and Mobility Risks
The athlete does not possess their own passport or identity documents.
An agent, coach, or club holds the athlete's passport or visa.
The athlete is uncertain about their immigration status or is on an inappropriate visa (e.g. visitor's visa).
The athlete travelled internationally without clear documentation of the club or academy they were joining.
The athlete reports arriving in a country but not being taken to the promised club or training facility.
Travel arrangements were made entirely by a third-party intermediary with little transparency.
There is no valid return ticket (in the case of trials or tournaments).
The athlete incurred large debts to finance travel or recruitment costs.
3. Living and Training Conditions
Athletes are living in overcrowded housing or accommodation not associated with the standards expected of a legitimate club.
Athletes have limited access to food, healthcare, or basic necessities.
Athletes are isolated from the local community or prevented from leaving accommodation.
Athletes cannot contact family members freely.
Athletes are transported frequently by unknown individuals.
Young athletes are unsupervised in residential environments.
Athletes appear malnourished, exhausted, or neglected.

4. Financial Control and Contractual Exploitation

The athlete's salary, prize money, or appearance fees are controlled by an agent or coach.

The athlete receives only a small portion of their earnings.

Athletes are required to pay ongoing "training" or "maintenance" fees.

The athlete cannot access their own bank account.

The contract requires extremely high commissions (e.g. 30-50% of earnings).

The athlete and/or family reports not understanding the contract they signed.

The athlete was forced or pressured to sign a contract quickly.

5. Psychological and Behavioural Indicators

The athlete appears fearful of coaches, agents, or club staff.

The athlete avoids speaking about their recruitment or living arrangements.

The athlete expresses fear of deportation, arrest, or punishment.

The athlete seems socially isolated or withdrawn.

The athlete shows signs of hyperarousal, depression, anxiety, or emotional distress.

The athlete appears overly submissive or controlled by another individual.

6. Sexual or Criminal Exploitation Risks

The athlete is being transported to unknown locations outside of training activities.

The athlete reports being asked to perform activities unrelated to sport to earn money.

The athlete has unexplained money, gifts, or items.

The athlete is being threatened with exposure or shame.

The athlete reports being pressured into sexual activity or illegal activities.

7. Institutional and Governance Red Flags

The academy or club is not registered with the relevant federation.

There is no safeguarding officer or welfare policy.

Staff have not undergone background checks.

The academy houses large numbers of foreign players without documentation.

Players regularly leave or disappear without explanation.

Sport Contract Red Flag Checklist (for Athletes)



Use this structured checklist before signing any professional sports contract. A single “No” does not necessarily invalidate the agreement, but multiple risk indicators significantly increase the likelihood of a dispute or exploitation.

1. Contract Formalities

Is the contract in written form?

Are all annexes and federation rules attached (not merely referenced)?

Are amendments required to be in writing?

Has the contract been reviewed by independent legal counsel?

Red flag: No written agreement or reliance on verbal assurances.

2. Identity and Verification of Parties

Are all parties clearly identified? (Club/Academy Name; Full address and contact details; Legal registration)

Is the agent/intermediary named and licensed?

Can the club/organisation be independently verified (website, federation, registry)?

Red flag: Vague or missing organisational details.

3. Core Employment Terms

Is the duration clearly stated (start and end date)?

Is the competition level specified?

Are performance obligations objectively defined?

Are training and match participation expectations clear?

Is the governing law specified?

Is the dispute resolution forum clearly identified (court/arbitration)?

Red flag: Vague language such as “reasonable efforts” or undefined duties.

4. Salary and Financial Protection

Is salary clearly defined as gross or net?

Is the payment schedule fixed (specific date each month)?

Are bonuses tied to objective, measurable criteria?

Are late-payment penalties included?

Is pension provision addressed?

Is tax responsibility clearly allocated?

Red flag: History of late payments or unclear bonus triggers.

5. Insurance and Injury Protection

Is there insurance for a career-ending injury?

Is salary protected during injury?

Are rehabilitation obligations defined?

Is the athlete entitled to a second medical opinion?

Are medical decisions independent from performance pressures?

Red flag: No injury insurance in a high-risk sport.

6. Termination and Exit Rights

Is termination for “just cause” clearly defined?

Are disciplinary grounds limited and proportionate?

Does the athlete have termination rights comparable to the club?

Is there a release clause or buyout mechanism?

Are renewal clauses optional rather than automatic?

Red flag: Unilateral termination rights favouring the club only.

7. Disciplinary and Fine Provisions

Are disciplinary rules provided in full?

Are fines capped or proportionate?

Is there a clear appeal process?

Are sanctions aligned with federation regulations?

Red flag: Open-ended discretionary fines.

8. Working Time and Schedule Protections

Is the training and match schedule framework described?

Is annual leave addressed?

Is notice required for schedule changes?

Are rest and recovery periods considered?

Red flag: No notice requirements for schedule changes.

9. Image Rights and Commercial Obligations

Is image-use limited in scope and duration?

Is compensation provided for commercial exploitation?

Are sponsorship obligations reasonable?

Do image rights revert upon contract termination?

Red flag: Perpetual or unpaid image rights.

10. Mobility and Restrictive Clauses

Are non-compete clauses time-limited and proportionate?

Are transfer conditions transparent?

Are post-termination restrictions justified?

Red flag: Broad mobility restrictions beyond the contract term.

11. Negotiation Conduct

Was sufficient time given for review?

Were revisions permitted during negotiation?

Do written terms reflect verbal assurances?

Is the counterparty financially stable?

Red flag: Pressure to sign immediately without review.

CASE STUDIES

THE CONSEQUENCES OF RECRUITMENT FRAUD, CONTRACT MANIPULATION, COERCION AND EXPLOITATION



The agent an athlete engages often determines the trajectory of their career and the security of their rights. A lack of due diligence – failing to properly vet an agent’s credentials, reputation, and contractual practices – can expose athletes to significant risks. Without thorough scrutiny, athletes may encounter predatory agents who exploit their trust, engage in financial malfeasance, or facilitate situations that verge on or constitute human trafficking. These lapses create a direct pathway from negligence in agent selection to the exploitation and endangerment of vulnerable athletes, particularly minors seeking opportunities abroad. An oft-cited factor is the limited understanding of sports recruitment processes among parents, guardians, and young athletes themselves. This may also extend to others tasked with safeguarding youth athletes, such as coaches, particularly at amateur clubs, from whom they may be recruited. Below are case studies involving the consequences of recruitment fraud and contract manipulation. Each case study is structured as follows:

1. Context and recruitment pathway (how the athlete entered the system)
2. Safeguarding risks and exploitation mechanisms (forms of abuse, coercion, or exploitation)
3. Warning signs and indicators
4. Governance or system failures (institutional weaknesses that allowed abuse)
5. Safeguarding actions and prevention measures

Case Study 1: Sexual Exploitation within a Youth Football Club *Atlético Independiente* (Argentina)

Context and Recruitment Pathway

Youth players were recruited from economically disadvantaged provinces in Argentina by scouts and agents seeking promising young footballers. Families were encouraged to send their children to Buenos Aires to join Atlético Independiente. Players were housed in a residential complex near the club's training facility. Parents signed authorisations allowing club staff to move their children within the city.

Safeguarding Risks and Exploitation Mechanisms

i. Abuse of institutional authority: Several club staff members used their access to youth players to facilitate sexual exploitation.

ii. Movement control: Staff transported players to private apartments around the city after training sessions.

iii. Financial exploitation: Victims were paid small sums for sexual acts, but most of the money was confiscated by facilitators.

iv. Grooming through incentives: Players were offered football equipment, money, and visits home in exchange for compliance.

v. Peer facilitation: A former youth player living in the academy helped arrange transport to exploiters.

Warning Signs and Indicators

- Players frequently leaving the training complex late at night
- Unexplained cash or gifts
- Children associating with unknown adults
- Emotional distress or behavioural withdrawal
- Players discussing "extra work" outside football or engagement with adults not affiliated with the Club

Governance or System Failures

- Lack of oversight of youth residential facilities
- Poor monitoring of staff interactions with minors
- Weak safeguarding policies within the club
- Parental consent forms enabling unsupervised movement

Safeguarding Actions and Prevention Measures

In this particular case, the Club had become an entrenched vehicle for organised abuse and exploitation over many years. However, it does highlight the need for:

- Club and youth academy governance
- Independent safeguarding officers in residential clubs/academies
- Mandatory background checks for all staff (including volunteers), agents and scouts
- Movement protocols
- No unsupervised external trips for minors
- Travel logs and parental notification
- Reporting mechanisms and anonymous reporting channels for players (internal and external)
- Independent child protection audits of youth programmes

Case Study 2: Trafficking and Coercive Control in a Football Academy – Bports Football Academy (Portugal)

Context and Recruitment Pathway

Young footballers from Africa and South America were recruited with promises of professional opportunities in Europe. Coaches and intermediaries in their home countries played a significant role in the recruitment process. While many travelled legally to Portugal to join the academy, 80 were undocumented. Upon arrival, dozens of players were confined in exploitative and poor conditions. Some had been held against their will for a period of two years.

Safeguarding Risks and Exploitation Mechanisms

- i. Document confiscation: Management seized passports and identity documents.
- ii. Psychological coercion and emotional manipulation: Coaches verbally abused players to break their confidence.
- iii. Isolation: Players were prevented from communicating with families except to request additional funds.
- iv. Restricted movement: Players were prohibited from travelling or visiting their families.
- v. Exploitative labour: Players trained excessively while receiving inadequate food and medical care.
- vi. Immigration vulnerability: Without documents, players feared deportation if they reported abuse.

Warning Signs and Indicators
• Foreign players without access to their passports • Academies housing unusually large numbers of foreign minors • Athletes reporting food deprivation or unpaid labour • Limited contact between players and their families • Constrained freedom of movement
Governance Failures
• Weak regulation of private football academies • Inadequate monitoring of international player recruitment • Failure to enforce labour and child protection laws
Safeguarding Actions
• Academy regulation • Mandatory licensing and inspections of football academies • Athlete rights education and enforcement • Absolute prohibition on passport confiscation • External monitoring • Routine welfare checks by federations or unions
Case Study 3: Fraudulent Football Recruitment Leading to Sexual Exploitation (Colombia-Spain Football Trafficking Network)
Context and Recruitment Pathway
A network of intermediaries recruited young footballers through trials and talent identification programmes in Colombia and Argentina. Players were promised opportunities with Spanish clubs and encouraged to finance their own travel. Some of the victims had already debuted in the First Division and had gained experience in Mexico and the United States.
Safeguarding Risks and Exploitation Mechanisms
i. Fraudulent recruitment: Opportunities at clubs and facilities shown to recruits did not exist.
ii. Debt bondage/coercion: Players' families borrowed money to pay for travel.
iii. Isolation and poverty: Victims were confined to overcrowded housing, and incurred housing and food debt.
iv. Sexual exploitation: Players were forced to participate in homosexual sexual encounters arranged by traffickers, as well as actively sourcing "clients" via online platforms.
v. Financial exploitation (living off the proceeds of forced prostitution): Traffickers confiscated earnings and demanded commissions where victims had sourced their own clients.

Warning Signs
Recruitment programmes requiring large upfront payments
Claims of connections to major clubs without verification (use of social media posts and photos)
Players arriving abroad without confirmed contracts
Governance Failures
Weak oversight of international trials
Lack of verification of recruitment agents
Safeguarding Actions
Public registries of licensed agents
Mandatory verification of overseas trials
Registration of migrant, youth athletes with embassies upon arrival
Education campaigns for families and players
Reporting mechanisms
Case Study 4: Recruitment Fraud and Secondary Criminal Exploitation
Context and Recruitment Pathway
A Nigerian footballer paid agents over one million naira for opportunities in Europe. The purported agents disappeared with the money. The athlete was offered a regional opportunity after being left near destitute and later joined an unregistered club/academy in South Africa linked to organised criminal activity.
Safeguarding Risks
i. Recruitment fraud by unlicensed agents for non-existent opportunities (upfront placement fees).
ii. Illegal clubs and academies acting as fronts for criminal enterprises and money laundering.
iii. Exploitation of undocumented migrant athletes: When the academy closed, the athlete became involved in drug trafficking and sexual exploitation networks as a means of survival.
Warning Signs
Agents demanding large upfront payments
Academies operating without federation registration
Foreign athletes without legal documentation

Governance Failures
• Weak enforcement against fraudulent agents • Lack of oversight of football academies
Safeguarding Actions
• Verification portals for legitimate academies • Support services for stranded migrant athletes
Case Study 5: Contractual Exploitation: Moninda Marube and the Duma Runners Club (United States)
Context and Recruitment Pathway
Kenyan long-distance runner Moninda Marube travelled to the United States on a visitor's visa to compete in road races, hoping to secure sponsorship opportunities. However, the races offered no prize money. He was introduced to William Kosgei, founder of the Duma Runners Club in Minnesota, which hosted East African runners and appeared to be a legitimate running club. Kosgei required Marube to sign a nine-page contract without adequate time to review its terms.
Safeguarding Risks and Exploitation Mechanisms
i. Contractual coercion: Athletes were pressured to sign complex agreements without legal advice.
ii. Document confiscation: Kosgei seized Marube's passport and visa.
iii. Financial exploitation: Most race winnings and appearance fees were retained by the club.
iv. Immigration vulnerability: After his visa expired, Marube feared reporting abuse.
v. Exploitative living conditions: Multiple athletes were housed in overcrowded accommodation with inadequate access to food.
Warning Signs
• Athletes forced to sign contracts immediately upon arrival • Intermediaries controlling athlete finances • Confiscation of travel documents • Restricted movement and communication • Overcrowded housing arrangements
Governance Failures
• Lack of oversight of athletic/running clubs and athlete management • Absence of contract transparency for international runners

Safeguarding Actions
• Contract safeguards
• Mandatory contract review periods
• Access to independent legal advice for athletes
• Financial transparency
• Athletes must receive direct payment of winnings
Case Study 6: Extortion, Contract Control and Trafficking Risks in Baseball Recruitment – Cuban Players and Smuggling Networks
Context and Recruitment Pathway
Due to restrictions on direct migration from Cuba to the United States, baseball players often rely on smuggling networks to reach third countries before signing with professional teams. This also has economic incentives in relation to remuneration thresholds.
Safeguarding Risks
i. Organised crime involvement: Smuggling groups facilitate player migration.
ii. Contractual exploitation: Players may be forced to surrender 20-30% of future earnings.
iii. Violence and coercion: Players may be kidnapped or extorted during the migration process.
Warning Signs
• Third-party intermediaries demanding future contract shares
• Athletes being held in transit countries before signing contracts
Governance Failures
• Policies unintentionally encouraging irregular migration routes
Safeguarding Actions
• Transparent international transfer pathways, even from politically isolated countries
• Monitoring of third-party recruitment networks

Case Study 7: Basketball Recruitment and Intermediary Exploitation

Context and Recruitment Pathway

Teenage basketball players from Africa and other regions are recruited to attend high schools or academies in the United States with promises of college scholarships and NBA careers.

Safeguarding Risks

i. Guardianship manipulation: Intermediaries sometimes become legal guardians of recruited athletes who have not yet reached the age of majority.

ii. Future earnings control: Players may be forced to sign agreements giving intermediaries up to 40% of future earnings.

iii. Institutional collapse: When academies or schools close, players may be abandoned without support.

Warning Signs

- Coaches, agents or scouts requesting guardianship of minors
- Contracts claiming shares of future professional earnings
- Unverified academies recruiting internationally

Governance Failures

- Weak oversight of international basketball academies
- Conflicts of interest between agents, coaches, schools, and scouts

Safeguarding Actions

- Regulation of athlete guardianship arrangements
- Independent verification of scholarship programmes

Case Study 8: Abuse, Exploitation, and Institutional Failure in Elite Taekwondo

Context and Recruitment Pathway

The athletes were elite female taekwondo practitioners representing the United States at international competitions, including the Olympic Games. Their pathway into the system followed a high-performance sport trajectory, progressing through national-level selection structures governed by USA Taekwondo and overseen by the United States Olympic Committee (USOC). As part of this pathway, athletes were required to train, compete, and interact closely with nationally appointed coaches, including the Lopez brothers, who held significant authority over selection, training opportunities, and career advancement.

Safeguarding Risks

i. Heightened vulnerability: Athletes alleged sexual abuse, including rape, perpetrated by coaches in positions of trust and authority. The abuse occurred within an environment (training centres, competitions, and travelling) where power asymmetries, reputational pressures, and restricted autonomy heightened athlete vulnerability.

ii. Abuse of institutional authority (sextortion): These abuses were compounded by coercive dynamics linked to the athletes' dependence on coaches for selection and progression within elite sport.

iii. Multiple, overlapping forms of exploitation: Forced labour and services, sexual exploitation, and sex trafficking (including of minors) through force, fraud, or coercion.

iv. Institutional failure: Previous complaints/allegations dating back years were not investigated.

Warning Signs

- Repeated allegations of sexual misconduct involving the same individuals
- Patterns of inappropriate relationships between coaches and athletes
- Athletes expressing fear of retaliation or loss of selection opportunities
- Restricted reporting or reluctance to disclose abuse
- Continued access of alleged perpetrators to athletes despite complaints
- Lack of transparency in disciplinary or investigative processes

Governance Failures

- Significant institutional failures by governing bodies (failing to act on reports of abuse)
- Inadequately investigated claims, and the accused coaches were allowed to maintain positions of authority
- Claims that institutions actively shielded perpetrators from law enforcement and internal disciplinary consequences
- Structural weaknesses included insufficient safeguarding policies, lack of independent reporting mechanisms, conflicts of interest in oversight processes, and a culture that prioritised performance outcomes over athlete welfare

Safeguarding Actions

- Establish independent, confidential reporting mechanisms accessible to athletes at all levels
- Implement mandatory safeguarding training for all coaches, staff, and athletes
- Enforce strict codes of conduct regulating coach-athlete relationships
- Introduce robust vetting, monitoring, and accountability systems for coaches
- Ensure immediate suspension and independent investigation of individuals accused of abuse or exploitation
- Strengthen whistleblower protections to prevent retaliation
- Create athlete-centred safeguarding frameworks that prioritise welfare over performance
- Facilitate external oversight and collaboration with law enforcement in cases of suspected criminal conduct

Case Study 9: Social Media Recruitment Targeting Refugees in East Africa (Kenya/United States)

Context and Recruitment Pathway

Saido, a Somali refugee living in the Kakuma refugee camp in Kenya, used basketball to build confidence, social connections, and community support within the camp. Her talent attracted the attention of individuals claiming to represent a United States-based sports academy. The recruiters contacted her through social media platforms and presented what appeared to be a life-changing opportunity: a “full-ride scholarship” pathway to the Women’s National Basketball Association (WNBA).

The recruiters specifically leveraged her vulnerable social position as a refugee and framed the opportunity as her “only chance” to escape the camp and achieve a better future. All communication occurred digitally, with no verifiable club documentation, official contracts, or independently confirmed affiliations.

Safeguarding Risks and Exploitation Mechanisms

- i. Targeting of vulnerable populations: Refugees living in camps with limited legal protection and economic opportunity were specifically targeted.
- ii. Fraudulent recruitment: Recruiters falsely presented themselves as legitimate scouts linked to overseas basketball opportunities.
- iii. Digital grooming and manipulation: Social media platforms were used to establish trust and create emotional dependency.
- iv. Debt bondage risks: Families were often expected to pay hidden “processing”, visa, or travel fees that could later be used as leverage for exploitation.
- v. Bait-and-switch exploitation: Promised sporting opportunities frequently functioned as gateways to labour exploitation, domestic servitude, or other forms of abuse after arrival in destination countries.
- vi. Immigration and documentation vulnerability: Refugees with uncertain legal status faced heightened difficulty seeking protection or reporting abuse.

Warning Signs and Indicators

- Recruitment targeting refugee camps or displaced communities
- Exclusive reliance on social media communication
- No verifiable club documentation or official recruitment channels
- Promises of elite professional pathways without transparent processes
- Messaging framing the opportunity as a “once in a lifetime” escape route
- Requests for visa, processing, or travel payments
- Lack of independently confirmed scholarships or educational arrangements

Governance or System Failures
• Limited safeguarding oversight within refugee sport environments • Weak verification systems for international scholarship offers • Lack of digital literacy and fraud awareness among vulnerable youth populations • Inadequate cross-border monitoring of sport recruitment networks operating online • Insufficient coordination between humanitarian organisations, sport bodies, and migration authorities
Safeguarding Actions and Prevention Measures
• Verification mechanisms for international scholarship and academy offers • Awareness campaigns within refugee camps on fraudulent sport recruitment schemes • Digital safety education for young athletes using social media platforms • Partnerships between humanitarian organisations and sport federations to vet recruiters • Independent reporting channels accessible to refugee athletes • Mandatory due diligence requirements for international athlete recruitment involving minors and displaced persons
Case Study 10: Large-Scale Fraudulent Recruitment and Forced Criminality (Ghana/Nigeria)
Context and Recruitment Pathway
In 2025, Ghanaian police reported the rescue of 76 young people who had been trafficked to Nigeria through fraudulent football recruitment schemes. The victims had been recruited through Facebook and WhatsApp advertisements promising trials with prestigious European football clubs and sponsorship opportunities within Nigerian professional football. Recruiters encouraged the athletes to utilise ECOWAS free movement arrangements to travel regionally, reducing perceptions of risk and creating the impression that the process was legitimate. Most communication occurred exclusively online, and victims were persuaded to pay “administrative” or “trial processing” fees before departure.
Safeguarding Risks and Exploitation Mechanisms
i. Fraudulent football recruitment: Victims were deceived with false promises of professional trials and contracts. ii. Forced criminality: Upon arrival, athletes were coerced into cyber-scamming operations rather than football activities.

i. Document confiscation: Phones and identification documents were seized to restrict movement and communication.
ii. Coercive control and isolation: Victims were confined in overcrowded compounds under exploitative conditions.
iii. Financial exploitation: Families were manipulated into sending additional funds for fabricated travel or administrative expenses.
iv. Peer recruitment coercion: Victims were pressured to recruit friends and acquaintances through their own social media networks, mirroring multi-level marketing (MLM) structures.
Warning Signs and Indicators
• Large-scale recruitment for supposedly “exclusive” football opportunities
• Recruitment conducted entirely through social media platforms
• Absence of formal contracts or verified club affiliations
• Requests for upfront administrative or trial fees
• Pressure to travel quickly across borders
• Multiple recruits travelling together without confirmed club arrangements
• Recruiters avoiding in-person meetings or official documentation
Governance or System Failures
• Weak regulation of digital football recruitment advertisements
• Limited cross-border oversight of recruitment networks within regional free movement systems
• Insufficient public awareness regarding online football scams
• Inadequate monitoring of unlicensed agents and intermediaries
• Limited protections for migrant youth athletes travelling independently
Safeguarding Actions and Prevention Measures
• Public awareness campaigns on online football trafficking schemes
• Verification systems for agents, academies, and overseas trials
• Regional cooperation between law enforcement agencies and football federations
• Monitoring and reporting mechanisms for suspicious digital recruitment activity
• Athlete education programmes on safe migration and recruitment processes
• Strengthened oversight of international youth recruitment and intermediary licensing

Case Study 11: Lily Abdullayeva Switching of Allegiance (Ethiopia/Azerbaijan)

Context and Recruitment Pathway

Lily Abdullayeva, an 18-year-old Ethiopian middle-distance runner, was persuaded by a Turkish coach to switch her sporting allegiance to Azerbaijan. The move was presented as a pathway to international success and Olympic participation.

She was promised substantial financial rewards, including a high salary, housing, and a vehicle. The recruitment process relied heavily on promises of improved living conditions and elite sporting opportunities abroad. Abdullayeva agreed to represent Azerbaijan internationally, believing that the move would provide both professional advancement and economic security.

Safeguarding Risks and Exploitation Mechanisms

i. Fraudulent promises and deception: Promised financial and lifestyle benefits did not materialise.

ii. Financial exploitation: The federation president allegedly appropriated a significant portion of her race winnings.

iii. Coerced doping: Coaches allegedly manipulated and deceived the athlete into using prohibited substances.

iv. Restriction of autonomy: Abdullayeva reported limitations on her movement and personal freedom.

v. Exploitative training demands: She was reportedly forced to continue competing despite injuries.

vi. Commodification of athletes: Athletes were treated as disposable assets whose value depended solely on performance outcomes.

