

SPORT INTEGRITY REVIEW

SUMMARY OF SUBMISSIONS

—
SEPTEMBER 2019

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INTRODUCTION

1. “Sport integrity” refers to the aspects of sport that allow those involved to have confidence in the outcomes or events, and to feel they are safe and being treated fairly. Threats to sport integrity:
 - a. undermine confidence in outcomes or events by unfairly skewing the playing field, e.g. through doping, match-fixing or corruption
 - b. discourage participation by creating threats to participants or their enjoyment of sport, e.g. through environments that unduly endanger mental or physical health and safety.
2. Sport makes a vital contribution to human and social capital, and thereby a vital contribution to the living standards of New Zealanders. It is important that integrity issues do not discourage New Zealanders from accessing the many benefits that participation in sport can provide.
3. Sport NZ, as the lead Government agency for sport and recreation, has launched a broad review of New Zealand’s sport integrity arrangements. The review is proactive and forward looking rather than responding to any known systemic issues. This is the first time Sport NZ has undertaken such a review. While New Zealand has a number of protections in place, concerning developments overseas suggest it is timely to review our arrangements for sport integrity.
4. As part of the review, Sport NZ released the Sport Integrity Review Discussion Document in October 2018.¹ We received 330 submissions including:
 - a. 296 through the survey tool
 - b. 34 through email, post or hand delivery.
5. This document summarises the submissions received. It does not suggest findings or make recommendations. Submissions are presented without commentary, even if they are, in our view, inaccurate or raise matters outside of scope (e.g. relating to the racing industry, or to diversity and inclusion which are outside the terms of reference for this review).
6. Submissions are generally summarised in two parts: (i) survey submissions and (ii) submissions received from other sources. This is for two main reasons:
 - a. Survey submitters faced closed questions, where their answers were selected from multi-choice options, often with an additional opportunity to comment on their answers. Other submitters were not limited by this format and could thereby provide more nuanced answers.
 - b. Submitters through other means were more identifiable and included significant actors in the sport system. For example, the email submission from 24 national sports organisations (NSOs) and Paralympics NZ carries particular weight.²
7. Readers can be assured that all comments were carefully considered and should understand that, as this is a summary, by necessity not every comment made will be reflected here.
8. We have generally anonymised individuals or organisations that are the targets of accusations as we do not want to disparage parties without giving them an opportunity to defend themselves.
9. Percentages have been rounded. The sum of rounded percentages may not add to 100.

¹ <https://sportnz.org.nz/assets/Sport-Integrity-Review/Sport-Integrity-Review-Discussion-Document-30-October-2018.pdf>

² The 24 NSOs were: NZ Golf, Yachting NZ, NZ Rugby, NZ Rugby League, Triathlon NZ, Squash NZ, Tennis NZ, Swimming NZ, Rowing NZ, Surf Lifesaving NZ, Basketball NZ, NZ Football, Netball NZ, Softball NZ, Athletics NZ, Snow Sports NZ, Hockey NZ, Gymnastics NZ, Bowls NZ, NZ Cricket, Touch NZ, Canoe Racing NZ, NZ Equestrian, and Waka Ama NZ. Yachting NZ, NZ Rugby, NZ Football, Athletics NZ, and Netball NZ also submitted separately.

01

ORGANISATIONAL CULTURE, WHISTLEBLOWING, AND THE INSTITUTIONAL ARRANGEMENTS FOR SPORT INTEGRITY

- I. We received 151 submissions on this chapter including:
 - a. 137 through the survey tool
 - b. 14 from other sources.

Demographic questions

2. Three demographic questions were asked, relating to gender, ethnicity, and sexual orientation, within this section of the survey. The tables below show the results. Please note that six of those who completed the demographic questions did not complete this section of the survey. Similar analysis has not been done for the submissions from other sources.

**TABLE 1:
WHAT IS YOUR
GENDER?**

Option	Female	Male	Prefer not to answer	Another gender	Total
Number of survey respondents	58	76	7	2	143
Percentage of survey respondents	40.6	53.1	4.9	1.4	100

**TABLE 2:
WHAT IS YOUR
ETHNICITY?**

Ethnicity	Number of submitters	Ethnicity	Number of submitters
New Zealand European	111	Tongan	1
Other European	1	Indian	1
Māori	9	African	2
Samoan	2	Prefer not to answer	7
Cook Island Māori	1	Another ethnicity	8
Total Responses: 143			

3. No submitters identified as Niuean, Tokelauan, Fijian, South East Asian, Chinese, Middle Eastern, or Latin American.
4. Of the eight submitters who self-identified with an unlisted ethnicity, three identified as New Zealanders, and the following ethnicities were identified by one person each: Australian, Kiwi, Pākehā, South African, and South American/West Indian.

**TABLE 3:
WHAT IS YOUR SEXUAL
ORIENTATION?**

Option	Heterosexual or straight	Homosexual, gay or lesbian	Bisexual	Prefer not to answer	Another orientation	Total Responses
Number	125	2	1	9	6	143
Percentage	87.4	1.4	0.7	6.3	4.2	100

Organisational culture

5. Questions OVI – OV3 relate to organisational culture.

OVIa: To what extent is organisational culture undermining integrity in the sport organisations you are involved with?

6. Results from the survey to this question are presented below. Results from other submissions are considered below, under OVIb.

**TABLE 4:
SURVEY RESPONSES
TO OVIa**

Option	A great deal	A lot	A moderate amount	A little	Not at all	Total Responses
Number	44	24	23	21	24	136
Percentage	32.4	17.6	16.9	15.4	17.6	100

OVIb: Please explain your answer.

Comments from survey submitters

7. Survey submitters made multiple points in their comments about the extent to which organisational culture is undermining sport integrity in their sport organisations.
8. Most comments related to negative organisational culture and the following themes:
 - a. A lack of accountability in the actions of leaders within sports organisations
 - b. The prevalence of organisational cultures that facilitated bullying
 - c. The presence of nepotism in some organisations
 - d. General comments about the link between negative culture and negative sporting outcomes.
9. A range of incidents and traits of particular organisations were also described to us.
10. Eight submitters who had responded 'not at all' about the extent to which organisational culture was undermining sport integrity in their sport organisations also commented on their answers, noting integrity was embedded in the values or culture of their organisations, or that they were unaware of any issues.

Comments from submissions from other sources

Organisational culture can undermine integrity in sport

11. One regional sports trust (RST) said they had seen “many examples” of integrity risked by fulltime, paid CEOs “capturing” volunteer boards, thereby reducing the boards’ role in strategy, policy setting and decision making. This creates a risk of conflicts of interest not being overseen which, in turn, can compromise integrity.
12. Another RST made a similar point, i.e. that the volunteer nature of boards meant poor behaviour and conflicts of interest were occurring.
13. The submission from 24 NSOs and Paralympics NZ drew a link between culture and the short-term funding model previously employed by High Performance Sport New Zealand (HPSNZ) which creates a sense of instability, limits staff retention and encourages risk taking (e.g. supplement use to get results). The submission also noted that geographical disparity in training and competition created challenges to culture. A submission from Yachting NZ supported this position.
14. NZ Football submitted that “the approach to integrity in sport needs to shift to a cultural exercise” rather than a mitigation approach.
15. One experienced sports administrator said there was “little doubt” organisational culture framed the management of integrity issues. The submitter suggested the review of Cricket Australia showed poor organisational culture can influence integrity on the field.
16. Non-governmental organisation, Multicultural New Zealand submitted that organisational culture contributed to the barriers to ethnic communities participating in organised competition.
17. Two individual submitters had very significant problems with the culture of their sports. One described their sport as having a culture of “self-interest first” and lacking in “impartiality and transparency due to failed human relationships”. Another described a “culture of abuse”.
18. Drug Free Sport New Zealand (DFSNZ) submitted that organisational culture underpins the values, attitudes and behaviours of those within an organisation. DFSNZ submitted that it appears that sports are taking individual approaches to integrity rather than a unified, consistent approach. Therefore, it is unclear whether lessons learnt in one sport are applied in others.

Some sports submitted they had a healthy organisational culture

19. Netball NZ submitted that they are not aware of organisational culture undermining integrity for Netball in New Zealand. They attribute this to “foundation documentation” establishing a healthy organisational culture at the NSO. NZ Rugby made a similar submission, noting the extensive programme of work underway to improve the culture within rugby following the Respect and Responsibility Review.

OV2: What changes, if any, would you make to organisational culture in the sport organisations you are involved with to improve sport integrity?

Survey submitters

20. One hundred survey submitters answered this question. The main themes that emerged were:
- a. Demand from survey submitters for change in the way their sport is governed, with calls for more representation in governance, better processes for electing officials, and better education for board members
 - b. Calls for more openness, honesty, responsibility or accountability
 - c. Stress of the need to eliminate cronyism and nepotism
 - d. The need to focus on participation rather than winning, with related comments about damaging practises in secondary school sport such as scholarships being used to poach players
 - e. Comments about the impact that quality coaching can have on sport integrity and organisational culture
 - f. Specific requests for help to improve sport integrity within organisations, e.g. template policies, a pathway for making complaints, etc
 - g. The need to eliminate sexism with specific comments including:
 - i. the need to consider more female coaches at elite level
 - ii. “women with an opinion are seen as a threat to men”
 - iii. selection of mixed teams should be based on skill
 - iv. having more women in decision-making positions would improve conduct and equality.

Submissions through other means

21. Most submissions received through other means suggested ways to improve organisational culture in a general sense, rather than in the specific context of their sport. General comments included:
- a. Focus on increasing Chairs' and Boards' awareness of the importance of establishing a set of policies and frameworks through which the CEO can be held to account. Boards need to be sufficiently connected through formal mechanisms to assess the implementation of values and policies and validate what they are told by the Chief Executive.
 - b. Continue to offer the governance mark but add a measure of organisational culture
 - c. Offer a “lite” version of the governance mark for less resourced organisations
 - d. Resource RSTs to take leadership role in establishing healthy culture in the organisations they work with (in support of a National Integrity Unit)
 - e. Organisations need to have good policies, promote them and enforce them
 - f. Organisations need to have clear lines of accountability
 - g. Recruit the best people to key roles
 - h. Make sure people in key roles have strong communication and relationship management skills

- i. There should be an independent complaints panel that participants can go to for complaint resolution if an organisation cannot offer a robust complaints mechanism
 - j. There should be more support for under-resourced organisations and director induction
 - k. Collaborative forums for sharing knowledge between chairs and chief executives were helpful.
22. Two NSOs said they would keep working through their programmes for improving organisational culture.
23. Some submitters made comments relating specifically to the high performance environment, e.g.
- a. What role should NSOs play when athletes retire?
 - b. Coaches need to find the right level at which to push an athlete
 - c. Yachting NZ has an “athlete-led” programme, with athletes having a lead role in planning their campaigns. This leads to “multi-agreed” delivery.

OV3: Who should be responsible for establishing a healthy organisational culture within a sport or sport organisation?

24. Survey submitters were able to select multiple choices. A total of 133 submitters responded to this question, and on average they each selected 3.8 response options.

**TABLE 5:
SURVEY RESPONSES
TO OV3**

Parents/ caregivers	Coaches	Administrators	Spectators	Athletes	Sport or recreation organisations	Sport NZ	Other
68	85	87	47	69	78	69	38

25. Of the 38 submitters who selected ‘Other’, there were two major themes in their comments:
- a. Everyone is responsible
 - b. Establishing a healthy organisational culture is a ‘top-down’ responsibility.
26. Ten submitters answered this question through other means. Most suggested organisational culture was led by more than one person or group within sport.

27. Most submitters through other sources suggested responsibility for organisational culture started at “the top”. Variations on this theme included:
- Five specifically said chief executives had responsibility, noting that they “drive” culture on a day-to-day basis
 - Five specifically said boards have responsibility through their leadership of strategy and governance
 - Five specifically said Sport NZ needed to play a greater leadership role in setting organisational culture through providing leadership, guidance and resources. One submitter said Sport NZ should make its template whistleblowing policy compulsory to adopt to receive Sport NZ funding.
 - Four submitters said sports organisations were responsible for the culture within their organisations.
28. Some submitters through other sources had a different perspective, e.g.
- Two said “everyone” had a responsibility for organisational culture
 - Two said communities were responsible for organisational culture
 - One said coaches and managers had an important role for setting culture within teams.
29. A submission from an NSO and the submission from 24 NSOs and Paralympics NZ noted that some NSOs have senior groups of athletes that play a useful role in leading culture.
30. Two RST submitters support the establishment of a national integrity unit to develop and monitor national standards in regard to culture and integrity.

Handling integrity breaches

31. Questions OV4 – OV8 and their sub-questions concern the handling of integrity breaches.

OV4a: To what extent do you feel you would report integrity breaches relating to doping to Drug Free Sport NZ?

32. This question was answered by 131 survey submitters.

**TABLE 6:
SURVEY RESPONSES
TO OV4a**

Option	Definitely would	Probably would	Probably would not	Definitely would not	Total responses
Number	75	44	12	0	131
Percentage	57.3	33.6	9.2	-	100

Submissions through other means

33. Nine submitters answered question 4 through other means.
34. Seven said they would report integrity breaches relating to doping to DFSNZ.
35. One said they would if there was a freely available service that was well publicised, managed and funded.
36. DFSNZ noted it has recently refreshed its whistleblowing line and intelligence gathering approach. This is being rebranded and will be promoted from early-2019. This extends beyond a whistleblowing phone line and policy, as other valuable sources of information and intelligence will include interactions DFSNZ has with athletes and support personnel, such as after their training. DFSNZ noted it had several cases in the last 12 months directly arising from whistleblowing, and more reports are recorded in its intelligence database for future action as appropriate.

OV4b: Please explain your answer.

Comments from survey submitters

37. Comments from non-survey submitters are above. Comments from survey submitters echoed the distribution of survey answers to OV4a. On one end of the spectrum, many commenters thought reporting doping was “the right thing to do”.
38. Other survey submitters were more circumspect, commenting that:
 - a. Deterrents to reporting included uncertainty over what constituted doping and the wish to avoid negative consequences of reporting
 - b. They would report some types of doping offences but not others, depending on the level of sport or the substance used.
39. A small group expressed significant reluctance to report doping, fearing negative repercussions or a lack of confidence in DFSNZ.

OV5a: To what extent do you feel you would report integrity breaches relating to criminal activity to the Police and other enforcement agencies?

40. This question was answered by 131 survey submitters.

**TABLE 7:
SURVEY RESPONSES
TO OV5a**

Option	Definitely would	Probably would	Probably would not	Definitely would not	Total responses
Number	72	41	16	2	131
Percentage	55.0	31.3	12.2	1.5	100

Submissions through other means

41. Nine submitters answered question 5 through other means.
42. Six said they would report criminal activity to the Police and other enforcement agencies. Comments from these submitters included:
 - a. One RST noting they had an internal whistleblowing policy
 - b. One NSO noting they had an integrity officer responsible for determining if an issue needed to be referred to the Police
 - c. Another NSO noting they had regulations that require criminal activity to be reported, as well as a memorandum of understanding with the Police that had been used to report alleged criminal conduct before
 - d. One individual noting they would report criminal activity but there was a range of objectionable activity that was not criminal and therefore enforcement agencies could not do anything about it.
43. Two submissions – one from an NSO and one from 24 NSOs and Paralympics NZ – made a point similar to the last point, noting it could be difficult to determine whether an incident was criminal and therefore worth reporting.
44. Crimestoppers submitted noting they offer a vehicle for anonymous reporting of criminal activity.

OV5b: Please explain your answer.

45. Comments from non-survey submitters are above. The main themes of comments from survey submitters were:
 - a. Comments expressing general support for reporting criminal activity
 - b. Details of previous experiences reporting criminal activity and/or facing negative consequences from reporting criminal activity
 - c. Submitters noting a reluctance to report due to fear of recrimination or the need to be certain criminal offending had occurred
 - d. Submitters advising they would report within their organisation before contacting an outside organisation like the Police
 - e. Submitters advising they would be more likely to report some crimes more than others.

**TABLE 8:
SURVEY RESPONSES
TO OV6a**

Option	Definitely would	Probably would	Probably would not	Definitely would not	Total responses
Number	72	41	16	2	131
Percentage	55.0	31.3	12.2	1.5	100

OV6a: Does your sport have mechanisms for reporting integrity breaches?

46. This question was answered by 131 survey submitters.

**TABLE 8:
SURVEY RESPONSES
TO OV6a**

Option	Yes	No	I don't know	Total Responses
Number	48	22	61	131
Percentage	36.6	16.8	46.6	100

47. Seven submitters from other sources noted their sports had mechanisms for reporting integrity breaches.

OV6b: Are they domestic or international mechanisms?

48. This question was answered by 45 survey submitters.

**TABLE 9:
SURVEY RESPONSES
TO OV6b**

Option	Domestic	International	Both	Total Responses
Number	26	3	16	45
Percentage	57.8	6.7	35.6	100

49. Three submitters through other sources noted their sports had international mechanisms for reporting sport integrity breaches.

OV6c: Please provide details.

50. A submission from 24 NSOs and Paralympics NZ noted the well-resourced NSOs had reporting mechanisms but less well-resourced NSOs were less likely to have mechanisms.
51. Four NSOs submitted separately saying they had reporting mechanisms and processes set out in their policies, regulations, codes of conduct, codes of ethics and other documentation. NZ Rugby noted it had a complaints management service and the Rugby Intel app.
52. Individuals who felt they had unresolved issues with sporting organisations made two submissions, both saying their organisations had policies around reporting (and incident management) but they were either unclear or unpublished.
53. DFSNZ submitted that it can be hard for an individual to trust a sports organisation to investigate itself and therefore internal whistleblowing can be deterring and limited in its effectiveness. DFSNZ submitted that it has seen examples of this in New Zealand sport. It also submitted that Sport NZ's whistleblowing policy will have low uptake if it is not promoted, monitored and trusted. People also need to be educated on what to report.

OV7a: Do you trust your sport to handle integrity breaches appropriately and effectively?

54. This question was answered by 129 survey submitters.

**TABLE 10:
SURVEY RESPONSES
TO OV7a**

Option	Yes	No	I don't know	Total Responses
Number	44	62	23	129
Percentage	34.1	48.1	17.8	100

Submissions through other means

55. Seven submitters through other sources directly addressed this question.
56. Three NSOs submitted saying they trusted their sports to handle integrity breaches appropriately and effectively because they had good policies and/or boards.
57. Two individual submitters said they did not trust their sports to handle integrity breaches appropriately and effectively. One said the chair was a barrier to their issue being resolved. The other said the matter she raised was not properly investigated, she was ignored in the process and there was a lack of communication and transparency.
58. A submission from 24 NSOs and Paralympics NZ said the quality of the handling of integrity breaches depended on the quality of the communication, relationships and board in an NSO.
59. DFSNZ submitted that it was unclear how well sports are handling issues with the policies they have in place currently. However, what is clear is that this is not their core business and many sports do not have sufficient financial resources or personnel to prioritise and/or have relevant up-to-date experience in this area.

OV7b: Please explain your answer.

60. Comments from non-survey submitters are above. The main themes of comments from survey submitters were:
- a. Some submitters documented processes they had been through with their sport organisations
 - b. Submitters that answered “yes” expressed support for their organisations’ ability to handle integrity breaches
 - c. Submitters that answered “no” expressed low confidence in their organisations’ ability to handle integrity breaches, saying:
 - i. issues are “covered up” or “swept under the carpet”
 - ii. their organisations are preoccupied with protecting their reputation
 - iii. they feared retribution if they raised issues
 - iv. cronyism prevented their organisation(s) handling integrity issues effectively and appropriately
 - v. a lack of capability and/or a third-party resolution avenue prevented issues being resolved.

OV8a: How does your sport organisation handle integrity breaches?

OV8b: Does it have a written policy?

61. OV8a and OV8b will be summarised in tandem.

Submissions through the survey tool

62. OV8b was answered by 133 survey submitters.

**TABLE II:
SURVEY RESPONSES
TO OV8b**

Option	Yes	No	I don't know	Total Responses
Number	40	24	69	133
Percentage	30.1	18.0	51.9	100

Process-driven

63. Twenty-one submitters reported that integrity breaches are handled via an established process of some sort. Submitters generally described the process, or named the policy. Responses are from one submitter unless otherwise stated. Responses included:

- a. Following the process as per the policy (such as Code of Conduct, Whistleblowing, and Fraud and Gifting policies) or bylaws (three submitters)
- b. A designated officer (usually CEO) receives integrity breach reports (five submitters)
- c. Through a formal complaints process/policy (not further described) (six submitters)
- d. Through a defined, transparent process: escalate, document, track, communicate
- e. Through a committee (such as Review and Disciplinary groups; Judicial subcommittee)
- f. Communication with leader of choice, and/or executive member
- g. Through the performance management process.

Avoidance

64. Eleven submitters commented that their sport organisations avoid dealing with integrity breaches. They used terms including “sweep it under the carpet”, “take no action or deny responsibility”, “cover them up”, “pay lip-service”, “bury their heads in the sand”, “ignoring your grievance”, “turn a blind eye”, and “skirted around.”

Inconsistent approaches

65. Six submitters commented that their sport organisations are inconsistent in their handling of integrity breaches. They commented: “variably”; “on the hoof”; “depends who you are”; “it’s who you know not what you know”; and one commented: “The committee deals with it. Or it doesn’t get dealt with.” One submitter reported that their sport organisation has effective polices for breaches relating to doping but “we do not handle coach/athlete misbehaviour and well-being very effectively.”

The quality of the response

66. Seven submitters commented on the quality of the response rather than the process of responding. Six of these submitters reported that responses are poorly handled (with one adding that there should be an independent audit of processes and outcomes); and one submitter reported that they are handled “without visibility.”

Getting outside help

67. Four submitters referred to occasions or circumstances where their sport organisation has or would get assistance to deal with investigating integrity breaches. Only one submitter named the likely source of external assistance: DFSNZ.

Other responses

68. Six submitters made other responses, as listed below. Points are from a single submitter unless otherwise stated.
- a. One submitter reported the likely outcomes of a confirmed integrity breach, rather than describing the process, commenting that “there would be vilification from other members,” but it was unclear if the reporter or the reported or both would be vilified
 - b. Integrity breaches would be handled by “financially supporting legal challenges”
 - c. Previous investigations have resulted in “lies ... created to protect the bully/person in the wrong as well as the organisation’s reputation”
 - d. One submitter commented that their organisation had not experienced any integrity issues
 - e. One submitter commented “well written” without further explanation
 - f. One submitter commented “report” without further explanation.

Submissions from other sources

69. Nine submissions were received through other sources on this question.
70. Two were received from individuals, both of whom were critical about the way their sport organisations handled integrity issues. One said that written policies may exist but they were hard to find or out of date. The other said that the process used to investigate their complaint seemed ad hoc and that the written policies the organisation had were worthless if they are not followed.
71. Two RSTs submitted. One noted they had written policies on fraud, harassment and whistleblowing. The other noted they had policies in place to deal with integrity breaches including a Quality Management and Auditing Policy that covers matters such as fraud.
72. Four submissions on this question were from NSOs, and one was from 24 NSOs and Paralympics NZ.
 - a. NZ Football noted it had investigation and adjudication procedures in its Code of Conduct and Code of Ethics and an investigation procedure set out in its Anti-Match-Fixing and Sports Betting Regulations.
 - b. Netball NZ submitted that it circulated complaints procedures for domestic events to the teams involved and that it had domestic and international mechanisms for reporting and handling integrity breaches through the International Netball Federation and its own regulations and policies.
 - c. NZ Rugby noted it has processes for handling integrity matters in its Anti-Corruption and Betting Regulations, Anti-Doping Regulations, Supplements Regulations, and Illicit Drugs Regulations. Further, if a breach involved an employee of NZ Rugby the handling of that breach may be determined by the employment agreement, Employment Relations Act, and common law.
 - d. Yachting NZ noted it had written policies that are reviewed annually.
 - e. The NSO community submitted that experienced board members are likely to ensure an organisation has written policies but smaller organisations may struggle to find the resources to put policies together. They also noted most NSOs would have a policy in place and would review it annually. The submission said there was value in NSOs sharing knowledge and policies. Finally, it said participants needed to have some self-responsibility for their own integrity and their knowledge of the information circulated by the organisations they belong to.

Sport integrity institutional arrangements

73. Questions OV9 – OV11 and their sub-questions concern institutional arrangements of sport integrity.

OV9a: Do New Zealand's institutional arrangements for sport integrity create any problems or risks?

74. OV9a was answered by 129 survey submitters.

**TABLE 12:
SURVEY RESPONSES
TO OV9a**

Option	Yes	No	I don't know	Total Responses
Number	49	11	69	129
Percentage	38.0	8.5	53.5	100

75. Submissions through other means on questions OV9a and OV9b are considered below under discussion of OV9c.

OV9b: Are there any gaps in New Zealand's institutional arrangements for sport integrity?

76. OV9a was answered by 129 survey submitters.

**TABLE 13:
SURVEY RESPONSES
TO OV9a**

Option	Yes	No	I don't know	Total Responses
Number	51	9	69	129
Percentage	39.5	7.0	53.5	100

OV9c: Please explain your answer

Survey submissions on OV9a and OV9b

77. Comments received through the survey tool on problems, risks and gaps in the current institutional arrangements for sport integrity covered several themes:
- a. Current arrangements can make it hard for a whistleblower to be anonymous and avoid retribution when reporting an incident
 - b. Some submitters argued a new, independent entity was needed to provide a single independent reporting point for integrity matters and to facilitate their resolution
 - c. General comments agreeing the current institutional arrangements were not perfect as evidenced by the recent issues in some high performance sport environments
 - d. More guidance and leadership is needed to ensure integrity
 - e. A small number of submitters suggested specific initiatives such as more police vetting, or a “white card” scheme like that in Australia.

Submissions through other means

78. Twelve submissions were received from other sources on the questions comprising OV9. Free form submissions on all parts of OV9 will be summarised together.
79. Submitters argued the main problem, risk or gap in the current institutional arrangements for sport integrity in New Zealand is the lack of an independent channel for reporting, investigation and dispute resolution. Submitters argued this is needed because:
- a. Smaller NSOs lack the resources to offer these services themselves
 - b. Recent events in the high performance environment show athletes need a body to turn to
 - c. A centralised body could develop specialised knowledge (e.g. in dispute resolution, integrity education) not currently held in every NSO
 - d. Current arrangements are convoluted, with the roles and responsibilities of the relevant organisations unclear
 - e. Policies, processes and effort in addressing sport integrity risks and problems are currently duplicated across organisations
 - f. Current arrangements are not working
 - g. New Zealand is inexperienced with illegal activity in sport but the risks are real and rising.
80. A number of submitters supported the formation of a new government body with a mandate to lead initiatives to counter risks to sport integrity. The body would provide an independent channel for reporting issues and having them investigated and resolved. This would increase transparency, fairness and impartiality, allow for proper information management, alleviate the burden on less-resourced NSOs, and protect anonymity where appropriate.
81. Four submitters said that their relationships with the Police and/or DFSNZ worked well, or that roles and responsibilities were clear under the current arrangements in regard to doping and criminal matters. One submitter noted the relationship each NSO had with these bodies was different.

OVIO: What role should central government play in addressing any gaps in the institutional arrangements for sport integrity?

Submissions through the survey tool

82. Seventy-eight submissions were received on this question through the survey tool.

The government should hold NSOs accountable

83. Twenty-three survey submitters commented that the government should play some role in keeping NSOs accountable. Suggestions included:

- a. The government should provide an avenue for complaints to be investigated
- b. The government should check legislative requirements are being met
- c. A dedicated integrity agency should be established, or an existing agency should be mandated to handle integrity issues
- d. The government needs more powers of investigation
- e. The government should more actively “mentor” sport organisations.

The government should have limited or no role

84. Seven submitters commented that the government should have a very limited, or no role to play in addressing gaps in the institutional arrangements for sport integrity.

Provide guidelines and templates

85. Six submitters commented that the government should provide sport organisations with guidelines and templates.

Set policies and regulations

86. Five submitters commented that the government needs to put in place more policies and regulations to ensure that the integrity of sport is maintained.

Provide funding

87. Three submitters commented that the government should provide some sort of funding.

Other comments from the survey submissions

88. Three submitters commented that they were not sure what government’s role should be.

89. Two submitters commented that the government should provide education and maintain awareness of sport integrity.

90. Two submitters commented on not-for-profit organisations, one arguing the government should have “better control” of these organisations and one arguing the rules for these organisations should be clarified.

91. Two submitters simply said the role of government was “massive”, “critical” or “fundamental”.

92. Twenty other survey submitters made a disparate range of other comments.

Submissions from other sources

93. Eleven submissions were received from other sources on this question.
94. Seven submitters from other sources said there would or could be value in establishing a new government agency with responsibility for sport integrity.
95. Other submitters advised the roles they would expect central government to play, either through a new agency or through existing agencies. These included:
 - a. Providing the regulatory functions to tackle sport integrity risks
 - b. Providing financial support to tackle sport integrity risks
 - c. Risk assessment and monitoring
 - d. Establishing systems and procedures
 - e. Providing and coordinating education and training
 - f. Coordinating the sharing of best practice
 - g. Monitoring the policies of the sector
 - h. Investigating integrity matters and enforcing compliance.
96. Other comments received were:
 - a. RSTs could be resourced to provide advisory services to their regions (under the umbrella of a new central government agency)
 - b. Whatever changes are made at central government level, sport must remain engaged
 - c. Any new agency must be accessible to the general public
 - d. A new agency could be overseen by sports administrators with specialist resource seconded from relevant existing organisations like the Police.

OVII: Do you have any other comments on organisational culture, whistleblowing and the institutional arrangements for sport integrity in New Zealand?

97. Themes of note from submissions on this question from all sources are noted here. Generally, submissions on this question are disparate and, loosely grouped under themes.

Whistleblowing

98. Specific comments about whistleblowing included:
- a. A reiteration that an independent body could help protect the anonymity of whistleblowers
 - b. Whistleblowers should be protected at all costs by their organisation, and that penalties should be applied if this does not happen. Sporting organisations should have to take any issues seriously.
 - c. Whistleblowers must be very careful to ensure institutions are not inculpated unnecessarily
 - d. It takes “a lot of guts” to stand up and provide evidence of wrongdoing
 - e. One NSO could consider adopting a specific whistleblowing policy.

Discrimination

99. Specific comments about discrimination included:
- a. Two sports where discrimination occurs were named by a submitter. This submitter commented that size and affordability should not be factors in the selection process, and that it should be about skill and performance.
 - b. There is an elitist attitude with respect to coaches and athletes in a particular sport being based in a particular part of the country.
 - c. A submitter’s child had been treated badly because they tried to deal with integrity issues. They also commented that the sport is run in a very “dysfunctional” way by people who lack governance skills, and that many players have left due to these issues.
 - d. More focus is needed on cultural competency and LGBT-friendly institutions.

Issues with Sport NZ

100. Three submitters provided comment on the way that Sport NZ operates, arguing:
- a. Sport NZ seems to focus on results and the top one to five percent of players. This submitter considered particular NSOs to be showing the most problems.
 - b. Sport NZ needs to determine why it exists, and whether it is all about high performance
 - c. Sport NZ is very “hands off” and does not “own the issues.”

Issues with government more broadly

I01. Submitters argued:

- a. A particular Minister needs to be investigated
- b. A plea that the government must act urgently to strengthen sport integrity arrangements
- c. That there has been a disproportionately high focus on integrity matters in high performance and New Zealand should not lose sight of integrity matters in grassroots sport
- d. The Incorporated Societies Act and Charities Act should be updated to include sport integrity, a lot of ground could be covered by addressing a couple of pieces of legislation.

Problems with particular sports organisations

I02. Submitters argued:

- a. A particular NSO has become very “top heavy”, having more staff with less work, creating a potential for “revolt” in response to this
- b. Their NSO had failings
- c. Some sports are having their image damaged by overpriced events
- d. One submitter gave an example of an organisation setting up an AGM in breach of the constitution, and didn’t call for nominations for President, allowing the incumbent President to run again unopposed. Several members did not feel safe to vote as they feared retaliation.
- e. One submitter commented that they wished their NSO understood its own role in setting standards for integrity.

Problem identification

I03. Submitters argued:

- a. New Zealand seems to be a nation of people who would rather “sweep issues under the carpet and continue pretending there are no issues”
- b. Protection for the victim is missing
- c. New Zealand is “way off the pace and very naïve in most codes”, particularly at RST and club level, compared to the rest of the world, and individual athletes are exposed and open to influence from overseas markets, for example in match-fixing
- d. The first step in integrity is for sport, and relevant organisations to understand, agree and disclose their values and live up to them, to lead by example for athletes
- e. The problem with many sports is that they rely on volunteers who are often there in their own self-interest

02

MEMBER PROTECTION

- I. We received 95 submissions on this chapter including:
 - a. 74 through the survey tool
 - b. 21 written submissions sent directly to Sport NZ.

Demographic details

2. Within the Member Protection section, three further demographic questions were asked of online submitters, relating to gender, ethnicity, and sexual orientation. The tables below report the data collected.

**TABLE 14:
GENDER DATASET FOR
SURVEY SUBMITTERS ON
MEMBER PROTECTION**

Female	Male	Prefer not to answer	Another gender	Total Responses
31	37	3	2	73

**TABLE 15:
ETHNICITY DATASET FOR
SURVEY SUBMITTERS ON
MEMBER PROTECTION**

Ethnicity	Number of submitters
New Zealand European	58
Other European	3
Māori	3
Chinese	2
Latin American	1
Prefer not to answer	4
Another ethnicity	2
Total Responses	73

**TABLE 16:
SEXUAL ORIENTATION
DATASET FOR SURVEY
SUBMITTERS ON MEMBER
PROTECTION**

Heterosexual or straight	Homosexual, gay or lesbian	Bisexual	Prefer not to answer	Another orientation	Total Responses
64	0	0	6	3	73

**TABLE 17:
DO YOU HAVE A
LONG-STANDING* ILLNESS,
DISABILITY OR INFIRMITY?³**

*Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time.

	Yes	No	Total Responses
	4	49	53

The rules of the sport as a barrier or enabler of member protection

3. MPI and its sub-questions explored the extent to which the rules of the sport are a barrier or enabler of member protection.

MPIa: To what extent are the rules of your sport(s) unnecessarily endangering participants?

4. MPIa was answered by 68 survey submitters.

**TABLE 18:
SURVEY RESPONSES
TO MPIa**

Option	A great deal	A lot	A moderate amount	A little	Not at all	Total
Number	3	2	4	21	38	68
Percentage	4.4	2.9	5.9	30.9	55.9	100

5. Comments from survey submitters and submissions through other means to MPIa and MPIb are summarised in tandem below.

MPIb: To what extent are the specific risk areas within your sport(s) mitigated by the rules you play by?

6. MPIb was answered by 67 survey submitters.

**TABLE 19:
SURVEY RESPONSES
TO MPIb**

Option	A great deal	A lot	A moderate amount	A little	Not at all	Not applicable	Total Responses
Number	15	18	15	9	7	3	67
Percentage	22.4	26.9	22.4	13.4	10.4	4.5	100

³ This question was added two days after the consultation period opened, by which time 20 submitters had already responded to the Member Protection section. The question was added after a submitter noted that disability had been overlooked. It is not known if these 20 submitters had a long-standing illness, disability or infirmity.

