

IMMAF SAFEGUARDING INDEPENDENT REVIEW

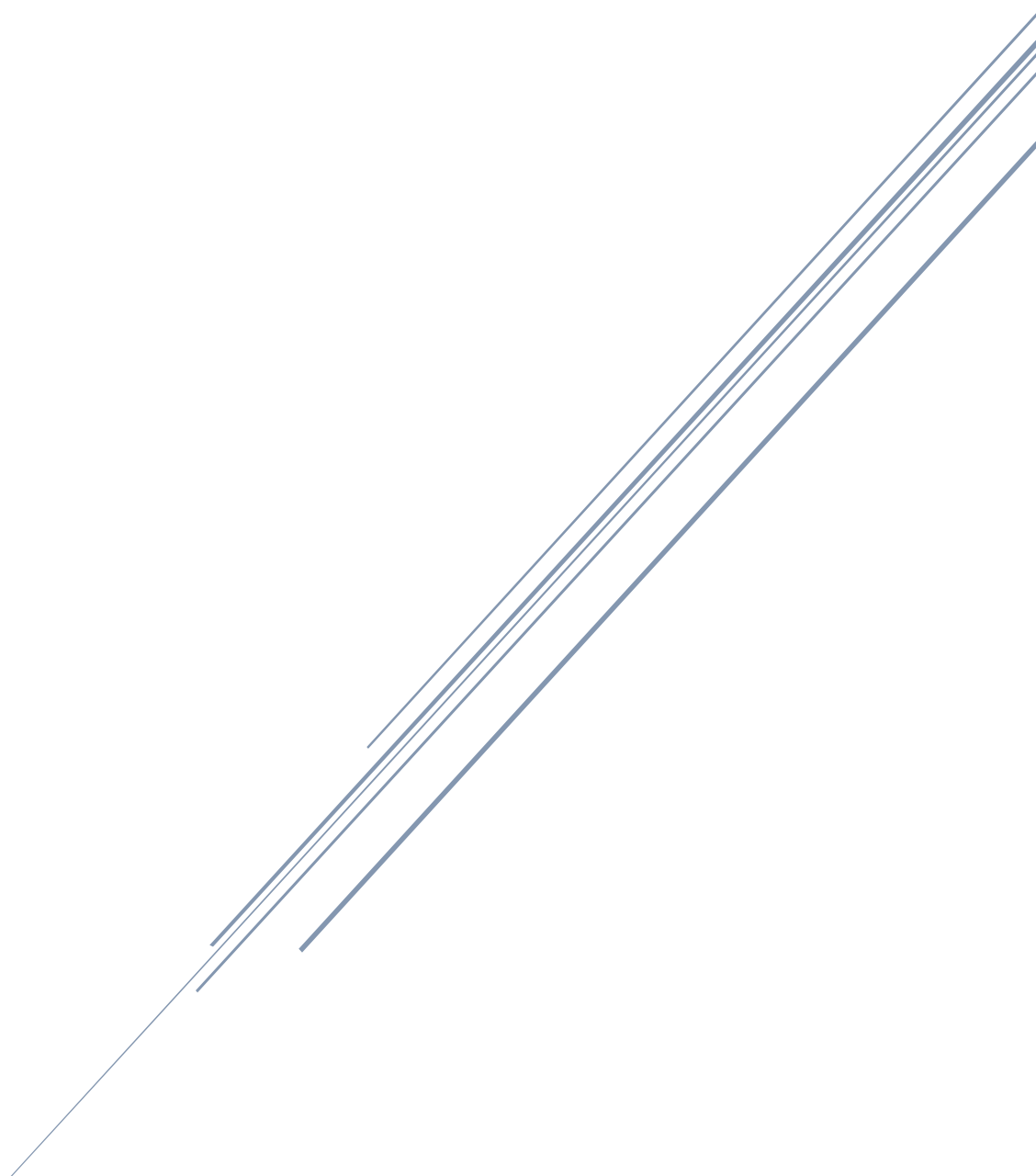


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Origin of the Review

Throughout the end of March 2023, it has been brought to the attention of IMMAF a safeguarding issue related to the 2021 IMMAF Youth MMA World Championships, held in Bulgaria. This alert, followed with other disclosures and public media reports, raised a number of safeguarding concerns and prompted IMMAF to set up an internal task force to investigate the case¹, enhance guidance and upgrade its safeguarding policy.

This task force didn't manage to work together, as there were members who haven't agreed to carry out this mission, albeit a preliminary assessment paper has been made available by the IMMAF consultant to whom the initial alert was referred.

Subsequently, I was appointed under Terms of Reference (TOR) agreed with IMMAF, in May 2023 to:

- a) carry out a review of IMMAF's actions in respect of complaints handling, and safeguarding case management, in line with the organisation's standards, policies and disciplinary procedures; and
- b) produce an overall report with recommendations to "advise the Board on the most appropriate policy and operational framework for safeguarding within IMMAF". Those TOR are at Appendix 1.

PART 1

Introduction

This Review identifies various areas in which IMMAF, its staff, personnel, officials and some of its members fell short. It is based upon the information initially received from IMMAF; further desk research, data collection and fact finding from the Review team, together with a number of elements excerpted from interviews to individuals who came forward with their experiences.