Warning Signs and Indicators

- Lavish promises of wealth and lifestyle benefits without contractual guarantees
- Lack of independent legal or athlete representation during allegiance transfers
- Coaches exerting excessive control over athlete health and medical decisions
- Athletes competing while injured or medically unfit
- Financial opacity regarding prize money and earnings distribution
- Pressure to use supplements or substances without informed medical oversight

Governance or System Failures

- Weak oversight of international allegiance transfer systems
- Insufficient protections for young athletes relocating internationally
- Lack of independent monitoring of athlete welfare within national federations
- Inadequate safeguards against financial exploitation by sport officials
- Limited oversight of coach-athlete power dynamics in high-performance environments

Case Study 12: Allan and the Varzim SC “Pay-to-Play” Scam (France/Portugal)

Context and Recruitment Pathway

Allan, a 21-year-old French-Portuguese football player, was approached by an intermediary who claimed to have connections with Portuguese second-tier club Varzim SC. The intermediary informed Allan that the club wanted to sign him but could not pay him immediately. Instead, he was told that it was “common practice” for players to financially contribute in exchange for the opportunity to join a professional club.

The intermediary pressured Allan to quickly secure funds and encouraged him to sell personal belongings, including his motorbike, to raise the required money. Believing the opportunity was legitimate and fearing he would lose the chance to play professionally, Allan paid approximately €12,000.

Safeguarding Risks and Exploitation Mechanisms

- i. Recruitment fraud: False claims were made regarding legitimate club interest and professional opportunities.
- ii. Financial exploitation: The athlete was pressured into making substantial upfront payments.
- iii. Informal and undocumented arrangements: No formal documentation justified the payment or guaranteed employment.
- iv. Psychological pressure and urgency: The intermediary exploited Allan’s fear of missing a professional opportunity.
- v. Economic vulnerability: The athlete was encouraged to liquidate personal assets to finance the scheme.

Warning Signs and Indicators

- Demands for upfront payments in exchange for contracts or trials
- Claims that “pay-to-play” arrangements are standard practice
- Absence of written contracts or formal agreements
- Pressure to make rapid financial decisions
- Requests to transfer money directly to intermediaries
- Lack of direct communication with the club itself

Governance or System Failures

- Insufficient regulation and monitoring of football intermediaries
- Weak enforcement against fraudulent recruitment schemes
- Limited awareness among players regarding legitimate recruitment practices
- Lack of accessible verification systems for club recruitment processes

Safeguarding Actions and Prevention Measures

- Mandatory licensing and regulation of football intermediaries
- Public awareness campaigns on recruitment fraud and “pay-to-play” scams
- Verification platforms for legitimate club trials and contracts
- Access to player union support services and legal advice
- Stronger reporting mechanisms for fraudulent recruitment activity
- Education programmes for young athletes on safe recruitment pathways

LESSONS LEARNT FOR COACHES AND GRASSROOTS PRACTITIONERS



From the above case studies, certain lessons and decision points can be distilled for coaches and grassroots practitioners and linked to safeguarding actions.

Situation / Risk Pattern	What This Looks Like in Practice	Decision Point for Practitioners	Immediate Action (Report / Intervene)	Prevention Going Forward
A coach or senior athlete holds excessive power over selection and careers	One individual controls training access, competition selection, and progression	<i>Am I the only person making decisions that affect this athlete's future?</i>	Escalate to club/federation safeguarding lead; ensure decisions are documented and transparent	Introduce multi-person selection panels and written criteria
Blurred professional boundaries	Private meetings, late-night messages, travel alone with athletes	<i>Is this interaction necessary, transparent, and observable?</i>	Stop one-on-one unsupervised interactions; log and report concerns if patterns emerge	Enforce the two-adult rule and clear communication policies
An athlete shows fear, withdrawal, or reluctance to speak	Avoids certain coaches, becomes anxious about training or travel	<i>Could this behaviour signal harm or coercion?</i>	Create a safe disclosure space; report concerns to the safeguarding officer even without full evidence	Build athlete voice mechanisms (anonymous reporting, regular check-ins)

Repeated rumours or complaints about the same individual	"Everyone knows", but no formal action was taken	<i>Am I ignoring a pattern because it's informal or unproven?</i>	Treat patterns seriously; escalate immediately to independent safeguarding structures or law enforcement (if abuse or exploitation is suspected)	Establish mandatory reporting rules and tracking of complaints
Athlete dependency on a single coach or agent	An athlete's career, income, or migration depends on one person	<i>Does this dependency limit the athlete's ability to refuse or report?</i>	Introduce a second point of contact; flag risk to safeguarding structures	Promote shared support networks (multiple coaches, mentors)
Pressure to prioritise performance over welfare	Injuries ignored, inappropriate behaviour tolerated due to success	<i>Am I excusing harmful conduct because of results?</i>	Intervene immediately; document and report welfare concerns	Embed "welfare over winning" policies and leadership accountability
The institution discourages reporting or handling complaints internally only	"Keep this within the team," no external escalation	<i>Is this being handled independently and transparently?</i>	Report through external or independent mechanisms (e.g., federation, hotline)	Ensure independent reporting channels are visible and accessible
Unsupervised travel, camps, or accommodation	Athletes share rooms with coaches, or lack oversight, or have no appropriate chaperones	<i>Are safeguarding controls in place for this environment?</i>	Adjust arrangements immediately; ensure supervision and safeguarding compliance	Implement travel policies (separate accommodation, supervision ratios)
Young or minor athletes in elite pathways	Early specialisation, relocation, and heavy reliance on adults	<i>Are additional protections in place for minors?</i>	Report any concerns involving minors urgently; follow child protection protocols	Apply heightened safeguarding standards for minors
Allegations of sexual misconduct or coercion	Any report, disclosure, or credible suspicion	<i>Do I recognise this as a safeguarding emergency?</i>	Immediately report to the safeguarding lead and law enforcement where required; do not investigate yourself	Regular training on recognising and responding to abuse
Lack of clear reporting knowledge among staff/athletes	People don't know where or how to report concerns	<i>Would I know exactly what to do if a disclosure happened now?</i>	Share reporting pathways immediately; ensure visibility (posters, briefings)	Conduct routine safeguarding briefings and drills

DELVE DEEPER

From the above case studies, we can see that across sports, several systemic safeguarding risks recur:

1. unregulated intermediaries;
2. recruitment fees and debt dependency;
3. confiscation of identity documents;
4. contract manipulation or substitution;
5. immigration vulnerability;
6. residential isolation of youth athletes.

Safeguarding systems must therefore focus on recruitment regulation, contract transparency, athlete mobility protections, and independent welfare oversight.

Exploitation in sport recruitment typically unfolds through four sequential but overlapping stages:

1. Recruitment and talent identification
2. Migration and mobility
3. Dependency and control
4. Exploitation and abuse

Understanding these stages allows safeguarding practitioners to identify intervention points before exploitation becomes entrenched.

Stage 1: Recruitment and Talent Identification	
<i>Typical Modus Operandi</i>	
Migrant youth athletes are identified through trials, scouting networks, or informal intermediaries. Recruitment frequently targets individuals from economically disadvantaged backgrounds or regions where professional sport represents a rare mobility pathway.	
Intermediaries often present themselves as	licensed agents
	academy recruiters
	scouts
	coaches
However, in many cases, they operate outside formal regulatory structures.	
Common Safeguarding Risks	
Fraudulent promises	Athletes are promised professional contracts, scholarships, or trials with well-known clubs that do not exist.
Recruitment fees	Players or families are asked to pay high upfront costs for trials, visas, travel or “placement” in clubs or academies.
Unlicensed intermediaries	Recruiters operate without oversight from sport federations.
Targeting minors	Youth athletes may be recruited without their parents’ understanding of the contractual implications.

Warning Signs

Requests for large upfront payments

Lack of written contracts or documentation

Recruiters claiming informal “contacts” at major clubs

Trials organised outside federation oversight

Social media recruitment campaigns targeting young athletes

Prevention Measures

Public registries of licensed agents and scouts

Mandatory verification of overseas trials

Education programmes for players and families

Federation oversight of youth recruitment activities

Stage 2: Migration and Athlete Mobility

Typical Modus Operandi

Athletes are transported domestically or internationally to join academies, clubs, or training programmes. Migration may occur through:

		legal channels (visitor visas, student visas, sports visas)
		irregular migration routes
		smuggling networks

Even when migration is legal, exploitation often emerges after arrival, when athletes become dependent on intermediaries.

Common Safeguarding Risks

Immigration vulnerability	Short-term visas may expire quickly, leaving athletes undocumented.
Passport confiscation	Agents or academy staff seize travel documents.
Isolation	Athletes are placed in housing controlled by recruiters.
Debt bondage	Families borrow money to finance travel.

Warning Signs

Athletes do not possess their own passports

Multiple foreign players living in crowded accommodation

Limited contact between athletes and families

Athletes are unsure of their legal immigration status

Prevention Measures	
Explicit prohibition on passport confiscation	
Monitoring of international athlete housing arrangements	
Immigration orientation for foreign athletes	
Federation reporting requirements for foreign player recruitment	
Stage 3: Dependency and Coercive Control	
<i>Typical Modus Operandi</i>	
Once athletes are geographically and/or socially isolated, intermediaries create relationships of dependency. Control is often exerted through psychological, financial, and administrative mechanisms.	
Common Safeguarding Risks	
Financial control	Agents or clubs control athletes' bank accounts, prize money, or salaries.
Contractual manipulation	Athletes sign contracts they do not understand, sometimes in foreign languages.
Communication restrictions	Athletes are prevented from contacting families or authorities.
Movement restrictions	Athletes are prevented from leaving training facilities or residences.
Psychological abuse	Constant criticism or humiliation is used to erode self-confidence.
<i>Warning Signs</i>	
Athletes unable to access their own earnings	
Agents controlling accommodation and transportation	
Contracts signed without independent legal advice	
Athletes reporting fear of deportation or arrest	
Prevention Measures	
Mandatory contract review periods	
Independent legal support for athletes	
Direct payment of salaries and prize money to athletes	
Confidential reporting mechanisms	

Stage 4: Exploitation and Abuse

Typical Modus Operandi

Once dependency is established, athletes may be subjected to various forms of exploitation, including labour exploitation, sexual exploitation, and financial abuse. Exploitation may occur within sport systems or in external criminal economies.

Forms of Exploitation Observed in Sport

Labour exploitation	Athletes are often forced to train excessively, without pay or adequate nutrition.
Financial exploitation	Agents, clubs or other intermediaries take disproportionate shares of earnings or impose fabricated debts.
Sexual exploitation	Athletes may be forced into prostitution or coerced sexual activity.
Criminal exploitation	Athletes may be drawn into drug trafficking or other criminal activity.
Contractual exploitation	Athletes are forced to sign agreements that require them to surrender large portions of their future earnings.

Warning Signs

Players reporting unpaid wages

Athletes forced to participate in activities unrelated to sport

Physical or emotional deterioration

Threats against athletes or their families

Prevention Measures

Athlete welfare inspections of academies

Strong whistleblowing mechanisms

Independent safeguarding investigations

Collaboration between sporting bodies and law enforcement

Key Safeguarding Intervention Points

Effective prevention requires action at multiple stages of the recruitment chain.

Stage	Intervention Priority
Recruitment	Agent regulation and recruitment transparency
Migration	Protection of travel documents and immigration support
Dependency	Contract transparency and financial independence
Exploitation	Athlete welfare monitoring and reporting mechanisms

Part III:

RESPONSE, INTERVENTION, SUPPORT



Children and youth athletes often find it extremely difficult to recognise, articulate, and report experiences of maltreatment. Children may lack the language, confidence, or conceptual understanding necessary to identify abuse or exploitation, particularly when the harm occurs within trusted relationships such as those with coaches, agents, or other authority figures.[i] As a result, safeguarding cannot rely on children to independently identify or report harm. It is the responsibility of adults working in sport to create safe environments, recognise indicators of abuse, and respond appropriately when concerns arise. [c]

Safeguarding involves both prevention and response. Preventive safeguarding focuses on creating safe environments, while protection refers to the actions taken when harm or risk of harm is identified. Both are essential components of effective safeguarding systems. Safeguarding is not solely the responsibility of safeguarding officers. It is a shared responsibility across the sporting organisation. Anyone working with migrant youth athletes, including coaches, educators, safeguarding officers, volunteers, and other professional staff, must understand their role in safeguarding. Those working closely with athletes are often the first to notice behavioural changes, disclosures, or warning signs. Equipping sport professionals to recognise behavioural and contextual warning signs, receive disclosures sensitively, and activate appropriate reporting and protection mechanisms is of paramount importance.

At the same time, youth athletes should be supported in understanding their rights and knowing whom to approach if they feel unsafe. Age-appropriate education about respect, bodily autonomy, and reporting pathways can help build protective awareness without placing responsibility for safeguarding on children.[ci]

Reporting maltreatment in sport is frequently delayed, minimised, or never disclosed. Long-term abuse, abuse experienced at a young age, and particularly violent abuse are especially difficult to report and may not even be recalled until adulthood.[i] Survivors often experience intense feelings of guilt, shame, and self-blame, particularly in cases where gifts, opportunities, or career advancement were offered in exchange for compliance. Emotional manipulation, including grooming within coach-athlete relationships, has been shown to intensify the psychological impact of abuse. In some cases, athletes may even interpret abusive relationships as consensual because of the powerful hierarchical structures within sport.[iii] Disclosure is further complicated by the broader culture of elite sport. Young athletes may fear losing opportunities, disappointing their parents, or jeopardising their future careers if they report abuse.

As discussed earlier in the Toolkit, the culture of sport itself can also obscure recognition of abuse. Certain behaviours, such as harsh training regimes, emotional intimidation, or extreme discipline, may become normalised within performance environments. Athletes and third parties may fail to identify these behaviours as harmful, interpreting them instead as a necessary part of high-performance sport. In addition, gender norms and social expectations can influence disclosure patterns, particularly where male victims are concerned.

Safeguarding requires proactive engagement from adults across the sport system. Effective safeguarding depends not only on individuals' willingness to respond appropriately, but also on organisations' broader readiness to confront abuse and exploitation. Organisations that prioritise reputation, deny the existence of abuse, or lack safeguarding capacity may unintentionally enable perpetrators and delay protective action.

Part III focuses on the response stage of the safeguarding journey. It provides guidance for coaches, safeguarding officers, educators, and social workers on how to recognise signs of harm, receive disclosures in a trauma-informed manner, and activate appropriate reporting and referral mechanisms. Migrant youth athletes may face additional vulnerabilities related to recruitment practices, migration status, financial dependency, and power imbalances within international sport systems.

Understanding Your Role in Safeguarding

Children and youth athletes often do not recognise abuse or may feel unable to speak up – especially when the harm comes from someone they trust, like a coach or agent. That means it is not the child's responsibility to report abuse. It is the responsibility of adults in sport to notice when something is wrong and take action.

Safeguarding is everyone's role. Coaches, educators, volunteers, and staff are often the first to see warning signs, changes in behaviour, or hear concerns. Knowing how to respond safely and appropriately is critical. At the same time, sport organisations must have clear systems in place to support reporting and protect athletes.

Many athletes delay or never report harm due to fear, shame, or worry about losing opportunities. In sport environments, harmful behaviours can also be normalised, making them harder to identify.

This section focuses on what to do when there are concerns. It will help you recognise signs of harm, respond to disclosures in a safe and supportive way, and connect athletes to the right support services.



Chapter 5

RESPONDING TO DISCLOSURE AND HARM



5.1 Trauma-Informed Interviewing; 5.2 Behavioural Indicators; 5.3 Mandatory Reporting v Internal Reporting: Clarifying legal obligations and internal procedures.

Introduction

Safeguarding systems are only effective when individuals know how to respond when harm or risk is identified. For migrant youth athletes pursuing opportunities in European sport systems, disclosure of abuse, exploitation, trafficking, coercion, or neglect may occur in a variety of contexts: during training sessions, in educational environments, within safeguarding reporting structures, or during support interventions. Safeguarding responses in sport must prioritise the safety, dignity and rights of young athletes. Migrant youth athletes are particularly vulnerable due to factors such as dependency on coaches or agents, language barriers, cultural isolation, and immigration status. These dynamics may create significant barriers to disclosure and reporting. Disclosure and reporting are often the weakest link in safeguarding systems, largely due to a lack of trust in institutions, fear of retaliation, uncertainty about reporting procedures, and power imbalances within sport environments.

For migrant youth athletes, these barriers may be heightened by a fear of losing opportunities to play professionally; immigration vulnerability or irregular status; dependence on adults controlling travel, contracts, or accommodation; cultural norms discouraging challenging authority; and/or limited knowledge of rights or reporting pathways. This chapter provides guidance on how SafeSport practitioners should respond, in line with international best practices, when harm or abuse is disclosed or suspected. It focuses on

- (i) trauma-informed interviewing and disclosure handling,
- (ii) behavioural indicators of abuse, exploitation, or trafficking, and
- (iii) legal and organisational reporting obligations.

The chapter is structured around the 5R safeguarding pathway.[cv]

1.Readiness: ensuring individuals and organisations are prepared to respond to safeguarding concerns.

2.Recognition: identifying indicators of harm or exploitation.

3.Disclosure and Reporting: enabling safe communication and ensuring concerns are recorded and reported.

4.Response: implementing safeguarding procedures to protect the child or young person.

5.Remedy: ensuring longer-term protection, support, and accountability.

This framework recognises that safeguarding is a journey rather than a single action, requiring coordinated responses from coaches, educators, safeguarding officers and social services, each with their own specific roles and responsibilities.

ROLE	PRIMARY RESPONSIBILITIES
Coaches	Recognise indicators and respond appropriately
Grassroots educators	Recognise concerns and support disclosure
Safeguarding officers	Record, assess risk, and report
Social workers	Investigate, protect, and coordinate services



Quick Guide for Coaches: Reporting Thresholds

CATEGORY	DEFINITION	INDICATORS	EXAMPLES	REQUIRED RESPONSE
Poor Practice	Behaviour that falls below accepted safeguarding or coaching standards but may not constitute abuse. Poor practice can still create unsafe environments or increase the risk of harm if not addressed.	• Inappropriate language or humiliation • Excessive shouting or degrading discipline • Lack of supervision during activities • Favouritism or exclusion of athletes (may be a grooming tactic) • Ignoring safeguarding procedures	A coach repeatedly shouts insults at players during training. A coach transports athletes alone without parental consent or organisational approval.	Address through internal safeguarding procedures, coaching supervision, or disciplinary action. Record the concern and report it to the Safeguarding Officer or Designated Safeguarding Lead (DSL).
Abuse	Behaviour that causes harm or poses a significant risk of harm to a child or young person. Abuse may be physical, emotional, sexual, or involve neglect. In most cases, it constitutes a criminal offence .	• Unexplained injuries • Sudden behavioural changes • Fear of a particular individual (coach, staff, peer) • Sexualised behaviour or comments • Signs of emotional distress	A coach physically assaults an athlete during training. An adult sends sexually explicit messages to a youth athlete. A staff member repeatedly humiliates or threatens athletes.	Immediate safeguarding response required. Record the concern and report to the DSL immediately. The DSL must determine whether referral to child protection services, social services or law enforcement is required.

Exploitation	A serious form of maltreatment where an individual uses power, control, or vulnerability to gain financial, sexual, or other benefits from the athlete. Exploitation often involves coercion, deception, or manipulation, particularly in migration or recruitment contexts.	• Control of athlete finances or identity documents • Pressure to repay recruitment debts • Restriction of movement or communication • Promises of contracts or team placement in exchange for favours • Athletes abandoned after failed trials or injury	An agent confiscates an athlete's passport and controls their salary.	High-risk safeguarding concern. Report immediately to the DSL. Cases require referral to law enforcement, and child protection or social services. Report to relevant anti-trafficking referral mechanism.
			A young player is forced to work or compete to repay recruitment fees.	
			An athlete is recruited internationally with false promises and abandoned without support.	

Practice Note: Receiving a Disclosure – What Matters Most

When a young athlete discloses harm, your role is not to investigate, but to respond in a way that protects the athlete and preserves the integrity of any future investigation. The priority is psychological safety, not information gathering. Practitioners should listen without interruption, reassure without judgment, avoid leading questions, and clearly explain what will happen next. Only minimal clarification is required; detailed questioning must be left to trained investigators or law enforcement.

Across all roles, the core safeguarding sequence is the same: Listen à Reassure à Record à Report. Accurate documentation, using the athlete's own words, is essential. Concerns must be escalated immediately through designated safeguarding channels and, where criminal conduct is suspected, referred to the appropriate authorities.

A trauma-informed approach recognises that disclosures may be fragmented, delayed, or emotionally complex. These are normal responses to harm, not indicators of unreliability. Maintaining clear professional boundaries, acting promptly, and prioritising the athlete's safety at all times are the foundations of effective safeguarding practice.

5.1 Trauma-Informed Interviewing: Best Practice for Receiving a Disclosure



Young athletes may disclose abuse in different ways: directly, indirectly, or through behavioural signals. In many cases, they may first “test” the system by sharing partial information to assess whether adults are safe to trust.[cvi] How adults, particularly those in positions of power and authority (such as coaches), respond at this moment is critical. A supportive response can build trust and enable protection, whereas a dismissive or poorly handled response may silence the young person and expose them to further harm.

As discussed earlier in this Toolkit, trauma affects memory, communication and emotional regulation. Individuals who have experienced abuse may struggle to recall events chronologically, provide fragmented or inconsistent accounts, show strong emotional reactions or appear detached. These responses are normal trauma reactions, not indicators that the disclosure is unreliable. A trauma-informed approach recognises these impacts and aims to minimise further harm during the disclosure process. Practitioners should view disclosure as a process that may unfold over time. Pressuring athletes to provide detailed accounts prematurely may increase distress and reduce accuracy. Psychological safety should be prioritised over information gathering.

Core Principles of Trauma-Informed Responses

A trauma-informed response should aim to:

1. **Promote safety:** Ensure the young person feels physically and emotionally safe.
2. **Build trust:** Respond calmly and respectfully. The athlete is taking a significant risk by disclosing.
3. **Empower the athlete:** Allow them to speak in their own words and at their own pace.
4. **Avoid retraumatisation:** Minimise repeated questioning or multiple interviews.
5. **Prioritise protection:** Ensure the information is recorded and passed to the appropriate safeguarding, child protection or law enforcement authorities.

Steps When Receiving a Disclosure

If a migrant youth athlete indicates that they are being harmed, SafeSport practitioners should follow these steps.

STEP 1: STAY CALM AND LISTEN	
Remain calm and attentive (active listening).	
Allow the young person to speak freely.	
Avoid interrupting or expressing shock or anger.	
Emotional reactions from adults may discourage further disclosure.	
STEP 2: REASSURE THE YOUNG PERSON	
Tell them	They did the right thing by telling someone.
	The situation is taken seriously.
	They are not to blame.
STEP 3: DO NOT PROMISE ABSOLUTE CONFIDENTIALITY	
Explain clearly that	The information will need to be shared with professionals who can help protect them.
	Only relevant safeguarding personnel will be informed.
STEP 4: ASK MINIMAL QUESTIONS	
Avoid investigative questioning.	
Your role is to receive the disclosure, not investigate it.	
Examples of appropriate questions	
<i>"Can you tell me more about what happened?"</i>	
<i>"When did this happen?"</i>	
Avoid leading questions	
<i>"Did your coach hit you?"</i>	
<i>"Was it sexual?"</i>	
STEP 5: EXPLAIN WHAT HAPPENS NEXT	
Vulnerable athletes (such as migrant youth) often fear the consequences of disclosure.	
Explain	What will happen with the information
	Who will be told
	That their safety is a priority
STEP 6: RECORD THE INFORMATION	
Write down exactly what was said.	
Use the person's own words.	
Include date, time, location and any witnesses.	
Sign and date the record.	
Accurate recording is critical for safeguarding investigations.	