Comments from survey submitters

7. Sixteen survey submitters commented that the rules of their sport could unnecessarily endanger participants when not applied correctly. Most risk areas relating to physical contact are mitigated, but intentional and unintentional rule breaches can lead to increased risk.
8. Some submitters' comments focused on referees. Submitters commented that there seems to be more of a focus on physical safety, but the enforcement of these rules can be variable. The referees are trying to be better at enforcing rules, but it varies a lot as most referees are young and players themselves from their home teams. Another submitter commented that their (unspecified) sport is no longer a non-contact sport, and the referees have allowed it to become physical.
9. Other submitters commented although the rules are appropriate, that the risks are mainly realised where there is poor officiating by untrained volunteers, parents, or players involved in teams, which can lead to insufficient levels of protection, particularly in the lower grades of senior play.
10. Some submitters commented specifically on individual code rules which endanger participants, for example netball's stepping rules, drag flicks in hockey, and lofted shots in cricket and golf.
11. Some submitters commented that there is no danger involved in their sport(s) in the first place. Other submitters commented that although the sport is inherently dangerous, participants are well protected by rules and regulation, and everyone takes reasonable steps to mitigate these risks.
12. Two submitters provided further comment to support their answer that the rules of their sport were unnecessarily endangering participants "a great deal" or "a lot".
 - The sport is dangerous by nature and has been turned into "a [kid's] play ground."
 - Water polo players can use their body to restrict another player's ability to resurface so long as their hands or feet are not used to hold the other player under the water. The rules are silent on this, so referees consider it to be "fair game."
13. One submitter commented that there are no rules around the conduct of the coach, bullying behaviour is seen as just being "old school" and as "having no filter." They said that bullying is deemed completely appropriate, and students are made to train even when injured and under treatment by ACC.

Comments from submissions through other means

14. Other submitters noted that many sports have inherent risk due to the physical contact involved in many sports. Yachting NZ noted that yachting is becoming increasingly dangerous due to the introduction of foiling into the sport.
15. Email submitters noted that many sports have processes and reviews in place to minimise issues such as injury, for example through continuous tweaking of the rules and equipment. Several submitters noted that some sports have put specific rules in place to mitigate the risk of injury, particularly head injury.

MPIc: Who should be responsible for safety on the field (or on the court, in the pool, etc)?

16. MPIc was answered by 69 survey submitters, who were able to select multiple responses to this question.

**TABLE 20:
SURVEY RESPONSES
TO MPIb**

Parents/ caregivers	Coaches	Administrators	Spectators	Athletes	Sport or recreation organisations	Sport NZ	Other
31	49	43	15	45	41	21	18

17. Of the 18 submitters who selected 'Other', nine submitters specified match officials; five submitters said that this was the responsibility of everyone; three said that the venue officials were responsible; and one said the competitors were responsible.

Comments from survey submitters

Safety is everyone's responsibility

18. Twelve submitters commented that it is everyone's responsibility to ensure safety on the field, on the court or in the pool. Variations on this theme were offered, including:
- Two submitters commented that administrators and organisers (for example NSOs, RSOs and Sport NZ) should take the lead when it comes to safety, but ultimately safety is everyone's responsibility, and if an issue is identified, people need to speak up.
 - One submitter provided further explanation in a swimming context. They stated that adhering to the rules relies on the "common sense" of the athlete, spectators and coaches, and the parents and coaches reminding athletes of the rules. There needs to be a recognition that everyone needs to adhere to the guidelines and rules and act on the instruction of officials.
 - One submitter qualified their comment that everyone is responsible for safety by saying that spectators should be just that – they should spectate and allow the officials and those in authority to perform their duties unhindered.
 - Another submitter qualified their response by saying that although everyone has a part to play in safety, for their sport (unspecified), this role falls primarily to the coaches, referees and judges and overall competition organisers.

Parents and caregivers have a key role in safety

19. Four submitters commented that parents or caregivers should be responsible for ensuring safety on the field, court or in the pool. Variations on this theme included:
- a. Parents and coaches are responsible for teaching and encouraging safe technique and behaviours and athletes are responsible for the execution of safe technique and behaviour
 - b. Parents should provide explicit guidance to other participants about what is acceptable
 - c. One submitter commented that encouraging play beyond an athlete's ability or capability level is under the control of a range of people both at and pre-competition. However, they qualified this response by saying that the athlete must also take some responsibility.

Coaches should be responsible for safety

20. Three submitters commented that coaches should be responsible for ensuring safety on the field, court or in the pool. Submitters considered coaches to have a similar role to parents, e.g. setting boundaries, encouraging good technique, managing behaviour, etc.

Other comments

21. Two submitters commented that it is the responsibility of participants to ensure their own safety on the field, court or in the pool. Once the rules are in place participants need to ensure they are adhered to.
22. Three submitters commented that administrators or organisers are responsible for ensuring safety on the field, court or in the pool. While those closer to the action had a role, administrators needed to set the framework for basic safety. They also needed to take responsibility, e.g. like a Board of Trustees in the school context.

Submissions from other sources

23. All five submitters using other means who addressed this question said a sport's world governing body is ultimately responsible for setting the sport-specific rules and that NSOs are responsible for administering these rules through the people they have in place such as coaches, administrators, volunteers and officials. Given this, submitters noted that the education of officials and coaches is crucial to ensure on-field safety.

Problems with behaviour on the field, court or in the pool

24. MP2 and MP3 and their sub-questions explored the scale of the problem of on-field (including on court, in the pool and other places where sport is played) behaviour, and who was considered responsible for managing this.

MP2a: To what extent is on-field (on-court, in-pool, etc) behaviour a problem in the sports you are involved with?

25. MP2a was answered by 69 survey submitters.

**TABLE 21:
SURVEY RESPONSES
TO MP2a**

Option	A great deal	A lot	A moderate amount	A little	Not at all	Total Responses
Number	7	8	14	27	13	69
Percentage	10.1	11.6	20.3	39.1	18.8	100

Submissions from other sources

26. A number of email submitters said that on-field behaviour was problem in the sport(s) they are involved with, for example players and coaches arguing with officials, players retaliating physically against other players and verbal abuse.
27. Some submitters said the problem was getting worse, with NZ Football submitting that some of it was being driven by professional players behaving disrespectfully towards other players and referees often with no consequences. NZ Football is also experiencing a decline in referees at the grassroots level due to the abuse experienced during games.

MP2b: What measures are in place to encourage appropriate behaviour?

28. Forty-three survey submitters responded to this question. The main themes that emerged are set out below.

Codes of conduct and guidelines

29. Seventeen submitters commented that codes of conduct are in place to encourage appropriate behaviour in their sport. Examples included the College Sport Wellington Bylaws, which lay out the expectations of students, participants, officials and spectators, very strict and clear animal welfare guidelines (the sport was not specified), or a sideline behaviour programme. Some submitters stressed that the existence of Codes of Conduct needed to be adhered to and reinforced by willingness to enforce the rules. Some organisations use additional mechanisms, e.g. one submitter commented that emails are sent to parents to remind them of appropriate behaviour.

No measures in place

30. Ten submitters commented that there are no measures in place to encourage appropriate behaviour, with some giving examples of the negative consequences of a lack of guidelines and policies. One submitter commented that “very little” is put in place to encourage appropriate behaviour in their sport. Another submitter commented that officially there are many measures, but really, there are none. Variations on this theme included:
- a. One submitter commented that although schools have protocols for parent and student behaviour, there are no behaviour protocols for coaching staff.
 - b. One submitter commented that there does not appear to be any measures in place for their sport. There are no codes of conduct, and police vetting does not occur for volunteer coaches. Student/staff ratios are not being maintained, and there are no easily accessible policies in place. The school does not take any responsibility for inappropriate behaviour.
 - c. One submitter commented that players have “no respect for officials.”
 - d. Three submitters outlined some of the consequences of a lack of guidelines for their sport.
 - i. The National Coach (who is also a High Performance Director) encourages “inappropriate behaviour” as necessary in order to compete internationally.
 - ii. The “caustic nature of the club” leads to bad behaviour by coaches and administration. In this case, the board do not listen to the parents, and the NSO is unable to respond unless an NSO rule is broken.
 - iii. One sport has few behavioural problems apart from slow play, which is difficult to control. The submitter said that the national body does not do enough to support clubs to address this. The submitter went on to comment that although another sport has sanctions available on the field, where there is no referee there is no mechanism to ensure appropriate behaviour.

Penalties and sanctions

31. Nine submitters commented that penalties and sanctions are in place to encourage appropriate behaviour, e.g. red and yellow cards.

Encouragement and culture

32. Five submitters commented on the culture of the sports that they are involved in.
- a. One submitter commented that coaches in children’s sports are encouraged to emphasise enjoyment as well as skill development, and are urged to praise all children’s efforts, not just the “stars.”
 - b. Two submitters commented that “team culture” is used to encourage appropriate behaviour.
 - c. One submitter stated that they have played against very physically aggressive players, and the club and team have complained to the RSO, but no action was taken. Another submitter commented that there is some minimal discussion from administrators, but this is often at the beginning of the season and not revisited.

Submissions from other sources

33. The submission from 24 NSOs and Paralympics NZ said that measures NSOs have in place to encourage appropriate behaviour include education, building and sharing a culture and good communication. The submission noted many sports are involving parents and athletes to set and communicate behavioural expectations as the sooner everyone involved understands the expectations and culture that sports live by, the less problems there are overall.
34. NZ Football is developing a football specific respect and responsibility initiative, to be implemented across all levels to raise awareness of the issues and address the changes that need to take place.
35. NZ Rugby noted they have always had a 'play hard but play fair' ethos, reiterated through the 'Rugby Way' charter which has 'Play Fair' as one of its central pillars.

MP3: Who should be responsible for managing behaviour on the field (or on the court, in the pool, etc)? Please explain your answer.

36. Survey submitters were able to select multiple responses to this question. Seventy submitters responded to this question, each selecting an average of 3.4 response options.

**TABLE 22:
SURVEY RESPONSES
TO MP3**

Parents/ caregivers	Coaches	Administrators	Spectators	Athletes	Sport or recreation organisations	Sport NZ	Other
26	53	34	14	48	32	14	18

37. Of the 18 submitters who selected 'Other' people who should be responsible for managing behaviour on the field (or on the court, in the pool, etc.), 12 submitters specified match officials, and four specified that everyone shares this responsibility. One submitter specified both match officials and managers, and one submitter specified road users.
38. The main themes of these survey submissions are set out below.

Everyone has a responsibility for managing behaviour to some extent

39. Twelve submitters said that managing behaviour on the field (or on the court, in the pool, etc.) should be the responsibility of everyone who is active in spectating, playing, officiating and administering the game.
40. One of these submitters commented that there must be cultural change across all parties. On the other hand, another submitter commented on social pressure, and stated that if most people are well-behaved, then the people who are not will stand out.
41. Two submitters commented that athletes are responsible for themselves, coaches have a responsibility to set standards, the club/school has a responsibility for their teams (such as setting a code of conduct), and regional bodies have a responsibility to upskill and educate the community on positive behaviour and deal with any negative behaviour.

42. One submitter added that the approach across different sports is different, and may not be coordinated effectively. They said that:
 - a. NSOs set rules, regulations and policies to regulate on-field/court behaviour
 - b. Match officials are important for on-field/court matters, not crowd behaviour
 - c. Clubs, RSOs and NSOs are responsible for following through in proper judiciary systems and processes
 - d. On-field behaviour cannot be entirely separate from the influence of parent, coach and supporter behaviour.
43. This submitter also commented that they have seen Council or Environment Court rulings which add clauses into Resource Consents with penalties to ensure that clubs play a bigger role in managing noise, language and behaviour of players and spectators.

Coaches

44. Five submitters commented on the role of coaches in encouraging appropriate behaviour. Generally, it was considered coaches should encourage the right behaviours and support officials in this regard. They should also instil healthy team cultures.

Athletes

45. Seven submitters commented that athletes must be educated and understand their obligations. Two submitters commented that although athletes need to be responsible for their own actions, coaches also need to take responsibility for their athletes' behaviour, and take them off the field/court if they witness inappropriate behaviour. One submitter commented that ultimately players are responsible for their own behaviour, but that infractions may require calling the police.

Officials and referees

46. One submitter commented that officials generally do a good job, but issues arise when they do not pick up infractions. Another submitter commented that it seemed that the referees and umpires were the "forgotten people" in this survey.

Submissions from other sources

47. All email submitters who addressed this question said that everyone involved in a particular sport had a responsibility for managing on-field behaviour, however some submitters noted that certain participants have a greater role and/or influence than others, for example coaches, referees/umpires and senior on-field leaders.
48. Aktive and Sport Wellington submitted that NSOs are primarily responsible for regulating on-field behaviour through the setting of rules, regulations, policies and procedures. Clubs, RSOs and NSOs are then responsible to follow through in proper judiciary systems and processes.
49. NZ Football submitted that while NSOs should lead the way on what is acceptable behaviour for their sport within both the rules and the culture of the sport, Sport NZ should also be outlining its expectations of NSOs in this area by setting a common standard across all sports.

Harassment, bullying and abuse

50. Questions MP4 and MP5 and their sub-questions explored the scale of bullying, abuse and harassment in sport organisations, and who was considered responsible for managing it.

MP4a: To what extent are harassment, bullying and abuse problems in the sport organisations you are involved with? Please explain your answer.

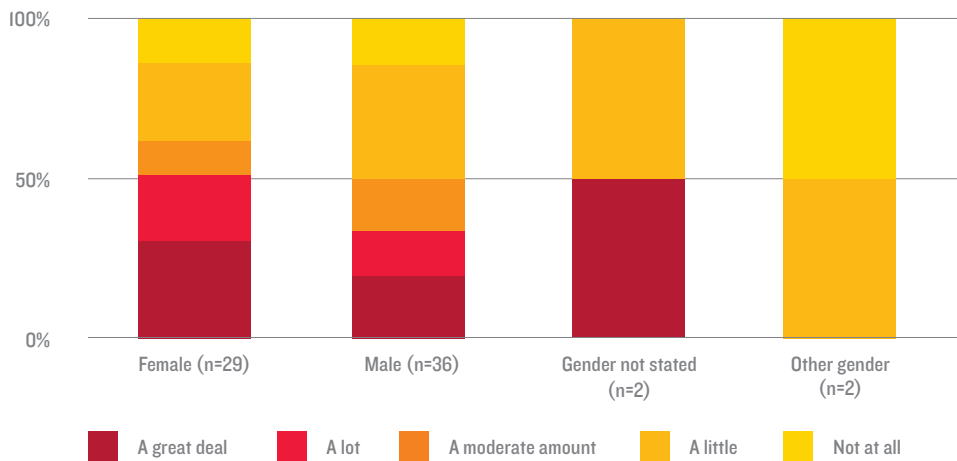
51. MP4a was answered by 69 survey submitters.

**TABLE 23:
SURVEY RESPONSES
TO MP4a**

Option	A great deal	A lot	A moderate amount	A little	Not at all	Total Responses
Number	17	11	9	21	10	69
Percentage	24.6	15.9	13.0	30.4	14.5	100

52. These data were also analysed by gender, and the results (illustrated in the figure below) suggest that women maybe more likely to consider harassment, bullying and abuse to be bigger problems within sports organisations.

**FIGURE X:
RESPONSES TO MP4a
ANALYSED BY GENDER**



Submissions from other sources

53. Fifteen email submitters identified a wide range of examples of harassment, bullying and abuse within their particular sports. These examples included bullying by coaches putting junior players off sport, international examples of sexual abuse in European football, findings from an international survey showing 71% of New Zealanders believe youth team sport is not safe for people of minority sexualities, racial and gender discrimination and abuse of players on social media.

Comments from survey submissions

Harassment, bullying, and abuse off the field/court

54. Comments related to extensive problems with harassment, bullying, and abuse off the field or court are included below.
- a. Most bullying involves adults, such as parents harassing coaches because of their child's play time or inappropriate comments and abuse from parents when a coach is running a session differently to how they want it.
 - b. Club and other administrators harass parents or players who raise issues around integrity, safety or bullying.
 - c. The school has no issue with a student staying at a coach's house on multiple occasions.
 - d. Issues with tall poppy syndrome.

Harassment, bullying and abuse while participating

55. Comments related to extensive problems with harassment, bullying and abuse while participating in sport (particularly for athletes) are included below.
- a. One submitter commented that they had been diagnosed with PTSD as a result of abuse that they suffered as an apprentice jockey. They also reported stories of abuse currently being suffered by other members in the industry and considered that the industry will not investigate these claims due to a fear of negative publicity. Horse racing does not fall within the ambit of Sport NZ.
 - b. One (unspecified) sport has a problem with bullying and harassment because there is a culture of not accepting decisions that are made.
 - c. Students are being bullied into competing when injured.
 - d. Athletes are bullied (it was not specified by whom), and little is done by the staff – this is partly due to a lack of skills in how to deal with this sort of issue.

Ineffectiveness of sport organisations in dealing with bullying and cultural issues

56. Comments related to the ineffectiveness of sport organisations in dealing with bullying and cultural issues (especially the role of managers) focused on poor culture or the difficulty of effecting culture change. Examples are included below.
- a. Addressing bullying takes time. The issue of bullying and harassment is currently undergoing an independent review, but it has gone on unreviewed for years even though top administrators knew about it.
 - b. Sport is “tribal” and an NSO has failed to take a leadership role in dealing with sections that are openly abusive to competitors (the NSO referred to was not specified).
 - c. Often people in management consider that they have the right to treat or bully their employees as they like. They break the law and get away with it because boards/ management have no protection or information available to employees, and no advocates to protect staff.
 - d. There is a national representative who is held out to be a role model, used in the press, and given national prominence, but is known to players, referees and coaches to be a “thug” who operates in breach of the code of conduct and is celebrated for doing so.
 - e. Bullying at lower levels of sport is most likely to escape the attention of RSOs who might help address it.
 - f. Sport NZ’s promotion of a “paid elite group of bureaucrats running sport” has created corruption of power.
 - g. One submitter ended on a positive note, saying that their RSO continues to help community sport organisations create great environments for young athletes to develop.

Other comments

57. Two submitters commented that any issues that exist are due to the competitive nature of sport, and the desire of parents to see their child perform well. One submitter said that there seems to be an increasing number of young athletes who do not accept the decision of the referee even when they are obviously infringing.
58. Two submitters commented on women experiencing harassment in sport. One submitter said that their daughter was the subject of inappropriate contact from her coach (unspecified). When pursued, it was discovered that the club involved was aware of other similar incidents and had swept them away. Another submitter commented that women coaches can be ignored, talked over or challenged by other coaches and parents.

MP5a: Are the sport organisations you are involved with willing and able to handle harassment, bullying and abuse when they arise?

59. MP5a was answered by 70 survey submitters.

MP5a: Are the sport organisations you are involved with willing and able to handle harassment, bullying and abuse when they arise?

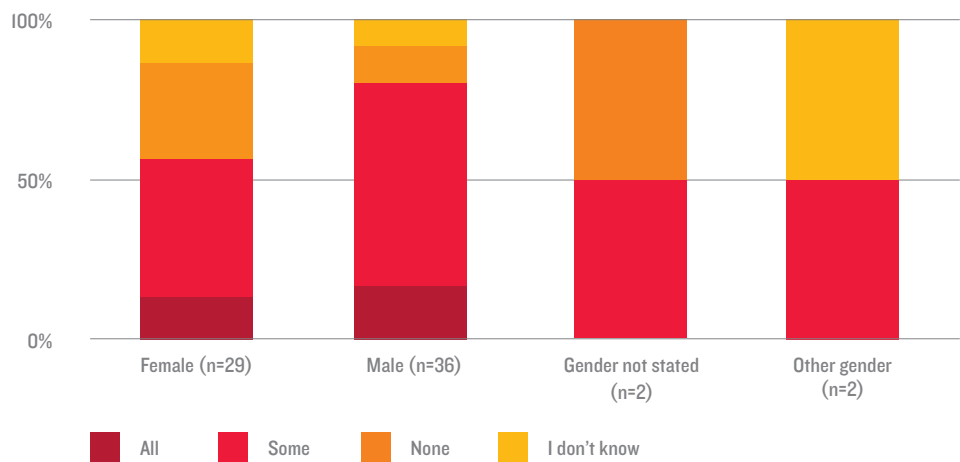
59. MP5a was answered by 70 survey submitters.

**TABLE 24:
SURVEY RESPONSES
TO MP5a**

Option	All are	Some are	None are	I don't know	Total Responses
Number	10	38	14	8	70
Percentage	14.3	54.3	20	11.4	100

60. These data were also analysed by gender, and the results (illustrated in the figure below) suggest that men may be slightly more confident in the sports organisations handling of bullying, harassment and abuse.

**FIGURE 1:
SURVEY RESPONSES
TO MP5a ANALYSED
BY GENDER**



Submissions from other sources

- 61. In one email submitter's experience, the club they are involved with did not respond to bullying complaints levelled at some club committee members and when the club undertook a review into its culture, no report was made available and no actions were signalled.
- 62. Another submitter believes not all sports are capable of handling such issues when they arise as they do not have up-to-date documentation, for example constitutions and rules.
- 63. The submission from 24 NSOs and Paralympics NZ said that NSOs typically lack the capability and/or capacity to handle these issues well.
- 64. Both Netball NZ and Yachting NZ are confident they are able and willing to address these issues should they arise.
- 65. One submitter said that in their experience neither their club, RSO or NSO are able or willing to handle these issues when they arise.

MP5b: Are you aware of any policies, processes or systems in the sport organisations you are involved with have in place to mitigate bullying, harassment and abuse?

66. MP5b was answered by 70 survey submitters.

**TABLE 25:
SURVEY RESPONSES
TO MP5b**

Option	Yes	No	I don't know	Total Responses
Number	38	21	11	70
Percentage	54.3	30.0	15.7	100

Submissions from other sources

67. Aktive said their 'Good Sports' programme is useful in creating a climate where sports' own policies are honoured and respected.
68. The submission from 24 NSOs and Paralympics NZ said that while NSOs do have policies in place, implementation, promotion and enforcement can be "patchy" and having quality HR and prompt legal advice is important.
69. Netball NZ said their regulations and processes in place to mitigate bullying, harassment and abuse have been tested and are reviewed and amended where necessary to ensure their effectiveness.
70. NZ Rugby have recently updated their bullying and harassment policy, which they intend to share with Super Rugby clubs and provincial unions.
71. One submitter said in their sport there are supposedly policies in place but in their experience, they are not enforced.

MP5c: Have you used, or would you be willing to use, these policies, processes, or systems?

**TABLE 26:
SURVEY RESPONSES
TO MP5c**

Option	Yes	No	I don't know	Total Responses
Number	19	25	8	52
Percentage	36.5	48.1	15.4	100

Submissions from other sources

73. Two email submitters addressed this part of the question. One submitter said they have requested information on the processes in place but this has not been forthcoming. The other submitter said they would not use these processes as they feel they cannot complain to the Chairperson about the Chairperson.

MP5d: If you have used these policies, processes or systems would you use them again?

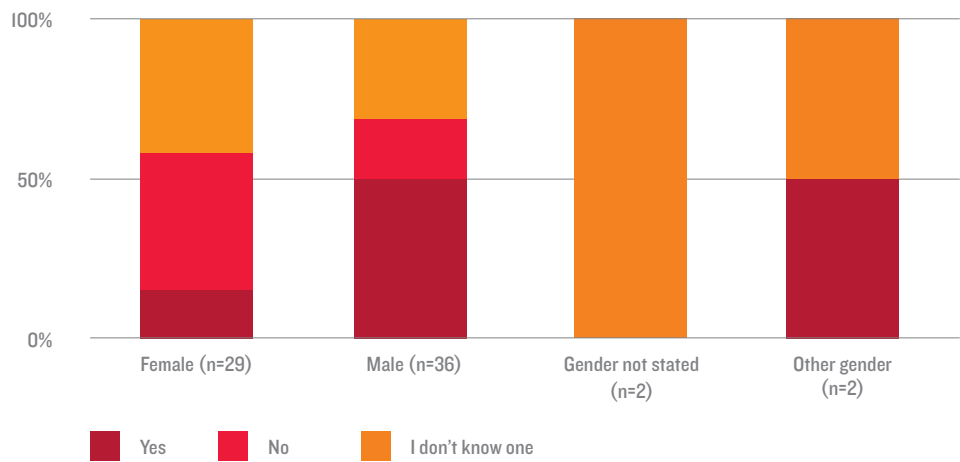
74. MP5d was answered by 38 survey submitters.

**TABLE 27:
SURVEY RESPONSES
TO MP5d**

Option	Yes	No	I don't know	Total Responses
Number	12	11	15	38
Percentage	31.6	28.9	39.5	100

75. These data were also analysed by gender, and the results (illustrated in the figure below) suggest females have a stronger dislike of the present policies process and systems.

**FIGURE 2:
SURVEY RESPONSES
MP5d ANALYSED
BY GENDER**



MP5e: If you haven't used these policies, processes or systems, would you be willing to?

76. MP5e was answered by 48 survey submitters.

**TABLE 28:
SURVEY RESPONSES
TO MP5e**

Option	Yes	No	I don't know	Total Responses
Number	32	3	13	48
Percentage	66.7	6.3	27.1	100

MP5f: If the sport organisations you are involved with require additional support to address bullying, harassment and abuse, what additional support do they need?

77. Forty survey submitters commented on the additional support that their organisations require to address bullying, harassment and abuse. The main themes are set out below.

Culture changes

78. Fourteen submitters commented on cultural issues that can manifest in harassment and bullying, such as bullying at the top level of leadership. The main ideas under this theme were:

- a. Organisations need a culture that makes it clear these behaviours are unacceptable and take complaints seriously when they are raised
- b. Issues need to be dealt with transparently and without bias
- c. Some sports organisations need a "fresh start", with the removal of many of the "old guard" before change can take place
- d. Greater independence between selection staff, coaches, psychologists and trainers would give athletes better outlets for airing grievances
- e. There should be good messaging and support from national organisations, and more direct contact to parents from national bodies
- f. The national body needs to have a Member Protection Advisor available to members, not just a policy
- g. Employees need a safe outlet for raising issues.

Policies and procedures

79. Nine submitters called for policies, systems, guidelines and procedures to be put in place to acknowledge that bullying exists and that it is not acceptable, and work towards addressing it. One submitter commented that a standard set of templates with supporting guidelines and information for organisations to use would be beneficial.
80. Examples of possible policies included:
- a. Bullying prevention
 - b. Whistleblowing
 - c. Complaints
 - d. Confidentiality
 - e. Coaching staff behaviour.
81. One submitter commented that a “fundraising” policy was important.
82. One submitter commented that their organisation always police vets staff to ensure the safety of everyone and to mitigate risk factors. Another submitter also commented that students should never be allowed to stay at a coach’s house, and that there should be an independent body set up to ensure that sporting organisations comply with policy and legislative requirements.

Training and education

83. Five submitters stressed the need for more training and education about bullying, including:
- a. How to recognise it and how to deal with it
 - b. Education at the executive and committee level, including building awareness of organisations’ obligations to the safety of employees
 - c. How to have a conversation around what is required to address the issues
 - d. Pre-season club meetings on what is considered appropriate behaviour (because a lot of people do not read provided documents).

Shortage of officials

84. One submitter commented that the main problem is that there is a shortage of officials, which means that every game cannot be adjudicated or viewed by appointed match officials.

Submissions from other sources

85. A number of email submitters said that additional support was required. Suggestions included training for physical education providers and sports leadership teams on the issues that non-cis gendered people face; support from Sport NZ and HPSNZ for NSOs in handling bullying, harassment and abuse issues when they arise; additional resources for sports organisations; guidance for sports organisations on where they can get advice on how to handle bullying, harassment and abuse when they arise; better cultural competence and clear guidelines for clubs and regions given the majority of committees at these levels are comprised of volunteers who often lack the skill or knowledge to deal with bullying, harassment and abuse.

MP5g: Please add any further comments relating to sport organisations working to address bullying, harassment and abuse.

86. Twenty-five submitters provided further comment about sport organisations working to address bullying, harassment and abuse. Many submitters advocated for further culture changes, and an independent review body to address the issues.

Culture changes

87. Four submitters reiterated that culture changes will need to be made to address the issues, including comments below.

- a. The culture of the community needs to change, which limits the ability of sport currently to bring about change
- b. Leaders need to stop turning a blind eye, and act
- c. Sports governance committees and CEOs need to show leadership in addressing the hard issues, and not hide behind documentation and process
- d. It is difficult when the bullying coaches have a national or significant role, because they feel emboldened to bully, harass and abuse students. The schools will turn a blind eye to this kind of behaviour because of who they are.

Independent review body or other dispute resolution mechanism

88. Five submitters stated that there needs to be an independent review body or dispute resolution mechanism to address issues of bullying, harassment and abuse. One commented that their NSO and its associated organisations need to be overseen and accountable to a higher body. Another submitter stated that allowing an organisation to undertake a review of itself enables the bullying to be covered up. This submitter stated that no school should be allowed to investigate anything without an independent body working alongside them.

89. One submitter said that there should be a dispute resolution mechanism outside the sport that will keep people at the leadership level under control. The submitter said that some of the not-for-profit organisations in an unspecified sport are being run by people in it for the money, and no one can stop them because of the amount of power that they have.

Problem identification

90. Three submitters identified further issues relating to bullying, harassment and abuse.
- One submitter commented that bullying in clubs seems to be common, which is concerning and destructive, and another said that it is difficult to “manage inflamed parents.”
 - One submitter commented that regional and national bodies are not equipped with the appropriate skills to deal with a query on inappropriate behaviour. They did not speak to the athletes concerned, and threatened defamation claims.

Solution identification

91. Four submitters suggested other changes that could be made (aside from culture changes), to improve levels of bullying, harassment and abuse.
92. One submitter commented that more work is needed in raising awareness of the extent and identification of the issues. Work is also needed to provide a template policy resource. One submitter commented that clubs could do with more good information coming down from the national body, and another said that organisations should be supported to educate people regarding these issues before they arise. One submitter suggested that parents could be punished for bad behaviour, such as being excluded from the next event, or even excluding the parent and child.
93. One submitter commented that their NSO seems to be doing a good job addressing these issues. This submitter did not provide any specific examples.

Social media

94. MP6 – MP8 and their sub-questions were concerned with the use of social media, and its outcomes.

MP6: Have you ever experienced harm as a result of using social media in relation to sports? Please provide details as you feel comfortable.

95. MP6 was answered by 68 survey submitters.

**TABLE 29:
SURVEY RESPONSES
TO MP6**

Option	Yes	No	I don't know	Total Responses
Number	14	53	1	68
Percentage	20.6	77.9	1.5	100

Comments from survey submitters that said yes

96. Eleven survey submitters who had answered 'yes' above commented about the harm that they experienced as a result of using social media in relation to sports. Some submitters provided specific examples of general social media harm that they had suffered included below.
 - a. Personal verbal assault
 - b. Defamation on social media when acting as a secretary of a club. According to this submitter, the perpetrator has conflicts of interest and makes big money off the sport so should not control a club.
 - c. A social media user commented on Facebook advising a player to bring a "Luger" to an event, so he could have some "fun"
 - d. Off-field official abuse (no further explanation was offered)
 - e. Facebook bullying as a result of high achievement
 - f. Personal comments on unofficial websites and group discussion sites, late at night and presumably alcohol-fuelled.

-
97. Two submitters gave examples of instances where social media abuse was reported to the NSO and no action was taken. One submitter commented that a formal complaint was laid against a coach, which resulted in a life ban. The coach's daughter then posted on social media asking, "do you want me to kill them", and the NSO "refused to take action." Another submitter said that inappropriate topless photos were taken in changing rooms and reported to the NSO who failed to take appropriate action until the incident was reported to the police.
98. Two other submitters also reported more high-level abuse, with one saying that a male coach used social media inappropriately to contact the submitter's daughter and other young females, and another reporting bullying on social media by their NSO and other competitors.
99. One submitter went on to say that social media provides an outlet for "keyboard warriors" who can remain anonymous in formal and open feedback and consultation sessions.

Comments from survey submitters that said no

100. Three submitters who had answered 'no' above commented about not experiencing harm as a result of social media in relation to sports. One submitter simply commented that "this applies to athletes", and the other commented that although they have received derogatory, negative and inappropriate statements a few times, they have just deleted them and blocked the people making them. The third submitter indicated that they were not concerned about harm from social media.

Comments from survey submitters that said I don't know

101. The submitter who answered 'I don't know' did not comment.

Submissions from other sources

102. Email submitters referenced several examples of harm caused via social media, including a significant amount of backlash from the public against a national team following some poor international performances. One NSO said they receive frequent 'pot shots' via social media from members of the public or participants within their sport.

MP7a: Do the sport organisations you are involved with have a social media policy?

I03. MP7a was answered by 69 survey submitters.

**TABLE 30:
SURVEY RESPONSES
TO MP7a**

Option	All do	Some do	None do	I don't know	Total Responses
Number	11	25	4	29	69
Percentage	15.9	36.2	5.8	42.0	100

Submissions from other sources

I04. Seven email submissions (including the submission from 24 NSOs and Paralympics NZ) said their sport organisations had social media policies in place. One submitter said they were not aware of their sport having one in place.

MP7b: If so, is it effective in preventing harm?

I05. MP7b was answered by 53 survey submitters.

**TABLE 31:
SURVEY RESPONSES
TO MP7b**

Option	Yes	No	I don't know	Total Responses
Number	7	19	27	53
Percentage	13.2	35.8	50.9	100

Submissions from other sources

I06. Three email submitters addressed this part of the question. Netball NZ said having social media policies in place provides staff and officials with a tool to mitigate exposure of individual players. NZ Rugby said social media guidelines alone will not prevent incidents happening but they do contribute to raising awareness, providing education and ensuring people have access to information that will help keep them safe from harm.

I07. The third submitter said the NSO of the sport they are involved with does have a social media policy but does not believe it is effective in preventing harm as it is not monitored or promoted.

MP7c: Do you think sport organisations need a social media policy?

I08. MP7c was answered by 67 survey submitters.

**TABLE 32:
SURVEY RESPONSES
TO MP7c**

Option	All do	Some do	None do	I don't know	Total Responses
Number	56	6	5	67	69
Percentage	83.6	9.0	7.5	100	100

Submissions from other sources

- I09. Aktive and Sport Wellington submitted via email that they recommend sport organisations have a social media policy to encourage transparency and appropriate engagement.
- I10. Netball NZ submitted that given that the area of social media is so wide-ranging, sport organisations do need a social media policy to provide clear expectations to all involved at all levels.
- III. The submission from 24 NSOs and Paralympics NZ said social media policies are important as the potential for harm is only going to get worse given that children are the biggest users of social media.
- I12. One submitter said it is important for sport organisations to have a social media policy but for it to be effective, it needs to be publicised, followed and enforced

MP8: What role should sport organisations have in their participants' use of social media?

II3. Thirty-nine survey submitters commented on the role that sport organisations should have in their participants' use of social media. The main themes identified are set out below.

Guidelines and policies

- II4. Seventeen survey submitters commented that sport organisations should provide guidelines and/or codes of conduct and advice around the use of social media. Specific comments under this theme included:
- a. The lead should be taken from overseas where policies and the policing of them are significantly more detailed than those in New Zealand
 - b. Organisations should refrain from commenting on individual posts, as this "inflames the situation"
 - c. Coaches and administrators must work within their boundaries and focus specifically on minors
 - d. Athletes should abide by policies and act in good faith towards their sport
 - e. Organisations need to have an informed person managing social media
 - f. Two submitters commented on the content of the policies, with one suggesting that there be rules around posting pictures of other people's children without their permission, and the right to request removal of posts, and the other saying that social media should be used for the appropriate purpose, without interfering with the privacy rights of any person.
 - g. There could be better promotion of existing social media policies
 - h. One submitter commented that although organisations can promote good practice, they cannot be held accountable for participants' behaviours outside of the sporting context. Another submitter commented that the use of social media is tough to regulate aside from contract/employed staff or volunteers.

Sanctions

- II5. Twelve survey submitters commented that sport organisations should have the ability to impose sanctions against perpetrators of abuse on social media, for example, remove them from teams. One submitter commented that sport organisations should be able to monitor, discourage and remove any harmful content on sites that are under their control.
- II6. One submitter suggested that rules and sanctions around social media should only apply to elite sports people.