What NOT to Do

SafeSport Practitioners should avoid the following actions

- Conducting their own investigation
- Contacting the alleged perpetrator
- Making promises of secrecy
- Dismissing the concern because the evidence is unclear
- Asking repeated or leading questions

Facilitators and coaches have a duty to report, not investigate.



ROLE-SPECIFIC GUIDANCE

Coaches

Coaches are often the first adults to observe changes or receive informal disclosures. Coaches should (i) listen calmly and without judgment, (ii) avoid probing for details, (iii) reassure the athlete, (iv) document concerns, and (v) immediately inform the designated safeguarding officer. Coaches should never attempt to investigate allegations themselves.

Grassroots Educators

Educators working with migrant youth athletes may receive disclosures in classroom or mentoring environments. Educators should (i) listen calmly and without judgment, (ii) provide emotional support (reassurance) over probing for details, (iv) document concerns, and (v) escalate through safeguarding or child protection channels.

COACHES AND GRASSROOT EDUCATORS ROLE

LISTEN

REASSURE

RECORD

REPORT the concern immediately

Never attempt to investigate or resolve the issue yourself

Safeguarding Officers

The Designated Safeguarding Officer/Lead serves as the primary point of contact for all Club/Academy staff and volunteers to report and refer safeguarding concerns to. Safeguarding officers play a more formal role in (i) assessing safeguarding risk, (ii) provide guidance and support, (iii) coordinating documentation and ensuring disclosure is documented properly, (iv) initiating reporting procedures, (v) initiating internal safeguarding procedures, (vi) coordinating referrals and liaising with external authorities, and (vii) ensuring the athlete receives appropriate support. The role of a safeguarding officer includes managing the internal investigation process for disciplinary purposes, handling lower-level misconduct (such as poor practice) that does not reach the threshold for criminal action. If a criminal offence is suspected, the matter must be referred to the appropriate authorities immediately (law enforcement and social services/child protection). A criminal investigation is often performed in parallel to a sports organisation's internal investigation. Most safeguarding policies require that the Safeguarding Officer suspend an alleged perpetrator within the Club/Academy pending a criminal investigation. The athlete's safety is of paramount importance, and that should take precedence. The sporting body's safeguarding policy is to guide safeguarding officers in respect of this.

Social Workers

Social workers may conduct structured assessments or interviews once formal protection processes begin. Their role includes (i) protective interventions, (ii) safeguarding investigations, (iii) psychosocial assessment, (iv) coordination with child protection or social services and law enforcement, and (v) long-term support planning.

The toolkit will not provide much guidance here, as social workers must abide by their own formal trauma-informed protocols, standards of practice and statutory duty of care. Rather more focus is placed on the role of Safeguarding Officers, who are a vital link between coaches and other individuals within sport organisations and external authorities, such as child protection and law enforcement.

Sport Organisations

Sport organisations should identify who is responsible for initiating investigations, appointing investigators, managing evidence, and communicating outcomes. Without clear accountability structures, investigations may become delayed, inconsistent, or influenced by conflicts of interest, ultimately undermining trust in the process.

Investigations should be conducted by appropriately trained and independent investigators. Because abuse cases frequently involve complex power dynamics and trauma-related behaviours, investigators require specialised expertise in safeguarding, trauma-informed interviewing techniques, and the evidentiary challenges typical of abuse cases. Organisations must ensure that investigative teams possess the professional skills and independence required to conduct thorough and impartial inquiries.[cviii]

Sport organisations must recognise that abuse allegations may simultaneously fall within both sport governance frameworks and national legal systems. Investigative processes must be designed to avoid interfering with law-enforcement procedures while still ensuring that safeguarding measures remain in place to protect athletes.

Evidence may take multiple forms, including testimonial accounts, physical and documentary materials, digital communications, and circumstantial evidence related to behavioural patterns or relationships between individuals. Effective investigative processes require clear protocols for collecting, recording, storing, and evaluating such evidence to ensure that findings are credible and legally defensible.[cix]

Investigations must be conducted in ways that respect the rights and well-being of all affected persons, including victims, witnesses, and individuals accused of misconduct. This includes maintaining confidentiality, providing appropriate support to survivors, and ensuring that investigative procedures are fair and transparent.



COACH'S GUIDE

HANDLING A DISCLOSURE SAFELY AND RESPONSIBLY



CONCEPT

When an athlete discloses harm, the coach's role is to act as a safe first point of contact, not an investigator or decision-maker. The objective is to create a space where the athlete feels heard, respected, and protected, while ensuring that information is passed through the appropriate safeguarding channels. Trust is the foundation of disclosure, and how a coach responds in that moment can determine whether the athlete continues to seek help or withdraws.

WHY IT MATTERS

Athletes, particularly migrant youth athletes, often disclose abuse cautiously and incrementally. They may test whether an adult is trustworthy before sharing more. A calm, respectful, and structured response can enable protection and support. A poor response, such as panic, disbelief, or excessive questioning, can shut down communication and increase the risk of ongoing harm.

Coaches must also avoid actions that could compromise evidence or future investigations. Safeguarding depends on appropriate responses and timely referrals, not on informal resolution.

WHAT TO DO

i. Create a safe space

Move to a quiet, private setting (without isolating the athlete). If you go to an office, leave the door open.

Give your full attention (no phones, no interruptions).

Use open and calm body language.

ii. Practise active listening

Active listening means:

- Allowing the athlete to speak freely without interruption
- Nodding or using brief verbal cues (“I understand,” “Go on”)
- Not rushing, correcting, or finishing their sentences
- Accepting pauses and silence

The goal is to hear and understand, not to gather evidence.

iii. Use an empathetic, trauma-informed (not emotional) approach

Empathy means showing understanding and support without becoming overwhelmed or reactive.

Appropriate: “I’m really glad you told me. That sounds difficult.”

Avoid: visible shock, anger, or distress (e.g. “That’s terrible! I can’t believe it!”)

A trauma-informed approach:

- Validates the athlete’s experience
- Maintains emotional stability
- Helps the athlete feel safe and in control

iv. Reassure clearly

“You did the right thing by telling me.”

“This is not your fault.”

“I’m going to help you get the right support.”

v. Do Not investigate

- Do not ask leading or detailed questions
- Do not try to “get the full story”
- Do not contact the alleged perpetrator

Limit questions to basic clarification only if necessary (e.g. “When did this happen?”).

vi. Be honest about confidentiality

Explain that you cannot keep this a secret. Clarify that information will only be shared with people who can help keep them safe. Assure them that they are not in trouble, and won’t be even if the police need to be involved.

vii. Record the disclosure

- Use the Safeguarding Incident Reporting Form (Chapter 6 of the Toolkit)
- Write down exactly what the athlete said (their words, not your interpretation)
- Include date, time, location, and any relevant observations
- Complete this as soon as possible after the conversation

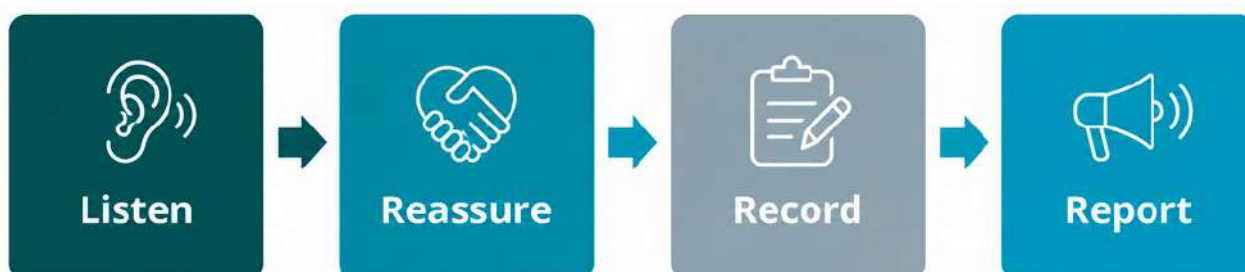
viii. Report immediately

- Submit the report to the Designated Safeguarding Officer
- If there is immediate danger or a serious offence, escalate to the appropriate authorities

WHAT IT MEANS IN PRACTICE

In real situations, disclosures may be unclear, emotional, or incomplete. A coach might notice behavioural changes, receive a partial comment, or be approached informally after training. The priority is not to resolve the situation, but to respond consistently and safely.

Coaches should follow a simple operational principle:



Trust is built through calm presence, respectful listening, and predictable action. By maintaining clear boundaries, using the Safeguarding Incident Reporting Form, and escalating concerns appropriately, coaches play a critical role in protecting athletes without taking on responsibilities that belong to safeguarding officers or investigators.

DELVE DEEPER

Responding to Disclosure and Harm: Role of the Safeguarding Officers in Handling Evidence and Escalation

The Designated Safeguarding Lead (DSL) plays a critical role in ensuring that allegations of maltreatment are managed responsibly and, where necessary, referred to the appropriate authorities. However, it is important that safeguarding officers do not undertake full investigative functions, as this responsibility typically lies with designated investigators, sport governing bodies (SGBs)/sport organisations, or law enforcement agencies. Instead, their role focuses on receiving concerns, documenting information, preserving evidence where possible, and escalating cases through appropriate safeguarding and legal channels.

Evidence relating to abuse and exploitation in sport can take several forms, and safeguarding officers should be aware of the different types that may arise when concerns are reported. One of the most common forms is testimonial evidence, which includes spoken or written accounts provided by victims, witnesses, experts, or individuals with relevant knowledge. These accounts are typically collected during formal interviews or may be submitted as written statements, sometimes through legal representatives. While safeguarding officers may receive an initial disclosure, detailed interviews should generally be conducted by trained investigators or law-enforcement professionals to avoid compromising the integrity of the evidence. [cx]

Another important category is physical evidence, which may include DNA samples, fingerprints, clothing, or other objects linked to an alleged incident. Safeguarding officers should avoid handling or altering such materials wherever possible and ensure that they are preserved in a manner that does not contaminate or compromise potential forensic examination. Remember, it is not your job to conduct a forensic investigation. Any (mis)handling/contamination of physical evidence can jeopardise a criminal case.

Documentary evidence may also arise in safeguarding cases. This can include photographs, written records, medical documentation, training schedules, receipts, or other documents that may provide contextual information about alleged incidents. Digital evidence is also increasingly significant. This may involve electronic materials such as text messages, emails, social media communications, call logs, security footage, or data stored on digital devices, including mobile phones, USB drives, or computer hard drives.^[i] Particularly in cases involving grooming, victims (and their families) should be encouraged to save the material and not delete it from digital devices – no matter how odious the material may be. Such material may be important for subsequent criminal investigations. They are to be provided to law enforcement. Safeguarding officers should not view any videos or photographs of sextortion or child sexual abuse material – even if the affected athlete alleges possessing documentary evidence of this. Refer the matter to law enforcement immediately and preservation of the abuse material. Clubs and academies should also preserve any security footage if the alleged incident took place on club premises.

Circumstantial evidence, including behavioural patterns, relationships between individuals, and other contextual factors that may support or explain allegations, may also be important in internal and external investigations.^[cxii] For example, patterns of inappropriate communication, grooming behaviours, or repeated boundary violations may help clarify the broader circumstances surrounding a safeguarding concern. It is thus important for safeguarding officers to ensure that issues such as these are reported by athletes, coaches or third parties through the creation and maintenance of safe reporting mechanisms, including independent reporting mechanisms.

When safeguarding officers receive information that suggests a potential safeguarding breach or criminal offence, they must carefully consider when escalation is required. In many cases, the DSL must report concerns to the relevant sport governing body (SGB) in accordance with organisational safeguarding policies.^[cxiii] Escalation is particularly important when allegations involve serious misconduct, abuse of power, or behaviour that may pose an ongoing risk to athletes or other participants.

ROLE OF A SAFEGUARDING OFFICER: WHAT THEY DO (AND DON'T DO)

A safeguarding officer is responsible for handling reports of abuse or harm in sport. Their job is not to fully investigate the case. Instead, they must (i) listen to concerns or disclosures, (ii) record what was said accurately, (iii) help keep any evidence safe, and (iv) report the case to the right authorities. Think of them as the first point of contact, not the investigator.

When someone reports abuse, different kinds of evidence may be involved:

1. Personal accounts (testimony)

This includes what victims (often referred to as the complainant) or witnesses say – either spoken or written. Safeguarding officers may receive the first report. Detailed interviews should be done by trained investigators or police, depending on the severity of the alleged harm.

2. Physical evidence

This could include items such as clothing or objects linked to the incident. Safeguarding officers should not handle or interfere with these items. Improper handling can damage a legal case. If a complainant has just been harmed, rather alert the police and take them to the nearest hospital or specialised clinic. Instruct the complainant to not wash or change out of their clothes.

3. Documents and records

This includes photos, medical reports, written notes, schedules or receipts. These can help show what happened or provide context.

4. Digital evidence

This is increasingly important and includes text messages, emails, social media chats, call logs, videos or photos. Do not delete anything, even if it is upsetting. Save it and pass it on to law enforcement.

Important: Safeguarding officers should not view illegal material (like abuse images). These must be reported to the police immediately.

Clubs should also keep CCTV footage if an incident occurred on-site.

5. Behaviour patterns (circumstantial evidence)

Sometimes the bigger picture matters, such as repeated inappropriate messages, grooming behaviour, and ongoing boundary violations. These patterns can help explain what is happening. Safeguarding officers should note any concerns regarding inappropriate behaviour by staff, volunteers or peers.

When Must Cases Be Reported (Escalated)?

Safeguarding officers must report concerns when there is serious misconduct or abuse; someone is at ongoing risk; or there is a possible criminal offence. This usually involves reporting to the relevant sport organisation (like a federation), and/or law enforcement (police).

Trauma-Informed Interviewing for Safeguarding Officers and Designated Safeguarding Leads

While coaches and educators are often the first individuals to receive a disclosure, Safeguarding Officers or Designated Safeguarding Leads (DSLs) may be required to conduct follow-up conversations with the athlete in order to clarify safeguarding concerns and determine appropriate reporting or referral actions. These conversations must be conducted with care. Poorly handled questioning can (i) increase distress for the young person (potentially leading to retraumatisation or secondary victimisation), (ii) discourage further disclosure, and (iii) contaminate evidence that may later be used in child protection or criminal investigations.[cxiv] Safeguarding officers should follow trauma-informed and child-centred interviewing principles, focusing on support, clarification, and safeguarding action, rather than formal investigation.[cxv] This approach aligns with international safeguarding standards, which emphasise that disclosures must be handled in ways that protect both the young person's well-being and the integrity of potential investigations.

Purpose of the Safeguarding Conversation

When a safeguarding officer meets with a young person following a disclosure, **the objective is not to conduct a forensic interview**. Instead, the purpose is to ensure the young person is safe, provide emotional support, clarify the nature of the concern at a basic level, determine whether statutory reporting is required, and identify immediate safeguarding actions. Detailed investigative interviewing should be conducted only by child protection specialists, law enforcement authorities, and, where appropriate, the sport governing body.

Preparing for the Conversation

Before speaking with the athlete, the safeguarding officer should take several preparatory steps.

1. Review Available Information

The safeguarding officer should review:

- the initial disclosure or report;
- notes provided by coaches or staff;
- any previous safeguarding concerns involving the athlete or alleged perpetrator(s) (if known).

This helps ensure the conversation is focused and sensitive to the athlete's circumstances.

2. Assess Immediate Safety

The safeguarding officer should consider whether the young person is currently safe. Key questions include:

- Is the athlete currently in contact with the alleged perpetrator?
- Is there a risk of intimidation or retaliation?
- Does the athlete require immediate care and protection?

If an immediate risk is identified, protective action should take priority over interviewing.

3. Select an Appropriate Setting

The conversation should take place in a private setting that is neither isolated nor intimidating to the migrant youth athlete. Where appropriate, a second safeguarding officer or social worker may be present to ensure transparency and support documentation, depending on the nature of the concern. Where possible and appropriate, the safeguarding officer should be the same sex as the migrant youth athlete. Refer to your country's local child protection legislation and policy, as well as the sport organisation's safeguarding framework, for guidance.

4. Establishing Rapport, Safety and Trust

At the beginning of the conversation, the safeguarding officer should focus on establishing trust and psychological safety.

"Thank you for meeting with me. I understand that you shared something important with Coach _____, and I want to make sure we understand how to support you."

The safeguarding officer should also explain their role.

"My role is to help make sure young athletes are safe and supported."

Clear communication about the safeguarding process helps reduce anxiety. Safeguarding officers should clearly explain the **limits of confidentiality**.

"What you share with me is important. I may need to share some of this information with people whose job it is to help keep young people safe, such as law enforcement or social services."

This ensures transparency while maintaining trust.

Using Trauma-Informed Communication

Trauma-informed communication recognises that migrant youth athletes who have experienced harm may feel fearful, ashamed, confused, and/or distrustful of adults or institutions. Safeguarding officers should therefore prioritise calm, supportive and non-normative laden (non-judgemental) communication. The safeguarding officer should (i) speak slowly and clearly, (ii) maintain neutral and supportive body language, and (iii) allow the young person to control the pace of the conversation. Silence should be accepted as part of the process.



Migrant youth athletes should never feel pressured to disclose more than they are ready to share.

Safeguarding officers should avoid statements such as:

- “You need to tell me exactly what happened.”
- “We can’t help you unless you tell us everything.”

Instead, use supportive prompts such as:

“You can share what you feel comfortable sharing.”

Questioning Techniques

Safeguarding officers may need to ask limited questions to clarify safeguarding concerns. These questions should be open-ended and non-leading.

Example

1. *“Can you tell me what happened?”*
2. *“Can you tell me when this started?”*
3. *“Are you able to tell me who was involved?”*

Questions should focus on basic clarification, not detailed reconstruction of events. In addition, it is important to avoid questions that suggest answers, such as:

1. *“Did your coach do this to you?”*
2. *“Were you forced to do that?”*

Leading questions can distort memory and compromise later investigations.



Managing Emotional Reactions

A migrant youth athlete may display strong emotional reactions during disclosure. Possible responses include crying, anger, withdrawal, silence, and confusion. Safeguarding officers should remain calm and supportive. Helpful strategies include taking breaks, offering reassurance, and validating emotions without reinforcing specific interpretations. For example, *“It sounds like that was really difficult for you.”*

Addressing Migration-Related Vulnerabilities

For migrant youth athletes, disclosure may be shaped by additional concerns, including (i) fear of losing a sporting opportunity, (ii) immigration/legal precarity, (iii) financial dependency on agents or intermediaries, and (iv) separation from family. Safeguarding officers should be sensitive to these dynamics and reassure the young person that their safety and well-being are the priority – and that disclosure will result in negative consequences for the athlete. Underscoring the concept of victims' rights in an age-appropriate and culturally sensitive manner is thus integral. If there are language and cultural barriers, a vetted professional interpreter – not affiliated with the Club/Academy or sport – should be brought in to assist with the disclosure process. Reassure the migrant youth athlete: "Your safety is more important than anything else, including sport."

Ending the Conversation

Before concluding the conversation, the safeguarding officer should:

- thank the athlete for sharing their experience
- explain the next steps in the safeguarding process
- ensure the athlete knows who they can speak to for further support

Example

"Thank you for telling me about this. The next step is that I will need to share this information with people who help protect young athletes like yourself so we can make sure you get the support you need."

Providing clarity about next steps helps reduce uncertainty.

Documentation

After the conversation, the safeguarding officer must document (see the template in Chapter 6):

1. The date and time of the conversation
2. Who was present
3. What the athlete said (using their own words where possible)
4. Any observations of emotional or physical condition
5. Safeguarding actions taken

Documentation should be objective and factual, avoiding assumptions or personal interpretations.

When to Escalate Immediately

Safeguarding officers must escalate the case immediately if:

- The athlete is at risk of immediate harm
- The alleged perpetrator has ongoing access to children or vulnerable individuals
- Serious criminal offences are alleged
- There are indicators of trafficking or exploitation

In such cases, safeguarding officers should contact child protection authorities and/or law enforcement without delay, in line with the escalation procedures described in Section 5.3.

Key Principles for Safeguarding Officers

When receiving disclosures, safeguarding officers should always prioritise:

- the best interests of the child (if the athlete is a minor)
- psychological safety during conversations
- accurate documentation
- data protection
- timely reporting to statutory authorities
- coordination with support services.

These principles ensure that safeguarding responses are child/victim-centred, legally compliant, and aligned with international safeguarding standards in sport.

Working with Interpreters in Safeguarding Interviews

Safeguarding disclosures involving migrant youth athletes often require the use of interpreters. This function is often employed during investigations by sport governing bodies and trained investigators. Language barriers can significantly affect the accuracy of information gathered, the athlete's sense of safety, and the integrity of the safeguarding process. When interpreters are required, safeguarding officers/designated investigators must ensure that interpretation supports, rather than compromises, trauma-informed practice. Poor interpretation practices can lead to (i) misrepresentation of disclosures; (ii) breaches of confidentiality; (iii) re-traumatisation; (iv) conflicts of interest; and (v) compromised evidence in legal proceedings. Best practice in safeguarding requires careful selection, preparation, and management of interpreters.

An interpreter should be used when (i) the migrant youth athlete cannot fully understand or express themselves in the interview language; (ii) sensitive safeguarding issues require precise communication; (iii) the athlete shows signs of distress or confusion when communicating in a second language; or (iv) the disclosure may become part of formal safeguarding or legal proceedings. Safeguarding officers should never assume conversational fluency equals comprehension, particularly when discussing complex or traumatic experiences.

Whenever possible, use a trained, professional interpreter (certified/vetted) with experience in safeguarding, social work, or legal settings. **Do not use:**

- Coaches
- Team staff
- Teammates or peers
- Family members
- Agents or club representatives
- Individuals connected to the recruitment pathway

These individuals may have conflicts of interest, may influence the athlete's responses, or may unintentionally discourage disclosure. The interpreter must be independent from the sports organisation where the alleged harm occurred in cases involving potential criminal offences such as maltreatment, exploitation or trafficking.

Preparing the Interpreter

Before the interview begins, the safeguarding officer should brief the interpreter on:

1. Purpose of the conversation
2. The discussion concerns child safeguarding and welfare
3. Confidentiality
4. Information must not be shared outside authorised safeguarding channels
5. Neutrality

Interpreters must translate exactly what is said, without summarising, modifying, or interpreting meaning.

Positioning and Communication

During the interview, the safeguarding officer should speak directly to the athlete, not the interpreter. Use first-person language ("Can you tell me what happened?"). Maintain eye contact with the athlete, not the interpreter. Ask the interpreter to translate verbatim, not in summary form. This approach helps maintain the sense that the conversation is between the safeguarding officer and the child, rather than being mediated by a third party.

Pace and Structure

Trauma-informed interviews conducted through interpretation require additional time. Safeguarding officers should:

- Use short, simple sentences
- Pause frequently for interpretation
- Avoid compound questions
- Allow time for the athlete to process and respond

The Safeguarding officer should regularly check comprehension. For example, by asking: ***"I want to make sure I understood correctly. Did you say that ...?"***



Cultural Sensitivity

Migrant youth athletes may come from cultural contexts where (i) authority figures are not questioned; (ii) discussing abuse or sexual harm is taboo; or (iii) disclosure carries social or family consequences. Interpreters can sometimes help identify cultural nuances, but safeguarding officers must remain cautious that cultural interpretation does not alter the athlete's words. If cultural dynamics appear to affect disclosure, this should be documented and considered when referring the case to child protection authorities in the case of minors.

Managing Emotional Distress

During interpretation, emotional intensity may increase because recounting events in the athlete's first language may deepen emotional recall, and with it, traumatic memories may surface more readily. Safeguarding officers should pause when distress occurs, offer breaks, and reassure the athlete that they can stop at any time.

Recording the Disclosure

When documenting interviews conducted through interpretation, the safeguarding officer should record (i) the name and role of the interpreter; (ii) the language used; (iii) whether the interpretation was consecutive or simultaneous; and (iv) any communication difficulties or cultural issues. This documentation may be important if the case proceeds to a child protection investigation or criminal proceedings.

Risks and Safeguards

Potential risks when using interpreters include:

- Interpreter influence or bias
- Inaccurate translation
- Community relationships affecting disclosure
- Breaches of confidentiality

To mitigate these risks:

- Use qualified interpreters where possible
- Avoid interpreters from the same local migrant community if confidentiality or complicity is a concern
- Ensure interpreters sign confidentiality agreements

5.2 Behavioural Indicators

Athletes do not always disclose abuse or exploitation directly. In many instances, they never disclose or disclose only after a significant delay (sometimes only years later). Instead, concerns may emerge through behavioural, emotional, or physical indicators. While no single indicator confirms abuse, patterns of change should prompt concern.

Emotional and Psychological Indicators

- Sudden withdrawal from teammates
- Loss of interest in the sport
- Anxiety or panic attacks
- Irritability or aggression
- Low self-esteem
- Emotional numbness
- Guilt or shame
- Distrust of adults

Some athletes may demonstrate extreme perfectionism as a coping mechanism.

Physical Indicators

- Unexplained injuries
- Repeated bruises or other injuries (such as burns)
- Sudden weight loss or weight gain
- Chronic fatigue
- Sleep disturbances
- Fear of physical contact
- Signs of neglect
- Inadequate clothing or equipment

Behavioural Indicators in Sport Settings

- Fear of a specific coach, staff member or peer
- Reluctance to travel
- Avoiding training or competitions
- Sudden performance decline
- Isolation from teammates
- Excessive self-blame/punishment for mistakes
- Unexplained or new rule-breaking behaviour

Performance-related symptoms may disguise maltreatment indicators in sport environments, making detection more difficult. Sport environments may mask abuse through “discipline” or “tough coaching.”

Indicators of Exploitation or Trafficking Risk

Attention should be given to indicators linked to migrant athlete exploitation discussed in Part II of the Toolkit, and cross-referenced with emotional, physical and behavioural indicators, such as:

- Confiscated passports or identity documents
- Restricted freedom of movement
- Dependency on intermediaries or agents
- Excessive training without adequate rest
- Financial exploitation
- Isolation from family or support networks
- Pressure to perform despite injury
- Lack of access to education in the case of minors
- Unclear living arrangements



Safeguarding Observation Checklist

If you observe concerning behaviours:

- Record the behaviour
- Note date/time and context
- Observe patterns over time (if uncertain)
- Report concerns to the safeguarding officer
- Do not confront suspected perpetrators

If two or more indicators are present, grassroots SafeSport practitioners should activate safeguarding procedures and escalate to the relevant Safeguarding Officer/Designated Safeguarding Lead.

5.3 Mandatory Reporting versus Internal Reporting

CONCEPT

Safeguarding reporting operates across two interconnected systems:

- i. Internal reporting**, which refers to organisational procedures for documenting and managing concerns within a sport organisation; and
- ii. Mandatory reporting**, which refers to legal obligations to report suspected abuse or exploitation to external authorities (e.g. law enforcement, child protection services, anti-trafficking mechanisms).

These systems are complementary, not interchangeable. Internal reporting ensures organisational accountability and case management, while mandatory reporting ensures legal protection and external intervention where required.

WHY IT MATTERS

Failure to report safeguarding concerns can expose migrant youth athletes to ongoing harm. Uncertainty about reporting thresholds or procedures is a common barrier, particularly among coaches and grassroots practitioners.

A key principle underpinning safeguarding is that reporting is triggered by reasonable suspicion, not proof. Waiting for confirmation, attempting to investigate independently, or prioritising organisational reputation over athlete safety can delay intervention and increase risk. Understanding the difference between internal and mandatory reporting ensures that:

- concerns are escalated appropriately;
- legal obligations are met; and
- athletes receive timely protection and support.

WHAT TO DO

i. Use internal reporting mechanisms

Report all safeguarding concerns through your organisation's safeguarding system (e.g. to the Designated Safeguarding Officer).

Use formal tools, such as incident reporting forms, and follow established procedures.

Internal reporting covers concerns such as inappropriate behaviour, unsafe environments, and policy breaches.

ii. Recognise when mandatory reporting applies

Mandatory reporting is required when there is reasonable suspicion of:

- physical or sexual abuse
- exploitation (including trafficking or forced labour)
- serious neglect
- threats to a child's safety or well-being

You do not need to prove abuse; suspicion is enough.

iii. Do not delay in cases of immediate risk

If the athlete is in immediate danger, contact emergency services or the relevant authorities immediately. Take steps to ensure the athlete's safety.

Inform the Safeguarding Officer as soon as possible.

iv. Maintain clear boundaries

- Do not investigate the matter yourself
- Do not wait for additional evidence
- Do not discuss the case informally with colleagues or third parties

v. Follow both pathways where required

Internal reporting should still occur even when a report is made to authorities.

External reporting does not replace internal safeguarding procedures, and vice versa.

WHAT IT MEANS IN PRACTICE

In real-world settings, coaches and grassroots practitioners are often the first to identify concerns but may hesitate due to uncertainty or fear of being wrong. Safeguarding systems are designed to address this: you are not responsible for determining whether abuse has occurred – only for reporting concerns appropriately.

A coach who notices concerning behaviour, receives a disclosure, or identifies red flags should report internally immediately and consider whether the situation meets the threshold for mandatory reporting. Where legal obligations apply, or where serious harm is suspected, external authorities must be informed without delay.

Operational Principle

- When in doubt, report internally
- When serious harm or legal thresholds are met, report externally
- When there is immediate danger, act immediately

DELVE DEEPER

Understanding reporting obligations is essential to effective safeguarding. Failure to report concerns can expose migrant youth athletes to continued harm. All individuals working within sport organisations share responsibility for safeguarding. This also extends to the sport organisation's leadership. However, many practitioners, such as coaches, may be uncertain about (i) when reporting is required, (ii) who must report, and (iii) how internal procedures relate to legal obligations. This section clarifies the distinction.

Internal Safeguarding Reporting

Most sports organisations operate internal safeguarding systems. Refer to your organisation's safeguarding policy. These systems typically include:

- Safeguarding officers
- Risk assessment protocols
- Reporting forms
- Internal case management procedures

Internal reporting ensures that concerns are documented and assessed consistently. Internal reporting may apply to situations such as coach or staff behaviour, suspected emotional or psychological abuse, unsafe training environments, inappropriate communication with athletes, and breaches of safeguarding policies. Internal reporting is not intended to replace reporting to authorities where criminal conduct is suspected. Rather, it provides the organisational mechanism for assessing and escalating safeguarding concerns.



Typical internal reporting steps, as indicated earlier in the Chapter, include:



Mandatory Reporting

Mandatory reporting refers to legal obligations to report suspected abuse or exploitation to authorities, such as law enforcement, social services, child protection, and anti-trafficking referral mechanisms.

Mandatory reporting laws vary across EU Member States, but most jurisdictions require professionals working with children to report reasonable suspicions of abuse or exploitation. Practitioners do not need to prove that abuse has occurred in order to report their suspicions. A reasonable concern or suspicion is sufficient to trigger a report. Mandatory reporting may apply in cases involving physical abuse, sexual abuse or exploitation, forced labour or labour exploitation, child trafficking, serious neglect, or threats to a child's safety or well-being. Failure to report suspected abuse in jurisdictions with mandatory reporting laws may carry legal penalties, including fines or professional disciplinary action. Mandatory reporting laws typically apply to teachers, social workers, healthcare professionals, and youth workers. In some jurisdictions, coaches may also be classified as mandated reporters.

If a young athlete is believed to be in immediate danger, practitioners should not delay action while following internal reporting procedures. Immediate actions should include contacting emergency services, ensuring the athlete's safety, and informing the Safeguarding Officer as soon as possible. In the case of imminent danger, protection of the child must always take precedence over organisational procedures.



Reporting Issues

Practitioners sometimes hesitate to report concerns due to uncertainty or fear of being wrong. However, safeguarding systems operate on the principle of reasonable suspicion rather than proof. Common issues include:

- waiting for confirmation
- attempting to investigate independently
- delaying reports due to organisational reputation concerns
- discussing cases widely within teams or informally to third parties
- Reports should always follow formal safeguarding channels.

Reasonable suspicion is enough for reporting. If you suspect something – report it!

Practitioners are not expected to prove abuse before reporting concerns.

In the case of children, protection takes priority over organisational reputation or performance considerations.

Trafficking indicators must be treated as serious safeguarding concerns, particularly where migration and sport recruitment intersect.

Reporting mechanisms must be accessible and victim/child-centred, ensuring that young athletes can safely disclose concerns.



Chapter 6:

CASE MANAGEMENT AND SUPPORT SYSTEMS



6.1 The Internal Reporting Protocol; 6.2 External Referrals; 6.3 Confidentiality and Documentation

Introduction

Safeguarding is a process that does not end when a disclosure is received or a concern is reported. Effective protection of migrant youth athletes depends on a sport organisation's ability to manage safeguarding cases in a structured, consistent, and legally compliant manner. Without clear case management systems, safeguarding responses risk fragmentation, delay, or conflicts of interest. Robust procedures are essential to ensure that concerns are assessed properly, that appropriate authorities are notified where necessary, and that affected athletes receive protection and support throughout the safeguarding process.

This chapter examines the organisational mechanisms required to manage safeguarding cases once concerns have been reported. It focuses on the role of safeguarding officers and designated safeguarding leads in assessing risk, documenting disclosures, coordinating referrals, and ensuring that safeguarding procedures are implemented in accordance with legal and ethical standards. It also addresses the importance of confidentiality, accurate documentation, and secure record-keeping. By establishing clear case management procedures and support pathways, sport organisations can ensure that safeguarding responses extend beyond initial disclosure and contribute to meaningful protection, accountability, and long-term support for migrant youth athletes.

6.1 Internal Reporting Protocol: Procedures for the Designated Safeguarding Lead (DSL) and Immediate Response Team

An internal reporting protocol ensures that safeguarding concerns are consistently documented, assessed, and escalated in a timely manner. The severity of the perceived harm will determine whether escalation is an immediate priority or can be addressed within 24-48 hours of disclosure. All sport organisations working with children and youth athletes should maintain a clear process that staff can follow when concerns arise. The protocol outlines the steps that must be taken once a safeguarding concern is reported internally, whether through an athlete's disclosure or staff observations.

STEP 1: RECEIPT OF THE CONCERN (CASE INTAKE)

Safeguarding concerns may be reported through:

- direct disclosure from an athlete
- observations by coaches or other sporting staff
- reports from agents
- reports from parents or guardians
- reports from teammates or other athletes
- third-party complaints
- anonymous reporting mechanisms

All staff must immediately report safeguarding concerns to the Designated Safeguarding Lead (DSL). All safeguarding concerns must be formally registered once they are brought to the attention of the DSL. The DSL should acknowledge receipt of the report and open an initial case intake file.

Initial case intake should include

- Date and time of report
- Name of the reporting person
- Athlete details (name, age, nationality, team)
- Nature of the concern
- Location where the incident occurred
- Immediate risks identified

Each case should be assigned:

- A unique case reference number
- A designated safeguarding officer responsible for the case

STEP 2: IMMEDIATE RISK ASSESSMENT/SCREENING

Once a report is received, the DSL must conduct a rapid safeguarding risk assessment. The purpose of this assessment is to determine:

- whether the athlete is in immediate danger
- whether the case involves potential criminal conduct
- whether urgent protective measures or medical attention are required
- Immediate protective actions may include:
 - ensuring appropriate adult supervision in the case of minors
 - removing the athlete from a harmful environment
 - suspending the accused individual pending investigation
 - contacting child protection authorities
 - contacting law enforcement
 - contacting social services
 - contacting victim support services

Where there is an immediate risk of harm, emergency services should be contacted.

STEP 3: CASE CLASSIFICATION

The DSL should classify the concern into one of three categories:

Category	Description
Poor Practice	Inappropriate behaviour that violates organisational standards but does not constitute abuse
Safeguarding Concern	Potential abuse, neglect, or harm
Serious Harm or Exploitation	Sexual abuse, trafficking indicators, physical violence, or other criminal offences

Serious concerns require immediate escalation to external authorities, such as law enforcement, social services, child protection, anti-trafficking organisations, and immigration support services. Concerns that are criminal in nature must be referred to law enforcement. Victim support services, such as psychosocial stabilisation and rehabilitation (counselling) are vital in cases of potential abuse or exploitation.

STEP 4: SAFEGUARDING CASE REGISTRATION

Once a concern is received, the DSL must formally register the case. The DSL should:

- Assign a case reference number
- Open a safeguarding case file
- Record the details of the concern

Once the case is registered, a formal safeguarding case file must be opened. The case file should include:

- Incident report form
- Disclosure documentation
- Witness statements
- Safeguarding officer notes
- Case tracking information
 - timeline of actions taken
 - referrals made to authorities
 - communication with external agencies

Case files should be stored securely in accordance with data protection regulations such as the EU General Data Protection Regulation (Regulation (EU) 2016/679).

STEP 5: INTERNAL INVESTIGATION

Sport organisations should not conduct criminal or forensic investigations, but the DSL may need to collect basic safeguarding information, such as safeguarding interviews with the athlete, interviews with witnesses, a review of travel documentation, and/or an examination of recruitment or contract documents. All interviews must follow trauma-informed safeguarding practices. Serious safeguarding concerns are to be reported to the sport organisation's national or international governing body for investigation.

STEP 6: PRESERVATION OF EVIDENCE

Safeguarding staff should take care to preserve potential evidence. They should avoid conducting extensive questioning that may compromise criminal investigations. They should retain any written communications or documentation related to the case, and secure CCTV or other recordings if available. In cases involving suspected criminal activity, evidence preservation is critical for law enforcement investigations. Do not encourage the deletion of any communications or files between the alleged perpetrator(s) and the victim. If sexual assault or abuse is alleged, contact the relevant authorities and ensure the victim is transported to the nearest hospital or clinic which conducts forensic medical exams that are legally admissible (correct protocols, forms and rape kits are used). Ensure a trusted adult or social worker is with the victim, especially in the case of a minor.

Internal investigations should not replace or interfere with criminal investigations.

STEP 7: CASE MANAGEMENT AND MONITORING

Safeguarding does not end once a referral is made. The DSL should continue monitoring the case. Monitoring may include maintaining communication with authorities, ensuring the athlete receives appropriate support services, and reviewing safeguarding risks within the organisation. Where necessary, safeguarding officers may implement additional protective measures within the sport organisation.

STEP 8: COMMUNICATION MANAGEMENT

Safeguarding cases require careful communication management. The DSL must:

- limit information sharing to individuals with a legitimate safeguarding role
- protect the privacy and dignity of the athlete
- avoid sharing case details with other staff or athletes unnecessarily

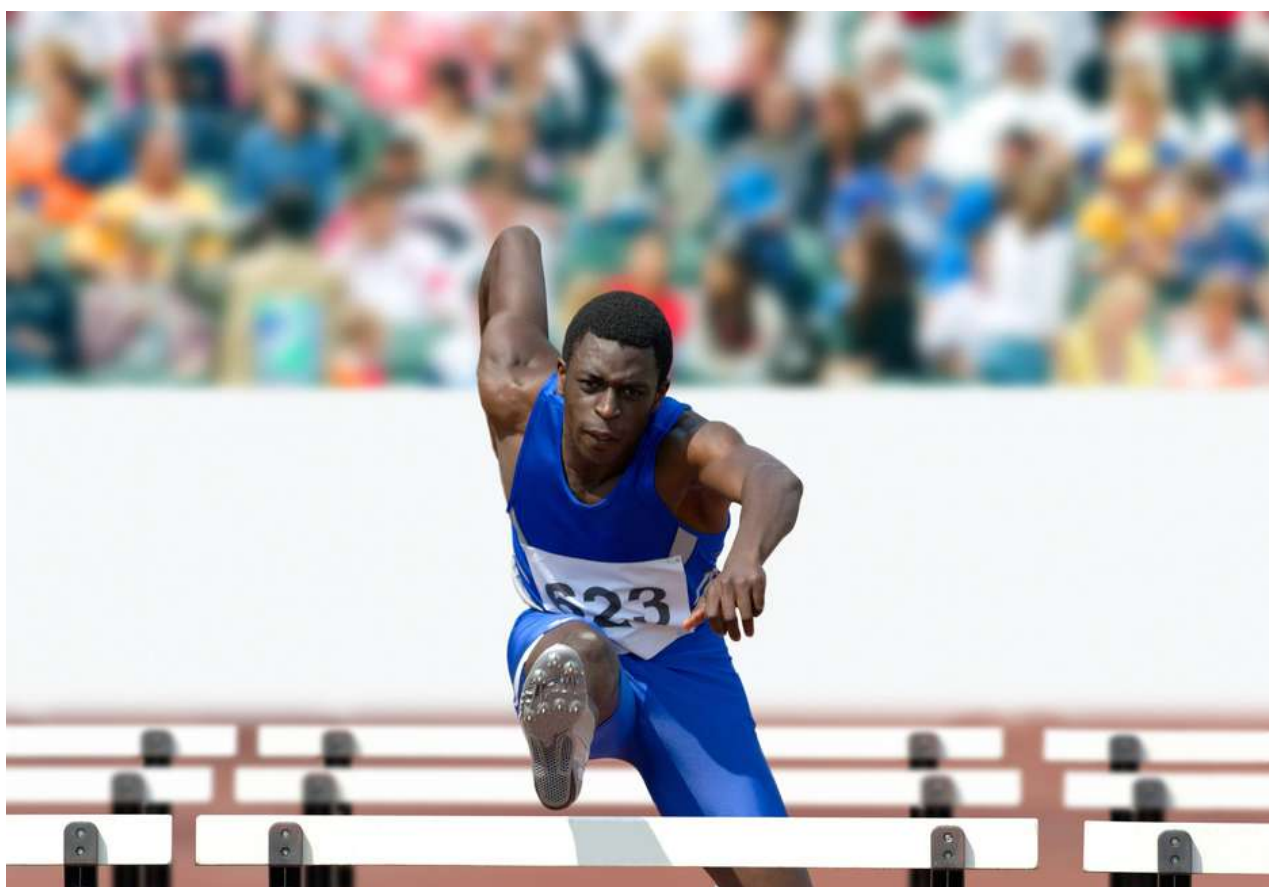
If the case becomes public, organisational communications should prioritise safeguarding transparency, victim protection, and legal compliance.

STEP 9: CASE CLOSURE AND REVIEW

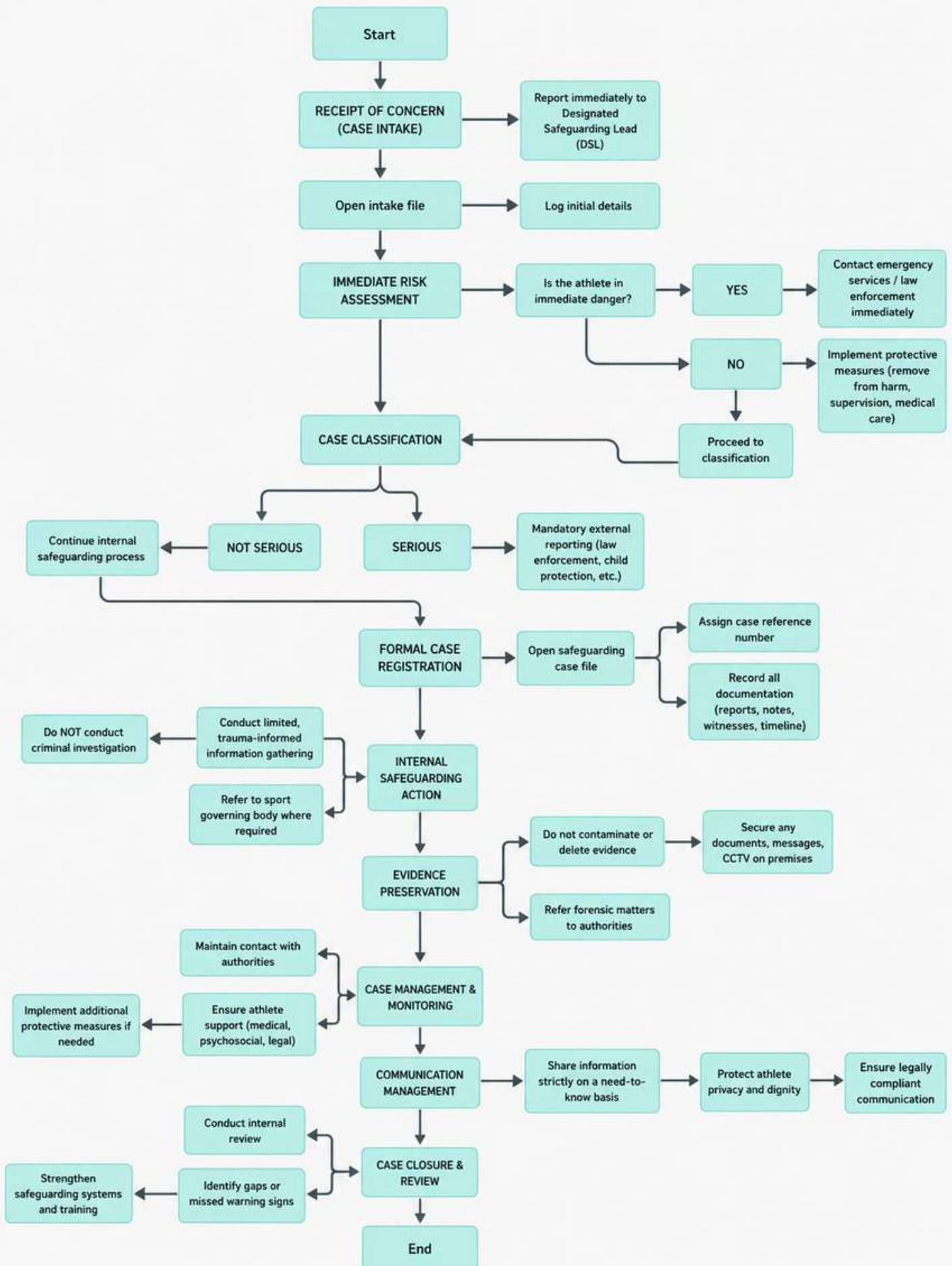
Once the case has been resolved, the safeguarding response team should conduct a case review. The review should examine:

- how the safeguarding concern arose
- whether safeguarding procedures were followed correctly
- whether earlier warning signs were missed
- whether additional safeguards should be introduced

Lessons learned should be used to strengthen organisational safeguarding policies and training.



Below is a flowchart of the case management protocol.



Safeguarding Case Tracking Dashboard

To maintain oversight of safeguarding activities, organisations should maintain a confidential case-tracking register.

CASE ID	ATHLETE	CONCERN TYPE	DATE REPORTED	RISK LEVEL	ACTION TAKEN	CASE STATUS
2026-01	Athlete A	Exploitation	01.04.2026	High	Police referral	Active
2026-02	Athlete B	Poor practice	15.08.2026	Low	Internal discipline	Closed

Safeguarding Case Timeline Template

A case timeline helps DSLs track events, actions taken, and communications with authorities. Maintaining a timeline ensures transparency and accountability.

Safeguarding Case Timeline Record for CAS 2026-01

DATE	EVENT / DISCLOSURE	ACTION TAKEN	RESPONSIBLE PERSON	EXTERNAL AGENCIES INVOLVED	NOTES
01.04.2026	Athlete disclosed passport held by agent	Report received and documented	Coach	None	DSL notified
02.04.2026	DSL risk assessment conducted	Case classified as high risk	DSL	Police / Social Services	Possible trafficking indicators
02.04.2026	Referral submitted	Police and child protection notified; Sport governing body informed	DSL	Police / Social services	Investigation opened
03.04.2026	Athlete referred to support services	Psychological support arranged	DSL	Victim support NGO	Athlete relocated

Below is a safeguarding incident reporting template that can be used to document safeguarding concerns.