Organisations should monitor their own social media use

- I20. One survey submitter commented that organisations and participants should keep their social media participation separate. Another submitter commented that organisations should only be involved where it is a direct comment or action from the sport organisation (or about the organisation). Anything else is hard to police.
- I21. Another submitter commented that although organisations should have no say in the content of personal accounts, they can advise members if that content is inappropriate. Content on the organisation page should always be vetted before being posted to prevent issues. Monitoring is not enough as once the post is up it is hard to refute, even if it is later removed.

Miscellaneous comments

- I22. Three survey submitters provided more general comment on social media.
- a. One submitter commented that there needs to be an awareness of the power of social media, and another said that the social media accounts of pro sports people should be managed by someone else for best effect.
 - b. One submitter stated that their organisation is badly run, with poor communication, which leads to people discussing issues on social media, because they cannot get any response from the organisation.

Submissions from other sources

- I23. Email submitters had a range of views on this question. Active and Sport Wellington submitted that sport organisations could expect those involved in the sport at NSO and RSO level to adhere to social media policies, but it would be much more difficult to enforce upon social and community sport participants.
- I24. Some NSOs submitted that sport organisations only have direct control over their employees' use of social media but can seek to influence wider participants' use through education and guidance (especially to children) on how to use/engage with social media.
- I25. One NSO raised the question of where responsibility lies when a social media issue arises and described an example of a 14-year-old female participant sending intimate photos of herself which the recipient later posted to social media. The father of the female then contacted the chief executive of the NSO asking what the chief executive was going to do about it.

Abuses of power

I26. Question MP9 – MPI2 and their sub-questions were concerned with experiences, prevention, and reporting or handling of abuses of power in sport organisations.

MP9: Have you seen abuses of power in sport organisations you are involved with? Please provide details as you feel comfortable.

I27. MP9 was answered by 68 survey submitters.

**TABLE 33:
SURVEY RESPONSES
TO MP9**

Option	Yes	No	I don't know	Total Responses
Number	48	19	1	68
Percentage	70.6	27.9	1.5	100

I28. Further details were received from 35 survey submitters who answers 'yes' and one submitter who answered 'no'. These comments are set out below.

Comments from survey submitters that said yes

I29. Thirty-five survey submitters who had answered 'yes' above commented on the abuses of power in sport organisations that they have witnessed. Examples of abuses of power are grouped under the themes below.

Corrupt processes

- I30. Most survey submitters gave examples of corruption as a result of abuses of power, conflicts of interest, and bias. Examples include:
- a. Coaches and managers breaking rules to further “their own agenda”
 - b. One survey submitter commented that abuses of power usually arise from conflicts of interest where a party has multiple roles. This submitter said that it can be as subtle as a quiet word to referees before a game or seeking a home advantage for important games, but that sometimes these abuses are more obvious, such as an over-representation of their affiliated club/school/supporters into opportunities/ regional training/national coaching roles.
 - c. Another submitter commented that there is a fine line between strong leadership and abuse of power, and it is a judgment call between playing a full role at a high level as needed and “being captured by the trappings of power.” One submitter gave the example of a CEO who “seems to greatly influence the board’s decisions and has an extreme bias towards one club in particular.” This submitter went on to say that members are too scared to speak out against the CEO in case their club is deregistered. Another submitter gave the example of a long-standing administrator at a national level who made people feel that they could not raise concerns or objections about things.
 - d. One submitter described a coach using “his trusted position” to make inappropriate contact, and a senior policeman who was a committee member who took the wrong action to address the issue
 - e. One submitter gave the example of organisations with a tendency to just “tick a box” to indicate that a policy exists, without enforcing it
 - f. One submitter said that their NSO shows no regard for player opinions and those in control are interested in only their own agendas with no regard for the game itself
 - g. One submitter commented that a lack of independent investigation is a problem in some cases, and another said that there is often a lack of equality in punishment when athletes break rules.

Issues with selection processes

- I31. Six survey submitters gave more specific examples of corruption, where people used their power, friendships, relationships or money to influence the selection of coaches, managers or athletes.
- I32. One submitter gave the example of board members overruling selections or ignoring applications to ensure that their family members are appointed to teams, or as coaches and managers. Another said that they were aware of a coach and selector for New Zealand teams who had pressure put on her by the main organisation to select certain players (mostly children of board members). Another submitter commented that parent officials sometimes actively abuse their position to disqualify athletes who are rivals of their own child.
- I33. One submitter commented on the non-selection of players as a result of non-sport related issues, and said that sport has been used as a part of a behaviour management process in a negative way.

Bullying

- I34. Some submitters gave examples of other forms of bullying, including:
- Extreme bullying of coaches by their boss, which is ongoing
 - A member of the Board of Trustees protecting bullying coaches by backing them and giving misinformation to sports administrators
 - A head member of an NSO is a known bully in the sport
 - Bullying, harassment and making athletes over-train or play when they are injured is often seen as being acceptable behaviour and is not disciplined.

Submissions from other sources

- I35. Ten email submitters addressed this question, with eight saying they had seen abuses of power in the sport organisation(s) they are involved with. Two submitters said they had not seen abuses of power (although one noted they had seen examples in sports they are not involved with).
- I36. Examples mentioned by submitters included not following proper processes, bullying, subverting investigative processes and favouritism towards certain participants in team selection and playing time.

MPIO: Do the sport organisations you are involved with have mechanisms in place to prevent and mitigate abuses of power? Please provide details.

- I37. MPIO was answered by 67 survey submitters.

**TABLE 34:
SURVEY RESPONSES
TO MPIO**

Option	All do	Some do	None do	I don't know	Total Responses
Number	7	19	17	24	67
Percentage	10.4	28.4	25.4	35.8	100

- I38. Twenty-nine survey submitters provided further comment on their answer to MPIOa. Most of these submitters commented that none of the organisations that they are involved with have mechanisms in place to prevent and mitigate abuses of power.

Survey submitters that said 'all do'

- I39. Five submitters who had answered 'all do' above commented on the mechanisms that their sport organisations have in place to prevent and mitigate abuses of power. One submitter commented that although the sport organisation "theoretically" has controls in place, if the control lies with peers, the mechanisms lie in the hands of those who are also using or benefiting from the same powers that they are designed to prevent. Other submitters commented that their organisations have:
- A complaints process
 - Robust governance structures and transparency of decision-making
 - A constitution and employment contracts.

Survey submitters that said 'some do'

140. Nine survey submitters who answered 'some do' above commented on the mechanisms that some of the sport organisations have in place to prevent and mitigate abuses of power. Some of these submitters provided specific examples and outlined potential issues included below.
- a. There can be overriding policies, but regional branches of the organisation must act.
 - b. College Sport Wellington and its member schools all have robust governance processes and structures in place. They are reasonably well equipped compared to volunteer organisations.
 - c. Most sports often have good documents for managing issues, but the practice and accepted culture do not align with the documented process.
 - d. A lack of reporting guidelines allows for poor decision-making.

Survey submitters that said 'none do'

141. Ten survey submitters who had answered 'none do' above commented in support of their view that none of the sport organisations that they are involved with have mechanisms in place to prevent and mitigate abuses of power.
142. One submitter commented that the organisation that they are involved with probably has a conflict of interest policy, but no one really understands it and they still allow parents to coach their own children and referee their own children's games. Another submitter commented that there is not enough information available about employees' rights. There seems to be no accountability for employers' behaviour and how they treat their staff.
- a. One submitter commented that although policies and mechanisms exist, they are "generally just ignored." Another submitter stated that systems are set up to remove any power from the athletes.
 - b. More specifically, one submitter commented that their NSO and high-profile trainers and selectors are the source of the bullying behaviour. Another submitter also commented that their organisation "participates willingly in the abuse", and another commented that it seems as if abuses of power are encouraged.

Survey submitters that said I don't know

143. Five submitters that had answered 'I don't know' above provided further comment. Four submitters commented that they did not think there were such mechanisms in place, but that if there were, they were not being used effectively. Another submitter commented that the NSO was asked to assist, but the support that they provided was "weak". No further explanation was given.

Submissions from other sources

- 144. Seven submissions from other sources addressed this question (including the submission from 24 NSOs and Paralympics NZ). Five submitters said the sport organisations they are involved with have mechanisms in place to prevent and mitigate abuses of power. Mechanisms referred to included good governance (including finance, audit and risk, human resources and remuneration, health and safety and funding and high performance subcommittees), robust reporting to the board, annual independent audits, panel of independent selectors, independent complaints management service and having an athlete-led approach to help mitigate the opportunity for one person to dictate how a programme will run.
- 145. Three email submitters said the sport organisations they are involved with do not have such mechanisms in place.

MPIIa: Do you trust the sport organisations you are involved with to handle the negative consequences of abuses of power appropriately and effectively?

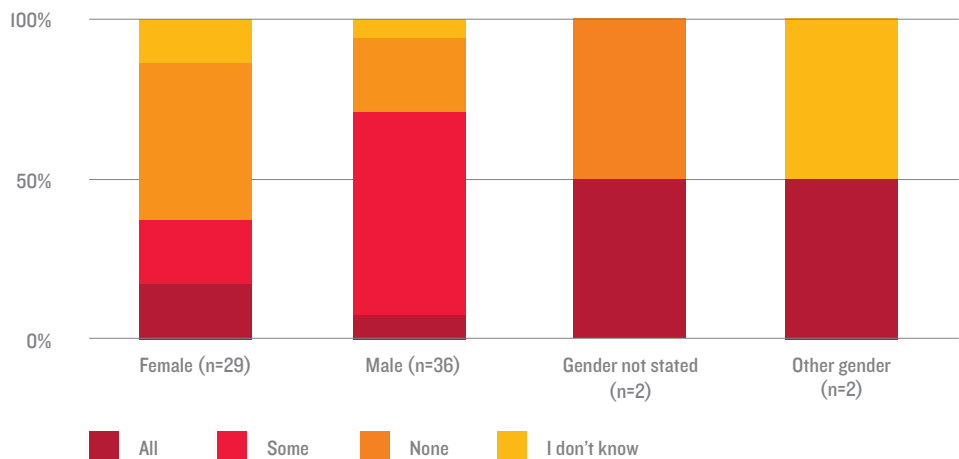
146. MPIIa was answered by 68 survey submitters.

**TABLE 35:
SURVEY RESPONSES
TO MPIIa**

Option	I trust all	I trust some	I trust none	I don't know	Total Responses
Number	10	28	23	7	68
Percentage	14.7	41.2	33.8	10.3	100

147. These responses were also analysed by gender, and the results (illustrated in the figure below) suggest that females may have less trust in the ability of their sport organisations to appropriately and effectively handle the negative consequences of abuses of power.

**FIGURE 3:
SURVEY RESPONSES
TO MPIIa ANALYSED
BY GENDER**



MPIIb: Please explain your answer.

148. Twenty-five survey submitters provided further comment on their answer to MPIIa. Most of them provided further comment on why they do not trust any of the sport organisations they are involved with to handle the negative consequences of abuses of power.

Survey submitters that said I trust all

149. One survey submitter who responded 'I trust all' provided further comment, stating that officials are very capable at evaluating the parent support.

Survey submitters that said I trust some

150. Eight survey submitters who answered 'I trust some' provided further comment on why they trust some of the sport organisations that they are involved with to handle the negative consequences of abuses of power.

- a. One submitter commented that they are constantly trying to "advise and persuade the organisations that actions are louder than just words." One submitter reiterated their view that College Sport Wellington and its affiliates do a good job in this area. Two submitters commented that the organisational set-up is dependent on the quality and integrity of management and elected people. If that is lacking then problems arise in times of conflict.
- b. One submitter commented that players with very dominant personalities often just want to play and leave the politics alone as long as they can get on the field.
- c. One submitter stated that they trust golf organisations that they are involved with, but not football organisations.

Survey submitters that said I trust none

151. Fourteen survey submitters who answered 'I trust none' provided further comment as to why they do not trust any of the sport organisations that they are involved with to handle the negative consequences of abuses of power.

- a. Four of these submitters stated that the problem is that the person/people at the top are either unaware or do not care about the issues.
- b. Other submitters stated that they had issues speaking out, and that the people at the top appear to support the perpetrators, rather than the victims.
- c. One submitter commented that schools do not listen to parents, and children are too afraid to talk about abuse in case they are dropped off the team.
- d. Another submitter stated that based on past personal experience, they wouldn't bother complaining about conduct again, and another commented that serious allegations were never pursued.
- e. One submitter commented that their NSO lacks integrity and judgement and is not prepared to be even-handed in dealings with members if it means upsetting their friends.
- f. A final submitter commented that it is hard for the organisation to handle abuse of power when there is a culture and environment of "win at all costs."

Survey submitters that said I don't know

I52. Two submitters who answered 'I don't know' provided further comment. One submitter commented that their umbrella organisation seems to have no power to intervene even if they have heard about abuse from multiple people. The other submitter commented that they had "never seen [handling of abuses] in action" without providing further explanation.

Submissions from other sources

I53. Four submitters using other means said they trust the sport organisation(s) they are involved with to handle the negative consequences of abuses of power appropriately and effectively. Two submitters noted that a sound reporting policy and ensuring everyone understands who to talk to where such an issue arises are crucial in achieving this.

I54. Two submitters using other means said they do not trust the sport organisation they are involved with to handle abuses of power appropriately and effectively. One submitter said that when they raised an alleged abuse of power with the NSO for their sport, the allegations were not investigated and were 'swept under the carpet'.

MPI2a: Where a behaviour is negative but not illegal, should it be left to the sport organisation to deal with?

I55. MPI2a was answered by 67 survey submitters.

**TABLE 36:
SURVEY RESPONSES
TO MPI2a**

Option	Yes	No	I don't know	Total Responses
Number	45	18	4	67
Percentage	67.2	26.9	6.0	100

Submissions from other sources

I56. All six email submissions that addressed this question generally agreed that it should be left to the sport organisation to deal with non-illegal behaviour. Some submitters noted however that some sport organisations do not have the capability to do so and suggested a national integrity unit be established to judge/act in this area.

I57. Two submitters said where the responsibility lies depends on the situation and such incidents should be dealt with by the sport organisation closest to the incident, for example by a club or RSO as NSOs do not always have control over what happens at the lower levels.

MPI2b: Please explain your answer.

158. Thirty-four survey submitters provided further comment on question MPI2a. Most of these commented on why they thought that negative behaviour should be left to the sport organisation to deal with.

Survey submitters that said yes

159. Twenty-one survey submitters who selected 'yes' for MPI2a provided further comment about why they thought that negative (but not illegal) behaviour should be left to the sport organisation to deal with.

Sport organisations should be able to deal with these matters

160. Six submitters commented that sport organisations should be able to deal with negative (but not illegal) behaviour on their own, but must have clear policies and procedures in place to do so. These submitters generally agreed that organisations should prepare for issues by having appropriate policies and escalate as necessary when issues are criminal.

161. One submitter commented that although it is not a national expectation from the Ministry of Education, administrators should be protecting health and safety of children. This submitter commented that schools are failing at this in the sports field.

Support is needed to help sport organisations manage negative behaviours

162. Some survey submitters that said sport organisations should manage issues that are not criminal provided qualified support. For example:

- a. Sport NZ must act as a catalyst
- b. Organisations can be expected to handle issues where they are sufficiently resourced
- c. There should be some sort of mechanism like a national integrity unit, whereby if someone feels a negative behaviour or incident is not dealt with well, they can take it somewhere else to be considered, in an anonymous way
- d. Two submitters considered it to be a case-by-case decision as to whether an incident should be handled by a sports organisation.

Survey submitters that said no

163. Eleven submitters who answered 'no' above commented further about why they did not think that negative behaviour should be left to the sport organisation to deal with.
- Six submitters commented that their organisation was either “incapable” of dealing with it or that leaving organisations to deal with issues can lead to them being “glossed over.”
 - Four submitters commented on the importance of having an independent body to deal with these issues. One of these submitters commented that “good process” would mean that every organisation (including Sport NZ) has an oversight body that can review or audit decisions made by the organisation. The submitter went on to say that in most cases this would simply be a club/RSO/NSO relationship, ideally with the NSO driving a standard of behaviour expected in the sport. Another submitter commented that negative behaviour is “just as harmful as illegal”, and that people’s wellbeing and mental health can be gravely affected. The submitter stated that there should always be an independent body that gets involved, “almost like a mediator.”
 - One submitter commented that their sport is losing players due to poor behaviour, and that it is not in the sport’s best interests for this to continue. The submitter went on to say that people are afraid to complain because they are concerned that it will affect their child’s selection chances.

Sideline behaviour

164. Questions MPI3 – MPI5 and their sub-questions are concerned with experiences, policies, and responsibilities concerning sideline behaviour.

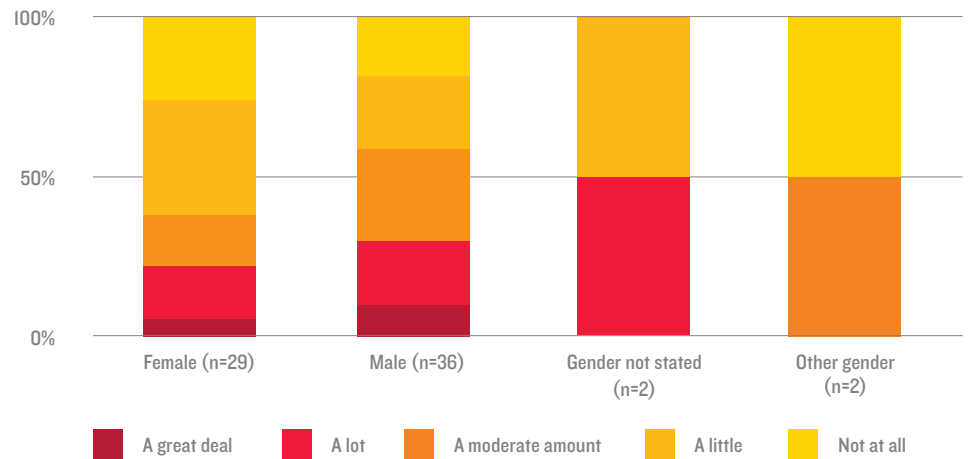
MPI3a: To what extent is poor sideline behaviour a problem in the sports you are involved with?

165. MPI3a was answered by 74 survey submitters.

**TABLE 37:
SURVEY RESPONSES
TO MPI3a**

Option	A great deal	A lot	A moderate amount	A little	Not at all	Total Responses
Number	6	14	17	21	16	74
Percentage	8.1	18.9	23.0	28.4	21.6	100

**FIGURE 4:
SURVEY RESPONSES
TO MPI3a ANALYSED
BY GENDER**



Submissions from other sources

167. The nine submissions from other sources that addressed this question expressed a range of views. Some submitters said that data shows it is not as big an issue as it is perceived to be, with isolated incidents occurring infrequently in their sports. Some submitters said that there will always be examples of poor sideline behaviour from parents as many of them are passionate about seeing their children succeed.

168. Other submitters said that it is a very manageable issue and less of an issue than it was 10 years ago. However, one NSO said it was 'absolutely an area that needs to be tidied up' at all levels and that this must be driven by NSOs themselves.

MPI3b: Please explain your answer.

169. Thirty-four survey submitters provided further comment to support their answer in MPI3a. Many of these submitters commented that poor sideline behaviour is a moderate or small problem in their sport, and provided examples of the types of behaviour that they have witnessed.

Survey submitters who said “a great deal”

170. Five submitters who answered ‘a great deal’ provided further comment on why poor sideline behaviour is a major problem in the sports that they are involved with.
- a. One submitter commented that it is a major problem and is putting people off the sport. Another stated that one sport “is the worst” and that nothing is done during the Saturday competitions. One submitter commented that trainers and parents are all contributing to the “shocking and disgusting” bullying from the sideline, sometimes even of children. Another submitter commented that children consider this behaviour to be normal.
 - b. One submitter commented that there is plenty of international and New Zealand research that indicates that issues like poor sideline behaviour exists. This submitter stated that they have sports reaching out to them seeking guidance and a framework to improve the environment, particularly around young athletes. They also said that all these issues are a consequence of a climate of a performance mindset that some adults have about youth sport. The submitter stated that they continue to help adults make sense of how they view youth sport so that they can start to positively change behaviours.

Survey submitters who said “a lot”

171. Six submitters who answered ‘a lot’ provided further comment on their question.
- a. Some submitters provided examples of the type of sideline behaviour that they had witnessed, such as ongoing abuse by coaches, players and spectators and “nasty, mean comments.” One submitter commented that while most games have some poor sideline behaviour during them, some games get heated and a few boil over. This submitter commented that athletes feel and respond to the sideline “temperature”, even young athletes.
 - b. Another submitter provided extensive examples of the behaviour that they had seen, including physical assaults, verbal abuse by adults to children, representative selections being threatened during club games depending on how a child is playing, umpire abuse, bullying by coaches, favouritism of some players and parents, undue influence on teams by parents, and physical assault by players of their team mates. This submitter commented that all these incidents were badly dealt with by their sport organisation.
 - c. One submitter stated that in their sport, match officials are not empowered to deal with abuse from spectators.

Survey submitters who said “a moderate amount”

172. Ten submitters who answered ‘a moderate amount’ provided further comment on this question.

- a. “Over-zealous” parents on the sideline was an issue according to eight submitters. One submitter commented that the issues mainly occur with girls’ parents. They try to coach their kids and “almost monitor every tiny amount of time that wasn’t with their child.” Three other submitters commented that parents can be abusive and derogatory towards other players, officials and coaches, and there is no mechanism for disciplining them.
- b. Another submitter commented that the behaviour of spectators on the sideline is “a more pressing concern” than the behaviour of students and athletes on the field. The submitter also said that there are particular sports (usually involving boys) where the behaviour of spectators needs to improve and gave specific examples:
 - i. One sport has always had an issue, but some people are trying to deal with it.
 - ii. We were informed of issues arising in two sports due to a “sport-specific acceptance of referee abuse.”
- c. One submitter commented that in general, bad behaviour on the sideline is decreasing in several sports. The submitter gave examples of two sports where they are aware that it is a struggle to get enough officials, because no one wants the abuse that comes from the spectators and coaches.

Survey submitters who said “a little”

173. Nine out of 21 survey submitters who answered ‘a little’ provided further comment to support their answer.

- a. Six of these submitters made comments about parents on the sideline, including that parents have been “sanctioned or trespassed” (although this submitter did not think that it was a major occurrence). Parents forget that it is just children’s sport “not international test matches”, the ego of the parents can get in the way, and that many parents think that their child is better than the others. One submitter commented that bad sideline behaviour happens at the higher level where parents want their children to be the best. However, this submitter considered that there is a strong policy against it and complaints against spectators can result in them being removed from the arena or incurring a penalty for the team that they are supporting.
- b. Another submitter commented that poor sideline behaviour usually involves coaches rather than spectators, including official abuse.
- c. One submitter commented that bad sideline behaviour is a very limited occurrence and is not really a problem.

Survey submitters who said “not at all”

174. Four submitters who answered ‘not at all’ provided further comment to support their answer that poor sideline behaviour is not a problem.
- One submitter commented that their sport does not get many spectators. Another stated that parents are subjected to protocols, so cannot speak, but coaches are still able to undermine children’s confidence.
 - One submitter commented that they recently held a tournament where a group of 80 gang members showed up, and their sideline behaviour was peaceful. The submitter went on to say that they were well-prepared in case any issues did arise (without providing examples of how they were prepared to deal with any potential issues).

MPI4a: Have clubs, regional sports trusts, national sport organisations or other bodies acted to improve sideline behaviour in your sports?

175. MPI4a was answered by 64 survey submitters.

**TABLE 38:
SURVEY RESPONSES
TO MPI4a**

Option	All have	Some have	None have	I don’t know	Total Responses
Number	6	39	8	11	64
Percentage	9.4	60.9	12.5	17.2	100

Submissions from other sources

176. All seven email submissions that addressed this part of the question (including the submission from 24 NSOs and Paralympics NZ) said their sport organisations have acted to address sideline behaviour.

MPI4b: What action was taken?

177. Twenty-one survey submitters commented on actions that have been taken by their sport organisations to improve sideline behaviour. Broadly, the main actions taken related to sideline behaviour strategies, the use of ‘duty umpires’, the Good Sports initiative, and advertising about appropriate behaviours. Some submitters gave examples of these working well, and other submitters made suggestions for things that could be done in the future.

Sideline behaviour initiatives

178. Six submitters commented that their organisation had initiatives in place, or would be initiating strategies soon. Examples included:

- a. Three submitters mentioned the Good Sports initiative.⁴ One submitter commented that Good Sports is a mechanism that is being adopted by clubs, schools, national and regional bodies, and another commented that the initiative should be rolled out country-wide.
- b. Two submitters commented on the use of 'duty umpires' in netball. One submitter commented that 'duty umpires' look out for bad sideline behaviour, and can be called to the courtside to address issues, which may or may not be followed up by a committee later. The other submitter commented that duty umpires were not available in their area because there were so many games being played at the same time, but that this sort of initiative would be beneficial.
- c. NZ Football is initiating a new sideline behaviour strategy in 2019.
- d. significant signage at school and council venues, monitors visiting games and venues to proactively discourage poor behaviour at rugby matches.
- e. The union and sub-unions are putting (unspecified) systems in place but clubs will still need to take responsibility for their own supporters
- f. The Taranaki Rugby Football Union has a policy, led by NZ Rugby
- g. Sport Otago sideline behaviour initiatives
- h. Organisations working collaboratively on a variety of interventions to address identified issues such as Conflict Resolution Workshops, Mediation Workshops, School/Club Links Workshops and Strategic Planning survey stakeholder feedback sessions.
- i. Six submitters commented that their organisation had used advertising to encourage people on the sideline to use appropriate behaviours, including reminders in email newsletters, posters and boards at games, and vocal messaging.

No actions have been taken

179. Four submitters commented further to support their submission that no actions had been taken to improve sideline behaviour in their sports.

180. One submitter commented that it had never been necessary as their rules are very clear and there is a system in place to protect all spectators and participants. Another commented that actions were not really required, and that incidents can be dealt with on a case-by-case basis.

181. One submitter emphasised that it is important for contracts with parents to be enforced. This submitter commented that there is no point designing a code of conduct when no one polices it. They gave an example of an elite intermediate-age tournament where parents and players were taunting an Under 13 level team.

⁴ Good Sports is an initiative that aims to create positive sporting experiences for kids by supporting and educating the key adult influencers in children's sport: parents, coaches, teachers and sport leaders.

Submissions from other sources

182. A number of submitters have focussed on education and are involved with the Good Sports programme, which aims to create positive sporting experiences for children by supporting and educating the key adult influencers in children's sport – parents, coaches, teachers etc.
183. Some NSOs have rules or policies in place to help ensure positive sideline behaviour, for example not allowing parents to attend representative trials, requiring parents to sit separately from athletes and banning parents who have demonstrated inappropriate behaviour. NZ Rugby said that some provincial unions have partnered with local businesses to offer prizes where good behaviour is demonstrated.

MPI4c: Was it successful?

Submissions from other sources

184. One email submitter addressed this part of the question and said that the methods employed in their sport have been successful in terms of implementation but have not investigated whether they have achieved the desired outcomes.

MPI5: Whose responsibility do you think it is to ensure good sideline behaviour?

185. Survey submitters were able to select multiple choices. Sixty-eight submitters responded to this question, each selecting an average of 4.5 response options.

**TABLE 39:
SURVEY RESPONSES
TO MPI5**

	Parents/ caregivers	Coaches	Administrators	Spectators	Athletes	Sport or recreation organisations	Sport NZ	Other
	56	46	39	53	34	39	22	17

186. Of the 17 submitters who selected 'other' people have this responsibility, eight suggested that this is a responsibility shared by everyone; two considered match officials to be responsible; one suggested the police to be responsible; another suggested people driving cars to be responsible; and one commented that coaches "are our biggest problem." A solution was also suggested around having guidelines and promotional material on display at venues.

Submissions from other sources

187. All eight email submitters who addressed this question agreed there was a collective responsibility for ensuring good sideline behaviour. Most submitters said that while NSOs should set the standard for their sport, everyone involved in the sport has a responsibility, including Sport NZ, RSTs, RSOs, clubs, schools, parents and athletes.

The Health and Safety at Work Act 2015

188. Questions MPI6 – MPI9 and their sub-questions are concerned with awareness of, and practices supporting, obligations under the Health and Safety at Work Act 2015.

MPI6a: To what extent are the sport organisations you are involved with aware of their obligations under the Health and Safety at Work Act?

189. MPI6a was answered by 68 survey submitters.

**TABLE 40:
SURVEY RESPONSES
TO MPI6a**

Option	Extremely aware	Very aware	Somewhat aware	Not so aware	Not at all aware	I don't know	Total Responses
Number	10	17	30	1	1	9	68
Percentage	14.7	25.0	44.1	1.5	1.5	13.2	100

Submissions from other sources

190. All eight email submissions that addressed this part of the question said the sport organisation(s) they are involved with are aware of their obligations, although the extent to which they are aware varies. Submissions from NSOs indicated a good awareness of obligations, with comprehensive health and safety policies in place and a lot of sharing amongst NSOs in the health and safety area. It was noted that stronger NSOs usually have someone on their board with a speciality in health and safety.

191. Some submitters said that awareness was not as good below the NSO level, for example in schools.

MPI6b: Please explain your answer.

192. Twenty-three survey submitters provided further comment on the awareness of their sport organisations on their obligations under the Health and Safety at Work Act. Of these, most comments were that their organisations were 'somewhat aware' of their obligations, but that there was room for improvement.

Extremely aware

193. Four submitters who answered 'extremely aware' commented further about their sport organisations being extremely aware of their obligations under the Health and Safety at Work Act stating:

- College Sport Wellington and its member schools need to meet very high standards in terms of their obligations.
- It is a legal requirement
- The organisation has recently developed a sport-wide safety management system for all clubs to use
- "There is a degree of over-reaction" (this submitter did not provide further explanation).

Very aware

194. Five submitters who responded 'very aware' provided further comment.

- a. One submitter commented that they attended a region-wide, para-code meeting on the new health and safety legislation, and that as a result safety had been getting better, with more policy being written down rather than having a "this is what we always do" attitude. Another submitter commented that they thought that national bodies and event managers were aware of their legal obligations, and that most national boards and committees have ensured that there is a document in place.
- b. One submitter commented that although most organisations understand their duty of care, not all have systems in place to address their obligations.
- c. One submitter commented that they were involved in a dangerous sport, and that everyone had to play a part.
- d. In contrast to their response that their sport organisation was 'very aware' of their health and safety obligations, one submitter commented that they were aware of a situation where coaches had made girls carry each other on slippery floors, which resulted in a shoulder injury reported to the Accident Compensation Corporation (ACC), which was still a problem six months later.

Somewhat aware

195. Fourteen submitters who responded 'somewhat aware' provided further comment.

- a. One submitter commented that there was limited awareness of health and safety obligations, as most clubs are run by volunteers. Another commented that if organisations were aware of their obligations, there would probably be more information available. One submitter commented that some organisations are aware, and some are not, and that attitudes to health and safety at a regional level and below are poor. This submitter commented that although schools have strong health and safety policies, Sport NZ fails to provide what schools need (this submitter did not provide any further explanation on what schools need).
- b. One submitter commented that a significant number of organisations involved in their sport are schools that have robust systems and awareness of the Act. However, this submitter considered that obligations to volunteers were not widely understood by schools or clubs.
- c. One submitter commented that organisations know how to avoid responsibilities, and another commented that while some organisations "bury their heads in the sand", others have proactive leadership and are up to date with their current health and safety responsibilities.
- d. Another submitter also commented that the club level is still not fully onboard, and another stated that there is not enough focus on health and safety. One submitter commented that there has been confusion over what the Act means for clubs, and that the information that applies to sports clubs is vague and tends to focus on employment.
- e. One submitter gave examples of two swim clubs. One club does not allow their swimmers to set up the lane ropes (life guards do it), but the other club's swimmers need to set up old, rusted, fraying lane ropes, which has led to cuts to hands.

- f. One submitter commented that they had attended health and safety courses, but were still getting their head around the responsibilities. Another submitter stated that their golf club was aware and operated accordingly. One submitter commented that although they were aware of the rules and procedures, they did not have an active committee member dedicated to the role.
- g. One submitter commented that a particular school has a health and safety policy but that it is not easily accessible. Volunteers are not police vetted, individual students are able to stay at a coach's house, and student/staff ratios are not maintained.

No comment

196. The submitters who responded 'not so aware', 'not at all aware' and 'I don't know' did not comment on their responses.

MPI6c: How did the sport organisations become aware of their obligations?

197. Twenty-seven survey submitters provided further comment about how sport organisations become aware of their health and safety obligations. Much of this information is passed on through regular dialogue with regional or national sporting organisations.

Regional or national sporting organisations provide information

198. Eleven submitters commented that sport organisations become aware of their obligations through regular and ongoing dialogue with regional or national sporting organisations. One submitter commenting as an NSO stated that it was their role to inform their members.

Education and communication about health and safety

199. Nine submitters commented that sport organisations could become aware of their obligations through education, information and examples.
- a. One submitter emphasised that organisations must ensure that they read bulletins on health and safety from Sport NZ.
 - b. One submitter specified that they receive information through media and social media, particularly when the law changes.
 - c. Two other submitters commented that they would consult or hire professional experts, without providing further information.
 - d. One submitter commented that schools usually have robust systems, although communication can be a challenge. This submitter also commented that health and safety workshops had been offered.
 - e. One submitter simply stated that organisations could become aware of their obligations by understanding the Act.

Other comments from survey submitters

200. Other comments received included:

- a. One submitter commented that organisations only become aware of their obligations “when stuff goes wrong”, and that there is a lack of proactive behaviour. Another submitter also commented that organisations become aware of their obligations by “being caught out.”
- b. One submitter commented that the organisations pass obligations onto committees, and the riders “enter at their own risk.”
- c. Four submitters commented that they did not know how sport organisations could become aware of their health and safety obligations.

Submissions from other sources

201. NSO submitters said recent changes to health and safety legislation meant all NSOs had to up their game and that NSOs were driving increased awareness among RSOs and clubs and that Sport NZ training was helping in this area. Submitters said they became aware of their obligations via several means, including government updates, sector updates, legal updates and Employers and Manufacturers Association updates.

MPI7a: To what extent are you confident the sport organisations you are involved with meet their obligations, if any, under the Health and Safety at Work Act?

202. MPI7a was answered by 66 survey submitters.

**TABLE 4I:
SURVEY RESPONSES
TO MPI7a**

Option	Extremely confident	Very confident	Somewhat confident	Not so confident	Not at all confident	Total Responses
Number	6	9	39	9	3	66
Percentage	9.1	13.6	59.1	13.6	4.5	100

Submissions from other sources

203. Seven email submitters addressed this question. Five of these submitters that were confident obligations are being met said health and safety was a well discussed and communicated area and that annual health and safety audits took place. One submitter said they were not confident their sport organisation was meeting their obligations and one said they had ‘minimal’ confidence they were being met.

MPI7b: Please explain your answer.

204. Twenty-six survey submitters provided further comment about the extent to which they were confident that their sport organisations meet their obligations under the Health and Safety at Work Act. Most of these submitters were ‘somewhat confident’ that their organisations met the requirements, but that there was always room for improvement.

Survey submitters who said they were 'extremely confident'

205. Two submitters out of the six who answered 'extremely confident' provided further comment on their answer. Both submitters said that their organisations have clear approaches to health and safety. One said that the Board has health and safety as its "starting item", and that filters down to the rest of the organisation, and the other submitter said that they employ professionals to do this work.

Survey submitters who said they were 'very confident'

206. One submitter who answered 'very confident' provided further comment on their answer. This submitter said that their sport is risky, so not every eventuality can be mitigated. They also said that most parts of the sport are doing their best to balance actual risk, perceived risk and managed risk.