SAFEGUARDING INCIDENT REPORT FORM
Organisation Information
Organisation Name:
Address:
Safeguarding Officer / Designated Safeguarding Lead:
Sport Governing Body (National/International):
1. PERSON COMPLETING REPORT
Name:
Role (coach, educator, safeguarding officer, etc.):
Address:
Contact details
Mobile number:
Email:
Date report completed:
2. AFFECTED ATHLETE'S (COMPLAINANT'S) DETAILS
Name:
Date of Birth / Age:
Sex:
Gender (if applicable):
Nationality:
Language(s) spoken:
Team / Programme / School:
3. PARENT/GUARDIAN
Name:
Address:
Contact details
Mobile number:
Parent/Guardian informed? Yes/No
If yes, briefly state the extent of disclosure made to the parent/guardian:
If no, explain decision:

4. NATURE OF CONCERN

Type of concern (tick all that apply):

Grooming (stage prior to abuse or exploitation occurring)

Physical abuse

Sexual abuse

Emotional/psychological abuse

Neglect

Bullying or harassment

Exploitation

Human trafficking

Debt bondage

Other safeguarding concern:

Describe the concern:

5. DISCLOSURE DETAILS (IF APPLICABLE)

Did the athlete disclose the concern directly? Yes / No

If yes, record the exact words used by the athlete where possible.

Do not interpret or paraphrase unnecessarily.

--

6. OBSERVED INDICATORS

Record any behavioural, emotional, or physical indicators observed. Below is a non-exhaustive list of possible indicators. Check all that apply.

Behavioural changes

- Fear of specific individuals – List: _____
- Avoidance
- Performance decline
- Hyper-perfectionism
- Hyper-arousal (e.g. aggression, mood swings)
- Isolation/Withdrawal
- Unexplained or new rule-breaking behaviour
- New inappropriate behaviour (e.g. hypersexualisation)
- Changes in routine behaviour or self-care (e.g. excessive/lack of hygiene)
- Lack of autonomy
- Excessive compliance
- Passivity
- Self-harm
- Other: _____

Physical indicators

- Physical injuries (unexplained, not received during practice or play)
- Disordered eating, including sudden weight changes (gain or loss)
- Chronic fatigue
- Sleep disturbances
- Signs of neglect (e.g. poor health)
- Improper clothing or equipment

Emotional/Psychological Indicators

- Depression
- Anxiety
- Disassociation (emotional numbness)
- Irritability or aggression
- Unsociable
- Loss of interest
- Loss of confidence/self-esteem
- Seeking affection/reassurance

7. INCIDENT DETAILS

Date of incident (if known):

Time:

Location:

Description of incident:

Who was involved?

If known, provide names, relationship to the victim and contact details.

Name:

Role/Relationship:

Contact Details:

Were there any witnesses? Yes/No

If yes, list names and contact details (if known):

Name:

Contact Details:

8. IMMEDIATE ACTIONS TAKEN

Describe actions taken immediately following the concern.

9. PERSONS NOTIFIED

Name:

Role:

Date notified:

10. ADDITIONAL INFORMATION

Include any relevant contextual information (such as history of previous safeguarding concerns, migration-related issues, language barriers, etc.).

11. TRANSLATION SERVICES (IF APPLICABLE)

Was an independent, certified translator used? Yes/No

Was a confidentiality agreement (NDA) signed? Yes/No

Name:

Language:

Contact details:

Date of services:

12. REFERRAL DETAILS

Was the case referred externally? Yes / No

If yes:

Agency referred to:

Date of referral:

Reference or case number (if available):

Contact person (if applicable):

2. SIGNATURE

Name:

Signature:

Date:

Documentation Principles

When completing safeguarding reports:

- Record facts, not opinions
- Use the athlete's own words verbatim where possible
- Record information as soon as possible after the disclosure
- Maintain confidentiality
- Store documentation in secure files (both physical and digital)



6.2 External Referrals: Connecting Athletes to Support Services in the European Union



Migrant youth athletes who are victims of crime or serious harm require specialised support external to the sport organisation. Such referrals may include legal assistance, healthcare and mental health support, specialised victim support services, anti-trafficking organisations or child protection authorities (in the case of minors). Within the European Union, safeguarding responses should align with the victim protection framework established through the Victims' Rights Directive (2012/29/EU), which establishes minimum standards on the rights, support, and protection of victims across all EU Member States.^[i] The Directive requires that victims receive respectful treatment, access to support services, protection from intimidation or retaliation, and access to justice. These rights apply regardless of the victim's nationality or residence status, meaning that migrant athletes are entitled to the same protections as EU citizens. There are also provisions made in other directives for the specific needs of victims of human trafficking, and child sexual exploitation and child pornography. The EU Anti-Trafficking Directive requires Member States to provide assistance, protection, and referral mechanisms for victims of human trafficking. The Directive also requires EU member states to establish National Referral Mechanisms (NRMs) that coordinate the identification, protection, and long-term support of trafficking victims through cooperation between state agencies and non-governmental organisations.

Safeguarding officers and sport organisations should establish clear referral pathways to external services capable of supporting migrant youth athletes who have experienced abuse, exploitation, or other harm. Before making a referral, safeguarding officers should follow several core principles (as discussed in Chapter 5):

1. PRIORITISE THE ATHLETE'S SAFETY

Immediate safety should always be the first consideration. If the athlete is in immediate danger, emergency services or law enforcement should be contacted.

2. OBTAIN INFORMED CONSENT WHERE POSSIBLE

Where appropriate and safe, the athlete should be informed of the purpose of the referral, the organisation receiving it, and the support they may receive. For minors, safeguarding officers must follow child protection procedures and legal reporting obligations, which may require referral even without consent.

3. PROTECT CONFIDENTIALITY

Only information necessary for providing assistance should be shared. Safeguarding officers must ensure that personal information is transmitted securely.

4. USE TRUSTED AND SPECIALISED ORGANISATIONS

Outside of statutory reporting requirements, referrals should be made to organisations with expertise in victim support, trafficking or exploitation, and/or migration-related vulnerabilities.



Referral Pathways in the EU

Each Member State must ensure the availability of general victim support services, as required by the Victims' Rights Directive. These services typically provide crisis intervention and counselling, psychological support, practical assistance with accommodation or welfare, and guidance on criminal justice procedures. Victim support organisations can assist migrant youth athletes in navigating unfamiliar legal and social systems. A list of these organisations can be found in Chapter 8 of the Toolkit.

The EU safeguarding and victim protection system generally operates through multi-agency referral mechanisms. These systems typically involve collaboration between law enforcement agencies, child protection authorities, specialised NGOs, victim support services, and legal assistance providers. Many Member States operate formal National Referral Mechanisms that coordinate these actors and ensure victims receive protection and access to services. Safeguarding officers should familiarise themselves with the national referral procedures in the country where the organisation operates.

Legal Assistance

Athletes who may be victims of exploitation or trafficking often require specialised legal advice, particularly where immigration status, contracts, or criminal investigations are involved. Legal assistance may support athletes in reporting crimes, understanding their rights as victims, addressing immigration or residency issues, pursuing compensation claims, and/or protecting them during legal proceedings.

Across Europe, free legal support is often available through victim support organisations and legal aid services, which cooperate with national victim assistance frameworks. Specialised NGOs may also provide legal representation in human rights or migration cases.

Mental Health and Psychosocial Support

As discussed earlier, migrant youth athletes who experience abuse, exploitation or trafficking frequently experience a host of psychosocial issues. Referral to trauma-informed psychological or lay counselling services is an essential part of the safeguarding response. Mental health services may include crisis intervention, trauma counselling, psychological assessment and long-term therapeutic support.

Anti-Trafficking and Victim Support Organisations

In cases where trafficking or exploitation is suspected, safeguarding officers should refer athletes to specialised anti-trafficking organisations through NRMs. These organisations typically provide safe accommodation, legal assistance, counselling and psychological care, interpretation services, and reintegration support. In many EU member states, these organisations are integrated into national victim support systems coordinated by government agencies and civil society partners.

Hotlines and Emergency Support

The European Union and Member States also maintain national anti-trafficking hotlines that allow individuals to report suspected trafficking or seek assistance. These hotlines connect callers with specialised services and victim support organisations. Safeguarding officers may use these services to obtain guidance from trained specialists, refer potential victims to appropriate services, and report trafficking concerns. Hotlines are particularly useful when safeguarding officers are uncertain about the correct referral pathway.

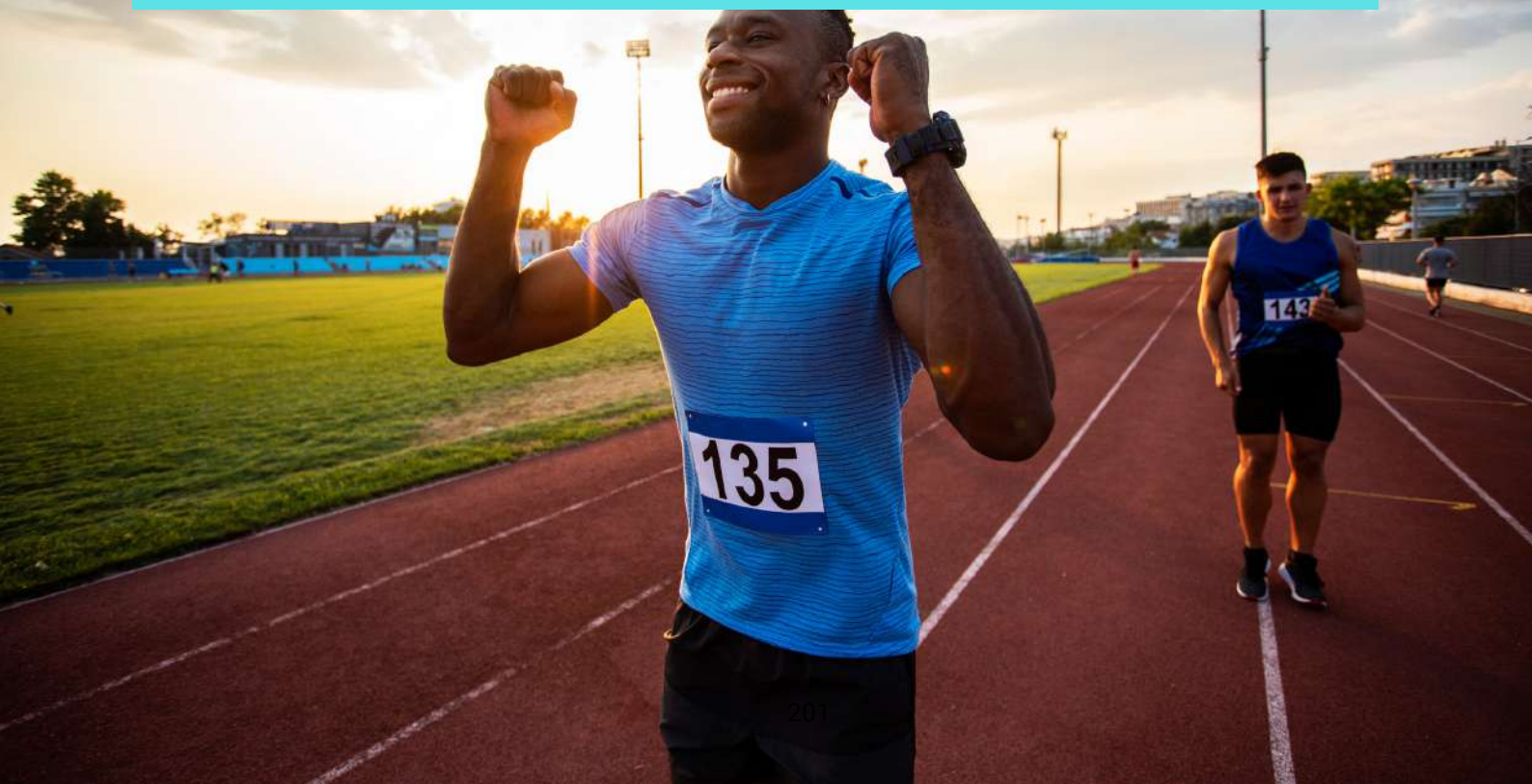
Cross-Border Cases

As cases involving migrant youth athletes may involve cross-border movement, safeguarding officers should be aware that support services may involve coordination across multiple countries. National referral mechanisms often coordinate and cooperate with immigration authorities, asylum services, international organisations, and cross-border law enforcement agencies. This cooperation helps ensure that victims receive protection and assistance regardless of their immigration status.

When making external referrals:

- Prioritise safety and immediate protection.
- Consult national referral mechanisms where trafficking is suspected.
- Refer athletes to specialised legal and psychological support services.
- Maintain confidentiality and accurate documentation.
- Continue monitoring the athlete's well-being after referral.

External referral is not the end of the safeguarding process. Safeguarding officers should maintain communication with relevant agencies and ensure that the athlete continues to receive the appropriate support.



6.3 Confidentiality and Documentation: Standards for Secure and Accurate Record-Keeping



CONCEPT

Safeguarding documentation is the formal recording of concerns, disclosures, observations, and actions taken in response to potential harm. It must be accurate, timely, objective, and complete, and handled in accordance with strict confidentiality standards.

Confidentiality in safeguarding does not mean secrecy. It refers to controlled information sharing, ensuring that sensitive information is accessible only to authorised individuals and disclosed when necessary to protect the athlete or support an investigation.

WHY IT MATTERS

Safeguarding records often serves as the foundation for internal case management, external referrals, and, in some cases, criminal proceedings. Poor documentation or inappropriate information sharing can:

- undermine investigations;
- compromise evidence;
- delay protective interventions; and
- expose athletes to further harm.

A common risk in practice is misunderstanding confidentiality. Practitioners may either overshare information informally or withhold critical information due to misplaced concerns about privacy. Both create safeguarding failures. Effective safeguarding depends on accurate records and responsible, lawful information sharing.

WHAT TO DO

i. Apply core documentation principles

Accuracy: Record facts, not assumptions; use the athlete's own words where possible.

Timeliness: Document as soon as possible (preferably the same day).

Objectivity: Use neutral, professional language; avoid speculation.

Completeness: Include who, what, when, where, and actions taken (including referrals).

ii. Use controlled confidentiality

Explain to the athlete that information may need to be shared to keep them safe.

Share information only with authorised individuals (e.g., the Designated Safeguarding Lead and authorities).

Do not promise absolute confidentiality.

iii. Recognise when information must be shared

Mandatory or necessary sharing applies where there is:

- suspected child abuse or exploitation
- trafficking or forced labour
- immediate risk of harm
- any other serious criminal conduct

In cases involving minors, safeguarding obligations override requests for confidentiality.

iv. Restrict internal access ("Need-to-know" basis)

Limit access to safeguarding officers and authorised personnel only.

Do not discuss cases informally with colleagues, parents, or other athletes.

v. Ensure secure storage

- Use password-protected, encrypted digital systems or locked physical storage.
- Keep safeguarding records separate from general personnel or athlete files.
- Maintain access controls and, where possible, access logs.

vi. Comply with data protection requirements

- Collect data only for safeguarding purposes
- Store securely and limit access
- Retain records according to legal and organisational policies
- Destroy records securely once retention periods expire

vii. Document information sharing

Record what information was shared, with whom, when, and why.

Ensure all referrals and communications with external authorities are logged.

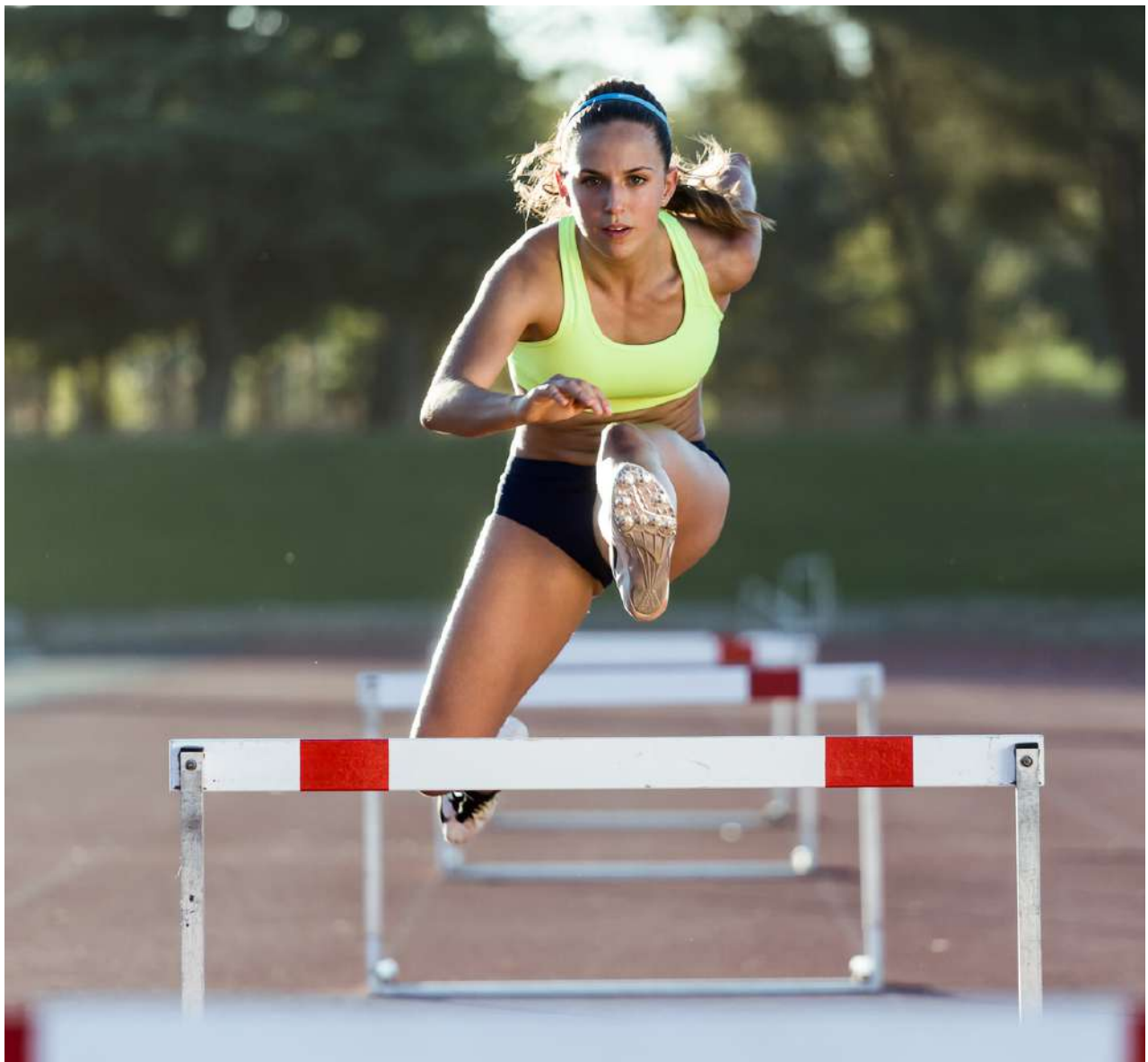
WHAT IT MEANS IN PRACTICE

In real-world safeguarding cases, documentation is often completed under time pressure and in emotionally charged situations. Practitioners must remain disciplined: record what was said, not what you think happened.

A coach or other sport personnel who receives a disclosure should document it immediately using the appropriate reporting form and pass it to the safeguarding officer. The safeguarding officer then assumes responsibility for secure storage, controlled sharing, and ongoing case documentation.

Confidentiality must be actively managed. This means resisting informal conversations, avoiding unnecessary disclosure, and being transparent with the athlete about how their information will be used.

In multi-agency cases, such as those involving abuse, exploitation, or trafficking, well-maintained records enable coordination between sport organisations, law enforcement, child protection services, and other actors.



DELVE DEEPER

Effective safeguarding responses depend on accurate documentation and responsible handling of sensitive information. Safeguarding records often contain highly sensitive personal data relating to children or vulnerable adults, allegations of abuse, or potential criminal offences. Poor documentation or breaches of confidentiality can compromise both child protection responses and criminal investigations. Sport organisations must ensure that safeguarding information is recorded accurately, stored securely, and shared only with authorised individuals.

Principles of Safeguarding Documentation

Safeguarding records should adhere to several core principles.

1. Accuracy

Records must reflect what actually occurred, rather than assumptions or interpretations. Safeguarding documentation should record facts clearly, distinguish between observations and opinions, use the complainant's own words where possible, and include dates, times, and locations (if known).

EXAMPLE

Appropriate record

"The athlete stated: 'My visa has expired and my passport is with the agent. I cannot get it back. He says that I owe him a lot of money.'"

Inappropriate record

"The athlete appears to be trafficked." No evidence has been presented as to why such a conclusion has been reached.

2. Timeliness

Safeguarding concerns should be documented as soon as possible after the disclosure or observation. Delays in documentation may lead to loss of important details, inconsistencies in evidence, and/or difficulties during safeguarding investigations. Whenever possible, records should be completed on the same day that the concern was raised.

3. Objectivity

Records should be written in factual, neutral and professional language. Avoid any speculation, personal judgments, or emotional language.

EXAMPLE

Instead of writing:

"The coach behaved in a disgusting and abusive way."

Write:

"The coach shouted repeatedly at the athlete and pushed her to the ground during training. The athlete reported injuring her wrist as she fell."

4.Completeness

Safeguarding documentation should include who reported the concern, when and where the incident occurred, what the athlete disclosed or what was observed, actions taken by staff, and referrals made to authorities (where necessary). Incomplete records can hinder investigations and delay protective actions.

Confidentiality in Safeguarding Cases

Confidentiality is essential in safeguarding cases. Confidentiality and anonymity are needed to protect the victim (particularly minors) and safeguard the integrity of safeguarding investigations. A similar threshold is required for individuals involved in the allegation until the investigation is finalised, and if charges are brought.

A common misconception among coaches and sport staff is the belief that safeguarding disclosures must remain confidential under all circumstances. Safeguarding frameworks recognise that protecting a child or vulnerable person takes priority over strict confidentiality. Confidentiality should be understood as controlled, responsible information sharing rather than secrecy. Safeguarding information should be shared with appropriate authorities when necessary to protect the child or vulnerable individuals, prevent further victimisation, investigate maltreatment, and support a criminal investigation. The affected athlete should be informed that certain information may need to be shared with safeguarding authorities if there is a risk of harm. Where appropriate, safeguarding officers should explain to the athlete why certain information must be shared, which authorities will receive the information, and what will happen next in the safeguarding process.

There are circumstances, however, where safeguarding professionals must share information with authorities, even if the athlete requests confidentiality. For instance, in cases of suspected child abuse, sexual exploitation, trafficking or forced labour, situations where the athlete is in immediate danger, and serious criminal offences. In many Member State jurisdictions, safeguarding officers and certain professionals are mandatory reporters, meaning they are legally required to notify child protection authorities or law enforcement.

Internally, information should only be shared on a “need-to-know basis”.[cxvii] This generally includes the Designated Safeguarding Lead (DSL), child protection or social services authorities, law enforcement agencies and state prosecutors when criminal conduct is suspected, and the sport governing body’s safeguarding structure (national or international – case dependent). Coaches and staff should not discuss safeguarding cases informally with colleagues, parents, other athletes or any third party. Unnecessary sharing of safeguarding information can compromise investigations and further expose the athlete to risk.



Secure Storage of Safeguarding Records

Safeguarding records must be stored in a way that protects both confidentiality and data integrity. Best practice includes restricted access to safeguarding files. Access should be limited to the DSL, deputy safeguarding officer (if applicable), and authorised safeguarding governance personnel. General staff members should not have access to safeguarding case files. Where digital systems are used, safeguarding records should be stored in encrypted systems, password-protected databases, or restricted safeguarding folders. Access logs should be maintained where possible to monitor who accesses safeguarding files. Where physical records exist, they should be stored in locked cabinets, in restricted-access offices, and kept separately from general organisational records. Safeguarding files should never be stored with general personnel or athlete files.

Data Protection and Legal Compliance

Safeguarding documentation often involves personal data relating to children and sensitive information, which must be handled in accordance with data protection laws. Within the European Union, safeguarding record-keeping must comply with the requirements of the European Union data protection framework established by the General Data Protection Regulation. Under these regulations, organisations must ensure that (i) personal data is collected only for legitimate safeguarding purposes; (ii) data is stored securely and confidentially; (iii) access is restricted to authorised personnel; and (iv) records are retained as long as institutionally necessary. Safeguarding officers should consult organisational data protection policies to ensure compliance with applicable legal requirements.[cxviii]

Retention of Safeguarding Records

Safeguarding records should be retained for an appropriate period in accordance with national child protection and data protection regulations. Retention policies should ensure that records are preserved long enough to support investigations or legal proceedings and securely destroyed once retention periods expire. Records are typically retained for as long as the participant remains active, even if formal proceedings didn't occur. Secure destruction methods may include confidential document shredding and/or secure digital deletion procedures.



Documentation in Multi-Agency Safeguarding Cases

Safeguarding cases involving abuse, exploitation, or trafficking often require cooperation between multiple institutions and professional services. These actors may include child protection or social services authorities, law enforcement agencies, immigration authorities, victim support organisations, healthcare and mental health professionals, and legal aid providers. Information sharing enables authorities to assess risk, coordinate protective interventions, and investigate potential criminal offences. When safeguarding concerns are referred to external authorities, safeguarding records may become part of multi-agency case management systems. In these situations, safeguarding officers must ensure that documentation is accurate and complete, referrals are clearly recorded, and all communication with authorities is documented. Whenever safeguarding information is shared with external authorities, safeguarding officers must document the information exchange clearly. Records should include what information was shared, with whom the information was shared, the date and time of the disclosure, and the legal or safeguarding reason for sharing the information.

Effective safeguarding requires both action and documentation.

Safeguarding officers should remember: If it is not recorded, it did not happen. Records must be factual, timeous, and secure.

Confidentiality protects victims but does not prevent reporting safeguarding concerns.

Proper documentation strengthens safeguarding responses, supports investigations, and helps organisations demonstrate accountability in protecting young athletes.

Part IV

PREVENTION AND EMPOWERMENT TOOLS



Part IV of the SafeSport Practitioners Toolkit focuses on practical strategies to prevent harm and strengthen the protection of migrant youth athletes through proactive, rights-based approaches. Chapter 7 centres on building a safe sporting environment. It outlines clear ethical boundaries for coaches, safeguarding officers, and social workers regarding the management of power imbalances and professional conduct. It also examines integration strategies to support migrant athletes' broader well-being, including access to education, language support, and safe accommodation. Finally, it emphasises the importance of promoting athlete voice by fostering inclusive environments where athletes can speak up without fear of retaliation.

Chapter 8 complements this by offering practical safeguarding templates and tools for real-world application, enabling organisations and practitioners to operationalise safeguarding standards effectively.

Chapter 7:

CREATING A SAFE ENVIRONMENT



7.1 Ethical Boundaries: Guidelines regarding power imbalances and staff conduct; **7.2 Integration Strategies:** Ensuring access to language classes, school enrolment, and safe accommodation; **7.3 Promoting Athlete Voice:** How to foster an inclusive, non-retaliatory culture.

7.1 ETHICAL BOUNDARIES: POWER IMBALANCES AND PROFESSIONAL CONDUCT IN SPORT

CONCEPT

Sport is built on authority structures. Coaches select teams, control training, and influence career pathways. This creates a power imbalance. Athletes depend on coaches for opportunities, while coaches do not depend on athletes in the same way. Ethical boundaries are the professional limits that regulate how this power is used. Boundary violations occur when those limits become blurred, often gradually and unintentionally.

WHY IT MATTERS

For many coaches, boundary violations are not always obvious because they can resemble “good coaching” at first. Extra attention, mentorship, or support may feel appropriate, particularly when working with talented or vulnerable athletes. However, when these interactions become exclusive, personal, or controlling, they can create dependency, silence athletes, and open pathways to grooming or exploitation.

For migrant youth athletes, the risks are significantly higher. They may rely on coaches not only for sport, but also for housing, documentation, language support, or access to opportunities. This means they are far less likely to question authority or report concerns even when something feels wrong. What appears to a coach as “helping” may be experienced by the athlete as pressure or obligation.

WHAT TO DO

i. Keep relationships professional, not personal

You are a coach – not a friend, parent, agent, or rescuer. Avoid becoming the athlete’s primary emotional or personal support.

ii. Avoid “special” relationships

Giving one athlete significantly more attention, opportunities, or benefits (e.g. gifts, extra contact, private sessions) creates dependency and perceived obligation.

iii. Use transparent and observable practices

Hold meetings in open or visible settings. Avoid one-on-one situations behind closed doors unless necessary, and ensure they are known and documented.

iv. Communicate through appropriate channels

Use official platforms (team groups, email). Avoid late-night messaging, private social media conversations, or overly personal discussions.

v. Do not extend beyond your competence

If an athlete has legal, financial, psychological, or migration-related issues, refer them to qualified professionals. Do not attempt to “handle it yourself.”

vi. Be conscious of influence

Statements like “I can make your career” or “you need to trust me” reinforce dependency and are inappropriate.

vii. Encourage independence and multiple support systems

Athletes should feel able to speak to parents, safeguarding officers, teammates, and other staff – not rely solely on you.

viii. Recognise early warning signs of boundary erosion

These include increased secrecy, emotional reliance, isolation from others, or situations where the athlete feels unable to say no.



WHAT IT MEANS IN PRACTICE

A boundary violation is often subtle. It may look like:

- Offering an athlete money, gifts, or accommodation outside formal structures
- Messaging an athlete privately late at night about non-sport matters
- Insisting on being the only person managing an athlete's career decisions
- Asking an athlete to keep certain interactions "just between us"
- Spending disproportionate time with one athlete compared to others

These behaviours may be rationalised as support, mentorship, or efficiency, but they shift the relationship from professional to personal, increasing risk.

By contrast, ethical coaching looks like this:

- Decisions are explained and based on clear, objective criteria
- Interactions are visible, documented, and accountable
- The athlete has access to multiple adults and support systems
- The coach maintains an appropriate distance while still being supportive

A useful test for coaches is:

"Would I be comfortable if this interaction was observed, recorded, or reviewed by my organisation?"

If the answer is no, the boundary may already be compromised.

Maintaining boundaries is not about being distant or uncaring, it is about creating a safe, structured environment where athletes can develop without pressure, dependency, or risk of exploitation.

POWER IMBALANCES

In sport, authority figures often control key parts of an athlete's life:

Selection decisions – who plays, trains, or travels

Career opportunities – access to contracts, scholarships, or scouts

Organisational structure – athletes are usually at the bottom

Financial dependence – athletes may rely on sport for income or education

Age differences – young athletes may not feel confident to question adults

Migration challenges – migrant athletes may depend on staff for housing, documents, and support.

Because of this, many athletes feel they cannot say no or speak up, even when something feels wrong.



DELVE DEEPER

Sport is structured around hierarchical relationships in which authority, expertise, and decision-making power are unevenly distributed. Coaches, safeguarding officers, and other sport staff frequently hold positions of institutional authority over athletes, particularly young athletes who depend on these professionals for training opportunities, access to competition, and welfare support. These structural relationships create power imbalances that can shape how athletes experience their environment and how freely they can exercise choice.

Power imbalances arise when one party has the ability to control or significantly influence another party's opportunities, resources, or well-being.[cxix] In sport, these imbalances are reinforced by several factors:

1. **Performance authority:** Coaches decide who plays, who travels, who receives training opportunities, and who is recommended to scouts or professional clubs.
2. **Career gatekeeping:** Coaches and agents often serve as gatekeepers to scholarships, professional contracts, and international competitions.
3. **Institutional hierarchy:** Athletes are typically positioned at the bottom of organisational structures, particularly in elite youth systems where compliance is expected.
4. **Economic dependency:** Many athletes rely on sport for education, migration opportunities, or income, making them reluctant to challenge authority figures.
5. **Age and maturity differences:** Youth athletes may lack the experience or confidence to question decisions made by adults in positions of power.
6. **Migration vulnerability:** Migrant athletes may depend on club officials or intermediaries for housing, documentation, language assistance, and financial support. Migrant youth athletes may feel unable to refuse requests, report inappropriate behaviour, or question decisions, even when those actions conflict with their well-being.

While power imbalances within sport environments do not automatically lead to abuse, when authority is exercised without clear ethical boundaries or oversight, these imbalances can create conditions in which grooming, coercion, and exploitation become possible. Ethical boundaries are thus essential to ensure that authority is exercised responsibly. Clear professional limits protect both athletes and staff by defining appropriate behaviour, preventing conflicts of interest, and reducing the risk of exploitative or coercive relationships. Safeguarding frameworks should therefore recognise that misconduct in sport rarely occurs in isolation. Rather, it often develops gradually through boundary violations that exploit structural power differences.

Why Ethical Boundaries Matter

Having power does not automatically lead to abuse, but without clear limits, it can. Ethical boundaries are important because they:

- Define what behaviour is appropriate
- Protect athletes from harm
- Protect staff from accusations or misconduct
- Prevent situations where power is misused

Abuse in sport often does not happen suddenly. It usually develops slowly when boundaries are crossed over time.

A key concern for coaches, agents, educators, and other sport staff is the grooming process. Grooming in sport often occurs gradually and can initially appear to be legitimate mentoring or support. Individuals in positions of authority may provide opportunities, attention, or material assistance that appear beneficial to the athlete. Over time, however, these interactions, which blur boundaries, may develop into relationships characterised by increasing dependency and control. Common grooming dynamics include:

1. **Favouritism:** granting special privileges or opportunities that create a sense of obligation.
2. **Gradual boundary erosion:** normalising behaviour that becomes progressively more intrusive or controlling.
3. **Dependency creation:** positioning the authority figure as the athlete's primary source of career advancement, financial support, or emotional validation.
4. **Isolation:** encouraging athletes to distance themselves from family members, teammates, or other support systems and sublimating their trust onto the authority figure (perpetrator).

These dynamics can be particularly dangerous for migrant youth athletes, who may already face structural vulnerabilities such as financial insecurity, unfamiliar legal systems, or limited social support networks. In some cases, these patterns intersect with broader forms of exploitation, ranging from financial exploitation to sport trafficking. For example, athletes may be pressured into exploitative contracts, financial arrangements, or migration pathways controlled by intermediaries who benefit economically from their dependence.

Effective prevention requires clear professional boundaries between athletes and authority figures; independent safeguarding structures within sport organisations; accessible reporting mechanisms for athletes and third parties; and staff training to recognise grooming dynamics and the abuse of power.

GROOMING

A major risk in sport is grooming, where someone in power slowly builds control over an athlete. At first, it may look like normal support or mentorship, but over time, it becomes harmful. Common warning signs include:

Favouritism – giving special treatment that makes the athlete feel they “owe” the person.

Slowly crossing boundaries – behaviour becomes more personal, controlling, or inappropriate over time

Creating dependence – the athlete feels they need this person for success, money, or emotional support.

Isolation – the athlete is encouraged to distance themselves from family, teammates, or others.



ETHICAL BOUNDARIES FOR COACHES

Coaches often have the greatest direct influence on athletes' daily lives. They control training environments, discipline, and selection decisions, and frequently act as mentors or role models. This influence can foster positive development, but it also creates the potential for dependency and undue influence. Ethical coaching requires maintaining clear professional boundaries that protect athlete welfare and autonomy.

The coach-athlete relationship can become problematic when athletes feel their selection or playing time depends on personal loyalty or obedience, when coaches exert excessive control over athletes' personal lives, or when emotional dependence develops when athletes believe their future depends entirely on a coach, or when coaches assume roles beyond their competence (such as counsellor, financial advisor, or immigration intermediary). These dynamics can make athletes reluctant to question behaviour that would otherwise appear inappropriate.

Professional Boundaries for Coaches

Coaches should adhere to the following safeguards:

1. Maintain professional relationships

Coaches must avoid personal relationships that compromise professional judgment or create emotional dependency. Romantic or sexual relationships with athletes, particularly minors or athletes under their authority, are strictly prohibited.

2. Avoid favouritism and coercive influence

Selection decisions must be based on performance criteria rather than personal loyalty or off-field relationships.

3. Respect personal autonomy

Athletes should not be pressured to disclose personal information unrelated to sport performance or welfare.

4. Maintain appropriate communication

Communication should remain professional and related to training or athlete welfare. Private late-night messaging, excessive personal communication, or emotionally intimate exchanges may indicate boundary erosion.

5. Ensure transparency

Meetings with athletes should take place in visible, professional environments where possible. Closed-door interactions should be avoided unless necessary and appropriately documented.

6. Promote athlete welfare

Training programmes must prioritise safety, appropriate workloads, and the long-term well-being of athletes rather than short-term competitive success.

Ethical Boundaries for Safeguarding Officers

Safeguarding officers occupy a unique role within sport organisations. They are responsible for receiving disclosures, responding to safeguarding concerns, and ensuring that athlete protection policies are implemented effectively. Their position often requires building trust with athletes while maintaining professional objectivity. Safeguarding officers may work closely with individuals experiencing trauma, distress, or vulnerability. They must be particularly attentive to professional boundaries. Boundary challenges can arise when safeguarding officers become emotionally over-involved with individual athletes; attempt to act simultaneously as investigator, counsellor, and advocate; maintain private relationships with athletes outside safeguarding processes; or promise confidentiality that cannot legally be maintained.

Professional Boundaries for Safeguarding Officers

Safeguarding officers should:

1.Maintain role clarity

A safeguarding officer's primary responsibility is to receive concerns, ensure appropriate referrals, and facilitate safeguarding processes. They are not responsible for conducting criminal investigations or providing specialised therapeutic counselling unless professionally qualified.

2.Avoid dual relationships (conflict of interest)

Safeguarding officers should not act simultaneously as a coach, agent, or disciplinary authority for the same athlete.

3.Ensure procedural transparency

All safeguarding concerns must be documented and processed through established reporting protocols.

4.Respect confidentiality within limits

Information shared by athletes must be treated sensitively, but safeguarding officers must explain that disclosures involving abuse or serious harm may require referral to external authorities.

5.Promote accessible reporting

Athletes must feel safe approaching safeguarding officers without fear of retaliation or dismissal.



ETHICAL BOUNDARIES FOR SOCIAL WORKERS WORKING WITH ATHLETES

Social workers engaged in sport settings frequently support athletes facing complex vulnerabilities such as migration challenges, financial exploitation, family separation, or trauma related to abuse or trafficking. While social workers are trained to provide psychosocial support, they must also navigate professional boundaries that distinguish supportive care from personal involvement. Boundary risks may arise when athletes become emotionally dependent on a single support professional, when social workers provide material assistance or financial support outside formal programmes, when personal relationships extend beyond professional support contexts, or when professionals attempt to solve complex problems without engaging appropriate external services. These dynamics can unintentionally create dependency or blur professional responsibilities.[cxxii]

Professional Boundaries for Social Workers

Social workers supporting athletes should:

1.Maintain professional distance

Empathy and support must not evolve into personal friendships or surrogate family roles.

2.Work within professional competence

Specialised legal, immigration, or financial matters should be referred to appropriate professionals.

3.Promote athlete empowerment

Support should focus on helping athletes develop decision-making capacity and independence rather than fostering reliance on a single professional.

4.Respect confidentiality

Information shared by athletes must be handled sensitively while complying with safeguarding obligations and legal reporting requirements.

5.Coordinate with safeguarding structures

Social workers should work collaboratively with safeguarding officers, medical personnel, and external support services to ensure a coordinated response to athlete welfare concerns.

Boundary violations should never be dismissed as minor disciplinary issues. They often represent early warning signs of a deeper safeguarding problem.

Red Flag Indicators: Boundary Violations and Abuse of Power

The following behaviours may indicate inappropriate use of authority or the early stages of grooming or exploitation.

- Physical contact unrelated to training or medical care
- Personal gifts or financial assistance from staff to individual athletes
- Emotional language suggesting the athlete has a special or exclusive relationship with a staff member
- A coach insisting on private meetings or transport arrangements with an athlete
- Excessive one-on-one attention or favouritism
- Staff communicating with athletes late at night or through private social media accounts
- Staff discouraging athletes from speaking to parents, teammates, or safeguarding officers
- Requests for personal loyalty in exchange for selection or opportunities
- Staff controlling an athlete's finances, travel documents, or accommodation
- Athletes appear fearful of disappointing a particular staff member
- Pressure is placed on athletes to hide information from parents or officials

Any of these behaviours should trigger further review or safeguarding discussion.



Good Practice Checklist: Maintaining Ethical Boundaries

Professionals working with athletes can strengthen safeguarding by consistently applying the following practices.

Transparency

- Conduct meetings in visible or observable environments
- Document significant interactions related to athlete welfare

Professional communication

- Use official communication channels for athlete contact
- Keep communication focused on training, welfare, or organisational matters

Shared accountability

- Avoid situations where a single staff member has exclusive authority over an athlete
- Encourage open communication with safeguarding officers and parents where appropriate

Clear role boundaries

- Refer athletes to specialists for legal, psychological, or medical issues
- Avoid taking on responsibilities beyond professional competence

Athlete empowerment

- Encourage athletes to voice concerns and ask questions
- Promote awareness of safeguarding policies and reporting channels

7.2 Integration Strategies: Ensuring access to language classes, school enrolment, and safe accommodation

CONCEPT

Safeguarding migrant youth athletes is not limited to preventing abuse and exploitation. It also requires active integration support, ensuring that athletes can communicate, access education, and live in safe, stable environments. Integration is a safeguarding function because it reduces dependency and vulnerability.

WHY IT MATTERS

When migrant athletes cannot speak the local language, are not enrolled in school, or rely entirely on a club or agent for housing, they become dependent. This dependency limits their ability to seek help, understand their rights, or leave harmful situations.

For coaches, these risks may not always be visible. An athlete who is quiet, withdrawn, or “compliant” may not be well-adjusted; they may be isolated, confused, or afraid. Poor integration increases the likelihood of:

- Misunderstanding instructions or contracts
- Social isolation from teammates
- Over-reliance on a single adult (e.g. coach/agent)
- Increased exposure to coercion or exploitation

WHAT TO DO

i. Language and communication

- Check understanding, don't assume it. Ask athletes to repeat or explain instructions.
- Avoid relying on a single teammate to "translate everything", as this can lead to miscommunication, exclusion or dependence.
- Use simple, clear language and visual demonstrations in training.
- Ensure interpreters are used for contracts, medical issues, and safeguarding discussions – never rely on informal translation in high-risk situations.

ii. Education and dual-career support

- Confirm that minor athletes are enrolled in school – this is non-negotiable.
- Be aware of training schedules that may conflict with schooling.
- Encourage athletes to continue their education and treat it as part of their development.
- Watch for signs of educational exclusion (fatigue, missed classes, disengagement).

iii. Safe accommodation awareness

- Know where your athletes are living and under what conditions (without intruding on privacy).
- Be alert to red flags: overcrowding, isolation, accommodation controlled by a single individual for multiple athletes, or housing linked to performance.
- Never host athletes at your home or arrange private accommodation independently from your sport organisation.
- Report concerns about housing immediately through safeguarding channels.

iv. Reduce dependency

- Encourage athletes to build multiple support networks (teammates, safeguarding officers, teachers, family).
- Avoid becoming the athlete's sole point of contact for non-sport issues.
- Refer athletes to appropriate services (legal, psychosocial, educational) rather than managing issues yourself.

v. Provide basic orientation and support

Ensure athletes know:

- Who the safeguarding officer is
- How to report concerns
- Where to access healthcare and support services
- Reinforce that they have rights beyond sport.

WHAT IT MEANS IN PRACTICE

A well-integrated athlete:

- Understands basic communication in training and daily life
- Is enrolled in school (if a minor) and supported academically
- Lives in safe, appropriate accommodation with oversight
- Knows whom to approach for help and is not dependent on one individual

A poorly integrated athlete may:

- Avoid communication or appear withdrawn
- Rely entirely on a coach or agent for decisions
- Live in unclear or potentially unsafe conditions
- Show signs of confusion about contracts, expectations, or rights

For coaches, the key distinction is this:

Performance is not the same as well-being. An athlete may train well but still be socially isolated, legally vulnerable, or at risk.

Cross-Sector Responsibility

Integration is not solely the coach's responsibility, but coaches are often the first to observe gaps. Effective safeguarding requires coordination between:

- Clubs and academies
- Schools and education providers
- Safeguarding officers and social workers
- Migration and legal services

The coach's role is to identify concerns early, maintain professional boundaries, and activate the right support systems – not to solve integration challenges alone.



DELVE DEEPER

Successful safeguarding of migrant athletes does not end with protecting them from exploitation or abuse. It also requires proactive strategies that support social integration, educational access, and safe living conditions. Migrant athletes often face significant barriers to integration in host countries, including language difficulties, lack of access to schooling, limited knowledge of their rights, and unstable housing arrangements. Without targeted support, these structural barriers can deepen athletes' dependence on intermediaries, clubs, or agents. The very conditions that increase vulnerability to exploitation. Integration strategies should therefore focus on three key pillars: language acquisition, access to education, and safe accommodation.[cxxiii]

1. Language Access and Communication Support

Language barriers are one of the most frequently reported challenges facing migrant athletes. The inability to communicate with coaches, teammates, and administrators can lead to social isolation, exclusion from team dynamics, and difficulty understanding contracts or administrative procedures. The linguistic diversity among migrant athletes means that a one-size-fits-all approach to language training is ineffective.

Sport organisations and safeguarding structures should ensure:

Mandatory language support programmes

- Newly arrived athletes should be offered structured language classes in the host country's primary language.
- Programmes should be adapted to athletes' schedules to avoid conflict with training and competition.

Sport-specific language learning

- Language instruction should include sport terminology and practical communication used in training environments.

Access to interpreters

- Qualified interpreters should be available when discussing contracts, legal rights, medical treatment, or safeguarding concerns.

Cultural orientation

- Orientation sessions should introduce athletes to the legal, cultural, and institutional structures of the host country, including labour rights and safeguarding protections.

Measures aimed at reducing isolation and empowering athletes to understand their rights and obligations within the sport system are closely interlinked to safeguarding.

2. Access to Education and School Enrolment

Youth migrant athletes, particularly those who are still minors, relocate during key stages of their education. Without proper educational support, athletes risk school disruption, limited career prospects outside sport, and increased vulnerability to exploitation. Integration policies at the club or academy level should recognise that dual-career pathways are essential to athlete welfare.

Ensure school enrolment for minor athletes (non-negotiable)

- Clubs and academies should ensure that all minor athletes are enrolled in accredited educational institutions within a reasonable period after arrival.

Flexible schooling arrangements

- Schools and sport organisations should cooperate to allow flexible scheduling that accommodates training commitments.

Educational support

- Tutoring and language support should be available for athletes who are learning in a new language environment.

Ensuring access to education also reduces the risk that sport becomes the athlete's sole pathway for social mobility, a factor that can increase vulnerability to exploitative recruitment practices.

3. Safe and Appropriate Accommodation

Migrant youth athletes may arrive without independent housing options, relying on clubs, agents, or intermediaries to provide accommodation. While this can facilitate integration, it also creates opportunities for financial exploitation, coercive control, or unsafe living conditions.

Vetted housing arrangements

- Accommodation provided by clubs or academies should meet basic safety and welfare standards and be subject to regular oversight.

Separate living arrangements from authority figures

- Athletes should not live in private residences of coaches or agents, as this can create dependency and blurred professional boundaries.

Independent oversight

- Safeguarding officers or social workers should periodically review housing conditions to ensure athletes are living in safe and dignified environments.

Access to support services

- Athletes should be provided with information about local healthcare, legal services, shelters and community organisations.

Emergency housing protocols

- Sport organisations should establish contingency plans for athletes who lose accommodation due to contract termination or disputes, and/or are in need of assistance with repatriation.

4. Cross-Sector Coordination

Coordination among sports institutions, government agencies, education systems, and migration authorities to support migrant youth athletes is vitally important. Effective integration requires collaboration across multiple sectors, including national sport federations, immigration authorities, Department of Education, social services, and athlete support organisations.