Survey submitters who said they were 'somewhat confident'

207. Thirteen submitters who answered 'somewhat confident' provided further comment on their answer.

208. One submitter said that their organisation is involved with ongoing education on health and safety matters, and another commented that although they are reasonably sure they have it right, they are constantly seeking more information, as the legislation appears to have "so many variables." Another submitter commented that health and safety is "always on the agenda." One submitter commented that it is not easy to stay up to date with health and safety commitments, and another simply commented that "change is hard."

209. One submitter commented that NSOs and RSOs with separate board and management structures are aware and complying, and some volunteer committees are aware and complying, while others are "flying under the radar of compliance." Another submitter also mentioned volunteers, commenting that because their competitions are delivered by volunteers, the responsibilities under the Health and Safety at Work Act do not apply. This submitter commented that they were not sure if their members were aware of that, but that they carry on as they always have.

210. One submitter commented that what is written down is not always necessarily followed. Another submitter commented that although their organisation is very aware of health and safety in some areas, such as child protection, in general the staff are not so aware. One submitter simply commented that their organisation was a "bit slack", and that more should be done.

211. One submitter commented that although they are not involved in health and safety enough to know whether their organisation meets obligations, they were injured two years ago, and the issue was dealt with immediately.

212. One submitter commented that they had moved clubs due to bullying, and that their new club was very aware and conscious of its obligations.

213. One submitter commented that their golf club was aware and compliant with the Act, but they were unsure about their organisation in another sport.

Survey submitters who said they were 'not so confident'

214. Seven submitters who answered 'not so confident' provided further comment to support their answer.
- a. One submitter commented that as a regional body overseeing many sports, they are always chasing organisations and clubs on their health and safety policies and documents, and attitudes towards health and safety are generally poor.
 - b. One submitter commented that there did not seem to be a lot of follow up to ensure that policies are communicated or enforced. Another submitter also commented that there was a lack of monitoring, consistent communication and accurate reporting.
 - c. Two submitters commented that although there is a health and safety policy, it is not accessible, there is currently no police vetting in the organisation for volunteers, and student/staff ratios are not always maintained. One of these submitters went on to say that students are subject to further injury from the bullying behaviour of coaches when under ACC treatment.
 - d. Another submitter commented that schools are employing coaches with poor people skills who do not uphold the safety of children.
 - e. One submitter commented that although physical health is a high priority, emotional care does not always factor in.

Survey submitters who said they were 'not at all confident'

215. Two submitters who answered 'not at all confident' provided further comment to support their answer. One submitter commented that health and safety is merely "lip service", and the other commented that health and safety was not considered in the workplace.

MPI8: What health and safety training do paid and volunteer workers receive in the sport organisations you are involved with?

216. Thirty-four survey submitters commented on this question. Their comments show divergent practices regarding health and safety training. Many submitters were either from organisations that did not have paid employees, or they were unaware of the kind of training they received.

Survey submissions in regard to paid staff**Paid staff receive training**

217. Eleven submitters commented that their paid staff do receive health and safety training, and some provided further comment about this.
218. Three submitters commented that their staff are now receiving more training than ever. One submitter commented specifically on golf, and said that their club takes health and safety seriously, and all staff have training. One submitter commented that staff received health and safety training in 2016, and renew their first aid certification every two years. Another submitter commented that lifeguards would have mandatory training.

219. Other examples of the varied frequency, consistency, intensity, and type of health and safety training were identified by several individuals.

- a. Two submitters commented that staff receive health and safety training as part of their induction.
- b. One submitter commented that all contractors are updated when onsite.
- c. One submitter commented that their employees attend health and safety meetings and workshops.
- d. One submitter commented that their staff receive some training, but that it is variable. When the training is Board-driven, it is likely to be better done and recorded, and meet director obligations. This submitter went on to say that volunteer committees with one or two employees are less likely to be complying.
- e. One submitter commented that there is some training in schools, but that it is not regularly updated, and there is little in clubs.
- f. One submitter commented that their employees receive Sport NZ online training and do research provided by other organisations.
- g. One submitter commented that although their organisation provides training, it is mostly self-managed, as it is a very small organisation.

Paid staff do not receive training

220. Five submitters commented that their paid staff do not receive any health and safety training that they were aware of. One submitter commented that staff would not receive much training at all, unless it was self-directed. There are many free courses that people can attend, but participation rates are low. Another submitter commented that although their staff do not receive any specific training, there is general awareness of health and safety.

Unsure or no paid employees

221. Eleven submitters commented that they did not know whether their paid workers received health and safety training or not. One of these submitters went on to comment that there may be some training on bullying.

222. Six submitters commented that their organisation does not have any paid employees, and therefore the question was not relevant. One submitter commented that any paid staff that they did have were clerical and secretarial and not directly exposed to the sports arena.

223. Thirty-seven submitters commented on the health and safety training that volunteers at their organisations receive. Again, most of the submitters commented that they did not know, or that volunteers receive little or no training.

Survey submissions in regard to volunteer staff

Volunteers receive little or no training

224. Thirteen submitters commented that volunteers do not receive health and safety training. One submitter commented that any training that volunteers receive is "up to them." Thirteen submitters commented that volunteers receive little, or not much training.

Volunteers receive training

225. Nine submitters commented that volunteers do receive health and safety training, and some provided further explanation about the varying types and frequency.
226. One submitter commented that training of volunteers is conducted by the schools and RSOs that they work with. Through those formal arrangements with both groups, it is expected that they are all adequately trained.
227. Another submitter commented that volunteers receive training about basic safety within the environment, as well as safety plans for specific events and pre-competition briefings. This submitter also commented that there is a Safety Officer active during all events. Another submitter commented that volunteers attend water safety workshops, and a health and safety briefing before they start work where they check assembly points and emergency exits as examples. Two other submitters commented that all new staff receive health and safety training as part of their induction.
228. One submitter commented that volunteers receive a health and safety induction when they are new to the facility, and must also sign a waiver.
229. One submitter commented that volunteers receive First Aid Level 1 and 2 training at a senior level, and that this is a requirement for running a dojo/club.
230. One submitter commented that their organisation is currently rolling out the safety management system for clubs, and working with clubs on an event-by-event basis. Their system is available online for all to access, and a monthly newsletter is sent out to all members that includes information and tips.

Unsure

231. Three submitters were unsure whether volunteers involved with their organisations received any training.

Other comments

232. One submitter commented that the question was ambiguous, and that the answer is different depending on whether it is referring to worker safety or player safety. They said that the documentation (unspecified) tends to focus on a safe work environment, rather than safe playing techniques.

Submissions from other sources

233. The majority of the nine email submitters who addressed this question said their sport organisation(s) have at least some health and safety training in place. The submission from 24 NSOs and Paralympics NZ said that as health and safety training was required under legislation, all NSOs would have at least some training in place.
234. One NSO was actively looking to increase training over the next 12 to 24 months while three NSOs said all employees (and in one case all volunteers) went through a health and safety induction. One RST said they provide some advice to their partners in the health and safety area but that, in their experience, the health and safety training undertaken by the sport sector workforce in general would likely be at the lower end of the scale.

MPI9: Do you have any other comments in relation to member protection?

235. Eleven survey submitters provided further comment in relation to member protection. Most submitters provided further comments about the issues with member protection, and some provided suggestions for improving member protection.

Issues with member protection

236. Survey submitters provided additional comments, or reiterated previous comments about the issues that exist with member protection.
- a. There is no confidence in the national body to protect members.
 - b. There is no member protection unless you are rich.
 - c. When athletes' wellbeing and welfare are not considered, they are subject to further injury, which eventually leads to a decline in wanting to participate in sport.
 - d. One submitter witnessed a national player turn up to a finals match in a sling and brace, take limited part in the warmup, and then play in the game with acceptance from the coach, referees and national representative.
 - e. There is a lot of confusion around the legislation and the coverage for sport organisations. This submitter takes the position that they are a Person Conducting a Business or Undertaking (PCBU) to ensure that they take all practicable steps rather than the reverse, and later find out that they are in breach of their obligations anyway.
 - f. In trying to legislate safety in sport, little consideration is given to how to resolve the conflict of sport as an outlet for aggressiveness, especially in contact sports, and the desire not to have any injuries. Sport NZ has not provided leadership in this area in providing meaningful advice and practical resources.

Suggestions for improving member protection

237. Four submitters made suggestions to improve member protection.
- a. More work is needed on compliance (presumably with health and safety laws, although this was not specified).
 - b. There is a need to include protection through accreditation of volunteers from other forms of harm. We are behind other countries in terms of protecting young people from possible harm and abuse from adult volunteers, and police vetting is insufficient. Protection (and training on how to avoid tricky situations and possible false accusations) is then enhanced for coaches as well as providing better protection for athletes.
 - c. There is currently no member protection that is independent of the organisation. It cannot be expected that the organisation, which may be part of, or the entire problem, to also protect the victim. There must be an independent body whose job it is to protect and investigate all allegations, and deliver a verdict and consequences if necessary, with the right to enforce health and safety laws on the organisation.
 - d. Encouraging personal responsibility is key.

Submissions from other sources

238. Several email submitters provided additional comments on member protection. The submission from 24 NSOs and Paralympics NZ said the question of what NSOs are ultimately responsible with regards to member protection was a key one. The submission noted that NSOs can put policies in place and while there is a certain level of behaviour that everyone would agree is acceptable, NSOs do not have much influence over what happens at club level. The submission therefore questioned whether NSOs should be responsible for what goes on within a club given the lack of influence.
239. One submitter said the expansion in recent years regarding health and safety legislation, mental health awareness, organisational culture and treatment of staff and player welfare concerns means that much of a sport organisations 'business' is now too complex for volunteer administrators.
240. One RST submitted there is a disproportionate focus on integrity matters in high performance sport rather than the greater threat to participation from integrity issues at the grassroots/community level.
241. Another submitter noted that the power of sport can create and achieve social good, however, a number of sport organisations are reluctant to recognise the interests and requirements of immigrant communities, for example food, alcohol and behaviour at an after-match function, altering uniform requirements and providing material in the native language of potential players and participants.
242. College Sport Auckland noted that all schools have health and safety, whistleblowing and harassment policies in place however these may not always be shared with volunteers and external coaches and officials.
243. A submission from a former Commonwealth Games athlete said that more support is needed for athletes after big international events so they do not feel post-pinnacle-event depression or post-Olympic stress disorder.
244. Lastly, one submission outlined the barriers faced by rainbow young people wanting to participate in sport. These include homophobic, biphobic and transphobic discrimination from participants, exclusion from gender-specific sports teams, being made to use gender-specific changing facilities and a lack of inclusive policies which enable people to self-determine their gender and participate equitably in sport. The submitter called on sport leaders to tackle these barriers with policies and behaviours and suggested that sports management follow the IOC standards for transgender and gender-diverse athletes.

03

INTEGRITY ISSUES IN CHILDREN'S SPORT

1. We received 176 submissions on this chapter including:
 - a. 153 through the survey tool
 - b. 23 through email, post or hand delivery.

Police vetting and criminal record checking

2. Questions CPI – CP4 and their sub-questions explore the extent to which police vetting and criminal record checking are used; barriers to use as part of the recruitment process for employees and volunteers working with children; and the processes for using these screening tools.

CPIa: Do the sport organisations you or your children are involved with use police vetting as part of their recruitment processes for employees working with children?

CPIb: If not, why not?

3. Submissions on CPIa and CPIb will be summarised in tandem.
4. CPIa was answered by 152 survey submitters.

**TABLE 42:
SURVEY RESPONSES
TO CPIa**

Option	All do	Some do	None do	I don't know	Total Responses
Number	55	57	10	30	152
Percentage	36.2	37.5	6.6	19.7	100

Comments from survey submitters

5. Forty-three survey submitters commented on why police vetting is not used when recruiting employees. The main themes that emerged were:
 - a. Fourteen submitters suggested low awareness of obligations and/or confusion about whether this was a legal requirement as reasons why police vetting is not used as part of their recruitment process
 - b. Twelve submitters named resource constraints as a barrier to greater use of the Police vetting scheme, saying the process is resource intensive, “expensive”, takes a long time, and is “too hard” to administer, particularly for organisations that are largely run by volunteers
 - c. Five submitters simply wrote in support of the practice
 - d. Five submitters commented that they did not know why police vetting was not done
 - e. Three submitters commented that their organisation did not have employees.

Submissions from other sources

6. Fifteen submissions were received through other sources on CPIa and CPIb, as well as CPIc and CPId which ask the equivalent questions but for volunteers instead of employees. Submissions from other sources on all sub-questions within CPI are summarised below.
7. Three submissions from those involved in school sport noted that schools determine their own vetting policies. One noted that registered teachers are safety checked by the Teaching Council (formerly the Education Council) prior to having their practicing certificates issued. Another noted that boards (of trustees) and the Education Review Office monitor compliance and that schools generally have a good understanding of police vetting.
8. Six submissions were received from NSOs, including one from 24 NSOs and Paralympics NZ. Collectively, they showed NSOs generally use police vetting but to different levels. For example, some only vet workers within the NSO administration while others insist on vetting for those working with children at club level. The prevalence of police vetting is generally dependent on the resourcing of the NSO.
9. Specific comments from NSOs included:
 - a. One is working on police vetting guidelines, aiming for a mid-2019 release
 - b. One provides templates and resources to aid its RSOs and clubs in facilitating police vetting
 - c. One only requires police vetting for accredited coaches, and would support a broader accreditation or registration scheme for coaches in sport
 - d. One requires police vetting for its junior coaches but expects its secondary school-level coaches to be police vetted through the requirements of the education system
 - e. Three submissions noted it was hard to police vet large numbers of volunteers needed to run events.
10. Two RSTs submitted that they used police vetting within their broader child protection policies.
11. Two child protection experts submitted. One said thorough background checking was important and that police vetting should only be one component of a broader approach to child protection. The other said that sport organisations sought her expertise on police vetting as it was a “concern” to them.
12. One submitter commented that police vetting should be mandatory.
13. Only one submitter said that their organisation did not use police vetting. The submitter suggested the committee members of their organisation did not have sufficient experience to realise the importance of police vetting and that some clubs in their sport considered it “too hard”. The submitter noted coaches in Australia were required to have clearance to work with children.

CPIc: Do the sport organisations you or your children are involved with use police vetting as part of their recruitment processes for volunteers working with children?

14. CP1c was answered by 151 survey submitters.

**TABLE 43:
SURVEY RESPONSES
TO CP1c**

Option	All do	Some do	None do	I don't know	Total Responses
Number	25	69	29	28	151
Percentage	16.6	45.7	19.2	18.5	100

15. Submissions from other sources on CP1c and CP1d are summarised above.

CP1d: If not, why not?

Comments from survey submitters

16. Sixty-three survey submitters commented on why volunteers working with children are not police vetted. The main themes were:
- a. Resources are strained – 17 submitters mentioned cost and time as factors for why volunteers who are working with children are not police vetted. For four submitters, this was compounded by having a volunteer administration workforce, which meant that the necessary administrative skillset required to facilitate police vetting was not always available.
 - b. Police vetting is not mandatory and there is low awareness of risk
 - c. Police vetting acts as a deterrent to volunteers who are already in short supply
 - d. Eight submitters said they did not know why volunteers working with children were not police vetted
 - e. Volunteers are usually parents and therefore their trustworthiness is assumed
 - f. Some organisations use other means to vet volunteers.

CP2: Do you have any comments on the process for obtaining Police vets?

Submissions from survey submitters

17. Seventy survey submitters commented on the process of obtaining police vets. The main themes from these submissions were:
 - a. Eleven submitters commented that the process is too slow. One commented that New Zealand Police need to be better resourced “to ensure timely, thorough vets.”
 - b. Eleven submitters considered that the application cost was a factor in decisions about who needed to be police vetted. Two submitters suggested the process should be provided free of charge. Some submitters suggested the process should be undertaken by an RSO or NSO to alleviate the burden on clubs.
 - c. Five submitters considered that Police vetting should not be duplicated across organisations and three submitters considered that it occurred too frequently
 - d. Ten submitters said the process was easy while six found it confusing
 - e. Five submitters asserted that police vetting for people working with children should be compulsory, with a further three stating that it should be prioritised. Additionally, four submitters argued that police vetting alone is insufficient to protect children from abusers.

Submissions from other sources

18. Ten submissions were received from other sources on this question.
19. Four submitters said the process for obtaining a police vet was simple. One of those four submissions said the turnaround could be slow, although another said it only took two or three days.
20. On the other hand, one submitter said the process was cumbersome and loaded with “red tape”. Another said the cost was “concerning” while a third said it could get expensive when vetting large numbers of volunteers but that cost was a necessary part of child protection.
21. Submitters noted the limitations of police vetting, commenting that it was only as good as the day the vet was issued; that police vetting, by definition, did not include a record of undetected misdemeanours; that in practice, unvetted volunteers can fill in for vetted coaches on an ad hoc basis; and that vetting should only be one part of a broader package of child protection measures.
22. Two submitters said police vetting should be compulsory.
23. Three submitters advocated for a national volunteer accreditation scheme, in which police vetting would be necessary in gaining accreditation to volunteer in sport. This would reduce the cost of having the same people police vetted multiple times (for multiple sports) and would also help vulnerable adults (as well as children). Two submitters argued a national sex offender register would support the volunteer accreditation scheme.
24. One submitter said the process should be easy for clubs to use but they had no direct experience of it.

CP3a: Do the sport organisations you or your children are involved with use criminal record checks as part of their recruitment processes for employees working with children?

CP3b: If not, why not?

25. Survey submissions on CP3a and CP3b will be summarised in tandem.
26. CP3a was answered by 151 survey submitters.

**TABLE 44:
SURVEY RESPONSES
TO CP3a**

Option	All do	Some do	None do	I don't know	Total Responses
Number	29	28	21	73	151
Percentage	19.2	18.5	13.9	48.3	100

Comments from survey submitters

27. Thirty-seven survey submitters commented on why their sport organisations do not use criminal record checks. The main themes that emerged were:
- Four submitters told us that organisations use Police vetting and this is considered the “baseline”. A further four submitters said they felt people may be unsure of the difference between police vetting and criminal record checking. A further three submitters commented that sport organisations may be unaware of the importance of conducting criminal checks, and/or that this was a requirement.
 - Four submitters suggested that time and a general lack of resources to carry out criminal record checking may be a barrier, with one submitter stating this to be particularly so for not-for-profit organisations. Along these lines, another submitter commented that criminal record checking needs to be quicker, easier, and free of charge.
 - Six submitters reported that it had not been necessary to do criminal record checks.
 - Five submitters commented in support of criminal record checking

Submissions from other sources

28. Six submissions were received from other sources on questions CP3a – d. These submissions are summarised below.
29. Five submissions from the NSO community showed use of criminal record checks was inconsistent amongst NSOs. Well-resourced NSOs were more likely to use criminal record checks and employees were more likely to be checked than volunteers. Three submissions expressed uncertainty over what action to take if a check revealed a staff member or volunteer had a criminal record. Yachting NZ noted it checked the criminal records of international recruits.
30. Two submitters said the sport organisations they were involved with did not use criminal record checks, although one might in the future.

CP3c: Do the sport organisations you or your children are involved with use criminal record checks as part of their recruitment processes for volunteers working with children?

31. CP3c was answered by 149 survey submitters.

**TABLE 45:
SURVEY RESPONSES
TO CP3c**

Option	All do	Some do	None do	I don't know	Total Responses
Number	11	29	52	57	149
Percentage	7.4	19.5	34.9	38.3	100

32. Submissions from other sources on CP3c and CP3d are summarised above.

CP3d: Please explain your answer.

33. Fifty-one survey submitters commented on why their sport organisations do not use criminal record checks for volunteers. The main themes that emerged were:
- Seven submitters commented that doing criminal records checks is too much work. Four commented that this activity is not a priority for clubs, where emphasis is on growing the game and effort goes into recruiting coaches. Four submitters mentioned that sport organisations fear alienating potential volunteers by subjecting them to a process that gives the appearance that the person is untrustworthy.
 - Six submitters commented that some sport organisations are unaware of the risks of having volunteers working for them without having been screened, with one submitter commenting that many organisations have poor recruitment practices
 - Submissions from parents and volunteers were supportive of criminal record checking, but showed these groups can feel uninformed about the process
 - Six submitters stated that they were unsure about why criminal record checks were not being carried out.

CP4: Do you have any comments on the process for obtaining criminal record checks?

Survey submissions

34. Thirty-four survey submitters made additional comments about obtaining criminal record checks. The main themes were:
 - a. Nine submitters' comments strongly supported criminal record checking, with four of these submitters considering it should be compulsory and a fifth considering that schools should be heavily penalised for non-compliance
 - b. Four submitters sought more guidance around the process for obtaining criminal record checks, with one calling on Sport NZ to address this gap
 - c. Three submitters commented on the cost being too high
 - d. Two submitters sought a transferable system, where a criminal record check completed for one organisation could be used for another. The criminal record check being completed through an accreditation scheme was considered a way to reduce costs and inconvenience.

Submissions from other sources

35. Seven submissions were received from other sources on this question.
36. Two submissions said the process was fine.
37. Two supported the establishment of a national volunteer accreditation scheme. This would reduce the cost of having the same people police vetted multiple times (for multiple sports) and would also help vulnerable adults (as well as children). Two submitters argued a national sex offender register would support the volunteer accreditation scheme.
38. One submitter noted Police vetting was expensive and cost their organisation around \$50,000 per annum. A collaborative system, like the national volunteer accreditation scheme proposed by other submitters, would reduce costs.
39. One NSO submitter noted that a person needed to produce identification to get a criminal record check and where identification was missing it was a nuisance.
40. One submitter said the process should be easy for clubs to use but they had no direct experience of it.

Child protection

41. Questions CP5 – CP7 and their sub-questions explore risk assessment, training, and policies concerning child protection.

CP5a: How often do the sport organisations you or your children are involved with conduct a risk assessment in relation to child protection?

CP5b: Which risk assessment tool was used, if any?

CP5c: How did you find it?

42. These three sub-questions will be summarised in tandem.

Survey submissions

43. CP5a attracted 127 survey submissions as set out in the table below.

**TABLE 46:
CP5a – HOW OFTEN DO THE
SPORT ORGANISATIONS YOU
OR YOUR CHILDREN ARE
INVOLVED WITH CONDUCT
A RISK ASSESSMENT
IN RELATION TO CHILD
PROTECTION?**

Frequency	Number of responses
More than once every 12 months	8
Once every 12 months	12
Every 13 to 36 months	6
Less regularly than every 36 months	6
When external events prompt us to	20
We've never done a risk assessment	75
Total Responses	127

44. Forty-two survey submitters commented on the risk assessment tool used.

- a. Four submitters described using ad-hoc approaches as and when necessary, rather than having a formalised approach or using a tool.
- b. Three submitters reported using bespoke tools developed in-house.
- c. Each of the following tools was reported by one submitter each:
 - i. Sport NZ template
 - ii. Generic NSO tools
 - iii. Online survey
 - iv. Ministry of Health tool
 - v. Ministry of Social Development guide.
- d. Various “workarounds” were reported, including a Code of Conduct.
- e. Twenty survey submitters stated that they did not know.

45. No comments were received through the survey submissions that specifically addressed the effectiveness or ease of use of risk assessment initiatives.
46. One submitter did say that risk assessments are the main aspect of the Vulnerable Children Act that is neglected and that Safe Sport for Children needs to be updated to include guidance around identifying vulnerability, child abuse and neglect that maybe occurring away from sport.

Submissions from other sources

47. Seven submissions were received from other sources on questions CP5a – c.
48. The submission from 24 NSOs and Paralympics NZ noted the more resourced sports do a risk assessment. One NSO submitter said some sports do risk assessments and that education around the risk assessment tool is minimal.
49. One organisation noted its child protection policy was reviewed annually and that a risk assessment was conducted as part of one of its flagship children’s programmes.
50. Two organisations submitted that they have child protection policies which have flow on effects for other organisations, either under their ambit or in whom they invest.
51. Three submitters said a risk assessment had not been done at their sport organisations, at least since they became involved.

CP6a: Do the sport organisations you or your children are involved with have child protection policies?

52. CP6a was answered by 148 survey submitters.

**TABLE 47:
SURVEY RESPONSES
TO CP6a**

Option	All do	Some do	None do	I don't know	Total Responses
Number	27	54	20	47	148
Percentage	18.2	36.5	13.5	31.8	100

53. Submissions from other sources on CP6a – c are summarised under CP6d.

CP6b: If so, do they draw from the template and guidance in Safe Sport for Children?

54. CP6b was answered by 127 survey submitters.

**TABLE 48:
SURVEY RESPONSES
TO CP6b**

Option	All do	Some do	None do	I don't know	Total Responses
Number	15	21	16	75	127
Percentage	11.8	16.5	12.6	59.1	100

CP6c: Do they incorporate any additional areas that could be useful to note in the guidance?

55. CP6c was answered by 125 survey submitters.

**TABLE 49:
SURVEY RESPONSES
TO CP6b**

Option	Yes	No	I don't know	Total Responses
Number	10	24	91	125
Percentage	8.0	19.2	72.8	100

CP6d: Please explain your answers.

Survey submissions

56. Forty-one submitters commented on their answer to the question about additional areas that could be useful in the guidance. Most comments were fairly general. For example, some submitters mentioned guidance documents that worked well, with the implication being that if Safe Sport for Children was to be reviewed the reviewers could consider these other documents. A number of submitters criticised practices they had seen.
57. Specific areas suggested for inclusion in Safe Sport for Children were:
- Guidance on overnight stays and billeting
 - More guidance on reporting suspected child abuse occurring away from sport, e.g. in the home
 - More specific detail about what to do when a situation arises.
58. One submitter suggested that organisations should keep a register of people who have breached codes of conduct or child protection policies so that these people are no longer able to be involved with teams.

Submissions from other sources

59. Eleven submissions were received from other sources on this question. Further, two RSTs submitted noting they had child protection policies (CPPs) in response to other questions.
60. Three submitters from the secondary school sport sector noted that schools were required by law to have CPPs which were approved and enforced by boards of trustees and the Education Review Office. CPPs differ between schools. Schools' CPPs are reviewed annually as part of health and safety policy reviews.
61. Three NSO submitters were clear they had CPPs and they were based on Safe Sport for Children and other material. One NSO submitted that 90 percent of their RSOs had adopted a CPP based on Safe Sport for Children and that further outreach was planned. The submission from 24 NSOs and Paralympics NZ noted all NSOs have a CPP and, while CPPs can differ, many are based on Safe Sport for Children.
62. One club member noted their club ostensibly used the CPP of its NSO but it was not adhered to.
63. Two child protection specialists submitted. One said all sport organisations need a CPP and CPPs should allow for confidential reporting. The other said they had worked at an RST and found only seven organisations in the region had a CPP. The submitter used Safe Sport for Children to write CPPs for organisations that were lacking. They noted policy writing is a "concern" for sport organisations.

CP7a: What training do the sport organisations you are involved with provide staff and volunteers in regard to child protection?

CP7b: To what extent are staff and volunteers trained to work with the full range of children who play sport?

64. Submissions on these two questions will be summarised in tandem.

Survey submissions

65. Eighty-nine survey submitters commented on child protection training provided by sport organisations.
66. Forty-four submitters reported that they were unaware of any child protection training being provided through their sport organisation. A further nine submitters said that they were unsure or did not know if training was provided; and seven commented that they were aware of a small amount of training being provided.
67. Six submitters from differing codes (including swim teaching training, surf life saving, and junior rugby coaching) reported that child protection was covered in their coach training. A further three submitters reported that they had participated in online coach training concerning vulnerable children, provided through Cricket New Zealand.
68. Twelve various training methods were each mentioned by one submitter.
69. The tables below show the survey data in regard to staff and volunteer training.

**TABLE 50:
TO WHAT EXTENT ARE STAFF
TRAINED TO WORK WITH THE
FULL RANGE OF CHILDREN
WHO PLAY SPORT?**

Option	Fully trained	Have had most training	Have had some training	Have had no training	Total Responses
Number	11	21	61	27	120
Percentage	9.2	17.5	50.8	22.5	100

**TABLE 51:
TO WHAT EXTENT ARE
VOLUNTEERS TRAINED TO
WORK WITH THE FULL RANGE
OF CHILDREN WHO PLAY
SPORT?**

Option	Fully trained	Have had most training	Have had some training	Have had no training	Total Responses
Number	4	5	71	52	132
Percentage	3.0	3.8	53.8	39.4	100

Submissions through other means

70. Ten submissions were received from other sources on this question.
71. The submission from 24 NSOs and Paralympics NZ noted most NSOs would have some sort of training in place in regard to child protection. Of the four NSOs that submitted separately, three have training programmes in place. Netball NZ has training for all staff and volunteers and is developing an online course for those in zones and centres. NZ Rugby has, with experts, developed bespoke training for its provincial unions and clubs. It was delivered in eight regions in 2018. Some provincial unions make it mandatory. It will also deliver training by request where sufficient numbers will attend. All rugby coaches will get child protection training in 2019 as part of a mandatory coaching course. Yachting NZ delivers training for those working with children, often on a one-on-one basis given the nature of the sport. One NSO does not provide training but may in the future.
72. One club member submitted that their club did not provide training to staff and volunteers beyond the coach delivering some guidance about safety when picking up and dropping off children at the pool.
73. Two RSTs submitted through other sources. One said partners they fund must adhere to a CPP. The other said its child protection officer inducts staff in regard to child protection.
74. Two child protection experts submitted through other sources. One noted organisations request child protection training as a priority, as they are concerned about protecting children and the adults that work with them. This submitter also noted training was expensive. The other submitter said they supported the recommendation in Safe Sport for Children that education around child protection be provided to the staff and volunteers of sporting groups and organisations. Adults need to be able to handle the things children might disclose to them. They also need to be aware that children with disabilities are more likely to be abused when participating in sport so this group needs particular safeguarding.

Child Protection Officer role

75. Questions CP8 and CP9 and their sub-questions relate to the obligations and training of Child Protection Officers (CPOs), and confidence that the CPOs know what to do when an issue is raised.

CP8a: Do the sport organisations you or your children are involved with have a Child Protection Officer or someone with responsibility for child protection issues? (If you are a Child Protection Officer please answer in regard to yourself)

76. CP8a was answered by 141 survey submitters

**TABLE 52:
SURVEY RESPONSES
TO CP8a**

Option	All do	Some do	None do	I don't know	Total Responses
Number	9	28	50	54	141
Percentage	6.4	19.9	35.5	38.3	100

77. Submissions from other sources are summarised below under CP8c.

CP8b: Is their role well-publicised throughout your organisation?

78. CP8b was answered by 115 survey submitters.

**TABLE 52:
SURVEY RESPONSES
TO CP8b**

Option	In all cases	In some cases	In no cases	I don't know	Total Responses
Number	10	16	44	45	115
Percentage	8.7	13.9	38.3	39.1	100

CP8c: What training have they had?

Survey submissions

79. Twelve survey submitters commented on the training that has been received by Child Protection Officers (CPOs) in their organisation. A range of responses were received including:
- a. Uncertainty if or how CPO training was provided
 - b. Training is provided by child safety specialists, regional sports team training, staff meetings
 - c. CPOs understood their obligations (for reasons unspecified)
 - d. The CPO has knowledge gained through external verification, e.g. as a teacher or through a national security clearance
 - e. The CPO is not supported by the organisation
 - f. The CPO role is hard to fill, as volunteers prefer to coach.

Submissions from other sources on CP8a – c

80. Seven submissions were received from other sources on this question.
81. The submission from 24 NSOs and Paralympics NZ said most NSOs have a CPO although the role is not always well publicised throughout an organisation. Four NSOs submitted individually on this question:
- a. One said there was a small cluster of personnel working in this area aiming to roll out a CPO-style model into clubs
 - b. One said it had a CPO who was publicised in its regulations
 - c. One said it had a CPO
 - d. One said 80 percent of its RSOs had a child protection advisor and most of those people had been trained. Some clubs had CPOs and the NSO was working to increase uptake.
82. One child protection expert submitted saying they supported the recommendation in Safe Sport for Children for organisations to have a CPO.
83. One club member submitted that their NSO was supposed to have a CPO but the position was vacant.

CP9a: Are you confident your Child Protection Officer and/or sport organisations' leaders would know what to do if an issue was raised?

CP9b: Please explain your answer. (If you are a Child Protection Officer or a sport organisation leader please answer in regard to yourself)

Survey submissions

84. CP9a was answered by 83 survey submitters.

**TABLE 54:
SURVEY RESPONSES
TO CP9a**

Option	Extremely confident	Very confident	Somewhat confident	Not so confident	Not at all confident	Total Responses
Number	7	15	25	13	23	83
Percentage	8.4	18.1	30.1	15.7	27.7	100

Comments from survey submitters

85. Five survey submitters who answered 'extremely confident' to question CP9a reinforced their answer by saying their organisations were thorough and quick in handling child protection issues and that they had policies in place.
86. Six survey submitters who answered 'very confident' to question CP9a reinforced their answer by saying their CPO had received appropriate training and/or that their organisations had good policies.
87. Twelve survey submitters who were 'somewhat confident' in CPOs and sports leaders in relation to child protection issues commented on their responses. Generally, these submitters gave the sense that their organisations responded to child protection issues in an ad hoc fashion, relying on "common sense" or the abilities of individuals rather than policies and processes.
88. Six survey submitters who answered 'not so confident' to question CP9a reinforced their answer by noting child protection had never been raised with them in a sporting context, or describing their experiences with child protection issues.
89. Eleven survey submitters who answered 'not at all confident' wrote that issues are not raised and organisations are not prepared for issues if and when they arise.

Submissions from other sources

90. Eight submissions were received from other sources on this question.
91. Seven submitters said yes, the CPOs they work with know what to do. One NSO added that they had surveyed CPOs after training them and found they had a high level of confidence that they would know what to do. That NSO is working to continue the expansion of CPOs to clubs that do not have one.
92. One submitter said the CPO role was vacant in the organisation they are involved with and no one shows any interest in child welfare.

Handling child protection issues

93. Questions CPI0 – CPI3 and their sub-questions are concerned with the mechanisms for appropriate and effective handling of child protection issues.

CPI0a: Do the sport organisations you or your children are involved with have mechanisms for handling child protection matters?

CPI0b: Please explain your answer.

94. Submissions on CPI0a and CPI0b will be summarised in tandem.

Survey submissions

95. CPI0a was answered by 126 survey submitters.

**TABLE 55:
SURVEY RESPONSES
TO CPI0a**

Option	All do	Some do	None do	I don't know	Total Responses
Number	16	40	15	55	126
Percentage	12.7	31.7	11.9	43.7	100

Comments from survey submitters

96. Three survey submitters who had selected 'all do' made further comment, two noting that schools had policies and one reporting their club insisted that children were always under parent supervision.
97. Thirteen survey submitters who had selected 'some do' also commented. Most were critical of the organisations they had been involved with. Five felt preparedness for handling a child protection issue is often relative to organisational size, type of institution (schools generally have systems), and by code.
98. Six survey submitters who had selected 'none do' also commented noting a lack of policies at particular organisations or unsuccessful attempts to raise child protection issues in the past.
99. Eleven survey submitters who had selected 'I don't know' commented saying child protection issues had not arisen, they were not aware of policies in the organisations they were involved with, or expressing frustration at previous attempts to raise child protection issues.

Submissions from other sources

- I00. Seven submissions were received from other sources on this question.
- I01. Five submissions from the NSO community said NSOs had mechanisms for reporting and responding to child protection issues. One NSO uses a “traffic light” system to respond to issues proportionately.
- I02. One submission from a child protection expert noted that policy implementation and the handling of complaints is a “concern” for sport organisations.
- I03. One submission from a club member argued their sport dealt with their child protection issue by “sweep(ing) it under the carpet”.

CPIIa: Do you trust the sport organisations you or your children are involved with to handle child protection matters appropriately and effectively?

CPIIb: Please explain your answer

- I04. Submissions on CPIIa and CPIIb will be summarised in tandem.

Survey submissions

- I05. CPIIa was answered by 135 survey submitters.