Integration Checklist for Migrant Athletes

Safeguarding officers and sport organisations should verify the following within the first 30-60 days after an athlete's arrival:

- Contact information for safeguarding officers and support organisations has been provided
- Orientation provided on legal rights and responsibilities
- The athlete was informed about medical care and insurance, and other forms of social support
- Housing has been inspected and approved
- The athlete not residing with a coach or agent
- The athlete has independent access to communication and transportation
- The athlete is enrolled in language classes
- The athlete has access to translation for contracts and safeguarding disclosures
- If the athlete is a minor, they are enrolled in school
- Academic support is available if needed (e.g. tutoring)
- Flexible arrangements for training commitments are available in the case of minors

7.3 Promoting Athlete Voice: Fostering an Inclusive and Non-Retaliatory Culture

CONCEPT

Athlete voice refers to athletes' ability to express views, raise concerns, ask questions, and contribute to decisions that affect their sport experience without fear of negative consequences. It is a shift from a compliance-based model ("listen and follow instructions") to a participatory, athlete-centred approach.

WHY IT MATTERS

In many sport environments, silence is often mistaken for discipline or respect. Silence can indicate fear, dependency, or lack of trust. When athletes do not feel safe to speak:

- Early warning signs of abuse or exploitation go unreported
- Harmful practices become normalised
- Athletes internalise stress, confusion, or mistreatment
- Power imbalances deepen

Language barriers, cultural differences, and reliance on sport for opportunities may make migrant youth athletes further reluctant to speak.

WHAT TO DO

i. Create psychological safety in daily interactions

Regularly ask for athlete input: “How did that session feel?” / “What would you change?”
Respond to feedback calmly. Avoid defensiveness or retaliation.
Treat mistakes and questions as part of development, not disobedience.

ii. Make it safe to speak up about concerns

Clearly explain that raising concerns will not affect selection or opportunities.
Reinforce this consistently through your actions (not just words).
Take all concerns seriously – even if they seem minor.

iii. Use multiple communication channels

- One-on-one check-ins (especially for quieter athletes)
- Group discussions or debriefs
- Anonymous feedback (where possible within the organisation)

Not all athletes will feel comfortable speaking in the same setting.

iv. Involve athletes in decision-making (where appropriate)

- Co-create team rules or codes of conduct
- Allow input into training goals or routines
- Offer structured choices (e.g. between drills or recovery options)

This builds autonomy without undermining coaching authority.

v. Be culturally and socially aware

Recognise that some athletes may come from cultures where questioning authority is discouraged.

Adapt communication styles (simplify language, check understanding).

Ensure migrant athletes are not excluded from discussions due to language barriers.

vi. Strengthen support systems around the athlete

Encourage athletes to speak to multiple trusted adults (not only you).

Reinforce the role of safeguarding officers and other support staff.

Avoid becoming the sole gatekeeper of communication or support.

vii. Normalise speaking up

Regularly remind athletes of their rights and reporting options.

Integrate safeguarding discussions into everyday environments – not only during or after incidents.

Reinforce that speaking up is a strength, not a problem.

WHAT IT MEANS IN PRACTICE

A team that promotes athlete voice will look different in observable ways:

- Athletes ask questions without hesitation
- Feedback flows both ways (coach ↔ athlete)
- Concerns are raised early, before they escalate
- Team discussions include multiple perspectives – not just the coach's voice

By contrast, a high-risk environment may look like:

- Athletes rarely speak unless spoken to
- Fear of making mistakes or asking questions
- Concerns raised informally (or not at all)
- Over-reliance on the coach as the sole authority

For coaches, a critical self-check is:

“Do my athletes feel safe disagreeing with me?”

If the answer is no, athlete voice is not functioning effectively.

When athlete voice is embedded effectively:

- Abuse and exploitation are more likely to be identified early
- Athletes are more willing to seek help
- Power imbalances are moderated through accountability
- Team environments become safer, more inclusive, and more resilient

Promoting athlete voice does not weaken authority or allow for disrespect. Rather, it strengthens trust, improves decision-making, and enhances safeguarding.

DELVE DEEPER

Promoting athlete voice is a central component of ethical, inclusive, and rights-based sport systems. Inclusion in sport requires creating environments in which athletes feel genuinely heard, respected, and able to express their perspectives without fear of negative consequences.[cxxiv]

Sport has long functioned as a microcosm of society, reflecting broader power structures, inequalities, and cultural norms. Within many sport systems, hierarchical authority, performance pressures, and commercial interests can unintentionally reinforce cultures of silence, where athletes are expected to comply rather than contribute. In such environments, speaking up about concerns, whether related to abuse, unfair treatment, discrimination, or unsafe conditions, can be perceived as dangerous. Athletes may fear losing selection opportunities, damaging relationships with coaches, or being labelled as “difficult.” Fostering “athlete voice” requires a conceptual shift from compliance-based cultures to participatory, athlete-centred environments. Athletes are active stakeholders in their own development and well-being.[cxxv]

“Athlete voice” means making sure athletes can speak up, share their views, and raise concerns without fear of punishment or negative consequences.

The ability of athletes to express concerns, ask questions, and contribute to decision-making is closely linked to both psychological safety and protection from harm. When athletes feel heard and respected, they are more likely to (i) report safeguarding concerns at an early stage; (ii) seek help when experiencing distress or harm; (iii) challenge inappropriate behaviour or unfair practices; and (iv) engage more meaningfully in their development and team environment.

In contrast, environments that discourage voice often enable harmful practices to go unchallenged. Silence, isolation, and lack of agency are key risk factors in abuse and exploitation contexts, including sport trafficking and other forms of coercive control.

In many sports environments, coaches and officials have a lot of power, athletes are expected to follow instructions, not question them, and speaking up can feel risky. Athletes may worry that if they complain or question things, they might lose their place on the team, be treated unfairly, or be labelled as “difficult”. This can create a culture of silence, where problems go unreported.

Creating an environment where athletes feel safe to speak requires alignment across culture, systems, and leadership practices. The following principles underpin effective athlete voice frameworks:

1. Psychological Safety

Athletes must feel confident that expressing concerns, opinions, or disagreements will not result in punishment, exclusion, or loss of opportunity. Psychological safety is reinforced when those in positions of power and authority respond to feedback constructively and consistently.

2. Non-Retaliation

Clear, well-enforced non-retaliation policies are essential. Athletes must be assured that raising concerns, whether formally or informally, will not negatively affect their selection, playing time, or access to resources.

3. Accessibility of Voice Mechanisms

Opportunities to speak must be visible, accessible, and varied. Not all athletes are comfortable speaking in the same way – necessitating multiple channels (formal and informal).

4. Respect for Diversity and Inclusion

Athlete voice must reflect the diversity of the sport environment. Attention should be given to ensuring that marginalised groups, including migrant youth athletes, women, athletes with disabilities, and those from minority backgrounds, are able to participate fully and safely.

5.Shared Responsibility

Promoting athlete voice is not solely the responsibility of safeguarding officers. Coaches, administrators, and organisational leaders all play a role in modelling inclusive behaviour and facilitating open dialogue.

Strategies to Promote Athlete Voice

1.Establish Safe and Trusted Reporting Channels

Athletes, as well as whistleblowers, must have access to clear, confidential, and independent mechanisms for raising concerns. Based upon international best practice, these should include designated safeguarding officers, anonymous reporting systems or hotlines, and external reporting pathways (where appropriate). Athletes should be informed about how reports are handled, the escalation pathways, the outcomes to expect, and the protections in place.

2.Embed Athlete Participation in Everyday Practice

Athlete voice should not be limited to reporting concerns. It should be integrated into the daily functioning of teams and organisations. Coaches and practitioners can promote participation by (i) involving athletes in developing team agreements and codes of conduct, (ii) inviting input on training routines, team goals, and performance strategies, (iii) using open-ended questioning to encourage reflection and dialogue, and (iv) incorporating regular debriefing sessions where athletes can share feedback. These practices reinforce the idea that athlete perspectives are valued beyond performance outcomes.

3.Provide Multiple Channels for Expression

Different athletes will have different comfort levels when expressing themselves. Organisations should therefore provide diverse opportunities for engagement, such as anonymous surveys, one-on-one check-ins, group discussions, athlete committees or representative structures. Offering multiple channels reduces barriers to participation and ensures that quieter or more vulnerable athletes are not excluded.

4.Promote Autonomy and Choice in Training Environments

Allowing athletes to exercise choice within structured environments enhances both engagement and well-being. This may include allowing athletes to select between training activities, involving athletes in setting individual and team goals, or providing opt-in/opt-out options in high-pressure situations. From a psychological perspective, autonomy is a key driver of motivation and resilience. Environments that support autonomy are associated with higher levels of commitment, performance, and long-term engagement.



5. Build Culturally Responsive and Inclusive Communication

Athlete voice cannot be fully realised without attention to cultural and social dynamics. Communication practices should be adapted to different linguistic and cultural contexts, avoid assumptions or stereotypes, and recognise diverse communication styles and norms. Coaches and staff should be trained in cultural competence and inclusive communication, ensuring that all athletes feel respected and understood.

6. Strengthen Support Networks Around Athletes

Athletes are more likely to speak up when they feel supported. Organisations should actively encourage connections with teammates and peer networks, family members, mentors, and trusted adults and safeguarding professionals. These networks provide emotional reassurance and practical support, reducing the isolation that often accompanies speaking out.

7. Use Education and Awareness to Normalise Speaking Up

Athlete voice should be reinforced through education and awareness initiatives. These may include (i) workshops on athlete rights and safeguarding, (ii) sharing real-life examples of athletes who have spoken up (or inviting survivors to address athletes), and (iii) embedding discussions of ethics, inclusion, and respect into training environments. Normalising dialogue about safeguarding and rights helps shift organisational culture from silence to openness.

The Role of Coaches and Leadership

Coaches play a decisive role in shaping whether “athlete voice” is encouraged or suppressed. Their behaviour sets the tone for team culture, influencing how athletes interact with one another and how safe they feel in expressing themselves. Inclusive coaching requires:

- Actively inviting and valuing athlete input
- Responding to feedback without defensiveness
- Challenging discriminatory or exclusionary behaviour immediately
- Modelling respect, empathy, and accountability

Leadership must also extend beyond individual teams. At the organisational level, governance structures should incorporate athlete representation in decision-making, ensuring that policies reflect athletes’ experiences and priorities.

Athlete Voice, Empowerment, and Safeguarding Outcomes

Promoting athlete voice has broader implications beyond immediate safeguarding concerns. It contributes to identity development and self-confidence, particularly among young athletes; critical thinking and decision-making skills; stronger team cohesion and mutual respect; and improved governance and accountability within sport systems

When athletes are empowered to speak, they become active participants in safeguarding rather than passive recipients of protection. This shift enhances the overall resilience of sport environments and reduces the likelihood that harmful practices will persist unnoticed.

CONCLUSION

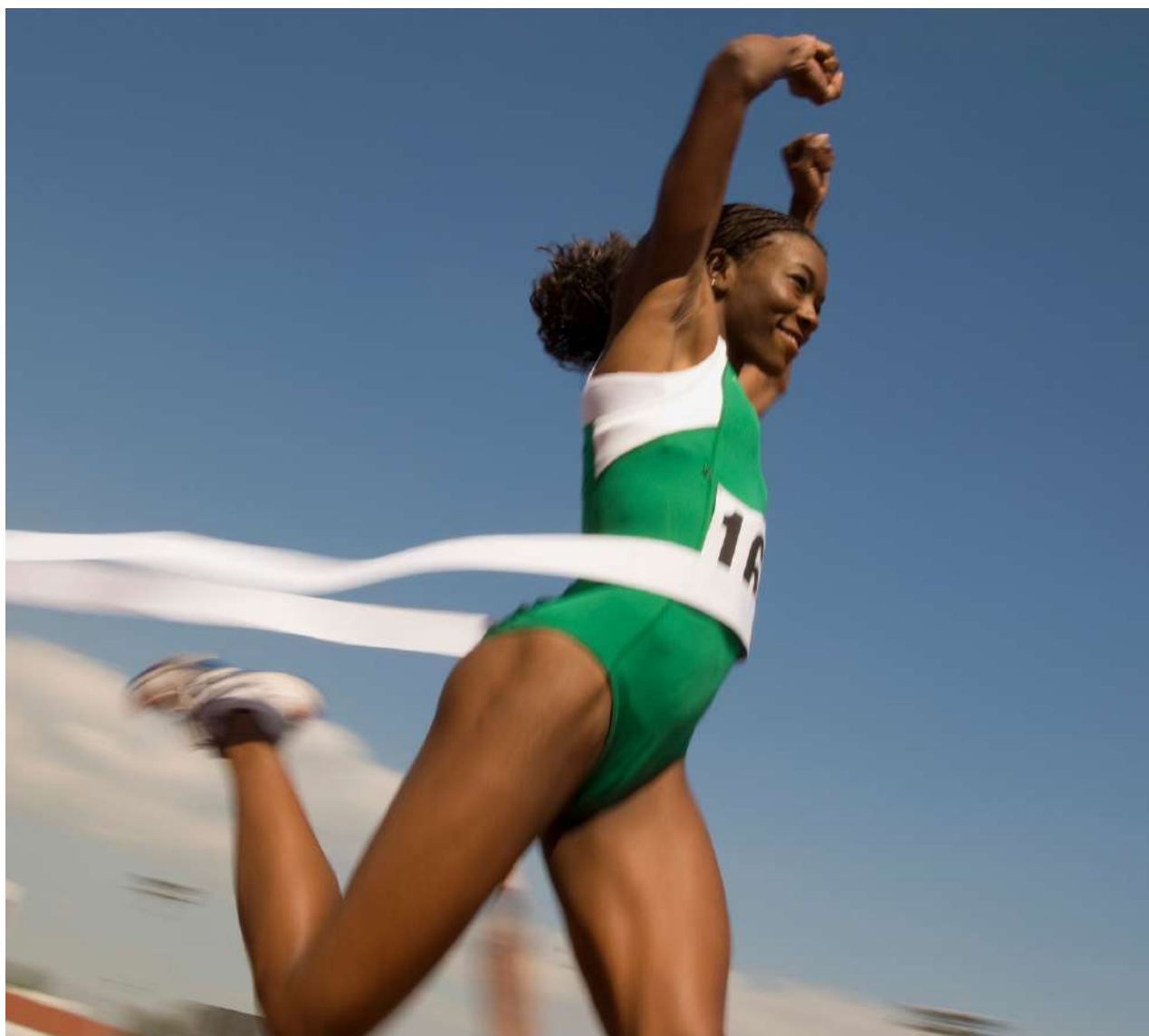
In contexts where power imbalances are significant, such as elite sport systems or migrant athlete pathways, the absence of athlete voice can enable unchecked exploitation. Athletes who are unable or unwilling to speak may remain in harmful situations due to fear, dependency, or lack of alternatives. By contrast, environments that actively promote athlete voice create early warning systems to safeguard against risks. Concerns can be identified and addressed before they escalate, reducing the likelihood of serious harm.

Promoting athlete voice is integral to building transparent, accountable, and ethically grounded sport systems. It ensures that safeguarding is not only reactive but proactive, participatory, and embedded in everyday practice.



Chapter 8

ESSENTIAL FORMS AND TEMPLATES



This chapter builds on the previous sections of the Toolkit to provide essential safeguarding tools, forms, and templates for migrant youth athletes. This chapter includes a safeguarding self-assessment (audit) tool, a rapid safeguarding risk assessment (intake) template, contextual risk mapping indicator, and national and international support organisation hotlines.

Safeguarding Audit: Organisational Self-Assessment Tool

Scoring Key

2 = Fully Compliant

1 = Partially Compliant

0 = Not Compliant

INDICATOR	SCORE	EVIDENCE	ACTION REQUIRED	UNIT/PERSON RESPONSIBLE	TIMELINE (IF ACTION REQUIRED)
GOVERNANCE AND POLICY					
Safeguarding policy formally adopted					
Safeguarding policy aligned with national and international best standards					
Safeguarding policy explicitly addresses abuse, harassment, discrimination, and exploitation					
Designated Safeguarding Officer appointed and trained					
Roles and responsibilities clearly defined					
Safeguarding policies publicly accessible					
Safeguarding integrated into organisational strategy					
Regular policy review (annual)					
Codes of conduct in place (coaches, athletes, volunteers, other staff)					
Section Score: ____ / 18					

SAFE RECRUITMENT AND VETTING

Background checks conducted for all staff (including volunteers)					
Recruitment processes assess suitability to work with children and vulnerable athletes					
Safeguarding included in job descriptions					
Reference checks completed					
Procedures exist to prevent individuals with known safeguarding risks from engagement					
Staff sign and commit to codes of conduct and ethical guidelines					
Staff safeguarding training on induction					
Ongoing (regular) safeguarding training provided					
External contractors subject to safeguarding checks					

Section Score: ____ / 18

ETHICAL BOUNDARIES AND PROFESSIONAL CONDUCT

Clear staff-athlete boundary guidelines					
Policy on relationships/power imbalance					
Rules governing communication (e.g. social media and messaging)					
Staff and athletes educated on ethical boundaries and professional conduct					
Monitoring of staff conduct and athlete interaction					
Disciplinary procedures enforced					
Transparent decision-making processes					

Section Score: ____ / 14

REPORTING AND RESPONSE SYSTEMS

Multiple reporting channels available (clearly signposted)					
Anonymous reporting option exists					
Clear response procedures					
Staff trained in handling disclosures					
Case documentation and management system in place					
Non-retaliation policy enforced (protection of whistleblowers and athletes)					
External referral pathways established and operational (law enforcement, child protection, social services, health and psychosocial services)					

Section Score: ____ / 14

ATHLETE VOICE AND PARTICIPATION

Athlete feedback mechanisms exist (formal and informal)					
Anonymous feedback tools used (e.g. surveys)					
Athlete representatives/committees established					
Athletes involved in decision-making (e.g. codes of conduct, goals)					
Staff encourage open dialogue					
Inclusion of marginalised/vulnerable groups					

Section Score: ____ / 12

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INTEGRATION AND WELFARE SUPPORT					
Language support programmes available					
Interpretation services provided					
Minor athletes enrolled in school/educational programmes					
Academic/vocational support provided					
Safe accommodation verified (appropriate and monitored housing)					
Independent housing from authority figures					
Access to healthcare/psychosocial/legal support services					
Section Score: ____ / 14					
TRAINING AND ORGANISATIONAL CULTURE					
Regular safeguarding training for staff and volunteers					
Awareness training for athletes and parents/guardians (across different areas of safeguarding affecting them, including abuse, exploitation, grooming, digital safety, poor practice, etc.)					
Anti-discrimination and inclusion policies					
Zero-tolerance culture communicated					
Leadership models ethical behaviour					
Section Score: ____ / 10					
MONITORING AND EVALUATION					
Safeguarding cases recorded securely					
Data reviewed for trends and patterns (to inform prevention strategies)					
Internal audits conducted					
External review mechanisms					
Athletes and staff consulted to improve policy and practice					
Lessons integrated into policy updates					
Section Score: ____ / 12					
TOTAL SCORE: ____ / 112					
RISK RATING					
90–112 (Low Risk / Strong Compliance)					
71–89 (Moderate Risk / Gaps Present)					
Below 70 (High Risk / Urgent Action Required)					
*Below ca. 60% in any single category requires urgent action.					

The Council of Europe and the European Union have also created self-assessment tools:
<https://www.coe.int/en/web/sport/self-assessment-tool> and <https://safergrassport.eu/self-assessment-tool/>

Rapid Safeguarding Risk Assessment (Intake) Tool

To help SafeSport practitioners quickly identify potential exploitation risks during recruitment, trials, athlete relocation, or early integration into clubs or academies. This tool should be used when a new athlete joins a programme, or an athlete arrives from another country or region, or an intermediary or agent is involved, or concerns about welfare or recruitment arise. The assessment should be conducted within the first 30 days of placement. A follow-up assessment may be required if the athlete starts exhibiting changed behaviour within the first 90 days of placement.

SECTION 1: BASIC ATHLETE INFORMATION					
Athlete Name					
Age / Date of Birth					
Country/Region of Origin					
Legal Guardian (For Minors)					
Current Club/Academy					
Date of Arrival/Recruitment					
Agent/Intermediary Involved	Yes / No				
Name of Agent/Recruiter					
Recruitment Method	Trial / Agent / Academy / Other				
SECTION 2: CONSENT AND CONFIDENTIALITY					
Athlete informed of purpose of assessment	Yes / No				
Consent obtained	Yes / No				
Confidentiality explained	Yes / No				
Signature (Athlete):					
Date:					
Signature (Assessor):					
Date:					
SECTION 3: RECRUITMENT PROCESS					
Ask the athlete simple, non-leading questions.					
QUESTION	YES	NO	UNSURE		
Did you or your family have to pay money for this opportunity?					
Were you given a written contract before travelling or joining?					
Did you have time to read and understand the contract?					
Did anyone explain the contract to you in your own language?					
Do you know if your agent or recruiter is officially licensed?					
FLAG: UPFRONT PAYMENTS, UNCLEAR CONTRACTS, OR UNLICENSED AGENTS.					

SECTION 4: TRAVEL AND DOCUMENTATION			
Question	Yes	No	Unsure
Do you currently have your passport or ID with you?			
Did anyone take your passport or visa when you arrived?			
Do you know your current visa or legal status in the country?			
Were travel arrangements explained clearly before you left home?			
FLAG: PASSPORT CONFISCATION OR UNCERTAINTY ABOUT IMMIGRATION STATUS.			
SECTION 5: LIVING CONDITIONS			
Question	Yes	No	Unsure
Are you living in accommodation arranged by the club or academy?			
Do you have adequate food and basic necessities?			
Can you leave your accommodation freely?			
Can you contact your family whenever you want?			
FLAG: ISOLATION, RESTRICTED MOVEMENT, OR POOR LIVING CONDITIONS.			
SECTION 6: FINANCIAL ARRANGEMENTS			
Question	Yes	No	Unsure
Do you receive money directly for competitions or appearances?			
Does someone else control your earnings or bank account?			
Do you have to pay ongoing fees to an agent or coach?			
Have any of your earnings been delayed or withheld?			
Does your family expect you to send money home?			
FLAG: THIRD-PARTY FINANCIAL CONTROL OR EXCESSIVE COMMISSIONS.			
SECTION 7: WELFARE AND SAFETY			
QUESTION	YES	NO	UNSURE
Are you enrolled in school or a vocational programme?			
Are you in regular/free contact with your family?			
Can you read, write and speak the local language?			
Do you know who to contact if you need help (medical, legal, psychosocial)?			
Do you have a support network here (peers/friends/relatives)?			
<i>Observe the athlete and ask carefully about their day-to-day activities, how they are enjoying training, schooling (if still a minor), and any extramural activities (within the first 30 days).</i>			
INDICATOR	YES	NO	UNSURE
Athlete appears fearful or anxious about coaches/agents/peers			
Athlete appears malnourished, exhausted, or distressed			
Athlete expresses fear of deportation or punishment			
Athlete reports being asked to do activities unrelated to sport			
Athlete gives vague answers or struggles to make eye contact			
Flag: Signs of coercion, exploitation, or psychological control.			

SECTION 7: COMPOSITE RISK ASSESSMENT

Overall Risk Level:

Low	Medium			High			

Rationale (brief narrative):

Provide a short summary linking key risk factors.

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SECTION 8: IMMEDIATE SAFEGUARDING ACTIONS

Action

Refer to the designated safeguarding lead (escalation)

Legal/immigration support referral

Financial counselling/support

Psychosocial/mental health referral

Interpreter services arranged

Emergency intervention (if high risk)

RISK SCORING GUIDE

Risk Level	Indicators
Low Risk	Few concerns, athlete understands recruitment and conditions
Moderate Risk	Some unclear recruitment practices or welfare concerns
High Risk	Passport confiscation, financial control, isolation, or coercion indicators

IMMEDIATE ACTION IS REQUIRED IF IDENTIFIED AS HIGH RISK

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Steps to take if multiple risk factors are identified:

1. Conduct a private welfare conversation with the athlete.

2. Document concerns carefully.

3. Notify the organisation's Designated Safeguarding Lead.

4. Refer to child protection services, labour authorities, or law enforcement if exploitation is suspected.

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IMPORTANT: ATHLETES SHOULD NEVER BE ASSESSED OR COUNSELLED IN FRONT OF AGENTS, COACHES, RECRUITERS, OR ANY OTHER PARTY SUSPECTED OF INVOLVEMENT IN MALTREATMENT OR EXPLOITATION.