**TABLE 56:
SURVEY RESPONSES
TO CPIIa**

Option	Yes, all	Yes, some	No	I don't know	Total Responses
Number	28	43	43	21	135
Percentage	20.7	31.9	31.9	15.6	100

Comments from survey submitters

- I06. Fifty-one survey submitters commented on their response to question CPIIa.
- I07. Two submitters who answered ‘yes, all’ also commented. One submitter was sure that any matters would be handled in accordance with agreed policy; and the other was “confident they would do their utmost for all their children.”
- I08. Seventeen submitters who answered ‘yes, some’ also commented. Seven submitters considered that there was variability, but they pointed to a range of reasons for variability including that some organisations and codes are more trustworthy than others, that some leaders were more trustworthy, that education about child protection varied between organisations.
- I09. Twenty-three submitters who answered ‘no’ to CPIIa also provided comments, citing as reason for their selection: low awareness of child protection issues in organisations, a lack of a culture that “puts kids first” or gave due consideration to these issues, that coaches and others had bullied children, and a lack of policies and guidance on child protection.
- I10. Two submitters commented that they had not needed to handle a child protection issue so they did not know if their organisation was trustworthy.

Submissions from other sources

- III. The seven submitters through other sources on the previous question submitted on this question also.
- II2. Four of the five submissions from the NSO community said yes, NSOs can handle child protection matters appropriately and effectively. The other NSO submitter said they had made a good start but they probably had a ten-year work programme ahead of them to bring all 500 clubs under their NSO up to best practice.
- II3. One submission from a child protection expert noted that policy implementation and the handling of complaints is a “concern” for sport organisations.
- II4. One submission from a club member argued their personal experience showed their sport could not handle child protection matters appropriately and effectively.

CPI2a: How many child protection issues have occurred in the last five years in the sport organisation you or your children are most involved with?

CPI2b: Please provide details as you are willing.

- II5. Submissions on CPI2a and CPI2b will be summarised in tandem.

Survey submissions

- II6. CPI2a was answered by 136 survey submitters.

TABLE 57:
SURVEY RESPONSES
TO CPI2a

Option	None	One to five issues	Six to ten issues	11 or more issues	I don't know	Total Responses
Number	34	33	4	6	59	136
Percentage	25.0	24.3	2.9	4.4	43.4	100

- II7. Forty-one survey submitters commented on their response.
- II8. The child protection issue most mentioned was bullying, with 12 survey submitters using this term to describe issues that were verbal, physical and psychological in nature.
- II9. Eight instances of sexually inappropriate behaviour were reported by six submitters, including instances of abuse, harassment, innuendo, grooming, inappropriate text messaging and a coach being convicted of being in possession of child pornography.
- I20. Two submitters made a general acknowledgement that child protection issues arise periodically but gave no further details. In contrast, four submitters commented that they were unaware of any issues arising: “As far as I know (30 years now) there have never been any issues.” One submitter considered there to be low recognition of child protection issues in many sport organisations. Some submitters accused organisations of hiding child protection issues.
- I21. A broad range of other issues were submitted, including verbal abuse and inappropriate language, an undetected eating disorder, issues relating to exclusion, favouritism, and an “aggressive” environment.

Submissions from other sources

- I22. Five submissions were received from other sources on this question.
- I23. Three NSOs submitted that they had not had any child protection issues arise, at least within the time the person writing the submission had been with the NSO.
- I24. One NSO was aware of several incidents in the last five years and will start tracking cases as part of the evaluation of the effectiveness of the child protection training it has implemented.
- I25. One club member submitted saying they were only aware of the incident they were personally caught up in but, as no changes had been made within the sport as a result of the incident, they could not see why a similar incident could not happen again.

CPI2c: What measures has the sport organisation taken to ensure the same issue or issues do not arise again?

- I26. Submissions from other sources on this question are summarised as part of the summary of these submissions under CPI2a and CPI2b.
- I27. Thirty-seven survey submitters commented on measures taken.
- Seventeen survey submitters either reported that no measures were taken, or that they did not know what measures were taken.
 - Seven survey submitters noted policies had been developed, processes improved or further training rolled out.
 - Other survey submitters that commented noted that a person accused of misconduct was removed from their role, one matter was escalated to the Police, various ad hoc responses were issued, and in some instances no changes were made.

CPI3: If a child protection issue needs to be escalated beyond a sport organisation you or your children are involved with do you know who to contact?

Survey submissions

- I28. CPI3 was answered by 131 survey submitters.

**TABLE 58:
SURVEY RESPONSES
TO CPI2a**

Option	Yes	No	I don't know	Total Responses
Number	56	48	27	131
Percentage	42.7	36.6	20.6	100

Submissions from other sources

- I29. Seven submissions were received from other sources on this question.
- I30. Five submissions from the NSO community agreed NSOs knew who to escalate issues to and had processes for doing so.
- I31. One child protection expert noted that policy implementation and complaint handling was a “concern” for sport organisations.
- I32. One club member submitted that they had escalated a child protection issue through their sport’s infrastructure (club, RSO, NSO) and that it had not been satisfactorily resolved. The submitter suggested the only way to escalate beyond that would be to the courts or the media, noting that the Sports Tribunal was not available for the issue at hand.

Safe Sport for Children

- I33. Questions CPI4 and CPI5 canvassed awareness of use of the guidance document Safe Sport for Children.

CPI4a: Were you aware of the Safe Sport for Children guidance before beginning this consultation process?

- I34. CPI4a was answered by 135 survey submitters.

TABLE 59:
SURVEY RESPONSES
TO CPI4a

Option	Yes	No	I don't know	Total Responses
Number	46	82	7	135
Percentage	34.1	60.7	5.2	100

- I35. Nine submissions were received from other sources on this question. Eight were aware of the Safe Sport for Children Guidance.

CPI4b: If so, how were you made aware?

Survey submissions

- I36. Thirty-two survey submitters who reported being aware of the guidance document *Safe Sport for Children* commented on how they found out about the resource.
- Ten submitters stated that they learned of the resource through Sport NZ
 - Four submitters learned of the resource through their work, such as through teacher training courses.
 - Three submitters reported finding out about the resource through their personal online research.
 - Three submitters reported that they learned of the resource through cricket.
 - Three submitters first learned of the resource via the Sport Integrity Review.
 - Two submitters learned of the resource through their RST.
 - Other sources were listed by one submitter each and included a number of sport organisations.

Submissions from other sources

- I37. Six submitters using other means were aware of *Safe Sport for Children* through communications from Sport NZ and/or RSTs. One of the eight found *Safe Sport for Children* through a Google search. One did not stipulate.
- I38. Only one submitter was not aware of the *Safe Sport for Children* guidance.

CPI5a: What parts of the *Safe Sport for Children* guidance have you found useful?

Survey submissions

- I39. The table below shows the parts of the guidance document submitters considered to be useful. Please note that submitters were able to select multiple parts.

TABLE 60:
SURVEY RESPONSES
TO CPI5a

<i>Part of Safe Sport for Children found to be useful</i>	<i>Number of responses</i>
Guidance on recruitment, police vetting and checking a criminal record	21
Guidance on appointing a Child Protection Officer	13
The Self Audit Tool	18
Guidance on developing a <i>Safe Sport for Children</i> policy	23
The sample process for responding to suspected or disclosed harm in the form of physical or sexual abuse	14
The policy template	21
Other	14

Submissions from other sources

140. Four submitters commented on what they found useful in Safe Sport for Children. This included:
- a. The steps to take (three submitters)
 - b. The obligations faced by sport organisations (one submitter)
 - c. The CPP template (one submitter).

CPI5b: Is there anything you would like to see included in Safe Sport for Children that is not included already?

Survey submissions

141. Twenty-two survey submitters suggested additional content or revised content for Safe Sport for Children.
- a. Four submitters requested more information about dealing with bullying, including criteria to define bullying and clear pathways for seeking help
 - b. Two submitters requested more information about emotional harm, and another submitter suggested including more information on mental health
 - c. Two submitters called for more information about working with or training volunteers, so that they can appropriately lead and deliver sport
 - d. Other suggestions were mentioned by only one submitter each and included guidance on: co-use of facilities by adults and children, anti-nepotism, keeping coaches and volunteers safe, managing situations where the referee has lost control of the game, and clear pathways for adults to use to help children experiencing abuse in any part of their life. One submitter suggested an “accountability statement” so that it is clear who is accountable for the safety of children in sport within each organisation.
142. Other survey submitters called for greater promotion of the resource and greater use of the resource by NSOs.

Submissions from other sources

143. Submitters from other sources commented that:
- a. It would be useful to have a public list of CPPs “endorsed by Safe Sport for Children”
 - b. The guidance is hard to find
 - c. Sport NZ has not shown leadership in this area lately
 - d. The online resource has taken time to become available
 - e. There is a lack of localised training opportunities.

CPI5c: Do you have any other comments on Safe Sport for Children?

Survey submitters

144. Twenty-three survey submitters made further comments on Safe Sport for Children.
- a. Five submitters considered that the resource should be made available more widely, including all committee members and club members.
 - b. Three submitters commented on the need for trainers/coaches to be qualified in some way.
 - c. Two submitters commented that child protection processes are too “onerous” for small clubs.
 - d. Two submitters reported that children can only succeed in college rugby if they have a parent who is prepared to ‘navigate’ the system on their behalf.
 - e. Two submitters made further comments on bullying, one reporting the institutional nature of bullying and one requesting greater emphasis be placed on mental and emotional abuse.
 - f. Two submitters commented on over-training, with one requesting Sport NZ to challenge organisations that are overtraining children.
 - g. A range of other comments were made by one submitter each.

Submissions from other sources

145. Two submitters reiterated that they were in favour of a national volunteer accreditation scheme.
146. Crimestoppers noted it could provide an anonymous reporting line which could encourage more reporting of child protection incidents.
147. Two submissions said the government needs to “take the lead” or “be all over this”.
148. One submitter simply said an independent person or body should be established to investigate child protection incidents in sport.

Legislation that protects children

149. Question CPI6 and CPI7 and their sub-questions explored awareness and compliance of sport organisations with obligations under the Vulnerable Children Act 2014, the Crimes Act 1961, and the Oranga Tamariki Act 1989. These questions were visible only to submitters who indicated that they were responding on behalf of their organisation.

CPI6a: To what extent is your sport organisation aware of its obligations regarding children under the Vulnerable Children Act, Crimes Act and Oranga Tamariki Act?

I50. CPI6a was answered by 32 survey submitters.

**TABLE 6:
SURVEY RESPONSES
TO CPI6a**

Option	Extremely aware	Very aware	Somewhat aware	Not so aware	Not at all aware	I don't know	Total Responses
Number	6	8	9	2	7	0	32
Percentage	18.8	25.0	28.1	6.3	21.9	-	100

Submissions from other sources

- I51. Seven submissions were received from other sources on this question.
- I52. Two RSTs submitted from other sources, both saying they were highly aware of their obligations. One said its staff drove a desire for enhanced protections, particularly if they had worked overseas.
- I53. Five submissions came from the NSO community. All said NSO staff were aware of their legal obligations. NSOs submitted their awareness came from:
- Sport NZ communications and support
 - Working with schools who wanted to see an NSO was aware of its obligations before partnering with them
 - Staff who work with children and young people
 - Recent legislative changes
 - The Employers and Manufacturers Association.
- I54. One NSO said its board may not be aware of its obligations. Another said some of its staff could potentially use a refresh.

CPI6b: Please explain your answer.

- I55. One submitter who answered 'extremely aware' commented: "All our staff are aware of their obligations and all receive training in child protection."
- I56. Two submitters who answered 'very aware' commented, with one stating that their organisation "takes these matters seriously," and the other stating that their work with schools "demands sound knowledge and understanding."

157. Four submitters who answered 'somewhat aware' made four different comments:

- a. One submitter thought "a couple of people" in their organisation would be aware but that most members would know nothing at all about child protection
- b. One submitter reported that their organisation has the tools and resources but lacks a policy
- c. A third submitter commented that it is hard to recruit volunteers who are prepared "to contribute to this challenging work"
- d. The fourth submitter considered that most of the young people involved with their sport "do not fit with these Act definitions" so they had not spent much time on this issue.

158. Comments were not provided by either of the submitters who selected 'not so aware'. Two submitters who answered 'not at all aware' commented, with one noting that while no one within their organisation has overall responsibility for their obligations under the Act, they do have several staff who are very passionate about it. The other submitter reported that they had not read the Act, but did not specify which Act they were referring to.

CPI6c: How did your organisation become aware of its obligations?

159. Thirteen survey submitters commented on this question:

- a. Three submitters became aware through legislation
- b. Three submitters report that they were made aware through either their NSO or RSO
- c. The following pathways were each identified by one submitter:
 - i. Health and safety training
 - ii. Sport NZ resources
 - iii. Professional knowledge
 - iv. Ad-hoc, i.e. dealing with issues as they arise
- d. One submitter commented that their organisation is a hub for giving and seeking information; and another stated that one person with their organisation has responsibility for understanding the obligations, but neither submitter elaborated on how they became aware of the obligations
- e. One submitter considered their organisation to be only partly aware of its obligations.

CPI7a: To what extent does your organisation fulfil its legal obligations regarding children under the Vulnerable Children Act, Crimes Act and Oranga Tamariki Act?

CPI7b: Please explain your answer.

I60. Submissions to CPI7a and CPI7b will be summarised together.

Survey submitters

I61. CPI7a was answered by 27 survey submitters.

**TABLE 62:
SURVEY RESPONSES
TO CPI7a**

Option	Always	Usually	Sometimes	Rarely	Never	Total Responses
Number	12	7	4	2	2	27
Percentage	44.4	25.9	14.8	7.4	7.4	100

Comments from survey submitters

- I62. Two submitters who had selected 'always' provided comments. One simply reiterated that they believe they follow all legal and moral requirements. The other was from an organisation that appeared to work with sport organisations to help them deliver children's sport in accordance with their legal obligations.
- I63. Two submitters who had selected 'usually', provided comments. One stated that they were reluctant to say 'always' because there were examples where more could have been done. The other stated their organisational awareness of children's vulnerability and that they "work hard to look after them."
- I64. One submitter who answered 'sometimes' commented, noting that their organisation has a generally reasonable practice although it does not intentionally fulfil its obligations under the Acts.
- I65. There were no comments from the two submitters who answered 'rarely'.
- I66. One submitter who answered 'never' commented, noting that this had never been discussed, "it may happen naturally but is not included in day-to-day running of the club."

Submissions from other sources

- I67. Seven submissions were received from other sources on this question.
- I68. Two RSTs submitted that they fulfilled their legal obligations.
- I69. Four submitters from the NSO community submitted, either explicitly or implicitly, that NSOs met their legal obligations. Two submitters remarked that they reviewed their compliance annually. One noted it had worked with the Police and had its general counsel review its obligations under the Vulnerable Children Act. One noted that while it believed it fulfilled its legal obligations, there was an opportunity to refresh and/or train staff.
- I70. One NSO said it aimed to meet its obligations in mid-2019 once its Police vetting guidelines and board-agreed national process was implemented.

The importance of winning

I71. CPI8 and its sub-questions explored the emphasis on winning.

CPI8a: To what extent is there an undue emphasis on winning in children's sport in the sport organisations you or your children are involved with?

I72. CPI8a was answered by 132 survey submitters.

**TABLE 63:
SURVEY RESPONSES
TO CPI8a**

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	34	43	30	16	9	132
Percentage	25.8	32.6	22.7	12.1	6.8	100

Submissions from other sources

I73. Eleven email submitters addressed this question. Most submitters believe there is an undue emphasis on winning in the children's sports they are involved in.

I74. The submission from 24 NSOs and Paralympics NZ acknowledged there is an undue emphasis on winning across many children's sports.

I75. NZ Football said there is an undue emphasis on winning in children's football, as there is in almost all sport. NZ Football said it is a particular problem in secondary school football.

I76. Netball NZ said while their future FERNS programme does not promote an emphasis on winning it is still evident among coaches and parents. Netball NZ said continual education is having a positive effect but it will take a generation to change so they must continue to share the messages.

I77. NZ Rugby said there is anecdotal evidence of undue emphasis on winning in some junior rugby grades, however there have been no empirical studies done to verify these assumptions.

I78. Yachting NZ said there was an undue emphasis on winning in junior yachting.

I79. One submitter said NZ Football's Whole of Football programme had made a huge impact, particularly in girls' football, where participation had markedly increased and the win at all costs attitude had been eradicated.

I80. Another submitter said non-streaming works in junior cricket as it gives all children an equal opportunity regardless of talent and they enjoy it more.

CPI8b: If there is an undue emphasis, who is driving that attitude, e.g. parents and caregivers, coaches, administrators, other young athletes, etc?

181. For question CPI8b, survey submitters were invited to select multiple responses. The table below shows that these submitters considered parents/caregivers and coaches to be the major drivers of an undue emphasis on winning in children's sport.

**TABLE 64:
SURVEY RESPONSES
TO CPI8b**

Parents/ caregivers	Coaches	Administrators	Spectators	Athletes	Other	Total Responses
100	83	38	43	28	21	132

182. Twenty-one submitters considered that others were driving these attitudes and made the following comments:

- a. Twelve submitters referred to schools in some way, with six referring specifically to school principals
- b. Three submitters nominated other groups: District Boards, high performance coaches, and adults in general
- c. One submitter attributed these attitudes to "human nature." Another attributed these attitudes to the New Zealand sporting culture, and another referred to the history of their sport.
- d. One submitter considered these attitudes to be driven by individuals rather than groups.
- e. One submitter commented that their sport was influenced by so many variables outside the control of the athlete that this "makes the playing field more level."
- f. One submitter commented that they had "not seen anyone driving an undue influence."

CPI8c: Please explain your answer.

183. Sixty-four survey submitters included a comment. These data are thematically analysed below.

Adults are the problem

184. To a considerable extent, the comments position adults as the drivers of undue emphasis on winning in children's sport, with submitters suggesting they are far more concerned with winning than children are.

185. The adults identified by submitters constitute three groups: parents, coaches, and school staff – particularly school principals and heads of sport/sports directors. Some submitters commented that the attitudes of the adults “rub off on young athletes,” who “copy and carry the expectations and messages from those that matter to them: parents and coaches”.

School staff

186. The comments of twelve submitters referred to schools and school staff as driving an undue emphasis on winning. Several submitters commented that schools gain in prestige through high-performing sports teams, one noting that schools use this in their marketing. One submitter refers to “an engrained culture [of winning],” and two submitters commented that some schools invest in specialist staff.

187. One of these submitters added that paid coaches have key performance indicators, such as achieving a top-four ranking. Another submitter noted the “change to professionalism” moving sports from participation to winning at all costs to improve the school's reputation. One way for schools to achieve this, is “they ‘buy’ [such as through scholarships] talent in from other schools, which further demonstrates this attitude.”

188. Other submitters referred directly to school principals. One submitter pointed to the “egos of Principals ...[being] out of hand in some schools, particularly North Island boys' schools.” Another submitter commented that “the Principal talks about wellbeing however actions are hurting the wellbeing of students.”

189. One submitter commented that there are “extremes” and that these are the minority: “the vast majority of school sport does not take place under this regime.”

190. A submitter who was previously in charge of some aspect of sport at a private school noted:

In private schools, parents are prepared to pay a great deal of money to ensure success and this puts huge pressure on everyone else.

191. Another submitter, who noted that they work in a secondary school reported observing:

There is a big drop off by Year 10 (4th Form) when those not regarded as top team material drop out of formal organised sport and find other pursuits.

192. Only one submitter commented beyond naming the group, remarking that the grading system resulted in children having a poorer quality experience and ultimately dropping out of the sport due to being graded into a team that separates them from their friends. The submitter comments that: “Secondary schools can be ruthless in their treatment of the individual in seeking to win.”

Parents

193. Fourteen submitters commented on parents as drivers behind this attitude, both from the sideline and from pressure and influence on sports administrators in the quest to advance their child toward higher honours, or “wanting what they consider the best for their child.” One submitter noted, from the perspective of a teacher-in-charge [of a sport or a team], “a large number of parents were interested in medals only and nothing else.”
194. One submitter commented that some parents are “over-invested”, and this comment was reflected in other submissions as well. Three submitters described adults as “living vicariously” through their children. Some submitters described parental pressure as contributing to burnout.
195. Submitters told us the attitude of the closely-associated adults (the ‘people that matter’ described above) “rubs on onto young athletes”. This would include parents. Parental attitudes can also influence other parents – one submitter suggested a clique of parents wanting their children to win can influence parents less interested in winning.

Coaches

196. Nine submitters mentioned the role of the coach as a driver of an undue emphasis on winning. Three submitters commented that some coaches are not practicing from a child-centred viewpoint, but focusing instead on the development of their personal reputation as a coach. One of these submitters also commented on observations that parent-coaches “put their children’s interests and development as a priority over others.” One submitter commented that coaches and parents “build stacked super teams” in order to increase the chances of winning.
197. Another submitter also commented that the need for accepting willing volunteer coaches can mean coaches are not trained in the factors they should emphasise.
198. A further submitter commented that when volunteer coaches hold dual roles, such as also holding a committee position, it becomes more difficult to hold the person accountable for their coaching decisions.

Other things children get out of sport

199. Several submitters used the comments section to describe other attributes of children’s sport, aside from winning. Submitters mentioned fun (3 submitters); respect (2); enjoyment (2); the journey (1) or ‘coming along for the ride’ (1); hard work (1); participation (1); and teamwork (4). Submitters reported that “research” suggests winning is not the major reason for children participating in sport.
200. One submitter noted that although children love to win, the challenge of sport is to find out what to do better or differently when they lose. They should not be made to feel bad about not winning. Another submitter commented that while children “always want to know the score,” they also “know how to take a loss.” A third submitter stated that “it’s important to realise the lessons are learned in the process of striving to win, not necessarily the action of winning itself.”

Early emphasis on winning

201. Four submitters critiqued the early emphasis on winning, giving examples such as awarding of end-of-year prizes to seven-year-olds (“taking things too far”); representative teams for children under 14 years of age; five-year-olds attending a world meet; and team selection and trials at primary school level.
202. One submitter commented that “lip service” is given to participation “but the emphasis of the club is on winning and creating an elite squad,” from a young age. One submitter commented that it is “totally wrong” to expect children to focus on one sport by the age of 14 or 15.

Pressure to win comes from multiple sources

203. One submitter commented that in their sport, parents, administrators and spectators were all responsible for this attitude. One submitter commented that there are “high achievement expectations amongst many involved.” One submitter observed that fair play was often regarded as a weakness, “while overly aggressive and loud verbal abuse is seen as tough, uncompromising – winners get results.”

Other comments

204. Two submitters reported that particular clubs have a “win at all costs” mentality which leads to the club favouring talented athletes.
205. Two submitters commented that the competition format in their sports encourages winning.
206. One submitter commented that it is taking things too far when children who are representing New Zealand in their sport are denied the opportunity to also play in age group teams on the basis that this is somehow unfair to other teams who will have little chance of winning.
207. One submitter noted that in their sport one region stood out as deviating from the NSO rules in this regard.
208. A submitter commented on their observation of teams and officials including “sideline abuse, blatant cheating when officiating and seeking to injure the opposition” as evidence of the urge to win at all costs.
209. Another submitter praised a particular athletics club for insisting that children train and compete in a wide range of events.
210. One submitter noted that the attitude varies with the level of the team.
211. One submitter stated that “it is good to have some drive to win as long as it is not to the child’s detriment.”

Submissions from other sources

212. Email submitters identified a range of drivers for this undue emphasis on winning in children’s sport, including children themselves, parental and student ambition, a desire by schools and clubs to use sporting performance as a marketing tool, coaches linking personal success with team success, society’s focus on winning as sport becomes increasingly professional, and the fact that success in sport is still defined by winning.

Coaching the coaches

213. Question CPI9 explored training and/or induction for coaches.

CPI9: What training or induction do coaches of children in your sport receive in the sport organisations you or your children are involved with?

Survey submitters

214. Survey submitters could provide multiple answers to this question. The most common answers provided were:

- a. Training or induction was not provided to coaches (22 submitters)
- b. Insufficient training was provided (14)
- c. Unspecified coaching course (11)
- d. I do not know (seven).
- e. Induction process (seven)
- f. RSO or NSO coaching course (four)
- g. Online, including Safety Net (three)
- h. National training (three)
- i. Courses available but not mandatory (three).

Submissions from other sources

215. All eight email submitters who addressed this question said coaches of children received some form of training or induction in the sport(s) they are involved in.
216. Aktive said all coaches or volunteers within an organisation receiving KiwiSport funding are required to attend a coach induction workshop, complete with an online Safety Net module and be observed.
217. The submission from 24 NSOs and Paralympics NZ said the level of coach training and induction across all sports is good.
218. NZ Football said there is not enough formal education and information that supports coaches to adjust or change their coaching philosophy to include a player welfare approach.
219. Netball NZ's futureFERNs workshops provide coaches with training on providing a quality experience for young netballers.
220. All coaches of junior and teenage rugby teams must attend an annual coaching course.
221. Yachting NZ provides face-to-face, online and hard copy training for its coaches and all coaches must sign their coach behaviour policy.

Early specialisation

222. Questions CP20 – CP23 explored the extent of and responsibility for early specialisation for children in sport.

CP20a: To what extent is early specialisation a problem in your sport?

223. CP20a was answered by 127 survey submitters.

**TABLE 63:
SURVEY RESPONSES
TO CPI8a**

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	35	20	30	23	19	127
Percentage	27.6	15.7	23.6	18.1	15.0	100

Submissions from other sources

224. All nine email submissions that addressed this question said early specialisation is a problem in their sport(s).

225. NZ Rugby said early specialisation and overtraining have been reported in some secondary school and junior representative teams but they are uncertain of the extent of the problem and therefore will be looking into it further in 2019.

CP20b: Please explain your answer.

Survey submitters

'A great deal' or 'a lot'

226. Survey submitters who responded 'a great deal' or 'a lot' made the following comments to support their answers:

- a. Children are being pressured to specialise, sometimes from several angles. This includes pressure from coaches to perform or be benched (including coaches used to greater specialisation overseas), pressure to obtain a sports scholarship, pressure from colleges to perform, pressure from parents, and pressure from sports academies to focus on one sport.
- b. Parents face pressure to enable their child to attend trainings and camps, and have their child specialise
- c. The overlap between the seasons discourages diversity of sporting experience. We were provided the example of a 12-year-old who was distraught to be forced to choose between playing out the rest of the summer season in one sport or resuming representative training for a winter sport.
- d. There appeared to be no strategy to change the situation
- e. There is a "system" driving early specialisation.

'A moderate amount'

227. Fifteen submitters who responded 'a moderate amount' made the following comments to support their position:

- a. Two submitters commented on the role of schools in forcing early specialisation, with one explaining that high training demands result in children being unable to cope with more than one sport.
- b. Points made by one submitter each included those made above, e.g. season overlaps discourage playing different sports, academies were part of the problem, some coaches pressure players to specialise to perform, and overseas environments influence the New Zealand attitude to specialisation.
- c. Other comments included:
 - i. Children specialise in not only a sport but a particular position
 - ii. Early specialisation has been observed as young as 8 years of age
 - iii. Specialisation should be delayed, because winning becomes more important and children "are flogged at training"
 - iv. Children are encouraged to specialise to achieve representative honours as early as possible.

'A little'

228. Thirteen submitters who responded 'a little' made comments.

- a. Three submitters commented that specialisation does not occur until the child is a teenager or in secondary school, which they implied to be old enough for specialisation.
- b. Three submitters commented that some or many children play multiple sports. One submitter considered that playing too many sports impacts the child's education. Another commented that playing too many sports "make for a big practices and game load." A third submitter noted that "some teenagers are still doing multiple sports, some aren't."
- c. Three submitters attributed the pressure to specialise to parents.
- d. The following points were each made by one submitter.
 - i. Sports are offering participation opportunities all year round which encourages specialisation
 - ii. Some children are 'naturally' "more suited to some disciplines than others," and they specialise according to their personal preference and ability
 - iii. Early specialisation can be a problem in a specialist position in one sport
 - iv. Early specialisation, combined with poor technique, coaching, and overtraining, can cause back issues in athletes in one sport
 - v. The problem of under-age youths being team-mates with older players was considered a problem socially (rather than on the field), with the submitter questioning "Is there adult supervision at all times for U18s who get into U19 U20 or U21 teams?"

'Not at all'

229. Three submitters who responded 'not at all' also commented. Two submitters reported that their clubs were focused on ensuring that sport was enjoyable and fun. One of these submitters and a third submitter also referred to having people within their organisations who "are driving this wagon." One of these submitters also reported that their club "has a highly qualified, knowledgeable coach who understands child development."

CP20c: What specific evidence of early specialisation have you seen?**Survey submitters**

230. Sixty-three submitters commented on their observations of early specialisation, with many providing multiple examples of evidence. The main evidence of early specialisation cited was:

- a. Overtraining (22 submitters)
- b. Child being forced to choose one sport at the expense of participating in others through pressure and the feeling that they need to get to a range of games and trainings (16)
- c. Children ending their participation in a sport due to boredom, burnout or injury (12)
- d. Children are getting injured through specialising too early (10)
- e. Training regimes that are excessive for children including one-on-one personal training and elite coaching through academies (10)
- f. Poor development of children in other aspects of their lives such as academia (three).

231. Each of the following pieces of evidence of early specialisation was offered by two survey submitters:

- a. Children specialising in a particular position within a particular sport
- b. Competition has increased to an unrealistic level
- c. There are a lot of tournaments
- d. There is pressure to play year-round
- e. Unnatural and disproportionate body development in children training with weights before they are ready
- f. Private schools engaging in "player poaching"
- g. There is pressure from parents to attain college scholarships.

232. Two submitters commented that early specialisation had not been seen, but they recognised the possibility of this occurring.

233. Each of the following pieces of evidence of early specialisation was offered by one survey submitter:

- a. Children consuming excessive calories
- b. The exclusion of children who are new to a sport
- c. A teacher commented that athletes have been known to fall asleep in class
- d. Fatigue-related recurrent infections
- e. Mental challenges that are inappropriate for young children
- f. The demands and behaviours of parents and coaches encourage early specialisation
- g. Children can be subjected to many pressures including “school/club and sport practices, academies, parent and coach demands and behaviours, overintensity of training, scholarships”
- h. Some codes institute representative team opportunities from an early age, to attract and retain players. This creates challenges for athletes needing to balance school, club and representative obligations.
- i. There are two levels of teams: ‘participation’ and ‘elite’
- j. There is a ‘win at all costs’ mentality.

Submissions from other sources

234. The New Zealand Secondary Schools Sports Council (NZSSSC) said the practice of awarding scholarships for a single sport leads to early specialisation and conflicts with international research and Sport NZ’s position on long term athlete development.

235. The submission from 24 NSOs and Paralympics NZ said competition for athletes and money is driving the member organisations of some NSOs to encourage early specialisation. Specific examples include representative cricket teams for children as young as year 4 and trainings twice a week for children as young as six.

236. One submitter said the increasing professionalisation of youth sport and youth academics are driving growing specialisation of young athletes.

237. NZ Football said many children are playing football for more than eight months of the year and not playing a secondary sport (aside from futsal, another form of football). These children are training and playing for too many hours per week, which is causing a large prevalence of injuries in younger players.

238. Sport Wellington see many sports pushing early specialisation among secondary students.

CP21a: Whose responsibility is it to avoid early specialisation?**CP21b: Please explain your answer.**

239. Submissions on CP21a and CP21b will be summarised in tandem.

240. CP21a was answered by 130 survey submitters who were able to select multiple options.

**TABLE 66:
SURVEY RESPONSES
TO CP21a**

Parents/ caregivers	Coaches	Administrators	Spectators	Athletes	Sport or recreation organisations	Sport NZ	Other
103	98	64	6	28	86	57	13

241. Of the 13 submitters who described 'other' people they considered to be responsible to avoid early specialisation, six submitters felt this was a responsibility shared by everyone listed (as per the table above). Five submitters considered schools and school principals to have this responsibility. Five submitters identified the following, with some identifying more than one: responsibility is top-down; that coaches are the problem; NSOs and RSOs; and that New Zealand culture in general is responsible.

Comments from survey submitters

242. Fifty-five survey submitters provided comments to support their answers. The main themes to emerge were:

- a. Standards or guidelines should be developed, possibly the basis of code. Alternatively, existing guidance material and research could be better promulgated.
- b. Leadership is needed to give the issue the 'top-down' attention necessary to achieve significant change. Monitoring and evaluation of initiatives is also required.
- c. Avoiding early specialisation is a joint responsibility shared by parents, coaches, administrators and others
- d. Avoiding early specialisation is ultimately the responsibility of parents
- e. Early specialisation might be reduced through changes in the sporting calendar, such that there is no overlap between seasonal codes and increasing the age at which representative teams are selected
- f. Coaches are responsible for early specialisation
- g. Societal factors encourage early specialisation, e.g. the possibility of a child from a low-income family making a lucrative career from sport.

243. Two submitters considered that early specialisation is not a problem. One submitter noted: "Allowing them to play to their strengths can help them get more enjoyment out of the games or sports they participate in." The other noted: "Athletes get to choose what they want to do. I don't see the issue – some specialise early, some don't."

Submissions from other sources

244. All eight email submitters who addressed this question generally agreed that all adults involved in youth sport have a responsibility to avoid early specialisation.

245. The submission from 24 NSOs and Paralympics NZ said clubs, schools, academies, coaches and parents all have the greatest responsibility as they have the most direct influence over youth athletes.

246. NZ Football, Netball NZ and NZ Rugby agreed that NSOs have a role to play in educating participants about the detrimental effects of early specialisation and putting structures in place throughout the sport to avoid early specialisation.

247. One individual submitter said that young swimmers should be encouraged to be proficient in all four strokes and not start to specialise in one stroke until the age of 14.

CP22a: To what extent is overtraining a problem for children and young people in your sport?

CP22b: Please explain your answer.

248. Submissions on CP22a and CP22b will be summarised in tandem.

249. CP22a was answered by 130 survey submitters.

TABLE 67:
SURVEY RESPONSES
TO CP22a

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	33	30	24	21	22	130
Percentage	25.4	23.1	18.5	16.2	16.9	100

Comments from survey submitters

'A great deal' or 'a lot'

250. Twenty-five submitters who had selected 'a great deal' and 20 submitters who had selected 'a lot' above also provided comments to support their answer.

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251. The intensity, frequency and (in)appropriateness of training regimes were described by submitters. Specific comments included:
- a. When children are playing at more than one level (e.g. school and/or club and/or representative levels) their training load is amplified
 - b. New Zealand has no limit on the training a child can undertake, unlike some other countries
 - c. NSOs should manage the amount of training being required of children, especially for contact sports
 - d. Several submitters commented on the volume of training expected of young athletes being excessive with examples
 - e. Three submitters mentioned inappropriate training methods, including weight training regimes inappropriate for developing bodies, encouraged by coaches.
252. Negative outcomes from overtraining, such as overuse injuries and fatigue, were reported by submitters, including some cases where these factors had contributed to burnout or dropout. At worst, these injuries can have life-long consequences and can be a product of bullying cultures within sport. Medical issues can include less obvious issues such as eating disorders.
253. Other comments from those who had selected 'a great deal' or 'a lot' in the previous question include:
- a. Noting of the 'snowball' effect where one parent 'pushes' for an advantage for their child, which encourages other parents to follow suit
 - b. The point that 'over-training' and 'specialisation' go together
 - c. Lack of knowledge and the need for education about appropriate training for particular athletes' conditions
 - d. The pressure put on students to perform: "Schools use sporting success as a way to get student enrolments"
 - e. Children being encouraged to play 'out of grade', which was considered a safety issue as well as encouraging early specialisation
 - f. The need for sports to limit themselves to seasons to avoid the need to train year-round.

'A moderate amount'

254. Nine survey submitters who selected 'a moderate amount' above also provided comments.
255. Three of these submitters mentioned coaches, with one suggesting they are "ego-driven" and focus on results rather than teaching skills. Another commented that "good results make the coach/club look good," with a third considering that occasionally a coach "forgets to balance the needs of athletes" but that usually self-corrects within a season when parents and/or the school realise there is a problem.
256. One submitter saw the problem as between club, coach, parent and child.

257. One submitter reported on a 14-year-old training two hours per day, seven days per week, commenting that there needs to be some guidance about what is reasonable for the age and stage of development of the child.
258. One submitter commented that having the 'best' training seemed to be equated with having the 'most' trainings, and that different sports vied to out-do each other in this respect.
259. One submitter focused on the outcomes of overtraining: "boredom, burnout, injuries."
260. Having easy access to facilities was observed by one submitter to be correlated with having a regime of over-training.
261. One submitter commented that their sport organisation promotes "balance is better."

'A little'

262. Seven submitters who had selected 'a little' above also provided comments.
263. One submitter commented that although the top teams may have "significant workloads" periodically, this was "not all the time." Similarly, another commented that "most students can take the training volume – although it is a lot, it is not over-training." Another commented "kids I know don't train that much".
264. Other submitters had different views, with one commenting that there were "no guidelines", and another noting that children give up their sport for more pleasurable activities once they have been overtrained.
265. Another submitter commented that more education was needed about physical development and the medical implications of overtraining.

'Not at all'

266. Eight submitters who had selected 'not at all' above also provided comments that were generally supportive of heavy training loads, or comfortable with the amount of training their children were undertaking.
267. Two RSOs were reported to be reducing representative level involvement and bolstering inclusive events such as tournaments where there are opportunities for all.

Submissions from other sources

268. Most of the email submitters who addressed this question said that overtraining was a significant problem in the sport(s) they are involved with.
269. The submission from 24 NSOs and Paralympics NZ said overtraining is a significant problem in many sports with medical practitioners seeing older teenagers with overuse injuries. The submission noted that the top young athletes often play for school, club and representative teams, which means they can be training or playing five or more days a week.
270. NZ Football said there is no planned approach to managing young players' training and playing workloads therefore rest days are non-existent in a large group of players.
271. Netball NZ said parents are not always aware that injuries have been caused by over-use and think the injuries are just part of playing netball. Netball NZ also said there is a misconception among the community that to be the best at your sport you need to play more of it.

272. One individual submitter said some young swimmers train every day, sometimes two or three times a day, along with gym sessions. The submitter believes this is mostly driven by parents.

273. NZ Rugby said overtraining has been reported in some secondary school and junior representative teams, however they are uncertain as to the extent to which this is a problem and will be looking at the issue in 2019.

CP23a: Whose responsibility is it to avoid the overtraining of children and young people?

CP23b: Please explain your answer.

274. Submissions on CP23a and CP23b will be summarised in tandem.

275. CP23a was answered by 131 survey submitters who could submit multiple answers.

**TABLE 68:
SURVEY RESPONSES
TO CP23a**

Parents/ caregivers	Coaches	Administrators	Spectators	Athletes	Sport or recreation organisations	Sport NZ	Other
104	113	62	5	32	78	47	13

276. Of the 13 submitters who identified 'others' with responsibility to avoid overtraining of children and young people, six considered this to be the responsibility of everyone; five felt that schools were responsible; and one suggested that coaches have responsibility. One responder offered a solution, that local level competitions should be "appropriate to the age and development of the children."

Comments from survey submitters

277. Forty-seven comments were received from survey submitters.

278. The main themes that emerged were:

- a. Avoiding overtraining is a shared responsibility, particularly for leaders in the sport sector
- b. Overtraining is caused by the "win at all costs" attitude of schools and coaches
- c. Parents encourage overtraining to live vicariously through their children
- d. Young athletes are unable to sway the opinions of their coaches and other influencers
- e. Early specialisation and the length of "seasons" is linked to overtraining.

279. Some submitters suggested solutions to avoid overtraining including:

- a. Guidance around the acceptable limits for training of children
- b. Limiting hours of training per week
- c. Parent education about acceptable limits of training and the role of sport in shaping rounded individuals
- d. The regulation of training schedules by administrators.

Submissions from other sources

280. As for early specialisation, email submitters generally agreed that all adults involved in youth sport have a responsibility to avoid the overtraining of children, with clubs, coaches and parents having the greatest responsibility as they have the most direct influence.

281. The submission from 24 NSOs and Paralympics NZ said responsibility lies with coaches and trainers, with NSOs providing guidance as to best practice. The submission also said that parents, athletes themselves, selectors, officials and medical teams all have a role to play. The submission noted that most overuse injuries take place in training rather than in competition.

282. NZ Football said it is important to instil in young players that it is ok to sit out when injured and that there is no need to hide injuries of the level of pain of an injury and no need to return to play too early.

283. NZ Rugby submitted they have a responsibility to provide information to schools, coaches, parents and players that balances rugby development with the wellbeing of the player and that provincial unions also have a responsibility to educate club personnel, coaches and parents.

Elite secondary school sport

284. Questions CP24 – CP27 focused on sport integrity issues in elite secondary school sport.

CP24a: To what extent is increasing professionalisation and commercialisation a problem in elite secondary school sport?

285. CP24a was answered by 114 survey submitters who could submit multiple answers.

TABLE 69:
SURVEY RESPONSES
TO CP24a

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	44	25	23	13	9	114
Percentage	38.6	21.9	20.2	11.4	7.9	100

Submissions from other sources

286. Most email submitters agreed that increasing professionalisation and commercialisation are problems in elite secondary school sport.
287. One submitter said this trend is causing an increased divide between the haves and have nots and believes this is being driven by private schools. The submitter cited a prominent secondary schools tournament in one sport as an example of businesses trying to cash in on the large school market.
288. One submitter said a number of schools are recruiting too many players from other schools rather than focussing on developing their own students from when they enter secondary school. The submitter suggested a quota of 10 to 20 percent for 'new to school' athletes in premier school teams.
289. Aktive and Sport Wellington said schools use sport as a marketing tool to attract students and that student athletes were becoming a commodity. This submitter also said increasing professionalisation and commercialisation were creating a divide between the haves and have nots.
290. The submission from 24 NSOs and Paralympics NZ said it is unclear to the extent to which increasing professionalisation and commercialisation are problems in elite secondary school sports. The submission said that 25 years ago these were never problems but that the prospect of a career as a professional sportsperson incentivises these issues and leads to drug use, agents and scholarships.
291. College Sport Auckland said increasing professionalisation and commercialisation leads to a climate of win at all costs, including targeted recruitment, uneven competitions and schools channelling funding for sports to marketing.
292. One submitter said in their experience academy places are being offered to increasingly younger players, which sports say is being driven by parent-driven demand. The submitter believes this is happening without regard to the negative impacts of doing so. The submitter also noted that 'streaming' of teams is also happening at a younger age.
293. Netball NZ recognises increasing professionalisation and commercialisation are problems within secondary school netball, driven by families who see netball as a career for their children. Netball NZ submitted that schools may not have a student's best interests at heart when offering sports scholarships.
294. NZ Rugby said their 2017 Respect and Responsibility Review identified increasing professionalisation and commercialisation as growing issues in secondary school rugby and that they intend to address this.

CP24b: To what extent is identity foreclosure a problem in elite secondary school sport?

295. CP24b was answered by 97 survey submitters who could submit multiple answers.

**TABLE 70:
SURVEY RESPONSES
TO CP24b**

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	26	23	25	13	10	97
Percentage	26.8	23.7	25.8	13.4	10.3	100

Submissions from other sources

296. Email submitters generally agreed identity foreclosure was a growing problem in elite secondary school sport.

297. One submitter said it was a problem to a 'large' extent.

298. Aktive and Sport Wellington said schools are pressuring students to put more time and energy into sport, at the expense of education and other endeavours. These submitters said elite sport students are treated like professional athletes when perhaps schools should not be promoting professional sport as a career.

299. The submission from 24 NSOs and Paralympics NZ said identify foreclosure was an issue later in life for athletes but less of a concern at school.

300. College Sport Auckland said identity foreclosure can be harmful if sport is everything to a student and they get injured. This can cause emotional harm, lead to a student dropping out of school and disincentive future participation.

301. Netball NZ said identity foreclosure is an issue in secondary school netball, with some students defined by themselves and their school as an athlete, which Netball NZ see as a risk.

302. NZ Rugby said their 2017 Respect and Responsibility Review identified identity foreclosure as a growing issue in secondary school rugby and that they intend to address this.

CP24c: To what extent is early specialisation and overuse injury a problem in elite secondary school sport?

303. CP24c was answered by 109 survey submitters who could submit multiple answers.

**TABLE 71:
SURVEY RESPONSES
TO CP24c**

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	39	29	23	10	8	109
Percentage	35.8	26.6	21.1	9.2	7.3	100

Submissions from other sources

304. Most email submitters that addressed this part of the question agreed early specialisation and overuse injury are problems in elite secondary sport.

305. One submitter said these problems exist to a 'large' extent.

306. Aktive and Sport Wellington said they are 'significant' issues. They said current models push elite student athletes towards involvement in one sport, creating year-round programmes that do not facilitate involvement in other sports. These submitters said overuse injuries depend on quality of training and how this is managed. Further, there is often a lack of communication and understanding of what young athletes also do outside of school.

307. College Sport Auckland said associated issues include coaches not allowing team members to participate in other sports during the off-season, longer seasons, repetition increasing the risk of injury, pain killer/supplement use being incentivised, multiple trainings for multiple teams. They noted hockey and netball are looking to cap the time spent on one sport across multiple teams each week.

308. Yachting NZ said early specialisation and overuse injuries are issues in many sports.

CP24d: To what extent is burnout, disaffection with sport and drop-out a problem in elite secondary school sport?

309. CP24d was answered by 109 survey submitters who could submit multiple answers.

**TABLE 72:
SURVEY RESPONSES
TO CP24d**

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	43	40	11	9	6	109
Percentage	39.4	36.7	10.1	8.3	5.5	100

Submissions from other sources

310. Email submitters generally agreed burnout, disaffection with sport and drop-out are problems in elite secondary school sport.
311. One submitter said these were problems to a 'large' extent.
312. Aktive and Sport Wellington said they are significant issues and schools lack the coaches and facilities to cater for all students and therefore tend to focus on the elite end. Dropout is more often due to disengagement, boredom and disaffection than actual burnout.
313. The submission from 24 NSOs and Paralympics NZ said drop-out is caused by a range of factors, including early specialisation, pressure, injury, lack of enjoyment, bullying and negative social media. The submission said sports are getting better at dealing with this but sports and schools need people in place to help them.
314. College Sport Auckland said school sport needs to be fun otherwise students will drop out and that a privileged sport environment can be hard to transition from.
315. Netball NZ said burnout can be the culmination of many factors, including early specialisation, parental pressure, overtraining, poor coaching and pressure student athletes put on themselves. Netball NZ said sports and schools need people in place to help students deal with these issues.
316. Netball NZ also said many students drop out of their chosen sport because they are not having fun, are constantly injured, parental pressure, lack of success, financial pressure, bullying on social media and additional pressure placed on academic results. Netball NZ has developed a youth strategy to address the drop-off between junior and secondary netball.
317. Twenty-five submitters commented on their previous answers in relation to issues in elite secondary school sport, often making multiple points.

CP24e: Please comment on your answers to questions CP24a – d and any other issues in elite secondary school sport.

318. Comments from email, post and hand delivered submissions are summarised under the heading of CP24a – d. Comments from 25 survey submitters on their answers to this range of questions are summarised by theme below.

The emergence of elite secondary school sport

319. Seven submitters described the context for the emergence of elite secondary school sport. Factors for this context include:
- a. The influence of the professional sports era and the realisation that sport can provide a career to a greater degree than for previous generations
 - b. Secondary schools use elite sport as a marketing ploy
 - c. Issues in elite secondary school sport vary between regions, codes and between schools.
320. It was argued the emergence of elite secondary school sport has led to further integrity issues in children's sport (poor sideline behaviour, early onset of overuse injury, burnout and disaffection with sport) as these issues "stem from adults who view youth sport from a climate of performance – where a 'win at all costs' attitude prevails."

Criticisms of elite secondary school sport

321. Criticisms of elite secondary school sport included:

- a. Criticisms of the scholarships offered by some schools, with submitters noting:
 - i. They create “immense dissatisfaction” amongst parents and players already at the school as they see the scholarship-receiving athlete taking the position of an existing player
 - ii. Funds could be better directed at improving school culture or providing quality coaching
 - iii. Colleges “poach” athletes and use their financial resources to manipulate the level of competition in which their teams compete
 - iv. Auckland schools take athletes from other regions
 - v. The scholarships indicate athlete welfare is a lower priority than “winning trophies”
 - vi. It feels like “positions become for sale”
- b. Condemnation of the way sub-elite athletes are treated, saying skills development is low or non-existent for students below the elite tier
- c. Disapproval of the way schools claim a monopoly on players, preventing them from playing for clubs and other teams
- d. Criticism of the way some schools focus their resources on single glamour sports
- e. Criticism of the shortage of talented coaches which, it was argued, exacerbates integrity issues in secondary school sport
- f. Noting the implications of an undue focus on winning, including:
 - i. The use of performance-enhancing drugs to get an advantage
 - ii. Schools “are not making participant-centred decisions,” having taken up a ‘win at all costs’ mentality, creating a toxic culture”
 - iii. Burnout, injuries, stress, and a detrimental effect on the other aspects of athlete’s lives
- g. The placing of responsibility with secondary schools for extending the season length, which effectively prevents children from playing multiple sports.

322. One submitter attributed the Sport NZ funding model with fostering the ‘win at all costs’ mentality adopted by a number of secondary schools.

Outcomes of elite secondary school sport

323. Some submitters commented on outcomes they have observed from elite secondary school sport, as set out below:

- a. The elite secondary school sport environment is generating early exit from sport due to burnout, boredom, injury, or bullying and peer pressure induced by a toxic environment focused on winning. This includes instances where young athletes have been replaced in secondary school teams by new athletes brought in on scholarships.

- b. Students are pressured to focus on one sport at the expense of other activities, feeding into identity foreclosure
- c. The social status of players is elevated, creating a risk of disaffection if a player does not “make the cut”
- d. Professionalism and commercialisation in elite secondary school sport are encouraging early specialisation
- e. There is a skewed allocation of resources within the school, with non-elite players having to ‘get by’
- f. A disconnect has been observed between the classroom and the training ground, with neither teacher nor coach recognising what the other is expecting of the child
- g. There are sometimes financial incentives for performance
- h. Sports results are used in marketing of elite secondary schools, which places pressure to perform
- i. Sports scholarship recruitment creates an imbalance in the competition, with teams left artificially short of skills when their top players are recruited to elite school squads
- j. There is a year-round focus on sports.

Other comments

324. Two submitters critiqued the question, with one noting that they did not understand what was meant by ‘identity foreclosure’, while the other objected to the use of the term ‘elite’, commenting that “the word ‘elite’ is a problem in itself. It’s elitist, exclusive, and screams specialisation.”

CP25: Whose responsibility is it to avoid sport integrity issues in elite secondary school sport?

325. CP25 was answered by 116 survey submitters who could submit multiple answers.

TABLE 73:
SURVEY RESPONSES
TO CP25

Parents/ caregivers	Coaches	Administrators	Spectators	Other Athletes	Teachers or school staff	Sport or recreation organisations	Sport NZ	Other
79	92	70	16	27	92	82	63	15

326. Of the 15 submitters who selected ‘other’ as responsible for avoiding sport integrity issues in elite secondary school sport, five submitters considered this the responsibility of school principals and boards of trustees, with a further four stating ‘schools’ more generally. Another four submitters felt this was the responsibility of everyone. One submitter felt that responsibility was shared by the New Zealand Secondary Schools Sports Council (NZSSSC), the New Zealand Principals Association, and the Ministry of Education. One submitter noted that this should be the responsibility of parents.

Submissions from other sources

327. There was a range of views among email submitters as to whose responsibility it is to avoid integrity issues in elite secondary sport.
328. One submitter, who is the headmaster of a large boys' secondary school, said responsibilities lie with principals who have, until now, done a 'poor job' of upholding values. The submitter also said the lack of values-based governance amongst sport associations, especially rugby, is unhelpful.
329. Active and Sport Wellington said responsibility ultimately lies with senior management of schools and boards of trustees, but that everyone has a part to play. They said Sport NZ and the Ministry of Education should have a role in determining guidelines for young people, considering health and safety and child protection policies. They also said there could be more guidelines from NSOs and RSOs.
330. The submission from 24 NSOs and Paralympics NZ said it is the schools' responsibility. While NSOs can have policies in place, the school is the entity that shares those amongst coaches and athletes and who responds to issues at the school level.
331. College Sport Auckland said responsibility lies primarily with school principals, but leaving it to them alone is not enough. Wider secondary school organisations, such as College Sport Auckland, should have rules and bylaws in place to create some equity and fairness and Sport NZ and NZSSSC also have a role to play as, if NSOs have too much control, they may focus on creating future sport-specific athletes.
332. One submitter said there is an opportunity for stronger leadership to address some of the negative aspects of junior sports and that, in their experience, there is too much 'light-handed' regulation of these matters. The submitter said allowing the sports themselves to self-manage enables a number of these negative outcomes.
333. NZ Football said responsibility to change these philosophies and practices within schools lies with Sport NZ and at governance level.
334. NZ Netball submitted that it is a shared responsibility between schools, NSOs, Sport NZ, NZSSSC, coaches, secondary school sport, parents and athletes. Similarly, NZ Rugby said all participants and stakeholders had a responsibility in this area.
335. One submitter said the responsibility lies with schools themselves and sporting bodies and that both should have clear policies in place.

CP26a: To what extent are sport integrity issues discouraging participation in general sport and physical activity within secondary schools?

336. CP26a was answered by 108 survey submitters.

**TABLE 74:
SURVEY RESPONSES
TO CP26a**

Option	A great deal	A lot	A moderate amount	A little	None at all	Total Responses
Number	36	22	27	16	7	108
Percentage	33.3	20.4	25.0	14.8	6.5	100

337. All email submitters believe this is a problem, to varying extents.

CP26b: Please explain your answer.

Survey submissions

'A great deal' or 'a lot'

338. The main themes of the comments received by submitters who answered 'a great deal' or 'a lot' to CP26a were:

- a. Resentment at nepotism leads to disaffection. When parent-coaches promote their own children or teacher-coaches prefer their favourite students other players can become disaffected.
 - b. Uneven resource allocation leads to dissatisfaction. Children and young people are likely to have a bad experience if they see resources being disproportionately allocated to elite teams, elite student athletes, particular sports, or in another fashion deemed to be inequitable.
 - c. An excessive focus on winning at elite secondary level discourages non-elite student athletes from participating at all. One submitter commented: "if you are not seen as elite/skilled, why try?" Children can be dissuaded by bullying, over-invested parents, pressure and elitism, which can all be stimulated by an excessive focus on winning. Another submitter commented that through sports scholarships "we [parents] effectively pay for other students to take the place of ours in sporting opportunities," suggesting that parents also experience discouragement when their children appear to have been overlooked.
 - d. If children become disillusioned they may move to different sports or less physical activities such as gaming.
 - e. Another submitter commented that children are deeply impacted when they consider situations to be unfair, also noting that body image can play a part. Another submitter who also commented on body image, remarked that children compare their own physique with that of the top players and ask, "what's in it for me?" suggesting that they experience despondency when they feel they do not physically compare favourably with elite athletes.
339. Two submitters stated that the bigger issue was the drop-off in sporting activity once children left school. One suggested that data should be collected about 'churn' at each age group, noting "the keen, passionate 13-year-old is often jaded and disengaged by 18."
340. One submitter commented that the issues apparent in secondary school sport are filtering through to primary and intermediate schools.

'A moderate amount'

341. Seven submitters who had selected 'a moderate amount' above commented on their answer. Collectively, comments from these submitters were more reserved than from those who answered 'a great deal' or 'a lot'.
- a. One submitter thought integrity issues might be off-putting for some children. Another agreed, commenting that this was the result of the "fixation" on elite sport in some schools.
 - b. One submitter felt this was led by coaches, who only want to work with the best students.
 - c. One submitter commented that "laziness has a lot to do with it."
 - d. In contrast, another submitter felt there should be "fair pathways."
 - e. Another commented that children leave sport because "team sports are up for sale."
 - f. One submitter commented that integrity varied by sport and school.

'A little'

342. Three submitters who had selected 'a little' above commented on their answer.
- a. One agreed that some children might exit their sport if they did not get into the top team.
 - b. Another suggested that peer pressure is a bigger factor, noting that if it is not deemed "cool", then students will not participate.
 - c. The third submitter commented that the competitive nature of sport does not suit half of the children.

'Not at all'

343. Two submitters who had selected 'not at all' above commented on their answer.
- a. One submitter commented: "It's just an excuse," but did not elaborate.
 - b. The other submitter commented on the growing participation in sports such as futsal, floorball, and basketball, noting that "overall participation figures have remained the same for a number of years," suggesting that they consider there to be no influence on general sports participation due to the emphasis on elite secondary school sport.

Submissions from other sources

344. One submitter said a lack of integrity is keeping only the elite in sport, to the detriment of wider participation.
345. College Sport Auckland submitted that students are very aware of what practices occur within their sporting environments and when the public message is not what is practised, they will give up and pursue other activities.

346. One submitter is concerned that children are starting on career pathways at an increasingly young age and is a very real danger to the fabric of participation in junior sport in New Zealand. The submitter believes there is an associated growing disparity in sport participation between lower socio-economic groups and communities and that fewer children from poorer areas participate in sport, to everyone's detriment.
347. NZ Football said children wanting to play sport socially are being pushed to one side and are unsure about continuing to participate due to the extreme pressure and competitiveness observed around them.
348. Sport Wellington said Sport NZ's Active NZ survey results show a significant drop off in sports participation at secondary school level, with integrity issues a likely contributing factor.
349. Netball NZ believes integrity issues are significantly discouraging participation in general sport and that sport unintentionally sends the message that to be involved in sport you need to be good, but we should be celebrating being physically active and involved in a community.
350. NZ Rugby has only an anecdotal view on this. Integrity issues relating to doping are not impacting rugby, however, aggressive recruitment of players at secondary school level is, anecdotally, impacting on participation numbers as the aspiration of participants is diminished by these behaviours.

CP27: Whose responsibility is it to uphold sport integrity in general secondary school sport?

351. CP27 was answered by 114 survey submitters who were able to select multiple answers.

**TABLE 75:
SURVEY RESPONSES
TO CP27**

Parents/ caregivers	Coaches	Administrators	Spectators	Other Athletes	Teachers or school staff	Sport or recreation organisations	Sport NZ	Other
72	88	69	29	47	98	75	60	21

352. Of the 21 submitters who selected 'other' people and roles to have responsibility to uphold sport integrity in general secondary school sport, nine submitters considered this to be the responsibility of school principals and boards of trustees. Seven submitters said that everyone was responsible for this; two submitters considered schools, in general, to be responsible; and two considered the NZSSSC to be responsible to uphold sport integrity in general secondary school sport. Two submitters named individuals, and one commented that this is a top-down responsibility.

Submissions from other sources

353. While two email submitters said schools themselves are solely responsible, most submitters said there was a joint responsibility between all participants and stakeholders in secondary school sport, including schools, Sport NZ, the Ministry of Education, NSOs and RSOs, regional college sport bodies, coaches, parents and student athletes themselves.

354. NZSSSC said initiatives that would help include: educating parents and coaches; ongoing development of regulations and criteria; identifying, calling out and addressing poor behaviour; and recognising and rewarding good behaviour.

CP28: Do you have any other comments in relation to integrity issues in children's sport?

Survey submitters

355. Twenty-five survey submitters made additional comments.

Fundraising activities

356. One submitter reported "questionable and skewed" fundraising activities that benefit students with sport scholarships, helping them to attend trainings, events, and tournaments. The submitter notes that other children miss out on such opportunities due to the presence of athletes on sports scholarships.

Negative practices in elite secondary school sport

357. Some survey submitters reiterated earlier points about negative practices in elite secondary school sport, saying:

- a. "Player poaching" (via scholarships) is preferred to talent development, and attempts to minimise player poaching have been unsuccessful
- b. Overtraining occurs
- c. Emotional and verbal bullying occur
- d. Participation should be emphasised over winning
- e. Schools consider their sporting performance vital to upholding their reputation
- f. Performance enhancing drugs – including creatine and steroids – are used in elite secondary school sport, by children as young as 14. Schools, it is submitted, are not good at handling this issue.

Nepotism and selection biases

358. One submitter reiterated that nepotism and the cost of participation both contribute to children exiting sport. Nepotism arose in the comments of another submitter also, where children from higher income families are promoted at the cost of talent. They also comment that selection practices are "racially motivated," but did not elaborate.

Comments on leadership and guidance

359. One submitter argued for more effort from sports leadership to get the focus back on to having fun and remove the focus from winning. Another submitter held leadership within schools as particularly accountable for integrity in school sport.

360. Sport NZ and the Ministry of Education were called on by one submitter to determine guidelines, considering health and safety and child protection policies. They also called for senior management in schools, board of trustees, and sporting bodies to take responsibility. Another submitter also called for “clear guidelines” for parents and coaches. A third submitter considered there needed to be an independent body to hold schools to account; and a fourth submitter considered the problem to lie with the head coach or head of sport.
361. One submitter reiterated an earlier call for an accreditation system for volunteers, which was considered necessary to protect children from harm in sport.
362. Another submitter called for a return to valuing participation, and valuing the volunteers “who make it happen,” noting that declining volunteer numbers will make it harder for children to have sports opportunities.

Win at all costs

363. One submitter reported that they had observed “absolutely appalling and criminal behaviour” in relation to children’s sport. They describe “adults living vicariously” with an “obsessive” desire for their child to succeed. Behaviour that is “widely accepted”, “if you’re not openly supporting the winning at all costs mentality, then you’re soft and of no use.” The submitter notes the lack of boundaries on what price is too high to pay for winning.
364. One submitter summed up the situation as being resulting from parents, coaches and schools exposing children to elitism at an early age, when they are ill-equipped to deal with the pressure that is placed on them.

Submissions from other sources

365. There were a range of additional comments from email submitters.
366. One submitter made a number of suggestions with regards to child sexual abuse in sport:
- a. Survey all sports clubs regarding the incidence of sexual abuse
 - b. Determine how many participants dropped out of sport due to bullying or abuse
 - c. Ensure clubs train staff regarding sexual abuse awareness and ensure clubs have a policy and procedure for addressing abuse claims
 - d. Work with ACC to determine how many reported abuse cases are linked to sport.
 - e. Possibly set up an anonymous phone line as overseas clubs have done to scope the problem.
367. NZSSSC has an integrity framework in place which includes the values of sport, a code of conduct and the disciplinary process for breaches of the framework. NZSSSC also has eligibility criteria setting out who can play for who in what. NZSSSC has partnered with DFSNZ to educate secondary students and the New Zealand Rugby Players’ Association and the New Zealand Aids Foundation to develop online character development modules for rugby players.
368. One submitter suggested looking at the impact of private schools on the integrity of secondary school sport and to move to values-based governance of secondary school sport.

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369. College Sport Auckland said there is too much emphasis on 1st teams and a number of those miss out and go on to drop out of the sport. College Sport Auckland said sport scholarships for secondary students can signal to some players they are not talented enough and while this can motivate some students, it demotivates others. They also noted it is hard to establish a team of equals when some players are on scholarships. College Sport Auckland believes there is a real danger of losing volunteer coaches, referees etc in secondary school sport due to a lack of integrity on the part of some participants.
370. Sport Wellington said they support RSTs playing a greater role in integrity matters and it supports the establishment of a national sport integrity unit as existing integrity measures are insufficient. Sport Wellington believes the roles and responsibilities for integrity matters are not clear at the national, regional and club levels but that RSTs are well placed to support sport integrity in their region, especially on matters impacting participation.
371. Multicultural NZ said some children from low socio-economic areas and former refugee communities find cost a major barrier to participating in sport.
372. Netball NZ said netball centres are a safe community for women and said they could progress the idea of providing support for women in netball communities if they need it.
373. Child Matters said internationally, there have been numerous instances of child abuse in sport and in many overseas jurisdictions, the necessary time and money has been put in to address these issues. For example, in the United Kingdom a hotline has been set up for footballers who experienced sexual abuse. Child Matters believes New Zealand must follow overseas precedents, for example the establishment of the Child Protection in Sport Unit in the United Kingdom which educates sport organisation staff and volunteers on identifying and responding to child abuse and helps develop policies and strategies to protect children.
374. Athletics NZ said the government should legislate for anyone purporting to be a coach or teaching an activity to be a registered and accredited with the relevant NSO so that a minimum standard can be applied in the interests of protecting children.
375. NZ Rugby said, while not wanting to attribute blame, the expectation created by player agents to school children to make a career out of rugby, at the exclusion of other career options, is a concern.
376. One submitter said safeguarding in children's sport was not really understood as a topic as recently as 2015.
377. Another submitter said we need to engrain the power and value of sport as an end of itself in children and that children just want to have fun and play with their friends
378. InsideOUT submitted that, in non-competitive sports settings, rainbow young people should have the right to determine which gendered sports team they compete in, to ensure they are affirmed and feel safe. InsideOUT noted that the Human Rights Commission recommends that children under 12 should play in sports teams of their self-determined gender.
379. InsideOUT also said students who do not identify as male or female should not be forced to pick a gender and should be allowed to either play mixed gender sports or sit out. If trans students are not comfortable participating in the physical aspects of physical education then they should be offered other roles such as coaching, refereeing, scoring or managing.

04

ANTI-DOPING

Overview of submissions on chapter 4

1. We received 55 submissions on this chapter including:
 - a. 45 through the survey tool
 - b. 10 through email, post or hand delivery.

The Sports Anti-Doping Act 2006

2. Question AD1 and AD2 and their sub-questions were concerned with the powers and functions of Drug-Free Sport NZ.

AD1a: Do you think the powers and functions of Drug Free Sport NZ under the Sports Anti-Doping Act are appropriate to realise New Zealand's anti-doping regime?

3. Those answering through the survey tool had the choice of three options as shown in the table below.

**TABLE 76:
SURVEY RESPONSES
TO AD1a**

Option	Yes	No	I don't know	Total responses
Number	27	12	3	42
Percentage	64.3	28.6	7.1	100

4. Submitters through other formats could provide a wider range of answers. Of the five that answered this question:
 - a. Two said DFSNZ could have greater powers
 - b. Two said DFSNZ probably did have adequate powers, or had them "for the most part"
 - c. DFSNZ noted its functions are largely those required under the UNESCO convention and through that, the World Anti-Doping Code, and that it did not have any "powers".⁵

⁵ The powers of DFSNZ are set out in section 13 of the Sports Anti-Doping Act 2006: <http://www.legislation.govt.nz/act/public/2006/0058/latest/DLM390142.html>.

AD1b: Please explain your answer

Those that answered “yes”

5. Of the 27 survey respondents that answered “yes”, five provided further comment to support their answer.
6. Three simply reiterated that testing is necessary, and that DFSNZ runs a good programme.
7. Qualified support was provided by two submitters:
 - a. One submitter stated that although the powers and functions are generally enough, more support from all sport organisations, the government, the New Zealand Olympic Committee, and High Performance Sport New Zealand is needed to support major decisions that DFSNZ makes (for example standing up to Russian doping). Details of this support were not provided.
 - b. One submitter commented that the methods for educating athletes, particularly school age athletes, are effective in the sense that information regarding drugs in sport and the risks involved are being recognised by athletes. However, the risk that an athlete can be doping without knowing is not being registered as significant by athletes (that is, the athlete is aware of the risk, but is in a state of mind where “it won’t happen to me”).
8. Of the two submissions received through other formats that argued DFSNZ probably or largely had sufficient powers and functions:
 - a. One argued that for some sports there is cause for greater collaboration between DFSNZ and NSOs regarding investigation communication and procedures
 - b. One argued that “it could be argued that [DFSNZ] should have greater powers to require people to answer questions and provide evidence as applies under the Australian Anti-Doping regime”.

Those that answered “no”

9. Six submitters using the survey tool provided further comment to support their answer. Some commented that the powers and functions of DFSNZ under the Sports Anti-Doping Act are not appropriate to realise New Zealand’s anti-doping regime.
 - a. Two submitters commented that there are too few drug tests (for example, one submitter reported having only had one out-of-competition test in ten years), and another commented that there is a small minority of athletes that still manage to cheat the system.
 - b. One submitter considered that DFSNZ is probably not resourced well enough, and that there needs to be more education of young people and parents to achieve the regime. Another submitter commented that there needs to be a greater focus on school sport.
 - c. One submitter commented that there is a conflict between the World Anti-Doping Agency (WADA) requirements and what is appropriate in New Zealand, without providing further explanation for this view.

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- I0. The two submissions received through other formats that argued DFSNZ could have greater powers argued this was necessary to conduct more testing.
 - II. DFSNZ submitted, arguing it would be useful to have the power to compel information from athletes, particularly for targeting traffickers or suppliers. Useful information could be referred to the Police or Medsafe. The DFSNZ submission notes that “such a production power might be used only on the basis of a reasonable suspicion that an ADRV had been committed and requiring formal approval and signoff by the DFSNZ Chief Executive. This approach would be consistent with other NADOs elsewhere such as ASADA. It would also allow the athlete to take full legal advice as required”.

Those that answered “I don’t know”

- I2. None of the submitters who answered the survey question with “I don’t know” provided any further comment.

AD2: Please provide any other comments on the Sports Anti-Doping Act 2006

- I3. Two submitters used the survey tool to provide other comments on the Sports Anti-Doping Act.
 - a. One submitter commented that DFSNZ is not well aligned with equivalent international organisations. This submitter considered that this results in artificially high levels of positive tests, and New Zealand’s sanctions (although correct) are much harsher than in other countries.
 - b. The other submitter commented that the legislation needs to be flexible enough to reflect rapidly evolving doping practices.
- I4. DFSNZ was the only other submitter on this question through other means, noting:
 - a. “As part of DFSNZ’s regulatory function, we have recently completed the field work in reviewing whether or not NSOs have properly adopted the Sports Anti-Doping Rules (SADR).
 - b. Initial results suggest that only a little over 30% have properly and fully adopted the SADR with an approach that we would consider on par with “best practice”. We will be reporting to Sport NZ and High Performance Sport NZ on this fully early in 2019 and thereafter working directly with NSOs to increase their compliance.”

Education and DFSNZ’s resourcing to manage the risk of doping

- I5. Questions AD3 – AD5 and their sub-questions explored the provision of anti-doping education, ways in which organisations work to manage the risk of doping, and the resourcing of DFSNZ.

AD3a: Have you had anti-doping education from Drug Free Sport NZ?

16. A majority of those submitting through the survey tool had received some form of anti-doping education from DFSNZ as shown in the table below.

**TABLE 77:
SURVEY RESPONSES
TO AD3a**

Option	Yes	No	I don't know	Total responses
Number	26	17	0	43
Percentage	60.5	39.5	-	100

17. Six submissions on this question were received through other means. Four were from NSOs and one was from 24 NSOs and Paralympics NZ, all of whom noted their top athletes received education from DFSNZ. The sixth was from DFSNZ who noted it ran an education programme.

AD3b: If so, what form was it delivered, e.g. face-to-face, online, etc?

18. Twenty-four submitters used the survey tool to comment on the mode of delivery in which they received anti-doping education from DFSNZ. A number of these submitters received education through more than one mode (such as face-to-face, online and/or printed resources). More detail on this breakdown is provided below.
19. Five submissions were received on this question through other means. Four of those submissions were from NSOs, including one from NSOs and Paralympics NZ, who noted DFSNZ provided education through face-to-face and online channels, and through promotional materials. DFSNZ also submitted, noting they produced resources available for anyone to use.