Contextual Risk Mapping: Migrant Youth Athletes

RISK MAPPING FRAMEWORK OVERVIEW				
LEVEL		FOCUS		CORE RISK DRIVER
Micro (Individual)		Athlete characteristics and experiences		Age, trauma, awareness
Mezzo (Interpersonal/Organisational)		Relationships and sport environments		Power, dependency, culture
Macro (Structural/Systemic)		Legal, economic, governance systems		Migration status, regulation gaps
Risk is cumulative and intersecting, not isolated.				
CONTEXTUAL RISK MAP				
Micro-Level (Individual Risk Factors)				
Who the athlete is and what they bring into the system				
RISK FACTOR	DESCRIPTION		RISK OUTCOME	
Age and developmental stage	Limited capacity to assess risk, high deference to authority		Susceptibility to manipulation and grooming	
Low rights awareness	Lack of knowledge about contracts, abuse, or reporting mechanisms		Inability to identify or report harm	
Aspirational pressure	Strong desire for success and family expectations		Tolerance of abuse or exploitation	
Prior trauma	Exposure to violence, displacement, or loss		Reduced trust, delayed disclosure	
Psychological coping	Normalisation of hardship, perfectionism		Masking abuse, self-blame	
MEZZO-LEVEL (RELATIONAL AND ORGANISATIONAL RISKS)				
How the sport environment operates				
RISK FACTOR	DESCRIPTION		RISK OUTCOME	
Power imbalances	Coaches/agents control careers, mobility, selection		Coercion, compliance-based relationships	
Dependency relationships	Reliance on clubs for housing, income, documents		Limited autonomy, fear of withdrawal	
Normalisation of harm	Abuse framed as discipline or performance culture		Blurred boundaries, underreporting	
Weak safeguarding systems	No clear reporting channels or trusted adults		Escalation of harm	
Unethical recruitment practices	Deception, fees, lack of contracts, informal trials		Financial exploitation, irregular migration	
Isolation	Separation from family/support networks		Increased control and vulnerability	

MACRO-LEVEL (STRUCTURAL AND SYSTEMIC RISKS)		
<i>Broader systems shaping vulnerability</i>		
RISK FACTOR	DESCRIPTION	RISK OUTCOME
Legal status insecurity	Visa dependency, asylum uncertainty, undocumented status	Fear of reporting, exploitation
Regulatory gaps	Weak enforcement of sport governance and labour protections	Impunity for abuse
Economic inequality	Recruitment targeting disadvantaged regions/communities	Predatory recruitment models
Migration systems	Complex, restrictive pathways	Irregular migration, trafficking exposure
Institutional cultures	Performance over welfare	Systemic abuse and silence
LEGAL STATUS RISK LAYER (CROSS-CUTTING)		
STATUS TYPE	SPECIFIC RISKS	LIKELY CONSEQUENCES
Documented	Visa tied to club; risk of contract termination	Loss of legal status, coercion
Refugee/Asylum Seeker	Dependency, uncertainty, fear of jeopardising status	Exploitation, underreporting
Undocumented	No legal protection, fear of deportation	Severe exploitation, trafficking risk
<i>Legal status acts as a risk multiplier across all levels.</i>		
CONTINUUM OF HARM		
<i>How risks translate into escalating harm</i>		
STAGE	RISK INDICATORS	OUTCOME
Poor Practice	Boundary violations, favouritism, lack of oversight	Normalisation of harm
Unethical Recruitment	Deception, fees, informal trials	Financial exploitation, dependency
Maltreatment	Physical, emotional, sexual abuse; sextortion	Trauma, withdrawal, silence
Exploitation and Trafficking	Forced labour, document control, coercion	Entrapment, bondage, severe rights violations

RISK INTERACTION PATHWAYS (HOW HARM DEVELOPS)	
PATHWAY 1: RECRUITMENT →DEPENDENCY →EXPLOITATION	
DECEPTIVE RECRUITMENT	
	→ Athlete incurs debt / relocates
	→ Becomes dependent on agent/club
	→ Exploitation (labour, financial, sexual)
PATHWAY 2: CULTURE →NORMALISATION →ABUSE	
HARSH TRAINING CULTURE	
	→ Boundary violations normalised
	→ Athlete cannot distinguish abuse
	→ Sustained maltreatment (abuse/exploitation)
PATHWAY 3: LEGAL STATUS → FEAR → SILENCE	
PRECARIOUS OR UNDOCUMENTED STATUS	
	→ Fear of deportation or contract loss
	→ Non-reporting
	→ Prolonged abuse or trafficking
PATHWAY 4: TRAUMA → DISTRUST → NON-DISCLOSURE	
PRIOR OR ONGOING TRAUMA	
	→ Difficulty trusting authorities
	→ Fragmented or delayed disclosure
	→ Missed intervention opportunities
EARLY WARNING INDICATORS (CROSS-LEVEL)	
INDIVIDUAL	
	Sudden behavioural change (withdrawal, aggression, perfectionism)
	Reluctance to speak about living/training conditions
RELATIONAL	
	Excessive control by agent/coach
	Isolation from peers/family
	Special treatment or targeting by authority figures
STRUCTURAL	
	Lack of contracts or unclear terms
	Confiscated documents
	Informal or repeated “trials”

Athletes' Rights Declaration

Mission 89: The Line We Don't Cross (see Mission 89 website)

Key National and International Support Organisations

EU-WIDE HELPLINES
EMERGENCY NUMBER (ALL EU COUNTRIES)
Phone: 112
Free, works anywhere in the EU
Call if:
You are in immediate danger
You need urgent help
CHILD HELPLINE (FOR ANYONE UNDER 18)
Phone: 116 111
Website: https://www.childhelplineinternational.org
Free and confidential
You can talk about:
Feeling unsafe
Abuse or mistreatment
Confusion about an opportunity
MISSING CHILDREN (EUROPE)
Phone: 116 000
Website: https://missingchildreneurope.eu
Free in all EU countries
They help with:
Missing or lost children
If you are lost or in danger
Cross-border protection
Emergency support
ANTI-TRAFFICKING HOTLINE (GLOBAL DIRECTORY)
Global Modern Slavery Directory
Website: https://www.globalmodernslavery.org/report
Helps you find a hotline in your country (Simply type in the name of the country or search on the map)
Support services near you
A21 CAMPAIGN HOTLINE
Website: https://www.a21.org/content/report-now/grbqhs#page-13359
Available in Bulgaria, Greece, Italy, Norway and Spain
They help with:
Human trafficking
Exploitation
Emergency support and advice

FRANCE
National Child Danger Hotline
Phone: 119
Website: https://www.service-public.gouv.fr/particuliers/vosdroits/F781?lang=en
SPAIN
Policía Nacional Anti-Trafficking Line
Phone: 900 10 50 90
Website: https://www.policia.es
PORTUGAL
APAV
Phone: 116 006
Website: https://www.apav.pt
SPORT-SPECIFIC SUPPORT
FOOTBALL
FIFA Reporting
Website: https://inside.fifa.com/human-rights/fifa-guardians/competition-safeguarding/report-a-concern/incident-report-form
Report:
Agents
Clubs
Abuse or exploitation
FIFPRO
Website: https://www.fifpro.org
They help with:
Contracts
Player rights
Exploitation cases
BASKETBALL
FIBA Integrity & Safeguarding
Website: https://www.fiba.basketball/integrity
Report:
Match fixing
Betting & integrity violations
Harassment, abuse, or safeguarding concerns
Misconduct by players, officials, or agents

ATHLETICS
World Athletics Safeguarding
Website: https://worldathletics.org/about-iaaf/documents/member-federation-resource-centre?_gl=1*1sb2qgy*_ga*MTc2NjY5NTcwNy4xNjkyODg5NTM4*_ga_7FE9YV46NW*MTcxNzA4NDEzMS44MjcuMS4xNzE3MDg0OTkwLjAuMC4w#collapsesafeguarding
Report:
Harassment or abuse Safeguarding breaches Athlete welfare concerns
ATHLETICS INTEGRITY UNIT (AIU)
Website: https://www.athleticsintegrity.org
They help with:
Clean sport enforcement Investigations Athlete integrity protection
SWIMMING
World Aquatics Safeguarding
Website: https://www.worldaquatics.com/rules/integrity
Report:
Abuse or harassment Athlete exploitation Safeguarding violations
TENNIS
International Tennis Integrity Agency (ITIA)
Website: https://www.itia.tennis
Tennis Integrity Protection Programme (TIPP)
Website: https://integrityprotectionprogramme.com/#/
They help with:
Clean competition Player education Investigations and enforcement
RUGBY
World Rugby Safeguarding
Website: https://www.world.rugby/the-game/player-welfare/guidelines
Report:
Abuse or harassment Safeguarding failures Welfare concerns
VOLLEYBALL
FIVB Safeguarding
Website: https://www.fivb.com/inside-fivb/medical/safeguarding/
Report:
Harassment or abuse Ethical misconduct Safeguarding issues

OLYMPIC / MULTI SPORT
IOC Safeguarding
Website: https://www.olympics.com/ioc/safe-sport
Report:
Abuse or harassment Safeguarding policy violations Athlete welfare concerns
NATIONAL OLYMPIC COMMITTEES (NOCS)
Website: https://www.olympics.com/ioc/national-olympic-committees
They help with:
National athlete protection Access to local safeguarding officers Escalation to IOC where required

DECISION TREE FLOWCHARTS

The following logic pathways illustrate the operational flow of a trauma-informed safeguarding system.

Recruitment Vetting Process Flowchart

1. Registry Entry: Log the agent's full name, corporate name, and federation license number.

2. Authentication Step:

- a. **Check:** Is the agent in the FIFA/FIBA/National Registry?
- b. **Result (No):** Halt. Advise the athlete of fraud risk.
- c. **Result (Yes):** Proceed.

3. Risk Screening:

- a. Question: Is there a request for upfront "administrative" or "trial" fees?
- b. Result (Yes): Halt. Report to Integrity Unit.
- c. Result (No): Proceed.

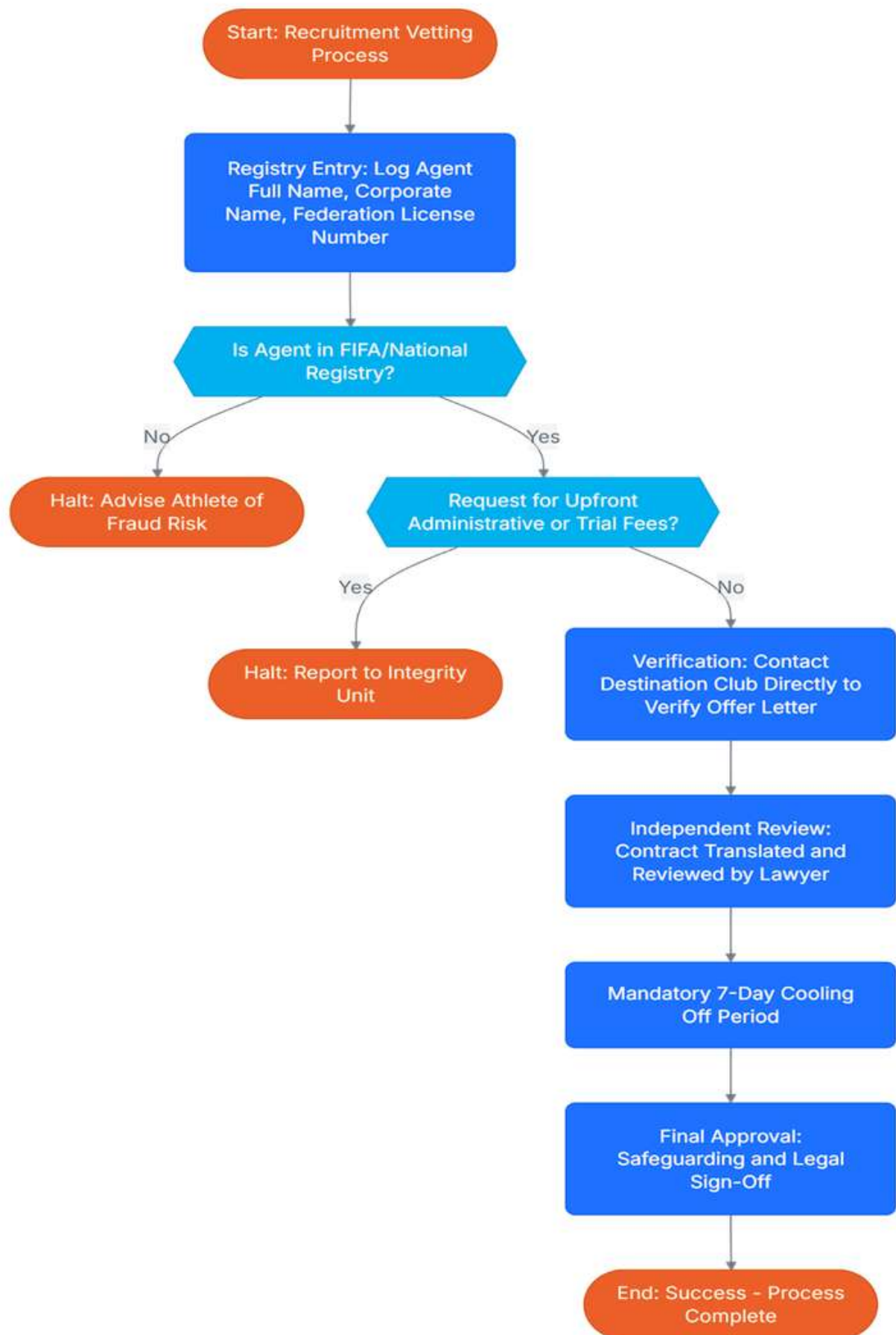
4. Verification:

- a. Action: Contact the purported destination club directly to verify the offer letter.

5. Independent Review:

- a. **Action:** Contract translated and reviewed by a lawyer. A 7-day "cooling off" period should be mandatory.

6. Final Approval: Safeguarding and Legal sign-off.



DISCLOSURE RESPONSE PATHWAY

1. Initiation: Disclosure received or behavioural indicators observed.

2. Safe Space: Conduct a private, supportive interview (non-forensic).

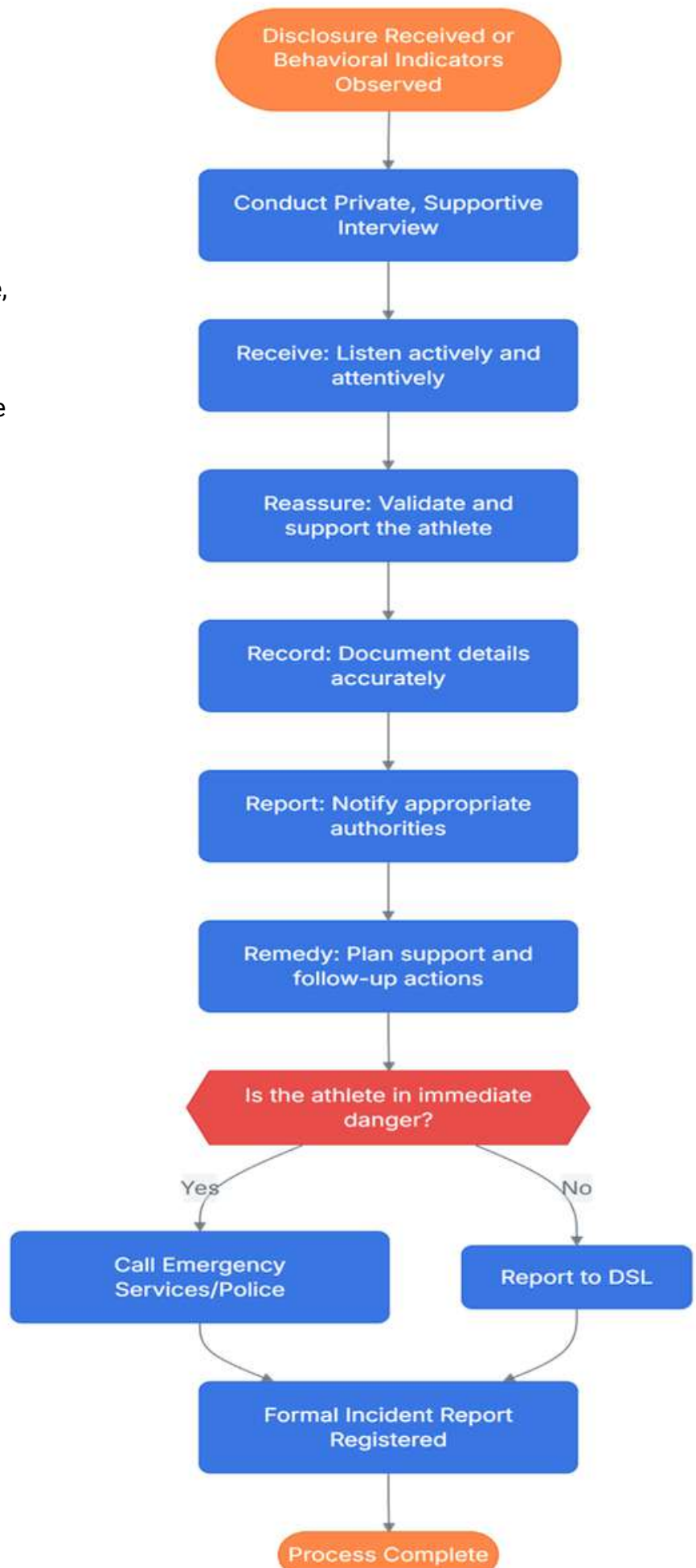
3. 5R Action: Receive à Reassure à Record à Report à Remedy.

4. Safety Check: Is the athlete in immediate danger?

a. **Yes:** Call Emergency Services/Police.

b. **No:** Report to DSL.

5. Documentation: Formal Incident Report registered.



Reporting Decision Tree

1. Is the Victim a Minor?

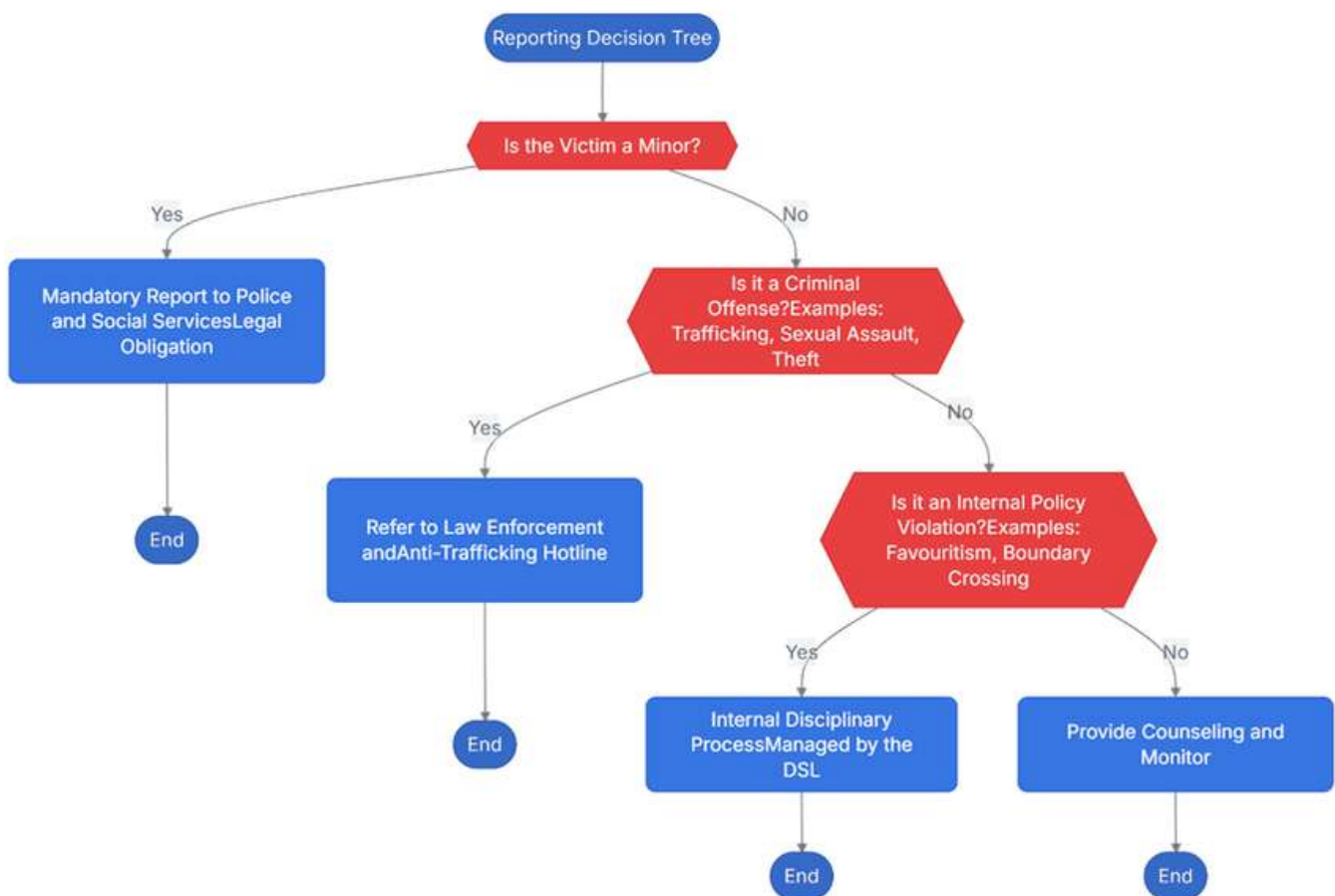
- a. Yes: Mandatory Report to Police and Social Services (Legal Obligation).
- b. No: Proceed to the next question.

2. Is it a Criminal Offence? (Trafficking, Sexual Assault, Theft)

- a. Yes: Refer to Law Enforcement and Anti-Trafficking Hotline.
- b. No: Proceed to the next question.

3. Is it an Internal Policy Violation? (Favouritism, Boundary Crossing)

- a. Yes: Internal disciplinary process managed by the DSL.
- b. No: Provide counselling and monitor.



Annexure

ACTION POINT	DESCRIPTION
Audit of potential threats and risks to employees/athletes in your organisation	Risks, threats, and protection measures perceived, expected or experienced by athletes and employees. Capturing the voice of everyone in the sporting ecosystem (underaged and mature athletes, employees, etc.) can be achieved through focus groups, surveys, and other methods.
Code of conduct	Setting up standards of behaviour, not tolerated behaviours, good practices and consequences of breaking the code of conduct.
Developing and endorsing safeguarding policy and procedures	Procedures to identify IV in practice. Mechanisms for reporting a concern. Organisational response mechanisms.
Employing designated safeguarding officers	Safeguarding officers should be independent person(s) who will deal with reports of problems, ensuring trust and transparency in the process. If a member of an organisation (e.g., a coach) also holds the position of safeguarding officer, this represents a clear conflict of interest and should be prevented. Safeguarding officers should also play a role in establishing prevention policies and practices (including education, awareness-raising, and specialised training).
Safeguarding training	Education on what safeguarding is and its importance, with a focus on how to spot IV and how to report it. Such training should be available for all employees, athletes, parents, and others in the sporting ecosystem.
Staff recruitment	Employing people who are suitable to work with underage athletes. Special attention, or mechanisms, should be dedicated to policies for casual staff – volunteers, placement students, internship holders, etc. – who might not undergo an organisation's usual, thorough recruitment checks.
Legislation	Following generic legislation for working with children and young people that already exists in your national and cultural context, whilst adapting it to the sport environment.
Monitoring and evaluating	Implementing specific mechanisms to monitor compliance with the procedures.

(Source: Khomutova et al., 2025)

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SafeSport
Pathways



SafeSport Pathways

SAFE CAREER DEVELOPMENT

Protection for Young Migrant Athletes

PROJECT:

SafeSport Pathways – Safe career development and protection for young migrant athletes Coordinator:
Mission 89 (Belgium) Partner: **Association Kampos Saint Denis (France)**

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