Face-to-face

20. Sixteen submitters responded through the survey tool that they had received face-to-face education. Some of these described the form that this face-to-face engagement took, although many did not (that is, they simply stated "face-to-face" without providing further explanation). Examples included:
- Attending seminars or workshops
 - Attending a presentation from a DFSNZ representative at a national performance team training camp
 - Presentation to school Physical Education class or involvement in a top school team
 - Involvement with the DFSNZ anti-doping education programme within secondary schools.

Online

21. Ten submitters through the survey tool stated that they had received education online, with one specifying that they accessed an online athletes' forum.

Printed resources

22. Two submitters through the survey tool commented that they had received printed handouts containing drug education information.

Other comments on AD3b

23. One submitter commented that they had also attended a WADA online course as a requirement for being a Chef-de-Mission for an offshore international championship.

AD3c: How did you find it?

24. Twenty-one submitters used the survey tool to comment on this question. Submitters interpreted this question differently. The majority of submitters interpreted it to mean “Did you think the education was good?”, but a small number interpreted it to mean “How did you come across the education services provided by DFSNZ?”
25. Five submitters used other means to submit on this question, all commenting on the quality of education provided by DFSNZ.

Comments on the quality of education provided by DFSNZ

26. Fourteen submitters used the survey tool to comment that the education was good. Specific comments included “Excellent. They are doing a great job”, “informative and educational”, “eye opening. More people need to hear it”, “common sense and appropriate” and “enlightening”. Only one submitter commented that the education was “tedious” via the survey tool.
27. Of the five submissions received through other means:
 - a. Two submissions said DFSNZ do a good job
 - b. Two submissions said it could be improved but noted the education was “appropriate” or “improving” already
 - c. One submitter argued the education was ineffective because recreational athletes were not aware of their obligations.

Comments on the ease of accessing education opportunities

28. Six submitters used the survey tool to comment on how they identified the education opportunities. These channels of access included:
 - a. The course was identified or recommended by an NSO
 - b. The course was part of a high-performance camp or national sports team camp
 - c. The submitter was approached through the Regional Spots Director network to attend the course
 - d. The course was provided as part of the Pathway to Podium programme.

AD3d: Have you had anti-doping education from any other sources?

29. Almost half of those that submitted through the survey tool had received anti-doping education from sources other than DFSNZ as shown in the table below.

**TABLE 78:
SURVEY RESPONSES
TO AD3d**

Option	Yes	No	I don't know	Total responses
Number	20	21	1	42
Percentage	47.6	50	2.4	100

30. Four submissions were received on this question through other means.

- a. Two of these submissions noted doctors associated with sports received education from DFSNZ and thereby became authorities on anti-doping in their own right
- b. One NSO submitter noted the online module provided by their international federation is a useful resource because it is easier to use than the DFSNZ equivalent and it provides a certificate which functions as a record of achievement
- c. DFSNZ noted better coordination between education providers and DFSNZ could help avoid duplication of effort.

AD4a: Do you feel the organisations you are involved with are working with Drug Free Sport NZ to manage the risk of doping appropriately?

31. Forty-two submissions were received on this question through the survey tool as set out in the table below.

**TABLE 79:
SURVEY RESPONSES
TO AD4a**

Option	Yes	No	I don't know	Total responses
Number	23	12	7	42
Percentage	54.8	28.6	16.7	100

32. Six submissions on this question were received through other means:

- a. Two submitters said yes, their organisations did work with DFSNZ appropriately.
- b. Two submissions said yes, their organisation did work with DFSNZ appropriately but more could be done if more resourcing was available.
- c. One submitter said their organisation worked appropriately with DFSNZ at the top and development levels but was less sure about the lower level.
- d. DFSNZ noted that it tried to work with NSOs and other stakeholders through the Good Clean Sport initiative and more widely, to provide education. DFSNZ noted some NSOs are very engaging while some are far more hands-off and less welcoming.

AD4b: Please explain your answer.

33. In addition to the more nuanced answers from non-survey submitters provided above, survey tool users provided comments as per below.

Yes, our organisations work with DFSNZ appropriately

34. Seven survey submitters provided further comment to support this position, with most submitters considering that organisations working with DFSNZ manage the risk of doping appropriately.
35. One submitter commented that there is a lot of awareness, without providing further explanation. Another submitter commented that while their organisation is not working directly with DFSNZ, they are ensuring that all of their athletes are playing by the rules.
36. One submitter commented that they were their organisation's representative, and that they were grateful for the support and information received from DFSNZ, particularly when athletes required therapeutic use exemption documentation.
37. Two submitters commented that DFSNZ is always willing to provide education and support. However, one of these submitters went on to say that although secondary schools are generally engaging well with DFSNZ, not all of them request the available workshops and support. This leaves a gap, and means that some student athletes are potentially missing out on learning about the risk of doping (particularly where they are not competing at an elite level). This point was also made by an email submitter. Another submitter commented that the level of play was relevant, and reported that there is definitely a DFSNZ presence at National Championship events, particularly in post-race testing.

No, our organisations do not work with DFSNZ appropriately

38. Four survey submitters provided further comment to support this position, with some submitters stating that inconsistent support was offered between codes and levels. This point was made by two email submitters. As noted, DFSNZ also made the point in its email submission that its engagement with NSOs varied between NSO.
39. Two submitters commented that the amount of support depends on the level of sport and organisation. One submitter gave the example of sports run by volunteers, where there is no connection to leverage, unless they have someone dedicated to focussing on engagement with DFSNZ. The other submitter commented that there is enough involvement at the elite level, but that there should be occasional random testing at secondary school events (for example, rowing) so that students and teachers are aware of their obligations. Another submitter included the example of DFSNZ prosecuting non-elite athletes and commented that these sorts of actions have resulted in DFSNZ losing credibility.
40. The fourth submitter stated that there is no security in stabling areas for horses, and that the incorrect procedure is often used when performing tests. This submitter did not provide further explanation for this view.

I don't know

41. One submitter stated that although this is a sensitive issue for secondary schools, "we must not bury heads in the sand". The submitter did not provide further explanation of this comment.

AD5a: Is Drug Free Sport NZ adequately resourced to meet its obligations?

42. Forty-one submitters used the survey tool to answer this question as set out in the table below.

**TABLE 80:
SURVEY RESPONSES
TO AD5a**

Option	Yes	No	I don't know	Total responses
Number	8	17	16	41
Percentage	19.5	41.5	39.0	100

43. Five email submissions said either:

- a. DFSNZ is not adequately resourced to meet its obligations; or
- b. DFSNZ could benefit from additional resourcing.

44. DFSNZ did not say yes or no, but submitted that it would “welcome the opportunity for discussion on additional future funding” and noted the range of cost pressures it faces.

AD5b: Please explain your answer

Submitters that said yes, DFSNZ is adequately resourced

45. Two survey submitters provided further comment to support their submission that DFSNZ is appropriately resourced.
- a. One considered that the effort that DFSNZ is putting in is making a difference to the knowledge of athletes about clean sport. This submitter reported that DFSNZ is providing the means of information and making an effort to go out of the office, providing education directly to athletes, particularly young athletes.
 - b. One submitter opined that DFSNZ has more than enough money, “judging by the absurd cases they have pursued against low level athletes”. This submitter did not provide examples of these cases.

Submitters that said no, DFSNZ is not adequately resourced

46. Eight survey submitters provided further comment to support their answer that DFSNZ is not adequately resourced.
47. Two survey submitters simply stated that DFSNZ is underfunded. Other survey submitters identified specific resourcing gaps (e.g. more staff/presenters at workshops, further funding for education, or upskilling regional resources to provide additional information and education resources in the regions).
48. One survey submitter commented that DFSNZ has partnered with the Regional Sports Director network to deliver Good Clean Sport Youth workshops this year, and that this is a positive step forward to increase resources to deliver messages at the secondary school level more effectively.
49. The submission from 24 NSOs and Paralympics NZ and a separate submissions from an NSO, argued DFSNZ should receive more funding to undertake more testing and ideally have a laboratory in New Zealand for analysing samples. One NSO argued DFSNZ needed more funding to allow for more education and investigation.

Submitters that said I don't know

50. Three survey submitters provided further comment to support their answers.
51. One submitter commented that they did not know where DFSNZ gets their funding, but that it should be kept in place to cover their needs. Another submitter considered that while DFSNZ seems to be able to provide a good service, with more resources their education programmes could be expanded. Another submitter considered that there is increasing pressure on DFSNZ, and they were unsure about how that was being managed, both financially and personnel-wise.

Hearing anti-doping cases in New Zealand

52. Questions AD6 and AD7 and their sub-questions explore perceptions of anti-doping cases and of the appeals processes.

AD6: Do you have any comments about the hearing of anti-doping cases in New Zealand?

53. Seven survey submitters provided comments about the hearing of cases.
54. One survey submitter commented that in their experience, cases are not highly publicised. The submitter considered that this is a good thing, however, there does need to be greater publication of (anonymised) stories of athletes who have been caught doping, to illustrate how real the problem is to other athletes, and show how it can ruin their reputations and career.
55. Another submitter expressed concern about a perceived "lack of natural justice" in some of the recent cases involving clenbuterol. This submitter considered that DFSNZ did not actually have to prove that the athlete took the substance, and that ordering it was deemed sufficient. This submitter considered that this does not reflect natural justice, and that the burden of proof should be on the prosecution to prove that the athlete has taken the drug.
56. One submitter considered that there should perhaps be less harsh outcomes in some cases, particularly for young people who are unaware that they are violating the rules. This submitter stated that the approach to education must come first, and that once education is sufficient in youth sport, it would be more appropriate to impose harsh sanctions.
57. Other comments from survey submitters about the hearing of cases were:
 - a. The survey submitter only knew of cases from the news media, and had no further comment
 - b. There is a bit of an "old boys network"
 - c. The hearings are fair and context is used
 - d. One submitter commented that there have been no hearings in their sport in New Zealand, and very few internationally.
58. The submission from 24 NSOs and Paralympics NZ suggested:
 - a. Hearings are held "behind closed doors"
 - b. Hearings can be too slow and it can take too long to get a result.

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- 59. One NSO submitted its support for the Sports Tribunal via email.
 - 60. DFSNZ submitted its support for New Zealand having an independent sports tribunal. DFSNZ noted its understanding that convening a panel can be difficult at times and often procedural discussions are overseen by the Chair alone. DFSNZ would like to see a wider use of the Tribunal members.
 - 61. While DFSNZ believes the Rugby Union Judicial Committee performs an excellent function, it believes a single tribunal for all sport in New Zealand would be more efficient, effective and consistent. NZ Rugby submitted that the “regulatory reasons” it operates “its own anti-doping regime” continue to apply.

AD7: Do you have any comments about the appeals process or the Court of Arbitration for Sport?

- 62. Three survey submitters provided comment about the appeals process:
 - a. One simply stated that the process was fair.
 - b. One submitter thought that the Court of Arbitration for Sport appointment process does not appear to be as robust as New Zealand’s appointment processes.
 - c. The third submitter considered that athletes involved in the recent clenbuterol cases should have been granted access to free legal counsel.
- 63. The submission from 24 NSOs and Paralympics NZ suggested the process for appealing to CAS worked “pretty well” but was expensive for the athletes and NSOs involved. One NSO submitted the same points in a separate submission. Another NSO submitter concurred that the appeals process was expensive and argued it would be preferable to have an avenue for appeal in New Zealand but noted it was outside the control of DFSNZ and New Zealand NSOs.
- 64. One NSO submitted via email that they support the appeal process to CAS.
- 65. DFSNZ submitted it was a fundamental right of athletes and others to appeal to CAS and this must be retained. DFSNZ submits the Sports Tribunal must be doing a good job, as only two anti-doping cases have gone to CAS.

The Sports Anti-Doping Rules and low-level athletes

- 66. Questions AD8 and AD9 and their sub-questions explore submitter perceptions about how broadly New Zealand anti-doping law should be applied.

AD8a: Do you think low-level athletes/participants should be subject to the Sports Anti-Doping Rules (i.e. be subject to punishment for doping)?

67. Forty-five survey respondents answered this question as set out in the table below.

**TABLE 8I:
SURVEY RESPONSES
TO AD8a**

Option	Yes	No	I don't know	Total responses
Number	34	9	2	45
Percentage	75.6	20.0	4.4	100

68. The more nuanced comments in submissions from other sources are considered below.

AD8b: Please explain your answer

Submitters that said yes, low-level athletes should be subject to the Sports Anti-Doping Rules

69. Fourteen survey submitters provided further comment to support their answers, and mostly thought that athletes at all levels should be subject to the same rules.
70. Nine survey submitters stated that all athletes should be subject to the same rules, and that anti-doping rules should apply to all athletes. One submitter thought that the question of targeting is more complicated, and that, due to cost, they would generally favour targeting elite players unless there is a tip-off or reason to suspect doping by non-elite players.
71. The remaining five survey submitters commented that the rules imposed on low level players have flow on effects for elite levels. All sportspeople start at a low level, and if they are talented enough and work hard, progress to higher and elite levels. These submitters considered that it would create a dangerous environment to allow lower levels to dope or to escape sanctions from doping.

Submitters that said no, low-level athletes should not be subject to the Sports Anti-Doping Rules

72. Seven survey submitters provided further comment to support their position that low-level athletes should not be subject to the Sports Anti-Doping Rules. These submitters mainly focused on different levels, resourcing and the impact of doping, including:
 - a. Funding is low for testing higher level athletes and is a waste of time and money to fund testing at lower levels.
 - b. Efforts should be aimed at the elite level where prize money is involved.
 - c. Recent cases pursued by DFSNZ for athletes on the fringes of sport are "absolutely ridiculous" and low-level athletes should only be tested if there is a tip-off about blatant cheating.
 - d. While the level at which athletes should be subject to testing is difficult to assess, there does need to be a cut-off, and it should be where athletes are in a sport as their career, and representing New Zealand internationally. However, where weekend athletes are participating in a local club competition, they should not be subject to the rules unless their actions are of a criminal nature.

Comments from email submitters were more nuanced

73. Eight email submitters answered question AD8. None said low-level athletes should be allowed to dope. However, answers ranged from explicit endorsement of the continued application of the Sports Anti-Doping Rules to low-level athletes to implicit endorsement of the same with certain conditions.
74. DFSNZ was unequivocal that doping should be prohibited at all levels of sport. This was important to ensure a fair and level playing field, to send the right messages to youth, and to avoid allowing ambitious sportspeople to gain unfair advantages. DFSNZ submitted that the approach taken in the Sports Anti-Doping Rules is consistent with the approach taken in other jurisdictions. DFSNZ also noted that defining low-level athletes is “perilous” as some are serious about reaching higher levels of sport and others are not.
75. The submission from 24 NSOs and Paralympics NZ and another submission from an NSO said yes, low-level athletes should be subject to rules and punishments for doping. Consistency of expectations for all athletes was important.
76. One NSO submitter said applying the Sports Anti-Doping Rules to low-level athletes should be a low priority in the context of protecting sport integrity in New Zealand.
77. One RST submitter said there should be a “different anti-doping regime” for low-level athletes, including lower sanctions. One NSO submitter made a similar comment, in favour of “proportionate sanctioning” for low-level athletes.
78. One NSO submitter said education must be provided to low-level athletes if they are to be subject to an anti-doping regime. Two other submissions also emphasised the value of education.
79. One submitter said there were too many examples of low-level athletes being prosecuted and there should be discretion over whether an athlete is taken through the system once found to have committed an anti-doping rule violation.

AD9a: Do you think low-level athletes/participants should be subject to the Sports Anti-Doping Rules but should have less harsh sanctions applied to them (e.g. warnings, reprimands, shorter bans from sport, etc)?

80. Forty-four survey respondents answered this question as set out in the table below.

TABLE 82:
SURVEY RESPONSES
TO AD9a

Option	Yes	No	I don't know	Total responses
Number	23	21	0	44
Percentage	52.3	47.7	-	100

AD9b: Please explain your answer.**Submitters that said yes, less harsh sanctions should apply to low-level athletes**

81. Six survey submitters provided further comment to support their answer supporting the notion that low-level athletes and participants should be subject to the same rules as elite athletes, but that they should receive less-harsh sanctions if they break those rules.
82. Two survey submitters commented that warnings should be given to first time offenders, as well as education being provided. Many of these athletes may not even be aware that what they are taking is against the Sports Anti-Doping Rules. One of these submitters went on to say that if they are tested and doping remains a regular issue, a short ban should be applied. Another submitter agreed with this, but thought that if it is a trainer or coach who committed the infringement they should be banned for life.
83. Another survey submitter also commented that consequences should relate to the availability of information. For example, this submitter considered that there should be a greater awareness of the rules in higher level athletes.
84. One survey submitter commented that less harsh sanctions should be imposed if the athlete's actions were criminal, but that no sanctions should be imposed where the actions are not of a criminal nature.
85. One survey submitter considered that imposing sanctions to low-level athletes would require a significant increase in resources for DFSNZ to allow the policing of sports at lower levels.
86. Generally speaking, seven email submissions argued less harsh sanctions should apply to low-level athletes. Submitters used different language to make this point. Two called for dopers to be considered on a case by case basis. One called for discretion to be available to prosecutors, one called for proportionality in the system and one called for a "different regime" to be applied to low-level athletes. One NSO explicitly said a lesser sanctioning regime should be applicable to lower level athletes and participants.
87. DFSNZ would like to see greater discretion available for the Sports Tribunal and New Zealand Rugby Judicial Committee to use when sanctioning truly recreational athletes. However, there is no possibility for discretion if New Zealand is to remain fully compliant with the WADA regime. This is the legal advice DFSNZ has received on this point, including from WADA itself. DFSNZ notes it continues to work with WADA on the 2021 review of the WADA Code to allow discretion in sanctioning truly recreational athletes.

Submitters that said no

88. Fifteen survey submitters provided further comment to support their answers.
89. Fourteen of these survey submitters considered that the rules and consequences of breaking those rules should be the same for all athletes, regardless of level played at. However, two of these submitters qualified their responses by saying that inadvertent use should be taken into account so that the focus is on intentional cheating, and another said that low-level athletes should never be tested, effectively making the consequences a "moot point".

90. One survey submitter reiterated that it is “absurd” for a club player to be banned for taking a substance that many were probably unaware was performance enhancing. This submitter stated that there needs to be a clearer separation between elite sport and low-level athletes when it comes to anti-doping. This submitter considered that policing low-level athletes would lead to “people hanging around social sport to see if people have taken one too many puffs of their inhaler or one too many aspirins”.

Other views

91. One NSO submitted via email that it “gets complex” as “a banned substance could be taken that is beneficial to the athlete for the long term”.

Data on doping

AD10: Can you provide any data or research to indicate trends in performance and image enhancing drug use in New Zealand?

92. No submitter provided any data or research in response to this question.
93. DFSNZ noted:
- Better information sharing had been occurring between agencies recently
 - It talks to its international counterparts about worldwide movements of steroids
 - It is gaining data through the research undertaken by its education manager and through focus groups.

Sports supplements or foods

94. Questions AD11 – AD13 and their sub-questions explored the use of sports supplements and sports food, and education concerning their use.

AD11a: Do you use any sports supplements or foods?

95. Forty-two survey respondents answered this question as set out in the table below.

**TABLE 83:
SURVEY RESPONSES
TO AD11a**

Option	Yes	No	I don't know	Total responses
Number	21	21	0	42
Percentage	50.0	50.0	-	100

ADIIb: Do people you associate with use any sports supplements or foods?

96. Forty-one survey respondents answered this question as set out in the table below.

**TABLE 84:
SURVEY RESPONSES
TO ADIIb**

Option	Yes	No	I don't know	Total responses
Number	30	10	1	41
Percentage	73.2	24.4	2.4	100

ADIIc: Are you concerned about the possible presence of prohibited substances in sports supplements or foods?

97. Forty-two survey respondents answered this question as set out in the table below.

**TABLE 85:
SURVEY RESPONSES
TO ADIIc**

Option	Yes	No	I don't know	Total responses
Number	39	2	1	42
Percentage	92.9	4.8	2.4	100

ADIIId: Do you check for prohibited substances before using sports supplements or foods?

98. Forty survey respondents answered this question as set out in the table below.

**TABLE 86:
SURVEY RESPONSES
TO ADIIId**

Option	Yes	No	I don't know	Total responses
Number	24	12	4	40
Percentage	60.0	30.0	10.0	100

ADIfE: Please provide as much relevant information as you are able

99. Eleven survey submitters commented on their answers relating to sports supplements.

Submitters consider it is up to the athlete to check ingredients

100. Six survey submitters considered that it is up to athletes to be aware of what they are putting in their bodies, and some gave examples of the supplements that they use. One submitter commented that although it should be up to athletes to check that they are not taking banned substances, the onus should also be on the retailers and suppliers to provide products that have been batch tested to ensure that they do not contain banned substances to make it easier for athletes who do everything to ensure that they are participating in clean and fair sporting competitions.

101. Two survey submitters commented that they use basic supplements, and gave examples of whey powder, iron and Vitamin C. One of these submitters said that they use them for overall health, which is a direct influence on their sport. The submitter checks every ingredient on the supplements that they use, and does research about the brands and their reputation to see if there have been any previous incidents involving the products. Another submitter commented that they always scan the ingredients of supplements, because athletes are responsible for what they put in their bodies. This submitter did not provide an example of the supplements that they use.

102. One survey submitter commented that they were aware of the different supplements and foods, but would only consume products if they could read and understand the ingredient list. For example, this submitter commented that they would drink coffee rather than a protein supplement.

103. One survey submitter commented that they run in mass participation events (not an elite athlete), and use gels.

Some submitters do not use supplements

104. Two survey submitters commented that they do not take supplements of any kind.

NSO submissions

105. Four submissions were received from NSOs, including one from 24 NSOs and Paralympics NZ. These submissions said:

- a. Supplement use is a concern to NSOs who are aware of the risks
- b. Athletes are encouraged to only use supplements that have been approved or batch tested by an appropriate authority.

106. NZ Rugby noted that they, with the NZ Rugby Players' Association, released a joint position statement on young players and supplement use. The statement makes clear that these organisations consider supplement use inappropriate for schools and age-group rugby players. NZ Rugby also registered its concern that supplements are used in unregulated training environments, e.g. in gyms.

DFSNZ's submission

107. DFSNZ submitted that it did not endorse the use of any supplements. It also noted that until recently, more than half of the positive results from testing arose from the use of supplements.

Other comments from survey submitters

108. Two submitters commented on equestrian events. One stated that there is a very tight international regime for equestrian, which is well understood and adhered to in New Zealand. The other submitter considered that WADA has gone "totally overboard", and for equestrian, the rules do not work in the best interests of the horse.

109. One submitter commented that current regimes of sports supplements have limited performance enhancing effects.

AD12a: What education regarding the use of sports supplements or foods have you or the athletes in your sports received?

110. Eighteen survey submitters commented on the level of education they had received regarding the use of sports supplements or foods. Submitters said they had received education about sports supplements through the following channels:
- a. DFSNZ presentations
 - b. Nutrition experts providing information about supplements
 - c. Regular updates and communication with the New Zealand Olympic Committee and the International Federation for Equestrian Sports
 - d. Sport NZ education lectures for high performance athletes
 - e. Online education resources
 - f. DFSNZ Good Clean sport youth workshops, which encourage a food first approach
 - g. Other unspecified workshops.

AD12b: Please provide any comments.

Comments about the education received

111. Two survey submitters provided information about the education that they have received. One of these submitters recalled being told never to take supplements that are not on a specified list. The other submitter commented that it is best to use real foods first, and that prohibited substances are sometimes found in sports substances or foods.

No education regarding sports supplements

112. Three survey submitters commented that they had received no sports supplements education. One of these submitters commented that they were not aware of any education, but that they were not a member of athletics clubs, and just enrolled in social events. One submitter stated that aside from doing their own research, the only education they received was at an international sporting event in Australia where the Australian Sports Anti-Doping Authority was present and provided information and a mobile app to check medications or other products for banned substances.

NSO submissions

- 113. Five submissions were received: one from 24 NSOs and Paralympics NZ, and four from individual NSOs included in the 24.
- 114. All 25 of those organisations said their athletes received education from DFSNZ and medical specialists within their organisations.
- 115. One NSO added that they require their top teams to have designated supplements managers (DSMs) that educate the players. Education from the DSMs includes the “food first” message, reminding players they are responsible for the substances they take and an explanation of batch testing.

DFSNZ's submission

- 116. DFSNZ noted that education was reasonably available to elite athletes but less available in the recreational environment. The Crown entity noted that few NSOs provide information about supplements on their websites and some proactively provide supplements to their top athletes, seemingly without understanding the risks. DFSNZ noted it has ceased its once active phone service for checking supplements and is instead working with HPSNZ to provide tools and information to aid decision making around supplement use. It is also talking to Australian authorities about the issue.

Other comments

- 117. One survey submitter commented that they had always recommended to athletes that they worked with to check with DFSNZ to ensure that anything they were using was clean.
- 118. Another survey submitter commented that some school coaches have been pressuring student athletes to use supplements.

ADI3: Do you have any comments on the regulation of sports supplements and sports foods?

- 119. Ten survey submitters provided further comment about the regulation of sports supplements and sports foods.

Regulations are good

- 120. One survey submitter commented that sports supplements regulations are very stringent and well policed. Another survey submitter commented that regulation is generally very good, and that sport supplement stores have batch tested products which they can test of banned substances. A third survey submitter commented that access to necessary information is easy.

Regulation does not go far enough

- 121. One survey submitter commented that the regulation of sports supplements does not go far enough, and that labels cannot be relied upon. Another survey submitter commented that there should be more stringent regulations. Two email submitters (representing 24 NSOs and Paralympics NZ) also submitted that the regulation of supplements is inadequate, although acknowledged it would be difficult to batch test all products.

-
- I22. One survey submitter commented that there should be more testing of products, and that a list of tested products should be available, along with the disclaimer that the list took an advisory approach rather than a complete confirmation that the products were free from banned substances. Another survey submitter commented that any banned substances should never be allowed in supplements.
- I23. One survey submitter considered that there needs to be more publication around the regulation of sports supplements.

Other comments

- I24. One survey submitter commented that the only supplements which ought to be banned are those that have been proven to be harmful. This submitter also considered that if a supplement poses potential health risks to particular groups of people, for example, pregnant women, this should be noted on the packaging. The submitter did note that they thought this was probably already a requirement.
- I25. One survey submitter considered the DFSNZ encouragement of a “food first” approach to be positive, as it would be hard to regulate sports supplements and foods and be completely confident that they are free of prohibited substances, particularly if they are made overseas.
- I26. One NSO submitter argued regulation (and education) regarding supplements should target schools and gyms.

Sports physicians and therapeutic use exemptions

- I27. Questions ADI4 and ADI5 invited comment on doctor conduct and on the process for gaining a therapeutic use exemption.

ADI4: Do you have any comments on the actions of sports physicians in New Zealand in relation to anti-doping?

- I28. Four survey submitters commented that physicians are generally very good at their jobs and ensure that athletes abide by the rules. However, two of these submitters qualified their responses. One commented that the doctor in a specific case should have lost their job, and the other stated that there are always some doctors who will bend the rules, and that it is up to the athletes to make “informed” decisions.
- I29. An email submission from 24 NSOs and Paralympics NZ, and three email submissions from individual NSOs within the 24 were positive about the physicians they had worked with.
- I30. DFSNZ noted it sees doctors advising athletes without due consideration of the regime athletes are subject to. It submits there could be a lack of understanding about the WADA regime amongst the medical community. For this reason, DFSNZ is working with general practice and sports medicine professionals to provide education to doctors. DFSNZ notes it would require collaboration from the sector, e.g. the Ministry of Health, and additional resource to make a greater impact.
- I31. One survey submitter questioned whether physicians are qualified to give advice.
- I32. One survey submitter commented that “they just aren’t enforcing it this year”, but did not provide any further comment to explain this view.

ADI5: Do you have any comments on the process for getting a therapeutic use exemption in New Zealand?

The process is not well understood or requires more publicising

- I33. One survey submitter commented that they had limited knowledge for getting a therapeutic use exemption (TUE) for human athletes, and another commented that it was a very complicated process for their sport.
- I34. One survey submitter commented that the TUE is not well understood, and there probably needs to be better education for athletes, coaches and parents. This submitter considered that asthma is very common in New Zealand, and has caused issues in the past for young athletes who did not know what was needed. The process for gaining a TUE must be simple for athletes to comply with. This submitter also suggested that there could be better education in the medical profession, so that general practitioners could help inform athletes.
- I35. Two survey submitters commented that the process needs better publication. One of these submitters also gave the example of asthmatics who do not know that it is necessary for them to obtain a TUE.
- I36. One NSO submitted via email saying the role of TUEs in athlete groups outside of elite competition needs to be clarified. The submission cited the example of masters-level athletes and those in domestic competitions.

The process is acceptable

- I37. One survey submitter commented that while the process for getting a TUE is “too lax” overseas, in their opinion it is suitably rigorous in New Zealand. One survey submitter commented that the process was good, and another stated that the athletes that they work with are aware of the process that they must follow.
- I38. Another survey submitter commented that although this is always likely to be a “grey area”, in general, a common-sense approach can be used.
- I39. Two email submissions from NSOs and one representing the views of 24 NSOs and Paralympics NZ said the process works well.
- I40. DFSNZ submitted that TUEs are “fundamentally important” to sport to allow all athletes to compete on a level playing field. DFSNZ considers the process “very robust” when followed properly and has “very high levels of confidence” in the process followed in New Zealand.

Other comments

- I41. One survey submitter simply commented that they had never had to apply for a TUE.
- I42. One NSO email submitter simply outlined the protocol for TUEs in their elite competitions.
- I43. Another survey submitter suggested that all of the TUEs should be collated nationally and be available for review where necessary.
- I44. One survey submitter commented that the TUE is an area that has created some difficulty for them, as DFSNZ wants everyone to use their process, but for this submitter’s sport the offshore TUE application process is preferred. The submitter did not provide more detail about how they resolved this issue.
- I45. One submitter considered that no one should be allowed a TUE because in their opinion it is just “legal cheating”.

Final comments on anti-doping

AD16: Please provide any other comments about anti-doping in New Zealand

Anti-doping systems in New Zealand are good

146. Two survey submitters provided positive comments about the anti-doping system in New Zealand:
- a. DFSNZ do a great job and New Zealand's anti-doping system is robust (however, internationally, systems are corrupt and fail clean athletes)
 - b. DFSNZ provide an excellent service.

Comments specific to young people

147. Four submitters provided specific comment on young people in relation to anti-doping.
148. Three submitters commented that there needs to be a greater focus on school sports and the pressure that is being placed on young athletes. These submitters commented that the pressure being placed on students is leading to the use of performance enhancing supplements among young people.
149. One submitter commented that the need to test teenagers in one sport is high, and that they "need to get onto it before something happens".

Other comments

150. One submitter reiterated their previous comments that the actions taken against low level athletes are excessive. They expressed concern that people will not take part in sport out of fear that they may fail a drug test and be branded as a 'drug cheat' by the media. This submitter considered that athletes caught up in the clenbuterol issue have suffered disproportionate publicity and criticism compared to their actions, and at the very most they should have received a suspended sentence and a warning. This submitter considered that there needs to be a complete change in the leadership of DFSNZ to restore public confidence in the agency.
151. One submitter commented that there needs to be more public comment from sports organisations, particularly the large ones, about the rigour of their anti-doping programmes. There is a risk that sports organisations could be more concerned with the international success of their code than of dealing effectively with doping. This submitter considered that this must be addressed, as ultimately a big doping scandal would have reputational impacts for all New Zealand sport and New Zealand society as a whole.
152. One submitter expressed concern with the possible WADA reduction in the seriousness of recreational drugs, and stated that in sports where judgment is critical to safety this would be a "hugely retrograde step". This submitter stated that they were also opposed to criminal offences being treated more leniently.
153. One submitter simply commented that the consequences of doping need to be made clearer, and another considered that any banned athletes should be banned from all sporting events, irrespective of sanctioning.
154. Crimestoppers submitted that they were ready to assist in anti-doping reporting if needed.
155. DFSNZ submitted that New Zealand has a strong record on anti-doping but that we should not be complacent.

05

PROTECTING AGAINST CORRUPTION

1. We received 60 submissions on this chapter, including:
 - a. 48 through the survey tool; and
 - b. 12 written submissions sent directly to Sport NZ.

Bribery or corruption

2. Question COI sought details of bribery or corruption in international sport organisations that is impacting any New Zealander.

COI: Are you aware of bribery or corruption in any international sports organisation where a New Zealander is involved or may be exposed? Please provide details.

3. Forty-two survey respondents addressed this question as set out in the table below.

**TABLE 87:
SURVEY RESPONSES
TO COI**

Option	Yes	No	Total responses
Number	13	29	42
Percentage	31.0	69.0	100

4. Most submitters who commented on this question were aware of some level of bribery or corruption in international sport organisations that is impacting any New Zealander. Some submitters provided specific examples of corruption that they had experienced.

Yes

5. Three survey submitters specified sports that had incidences of bribery and corruption, with all mentioning cricket, two mentioning football, and one mentioning rugby.
6. Four other survey submitters provided specific examples of the bribery or corruption that they were aware of:
 - a. New Zealanders working as international administrators whose colleagues were exposed (although there was no suspicion of the New Zealanders)
 - b. A case against an NSO that is being considered by the Privacy Commission
 - c. A compromised manager working with a close friend on a technology project
 - d. Manipulating the odds using sports betting (no further detail provided on who this involved).
7. Four submissions from other sources said “yes”. All four referenced examples of overseas bribery or corruption that have appeared in the media, including in football, cricket, Olympic sports and voting on Olympics hosting rights.

No

8. One survey submitter, appearing to contradict their 'no' response, commented that they did not trust anyone not to take advantage of their position to achieve financial, sexual or self-betterment. This submitter suggested that the more famous someone is, the less likely they are of being punished.
9. Another survey submitter commented that although they were not aware of bribery or corruption, having players serve as coaches, and having the same person coach at multiple levels, opens the prospect of corruption and bias, and should be avoided at all costs.
10. Two submissions from other sources answered 'no'.

Recognising and reporting crimes in the sporting context

11. Questions C02 and C03 sought to assess the degree to which submitters would recognise and report corruption, bribery, fraud, embezzlement, money laundering or other financial crimes occurring in a sports context.

C02: To what extent are you confident you would recognise corruption, bribery, fraud, embezzlement, money laundering or other financial crimes if you saw them in a sports context?

12. Forty-six survey respondents addressed this question as set out in the table below.

**TABLE 88:
SURVEY RESPONSES
TO C02**

Option	Extremely confident	Very confident	Somewhat confident	Not so confident	Not at all aware	Not at all confident	Total responses
Number	6	12	17	9	0	2	46
Percentage	13.0	26.1	37.0	19.6	-	4.3	100

13. The confidence of the seven submitters through other sources that addressed this question ranged from "low" through to "very" confident.
14. The submission from 24 NSOs and Paralympics NZ said NSOs might recognise some examples of this behaviour, but that a lot of activity goes on behind the scenes which chief executives do not see.
15. Three NSOs and one RST said they were confident they would identify such behaviour through policies or annual audit processes in place.
16. DFSNZ noted however, that there is anecdotal evidence that people overestimate their ability to recognise such issues. DFSNZ said that without education as to what to look for, people will often accept an "honest" explanation, however farfetched, before accepting there may be a "dishonest" explanation and that fraudsters rely on and exploit this to carry out their deception.

C03: If you saw corruption, bribery, fraud, embezzlement, money laundering or other financial crimes in a sports context would you be willing and able to report them?

17. Forty-seven survey respondents addressed this question as set out in the table below.

**TABLE 89:
SURVEY RESPONSES
TO C03**

Option	Yes	No	I don't know	Total responses
Number	32	4	11	47
Percentage	68.1	8.5	23.4	100

18. Seven written submitters addressed this question. Of these, five submitters said that they would be willing and able to report these activities.
19. The submission from 24 NSOs and Paralympics NZ said that NSOs would only report such behaviour if they could prove it and that if there is not enough evidence, they could be on a "hiding to nothing". This submission also said that people may be aware of such behaviour but may not report it if ultimately benefits them.
20. DFSNZ again suggested that there is anecdotal evidence that people overestimate their desire to report such behaviour and that without appropriate education as to what to look for and how to report it, this behaviour is likely to go unreported.

Incorporated Societies: Legal obligations and compliance

21. Question C04 and C05 sought to identify the extent of awareness of and compliance with legal obligations regarding financial record keeping amongst incorporated societies.

C04a: To what extent is your organisation aware of its legal obligations in regard to financial record keeping? (Please only answer this question if your organisation is an incorporated society)

22. Twelve survey respondents addressed this question as set out in the table below.

**TABLE 90:
SURVEY RESPONSES
TO C04a**

Option	Extremely aware	Very aware	Somewhat aware	Not so aware	Not at all aware	Total responses
Number	5	6	0	1	0	12
Percentage	41.7	50.0	-	8.3	-	100

23. Five submitters addressed this question through email submissions. All five submissions (including one from 24 NSOs and Paralympics NZ) said they were fully aware of their legal obligations in regard to financial record keeping.

C04b: How did your organisation become aware of its obligations?

24. Six submitters advised of how their organisation became aware of its legal obligations in relation to financial record keeping:
- Accounting and professional experience
 - Charitable status and an annual independent audit
 - Legislation and constitutional requirements
 - Early discussions and annual reporting procedure reviews with secretary/ treasurer
 - RST education
 - Reliance on board members and financial department staff to be aware.
25. Reasons given for the high level of awareness among email submitters included strong governance, thorough processes, regular reviews of legislative requirements and external specialist advisors providing updates when obligations change.

C05: To what extent does your organisation fulfil its legal obligations in regard to financial record keeping? Please explain your answer. (Please only answer this question if your organisation is an incorporated society)

26. Twelve survey respondents addressed this question as set out in the table below.

**TABLE 9I:
SURVEY RESPONSES
TO C05**

Option	Always	Usually	Sometimes	Rarely	Never	Total responses
Number	10	1	0	1	0	12
Percentage	83.3	8.3	-	8.3	-	100

27. Two survey submitters who answered 'always' provided further comment to support their answer. One survey submitter commented that their incorporated society's results are presented annually after each AGM. The other survey submitter commented that their incorporated society has charitable status, and is independently audited every year.
28. The survey submitter who answered 'rarely' provided further comment to support their answer. This submitter commented "volunteers", without providing further explanation.
29. All five submitters through other means that addressed this question said their organisation was fully compliant with all financial record keeping obligations. Reasons given for full compliance with these legal obligations included annual external audits, internal finance committees and highly capable internal finance staff.

Sports charities: Legal obligations and compliance

30. Questions C06 and C07 sought to identify the extent of awareness of and compliance with legal obligations regarding financial record keeping amongst sports charities.

C06a: To what extent is your organisation aware of its legal obligations in regard to financial record keeping? (Please only answer this question if your organisation is a charity)

31. Six survey respondents addressed this question as set out in the table below.

**TABLE 92:
SURVEY RESPONSES
TO C06a**

Option	Extremely aware	Very aware	Somewhat aware	Not so aware	Not at all aware	Total responses
Number	4	0	1	0	1	6
Percentage	66.7	-	16.7	-	16.7	100

32. Three submissions that addressed this question were received through other means, including one from 24 NSOs (some of which are registered charities) and Paralympics NZ. All three said they were fully aware of their legal obligations in regard to financial record keeping.

C06b: How did your organisation become aware of its obligations?

33. Four submissions from sports charities commented on this question. They said they became aware of their legal obligations due to:
- Charities Commission requirements and independent auditing
 - Research on Charities and IRD websites
 - The obligations being clearly set out when applying for charity status
 - Seeking advice from legal experts.

C07: To what extent does your organisation fulfil its legal obligations in regard to financial record keeping? Please explain your answer. (Please only answer this question if your organisation is a charity)

34. Six survey respondents addressed this question as set out in the table below.

**TABLE 93:
SURVEY RESPONSES
TO C07**

Option	Always	Usually	Sometimes	Rarely	Never	Total responses
Number	6	0	0	0	0	6
Percentage	100.0	-	-	-	-	100

35. Two survey submitters commented on this question. One survey submitter commented that their organisation keeps full financial records and accounts, which are independently audited annually. The other survey submitter also commented that they comply with Charities Commission requirements, and conduct independent auditing.
36. All three submitters that addressed this question through other means said their organisations were fully compliant with all financial record keeping obligations. Reasons given for full compliance with these legal obligations included the use of a legislative compliance register and reviews from internal risk and audit committees.

Sport NZ template resources

37. Questions C08 – C013 explored submitter confidence in governance arrangements and awareness of Sport NZ resources, with an assessment of the resources' worth where applicable.

C08: To what extent are you confident the sport organisations you are involved with have robust governance arrangements and protections against corruption? Please explain your answer.

38. Forty-four survey respondents addressed this question as set out in the table below.

**TABLE 94:
SURVEY RESPONSES
TO C08**

Option	Extremely confident	Very confident	Somewhat confident	Not so confident	Not at all confident	Total responses
Number	5	8	5	13	13	44
Percentage	11.4	18.2	11.4	29.5	29.5	100

39. One survey submitter who answered 'very confident' commented that they have no direct involvement with any of their members other than governance. They do not have large amount of funding to work with or distribute, so it is easy to control.
40. One survey submitter who selected 'somewhat confident' said there are robust rules for major breaches, but that these are limited for more minor issues. Another survey submitter agreed, but also said that people are "easily hoodwinked." The third submitter commented that there is some information around governance available, but that there is nothing to identify the people in charge of governance.
41. One survey submitter who responded 'not so confident' commented that they had raised concerns about the financial processes with the organisation that they are involved with, which resulted in bullying by staff and a lack of follow up by the organisation to resolve the issues. Another survey submitter commented that, under a broad definition, many of their officials are subject to corruption, particularly when a judgement is subjective.

42. Eight survey submitters who responded 'not at all confident' provided further comment to support their answer. Most of these submitters gave examples of the result of the lack of governance arrangements and protections in their sport organisations, including:
- The "events and happenings" over the last five years at the submitter's club show that they do not have such governance arrangements.
 - The head office is controlled by a few dominant people who bully the others in the office to do as they want and go to all means to prevent new members from changing anything or having any real say.
 - The NSOs that this submitter has been involved with have been unprofessional in their allocations of money based on friendships.
 - The NSO knows what is wrong but they ignore the rules when it suits them.
 - There is too much secrecy regarding where money is being spent among board members and when asked for clarification, member clubs do not receive an answer.
43. Nine submitters addressed this question through other means. There were varying levels of confidence among these submissions, from low confidence through to very high confidence. Explanations for low levels of confidence included increasing demands on many sector participants, lack of understanding of the appropriate governance arrangements and under-resourcing of capability within the sector. Measures suggested by these submitters that would lead to higher levels of confidence included vigilance in terms of robust governance and policy implementation, avoidance of actual or perceived conflicts of interest, shared resources between NSOs to help raise awareness of best practice, clear processes and policies, thorough contract sign-off process and NSOs supporting their RSOs in this area.

C09: Were you aware of the Sport NZ resources to help organisations with their governance arrangements? If so, how were you made aware?

44. Forty-five survey respondents addressed this question as set out in the table below.

**TABLE 95:
SURVEY RESPONSES
TO C09**

Option	Yes	No	I don't know	Total responses
Number	23	18	4	45
Percentage	51.1	40.0	8.9	100

45. The majority of survey submitters were made aware of Sport NZ's governance resources through direct involvement with Sport NZ. Some submitters were made aware through their own online research.
46. All seven submissions through other means addressing this question (including the submission representing 24 NSOs and Paralympics NZ) said they were aware of these resources. These submitters were made aware of these resources in a range of ways, including Sport NZ Partnership, Relationship and Capability Managers, and Sport NZ communications (e.g. Partner Update e-newsletter).

COIOa: Have you used the Sport NZ resources to help an organisation with its governance arrangements? If so, which resources did you use?

47. Forty-five survey respondents addressed this question as set out in the table below.

**TABLE 96:
SURVEY RESPONSES
TO COIOa**

Option	Yes	No	I don't know	Total responses
Number	8	35	2	45
Percentage	17.8	77.8	4.4	100

45. The majority of survey submitters were made aware of Sport NZ's governance resources through direct involvement with Sport NZ. Some submitters were made aware through their own online research.
46. All seven submissions through other means addressing this question (including the submission representing 24 NSOs and Paralympics NZ) said they were aware of these resources. These submitters were made aware of these resources in a range of ways, including Sport NZ Partnership, Relationship and Capability Managers, and Sport NZ communications (e.g. Partner Update e-newsletter).
48. Survey submitters said they have used the following resources:
- Nine Steps of Governance Board Manual
 - Templates
 - Governance workbooks
 - Effective Steps to Governance
 - Governance IOI (online).
49. Six submissions through other means (including one representing 24 NSOs and Paralympics NZ) said they had used Sport NZ's governance resources. Examples given by these submitters included the Effective Governance Toolkit and constitution template.

COIOb: Did you find them useful?

50. Thirty survey respondents addressed this question as set out in the table below.

**TABLE 97:
SURVEY RESPONSES
TO COIOb**

Option	All were useful	Some were useful	None were useful	I don't know	Total responses
Number	4	7	1	18	30
Percentage	13.3	23.3	3.3	60.0	100

CO10c: Do you have any comments?

51. A survey submitter commented that Sport NZ resources encourage anti-democratic behaviour and lead to a temptation towards corruption. Another survey submitter commented that more examples or exercises to work through would be useful, and that they would be happy to attend workshops where scenario and role play were used as education tools.
52. Three submissions through other means from NSOs noted the submitting organisations had been awarded Sport NZ's Governance Mark.
53. Aktive noted it has established a governance initiative called the Chairs' Roundtable for NSOs and RSOs based in the Auckland region to support and train board chairs in their leadership roles.
54. One email submitter noted that organisations need to actively ensure governance policies are being complied with. If this is not happening, governance policies (and the Governance Mark) become just a governance box ticking exercise.

CO10d: What additional support, if any, does the sport organisation you are involved with need in regard to governance?

55. Six survey submitters provided specific examples of the kind of help that their sport organisation requires:
 - a. Help with accountability in general, and particularly with monitoring
 - b. Protection from people who want the club land
 - c. Support with accounting
 - d. Training and frequent checks by outside agencies
 - e. Advice on how to remove a non-functional board when it is appointed by an outside entity with no support from affiliated members
 - f. There needs to be a lot of support in the school sector around governance of sport and the trade-off between school reputation and students' wellbeing.
56. Five survey submitters gave more general examples of the issues that their organisation is currently experiencing and what they believe they need:
 - a. A governance system that stops those in power controlling others and manipulating outcomes
 - b. Criteria for directors that is more akin to a commercial business- long service as a volunteer is not an indicator of the appropriate skills and experience
 - c. More democracy and a move away from the Sport NZ drive for centralisation, as centralisation concentrates power and concentrated power encourages corruption
 - d. "All of them" need "sorting out", especially in one sport. The better you are the more you can get away with and youngsters copy that behaviour
 - e. Volunteer organisations need governance assistance to improve confidence and decision-making.

57. A number of submissions through other means suggested greater sharing of resources would help, with one submitter suggesting a shared portal where NSOs can review each other's governance policies to improve their own. This would be particularly beneficial for smaller organisations who do not have the capability to implement all the appropriate policies.
58. One email submitter suggested that while Sport NZ does provide resources and assistance in this area, there could be greater promotion of it to ensure greater utilisation among the sector.
59. Netball NZ suggested regular updates from Sport NZ to the sector highlighting the new resources available would be beneficial.
60. NZ Rugby suggested an update of the Incorporated Societies Act would be beneficial.
61. DFSNZ noted that Sport NZ has served the sector well by preparing a range of governance resources, however, there is no incentive for organisations to use the resources, particularly if they are not focussed on managing a risk they perceive as low. Further, without someone checking whether organisations are actually using these resources, there may be no immediate need for them to do so.

COII: Were you aware of the Sport NZ finance policy templates? If so, how were you made aware?

62. Forty-four survey respondents addressed this question as set out in the table below.

**TABLE 98:
SURVEY RESPONSES
TO COII**

Option	Yes	No	I don't know	Total responses
Number	8	33	3	44
Percentage	18.2	75.0	6.8	100

63. Survey submitters told us they were made aware of the Sport NZ finance policy templates through online research, the Sport Integrity Review consultation process and/or an RST.
64. All seven submissions addressing this question through other sources (including the submission representing 24 NSOs and Paralympics NZ) said they were aware of these resources. These submitters were made aware of these resources in a range of ways, including Sport NZ's direct promotion of them to finance staff and Sport NZ Capability Managers.

CO12a: Have you used the Sport NZ finance policy templates? If so, which ones did you use?

65. Forty-one survey respondents addressed this question as set out in the table below.

**TABLE 99:
SURVEY RESPONSES
TO CO12a**

Option	Yes	No	I don't know	Total responses
Number	2	39	0	41
Percentage	4.9	95.1	-	100

66. Seven submitters through other means said their organisation(s) used the Sport NZ finance templates. Specific templates referenced in these submissions included the corporate credit card, debt management, fraud, insurance, designated authorities process policies.

CO12b: Did you find them useful?

67. Twenty-eight survey respondents addressed this question as set out in the table below.

**TABLE 100:
SURVEY RESPONSES
TO CO12b**

Option	All were useful	Some were useful	None were useful	I don't know	Total responses
Number	3	1	1	23	28
Percentage	10.7	3.6	3.6	82.1	100

68. One survey submitter commented that finance templates are useful to review, as their finance policy is written into their constitution. Another submitter commented "put money in and you will get used." No further explanation was provided for this comment.

69. All seven submissions through other means that addressed this question said they had found the templates useful.

CO13: What additional support, if any, does any sport organisation you are involved with need in regard to finance?

70. One survey submitter commented that their organisation required "a lot" of additional financial support, as in the past, members of the committee had issues with finance and they are still involved. Other submitters provided specific examples, including:

- a. It would be good if funding was increased for minor sport
- b. Make them all amateurs like "we were in the old days", too much money coming in creates the problems
- c. Be more accountable to providing services to members at the grass roots level and in the high-performance arena (it was unclear who this submitter thought should be more accountable).

71. One submitter that said they kept very minimal records which are reviewed by an accountant, were comfortable under the current arrangement, and did not require further support.
72. Additional support suggested by submitters through other means included assistance with improving financial reporting for boards, particularly the quality, detail and efficiency in data capture, the creation and presentation of financial reports and additional Sport NZ investment into financial systems improvement, improved confidence in cyclical funding, regular updates from Sport NZ and ongoing training courses for staff.
73. Some of these submitters commented that the sharing of resources between sports organisations would be beneficial, with one submitter suggesting a network of sports on the Xero system would be useful for shared learnings. One submitter recommended that Sport NZ talks to NSOs to see what they are doing and incorporate good practice into their templates and training etc.

Government transparency

74. Question COI4 relates to the transparency of government agencies in relation to sport.

COI4: To what extent do you think there are adequate provisions to ensure the government is transparent in relation to sport in New Zealand? Please explain your answer.

75. Forty survey respondents addressed this question as set out in the table below.

**TABLE IOI:
SURVEY RESPONSES
TO COI4**

Option	A full extent	A large extent	A moderate extent	A little extent	Not at all	Total responses
Number	5	11	17	6	1	40
Percentage	12.5	27.5	42.5	15.0	2.5	100

76. Most submissions through other means that addressed this question believed there are adequate provisions in place, with one submitter stating that the select committee annual review process provides further transparency in addition to the provisions outlined in the discussion document.
77. However, one submitter questioned whether the provisions outlined in the discussion document would apply to sports sector organisations such as NSOs, and said therefore it is not clear how transparency would be applied across the sector.
78. Most submitters also noted that it is important to have a transparent system given the significant level of government investment into sport in New Zealand.

CO15: Do you have any other comments on corruption in sport in New Zealand?

79. Survey submitters commented on funding, nepotism, the challenges of exposing corruption, and other general issues to do with corruption.
80. One submitter commented that the allocation of sports funding has many anomalies, and queried whether allocation of funding was still about “connections”, and another submitter commented that anything to do with money “soon leads to issues.”
81. One submitter suggested that it would be useful for the total money that is invested, including a breakdown of who receives it, to be made public.
82. One submitter commented that corruption comes from our involvement with other countries, and their cultures.
83. One submitter commented that the selection for youth representative teams is an ongoing source of allegations around nepotism. The children of administrators and long-standing members of sport bodies do seem to be over-represented on these teams. The submitter went on to say that there are also claims that a parent’s ability to pay for travel influences selection.
84. One submitter commented that it is very hard to whistle-blow, as organisations look after their friends and do not listen to outside input.
85. One submitter commented that members deserve better and deserve to be engaged and appreciated. Another submitter said that in the political arena, we often get told what they think we want to hear with reasoning behind decisions often absent.
86. One submitter commented that they believed sport in New Zealand to be “pretty honest.” This submitter went on to say that even with the things that they are concerned about, the people involved usually feel that they are genuinely being helpful, but tend to bully others into their way of thinking. Another submitter also commented that in their small sport group they didn’t see corruption as being a major concern, however, larger sports and codes have many avenues where corruption may become a problem.
87. One written submitter stated that while New Zealand sport remains free of corruption, we cannot afford to be complacent given the numerous overseas examples of corruption in sport. The submitter suggested that it is likely New Zealand’s changing demographics would have an impact on our traditionally anti-corruption culture.
88. Sport Wellington recommended the establishment of a national integrity unit to address gaps in the current sport integrity arrangements and protections. Sport Wellington also believes that roles and responsibilities in relation to integrity at the national, regional and club level need to be made clear and that central government should fund the creation of regional sport integrity leads to deal with sport integrity matters negatively impacting participation in their region.
89. NZ Rugby stated that they would support government providing more resource and/or setting up either a separate entity or turning DFSNZ into an anti-corruption unit or separate division within Police but providing more resource for sports to access intelligence, investigative capability and other enforcement agencies around the world given the global nature of corruption, money laundering and organised crime.
90. Netball NZ submitted that there is increasing pressure, particularly on smaller organisations, to secure quality personnel to tackle issues such as corruption. In addition, there are increasing legal obligations for sports organisations to fulfil, including a number of international obligations from bodies like WADA and the IOC.

06

PROTECTING AGAINST MATCH-FIXING

1. We received 53 submissions on this chapter, including:
 - a. 41 through the survey tool; and
 - b. 12 written submissions sent directly to Sport NZ.

The extent of the risk

2. Question MF1 explored the perceived risk of match-fixing.

MF1: To what extent is match-fixing a risk for the sports you are involved with? Please explain your answer.

3. Thirty-seven survey respondents addressed this question as set out in the table below.

**TABLE I02:
SURVEY RESPONSES
TO MF1**

Option	A very high risk	A high risk	A moderate risk	A low risk	No risk	Total responses
Number	8	1	9	16	3	37
Percentage	21.6	2.7	24.3	43.2	8.1	100

4. The perceived risk among survey submitters varied depending on the sport(s) they are involved with. Some sports (e.g. football and golf) were identified as more susceptible to match-fixing, while others were perceived as low risk.
5. One submitter commented that the risk of match-fixing may rise as secondary school sport becomes increasingly televised or streamed online.
6. Most submissions from other sources acknowledged a growing risk of match-fixing in New Zealand, particularly for sports where there is significant betting interest.

The Crimes Act 1961

7. Questions MF2 – MF5 and their sub-questions explored match-fixing in the context of the Crimes Act 1961.

MF2: Are you aware that match-fixing is an offence under the Crimes Act 1961? If so, how were you made aware?

8. Thirty-seven survey respondents addressed this question as set out in the table below.

**TABLE I03:
SURVEY RESPONSES
TO MF2**

Option	Yes	No	I don't know	Total responses
Number	33	4	0	37
Percentage	89.2	10.8	-	100

9. Thirteen survey submitters who answered 'yes' about their awareness of match-fixing as an offence under the Crimes Act 1961 provided comments. Submitters noted the media, common knowledge, and training or workshops as the sources of this information.
10. All eight submissions through other sources that addressed this question answered 'yes'. Reasons given by these submitters for being aware included media coverage, Sport NZ and HPSNZ updates and working with Sport NZ during the policy development stage of the offences.

MF3: Are you aware of any legal action taken or considered under section 240A of the Crimes Act? If so, please provide details.

- II. Thirty-six survey respondents addressed this question as set out in the table below.

**TABLE I04:
SURVEY RESPONSES
TO MF3**

Option	Yes	No	I don't know	Total responses
Number	11	23	2	36
Percentage	30.6	63.9	5.6	100

12. Two survey submitters mentioned cricket, with one giving an example of an overseas team that competes against the New Zealand team. One mentioned harness racing, but gave no details.
13. Most other submitters were not aware of any legal action under section 240A of the Crimes Act.

MF4: Are you aware of any legal action taken or considered under any other legislation or provision in the Crimes Act in regard to match-fixing? If so, please provide details.

14. Thirty-three survey respondents addressed this question as set out in the table below.

**TABLE I05:
SURVEY RESPONSES
TO MF4**

Option	Yes	No	I don't know	Total responses
Number	4	24	5	33
Percentage	12.1	72.7	15.2	100

15. Most submitters using other means were not aware of any legal action under any other legislation or provision in the Crimes Act in regard to match-fixing.

MF5: Are you aware of any reasons why information relating to match-fixing attempts would not be reported to the Police? Please explain your answer.

16. Thirty-five survey respondents addressed this question as set out in the table below.

**TABLE I06:
SURVEY RESPONSES
TO MF5**

Option	Yes	No	I don't know	Total responses
Number	9	24	2	35
Percentage	25.7	68.6	5.7	100

17. Submissions through other means identified a range of reasons why information relating to match-fixing attempts might not be reported to the Police, these included lack of awareness and ignorance to different cultural values in certain communities, lack of proof, lack of confidence in the Police to investigate, lack of clear reporting process (or perceived lack), fear of personal penalty by association, risk of embarrassment and threats to family.

Additional actions to counter match-fixing

18. Questions MF6 – MF13 and their sub-questions explored measures intended to counter match-fixing.

MF6: Are you involved with a sport organisation that is a recipient of funding from Sport NZ and/or High Performance Sport NZ and thereby obliged to adopt the New Zealand Policy on Sports Match-Fixing and Related Corruption?

19. Forty-one survey respondents addressed this question as set out in the table below.

**TABLE I07:
SURVEY RESPONSES
TO MF5**

Option	Yes	No	I don't know	Total responses
Number	22	14	5	41
Percentage	53.7	34.1	12.2	100

20. We received five submissions through other means representing sport organisations that receive funding from Sport NZ and/or HPSNZ, including the submission from 24 NSOs and Paralympics NZ.

MF7a: Has your organisation developed rules to prevent and respond to match-fixing activity? (Please only answer if you answered yes to MF6)

21. Eighteen survey respondents addressed this question as set out in the table below.

**TABLE I08:
SURVEY RESPONSES
TO MF7a**

Option	Yes	No	I don't know	Total responses
Number	7	3	8	18
Percentage	38.9	16.7	44.4	100

22. All five written submitters who answered 'yes' to MF6 answered 'yes' to this question.

MF7b: Are they publicly available?

23. One survey submitter stated that the rules are posted on the website of their sport organisation and another named the rules used: ICCs Minimum Standards for Players and Match Officials Areas at International Matches.

24. All five submitters using other means said match-fixing rules were available on their websites.

MF8a: Has your organisation used the model match-fixing rules provided by Sport NZ? (Please only answer if you answered yes to MF6)

25. Eighteen survey respondents addressed this question as set out in the table below.

**TABLE I09:
SURVEY RESPONSES
TO MF8a**

Option	Yes	No	I don't know	Total responses
Number	5	5	8	18
Percentage	27.8	27.8	44.4	100

26. Three submissions through other means (including the submission from 24 NSOs and Paralympics NZ) indicated their organisation(s) had adopted the model match-fixing rules. NZ Rugby does not use the model match-fixing rules as Sport NZ considers their anti-corruption regulations sufficiently compliant and consistent with the model rules.

MF8b: If you have, did you find them useful? Why/why not? Please explain your answer.

27. Eleven survey respondents addressed this question as set out in the table below.

**TABLE IIO:
SURVEY RESPONSES
TO MF8b**

Option	Yes	No	I don't know	Total responses
Number	4	2	5	11
Percentage	36.4	18.2	45.5	100

28. One survey submitter commented that their organisation had found the rules “too large for a small organisation to be able to effectively and reliably implement.” As a result, they drew on the model to develop a smaller and more manageable policy.

29. One survey submitter commented they were previously unaware that a responsibility associated with receiving Sport NZ funding was to use the Sport NZ model match-fixing rules.

30. The three submitters using other means who use the model match-fixing rules said they found them simple and easy to understand and that having consistency across all sports is important when it comes to match-fixing. Submitters also said it is important that such policies stand up in court and cannot be picked apart by someone, thereby creating more problems than they solve.

MF9: If your organisation has not adopted the rules provided by Sport NZ regarding match-fixing, what assistance would it need to do so? (Please only answer if you answered yes to MF6)

31. Two submitters commented on this question. One requesting that a smaller version of the rules be developed for small organisations, but with the same intent and principles.

32. One NSO said: “Support needed, money, time, expertise, workshops”.

MF10: To what extent do you feel your organisation is managing the risk of match-fixing appropriately? Please explain your answer. (Please only answer if you answered yes to MF6)

33. Seventeen survey respondents addressed this question as set out in the table below.

**TABLE III:
SURVEY RESPONSES
TO MF10**

Option	Very well	Well	Just OK	Not well	Total responses
Number	3	6	3	5	17
Percentage	17.6	35.3	17.6	29.4	100

34. Five submitters using other means addressed this question. The submission from 24 NSOs and Paralympics NZ said most NSOs have some form of process in place for updating their match-fixing policy, communicating it to staff, assigning responsibility for managing and monitoring it and reporting against it. Individual NSOs said they were managing the risk as well as they could but said further support would allow them to manage it better, especially at sub-elite levels. NZ Football and NZ Rugby work closely with the TAB and some international betting agencies to monitor and analyse betting patterns.

MF11a: Has your organisation implemented a match-fixing education programme?

35. Seventeen survey respondents addressed this question as set out in the table below.

**TABLE II2:
SURVEY RESPONSES
TO MF11a**

Option	Yes	No	I don't know	Total responses
Number	5	8	4	17
Percentage	29.4	47.1	23.5	100

36. Four email submissions (including the submission from 24 NSOs and Paralympics NZ) said their organisations had match-fixing education programmes in place. One NSO said they do not have a specific programme in place.

MF11b: Does your organisation need more support in this area? Please explain your answer.

37. Seventeen survey respondents addressed this question as set out in the table below.

**TABLE I13:
SURVEY RESPONSES
TO MF11b**

Option	Yes	No	I don't know	Total responses
Number	7	6	4	17
Percentage	41.2	35.3	23.5	100

38. One survey submitter described the practice of consulting their membership during policy development, and then posting policies on their website, which the sport organisation considered “sufficient given the low likelihood” of match-fixing in their particular sport.

39. Two email submissions addressed this question. NZ Rugby said they do not need further support in this area – they deliver regular face-to-face education to their players and team management, with online education available to those unable to attend the face-to-face sessions. NZ Netball said they require further support in this area.

MF12a: Has your organisation implemented protection and support mechanisms around match-fixing? (Please only answer if you answered yes to MF6)

40. Eighteen survey respondents addressed this question as set out in the table below.

**TABLE I14:
SURVEY RESPONSES
TO MF12a**

Option	Yes	No	I don't know	Total responses
Number	5	7	6	18
Percentage	27.8	38.9	33.3	100

41. All five email submitters who addressed this question (including the submission from 24 NSOs and Paralympics NZ) said they have implemented protection and support mechanisms for personnel who may come into contact with, or be involved with, match-fixing activity or to limit risky situations where this might occur.

42. Specific protection and support mechanisms referred to included partnerships with players' associations to deliver education to domestic level athletes, prohibiting athletes under the age of 18 from competing in national senior competitions, agreements with NZ Racing Board to not offer betting on age-group competitions, regular review of referees' decisions and performances and multiple match-fixing reporting channels, including anonymous reporting.

MF12b: Does your organisation need more support in this area? Please explain your answer.

43. Eighteen survey respondents addressed this question as set out in the table below.

**TABLE II5:
SURVEY RESPONSES
TO MF12b**

Option	Yes	No	I don't know	Total responses
Number	7	6	5	18
Percentage	38.9	33.3	27.8	100

44. Netball NZ submitted that they require more support in this area.

MF13a: If a match-fixing issue arose would your organisation know who to inform? (Please only answer if you answered yes to MF6)

45. Seventeen survey respondents addressed this question as set out in the table below.

**TABLE II6:
SURVEY RESPONSES
TO MF13a**

Option	Yes	No	I don't know	Total responses
Number	10	4	3	17
Percentage	58.8	23.5	17.6	100

46. All five email submitters who addressed this question (including the submission from 24 NSOs and Paralympics NZ) said they would know who to report match-fixing issues to.

MF13b: If yes, who would that be?

47. One survey submitter would contact the International Cricket Council Anti-Corruption Manager; one would contact the Police or the NSO; another would contact a regional organisation. One survey submitter said they did not know who to inform but would search for this information on the internet.

48. The three email submitters who addressed this part of the question said they would either report it to their NSO's Integrity Officer and also to NZ Police, if appropriate. NZ Rugby said they would also report such issues to World Rugby's Integrity Manager as required by World Rugby Regulations.

New Zealand policy on sports match-fixing and related corruption

49. Questions MF14 and MF15 and their sub-questions relate to compliance with the New Zealand Policy on Sports Match-Fixing and Related Corruption

MF14a: Does your organisation comply with the New Zealand Policy on Sports Match-Fixing and Related Corruption? (Please only answer if you answered yes to MF6)

50. Sixteen survey respondents addressed this question as set out in the table below.

**TABLE I17:
SURVEY RESPONSES
TO MF14a**

Option	Yes	No	I don't know	Total responses
Number	7	1	8	16
Percentage	43.8	6.3	50.0	100

51. All four email submitters who addressed this question (including one representing 24 NSOs and Paralympic NZ said that, to the best of their knowledge, they comply with the NZ Policy on Sports Match-Fixing and Related Corruption.

MF14b: How has your organisation found complying with the New Zealand Policy on Sports Match-Fixing and Related Corruption?

52. Twelve survey respondents addressed this question as set out in the table below.

**TABLE I18:
SURVEY RESPONSES
TO MF14b**

Option	Very easy	Easy	Neither easy nor difficult	Difficult	Very difficult	Total responses
Number	1	3	7	1	0	12
Percentage	8.3	25.0	58.3	8.3	-	100

53. One email submitter noted this was an area that is clear and well communicated by Sport NZ.

MF14c: Does your organisation need more support in this area? Please explain your answer.

54. Fifteen survey respondents addressed this question as set out in the table below.

**TABLE I19:
SURVEY RESPONSES
TO MF14c**

Option	Yes	No	I don't know	Total responses
Number	4	6	5	15
Percentage	26.7	40.0	33.3	100

55. NZ Rugby said one area where they need support is in relation to changing the culture of reporting and breaking down the code of silence that exists.

MF15: Do you have any comments on the content of the New Zealand Policy on Sports Match-Fixing and Related Corruption?

56. One submitter commented, noting that “the rules are too large for a small organisation to be able to effectively and reliably implement.” They described how their organisation had created a smaller, more manageable policy that they can implement effectively if needed.

57. One email submitter said that legal costs of implementing the Policy are high and requested additional support.

Enforcement actions taken

MF16: Has your organisation taken any enforcement action under its match-fixing policy? Please provide details as you are willing. (Please only answer if you answered yes to MF6)

58. Sixteen survey respondents addressed this question as set out in the table below.

**TABLE I20:
SURVEY RESPONSES
TO MF16**

Option	Yes	No	I don't know	Total responses
Number	3	9	4	16
Percentage	18.8	56.3	25.0	100

59. In their written submissions, both NZ Football and NZ Rugby said they had taken action in relation to low-level breaches of betting restrictions.

The role of the New Zealand Racing Board

60. Questions MF17 and MF18 relate to the role of the New Zealand Racing Board.

MF17: How does your organisation use its sports betting agreement with the New Zealand Racing Board to manage match-fixing risks? (Please only answer this question if you are from a national sport organisation)

61. Four written submissions from NSOs addressed this question.
- NZ Football has a partnership with the TAB to provide supplementary education and monitor betting activity of relevant persons with betting accounts.
 - NZ Netball uses its partnership to reduce the risk of corruption and ensure appropriate odds.
 - NZ Rugby uses its agreement with NZ Racing Board to exchange information in relation to persons covered by their anti-corruption and betting regulations and NZ Racing Board provides information relating to breaches of that policy.
 - Yachting NZ uses its agreement to provide awareness and education to all within the organisation.
62. Just one survey submitter commented, noting that their sport does not have a betting agreement.

MF18: Do you think the New Zealand Racing Board should take any additional action to counter match-fixing?

63. Two survey respondents addressed this question as set out in the table below.

**TABLE I21:
SURVEY RESPONSES
TO MF18**

Option	Yes	No	I don't know	Total responses
Number	2	0	0	2
Percentage	100.0	-	-	100

64. Six submissions from other sources (including the submission from 24 NSOs and Paralympics NZ) addressed this question.
65. International betting integrity body, ESSA believes that NZRB's monopoly weakens integrity and that a licensing regime for overseas betting providers would likely bring most citizens and revenues under NZ regulatory control.
66. Aktive and Sport Wellington do not support the Messara Report's recommendation to remove the requirement for individual sports to determine the events on which betting is available. They believe this recommendation risks opening up the number of ill-informed athletes who might be approached to match-fix.
67. Netball NZ believes that NZRB has a role to contribute to the development of education resources in this area, particularly at the development level.
68. NZ Rugby believes the current provisions related to NZRB are adequate and that NZRB has appropriate internal controls for the early identification of any risks.

Additional comments

MF19: Do you have any other comments in relation to match-fixing?

69. Four survey submitters provided further comments in relation to match-fixing.
- a. One submitter expressed concern that there may be an increased risk of match-fixing on the horizon. Their comment is reproduced in full:
The Messara Report recently highlighted the desire of NZRB to drop the requirement for codes in NZ to sanction the events on which sports betting was available. But it falls to codes, with their limited resources, to regulate and educate the athletes involved in those events. This creates the risk of opening up the number of ill-informed athletes who might be approached to match-fix. It also creates the risk of match-fixing agencies targeting those non-sanctioned/policed events.
 - b. One submitter involved with secondary school sport suggested that it would be helpful to have some assistance with getting buy-in from school principals who “may not want to consider the possibility of this occurring within the school gates.”
 - c. One submitter commented that this is an issue for elite sport but not at grassroots level.
 - d. Another submitter simply stated that seemingly “unbelievable” results suggest that match-fixing is a problem.
70. In an email submission, ESSA said that understanding the size of the offshore betting market is hard and that it may be optimistic to believe that Australia accounts for most of our overseas gambling. Therefore, it may be difficult to enforce a licensing regime for overseas betting providers. ESSA broadly support the adoption of the Macolin Convention.
71. Crimestoppers NZ believes that NZ is a soft target for match-fixers and the Police, Sport NZ and regulating bodies must act now to address this threat.
72. One individual email submitter said that NZ can learn and adapt some of the overseas measures that have been designed and implemented in larger markets. The submitter suggested a national platform for the sharing of information and resources.



Level 1, Harbour City Centre
29 Brandon Street
Wellington 6011, New Zealand
PO Box 2251 Wellington 6140
Phone: +64 4 472 8058
SPORTNZ.ORG.NZ

New Zealand Government

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