The present document sets out the key areas of concern encountered during the Review and the recommendations for change focused on awareness, safeguarding, complaints handling, standards and governance taking into account, but not limited to, these questions:

- IMMAF has taken careful and responsible steps to raise awareness and educate its community about the mechanisms in place to refer conduct that placed children, minors and vulnerable at risk of serious harm to the statutory authorities, notably to the social services and to the police?
- IMMAF has taken allegations and risks of emotional, physical and sexual abuse seriously and has been relatively consistent, coherent, clear and swift in the way it handles complaints about abuse or sexual misconduct?
- IMMAF has raised awareness, prevented, trained and increased capacity of its community to recognize, refuse and report instances of abuse, most notably to its events' participants, such as athletes, coaches, staff, team personnel, officials and referees?
- IMMAF has provided clear and detailed guidance to its community about the importance of criminal records checks and operated competent systems for recording and maintaining accurate records about such checks and for safe recruitment generally?

In order to answer these questions, steering an independent Review into the concerns that had been raised, the investigator was invested with the following responsibilities, according to the specific TOR provisions:

¹ Regarding an accredited coach criminally convicted, in 2015, for a crime against a minor. The referred coach attended the 2021 IMMAF Youth MMA World Championships in Bulgaria and further international competitions.

- To ensure implementation of the IMMAF safeguarding protocol, monitor the effectiveness and impact of the protocol both internally and externally and recommend and implement improvements where needed;
- To use the IMMAF governance structures ensuring that safeguarding issues are considered and addressed at the appropriate level;
- To ensure that appropriate data is collected about safeguarding children and adults' activity in a way that supports IMMAF's statutory and regulatory roles;
- To ensure that the training programmes are in place to enable IMMAF staff to fulfil their duties and responsibilities in relation to safeguarding.

It stems, either from the TOR and from the guidance of this Review that it is not asked, intended or entitled to:

- Re-hear, or to review any of the disciplinary or other decisions that were made in allegations, complains, disclosures, reports and other instances of safeguarding;
- Use the findings of this Review, the evidence collated, the answers or information provided during the interviews or desk research as evidence to support or to be used as part of an investigation and/or any resulting disciplinary proceedings against anyone heard or examined, other than to collect data and intelligence about IMMAF safeguarding policies;
- Make criticism or judgement of any person or participant in any way, as no one has been given the opportunity to respond to or challenge this Review.

Methodology

The work of this Review started on 10 May 2023, after preliminary conversations and agreement on the TOR, with the sharing of elements brought to IMMAF's attention relating to disclosures, information, case management and safeguarding concerns.

Those elements were carefully examined and further cross-checked with additional information taken from different sources such as, but not limited to, documents publicly available at IMMAF's and its Member Federations' websites, desk research to media outlets, statutory authorities, social media and foreign databases of court rulings.

Underpinned by the work out on this body of data, the Review team started to flag a first group of key participants to reach out for a one-to-one conversation, for which received the support of IMMAF's CEO who built the bridge and introduced the Review team.

From this first group of interviewees, the Review managed to get acquiescence from all but one participant, Mr. Will Lexton-Jones, former chair of IMMAF Disciplinary Committee, who turned down the invitation for a conversation in an email grounded in the reasons previously shared with IMMAF on his resignation letter, which we had been aware of beforehand.

All meetings took place through an online videoconference platform following a previous email for appointment, always attached with the TOR and a Disclaimer (at Appendix 2) setting out the purpose of the meeting, information handling, recording consent and confidentiality to be signed as agreed by each interviewee.

Overall, all the interviewees proved to be cooperative and willing to answer the questions addressed, to give their opinions and to provide additional details, remarks or insights that they considered relevant although, one of the interviewees did not subsequently respond or show the same willingness to provide additional

elements requested during the interview, and repeatedly afterwards, given the relevance of such information for our mission.

Finally, a full written account of each interview was subsequently sent by email for the respective interviewee to confirm, amend and, by signing, formally validate his/her statement, all recorded in this case file.

Virtually, all the interviews were conducted by the two people that comprise the Review team and, in some specific circumstances, the individuals had the opportunity to be accompanied to the meeting by a support person (parent, guardian) but not a lawyer, a coach or any other third party.

Afterwards, several other interviews took place, exploring leads, which opened up new avenues of investigation, bringing new data and pieces of evidence to this Review, which were followed-up and are duly archived in the case file.

To this end, participation of the Review team in the 2023 IMMAF Youth MMA World Championships, held in Abu Dhabi, proved to be very fruitful, as it made it possible to:

- Monitoring and overseeing the safeguarding of the event, on which a report was issued (at Appendix 3);
- Become more familiar with the culture of the sport, particularly youth MMA, and how it is organised in the field, particularly after a number of changes to the structure and operation of IMMAF;
- Talking to and meeting officials, staff, referees, coaches, athletes and members of the local organising team, which speed up the completion of this report.

It is quite important to outline that this Review didn't open, encourage or launch any kind of official Call for Evidence, requesting anyone with information relevant for the Review's Terms of Reference to submit their information, or come forward with evidence, concerns, disclosures or reports about specific cases of physical, emotional or sexual abuse.

Nevertheless, a relevant and worrying body of data on such safeguarding issues has been collected throughout this process and included in the case file, not aiming to open disciplinary enquiries or possible police cases, but, according to the TOR, to analyse flaws in safeguarding policies and present improvements to the recommendations for IMMAF.

This Review is conscious there will be other individuals who should have been heard or other avenues been followed, although for a matter of time constraint to deliver this paper, it was not possible to attain it all in due course. Nevertheless, ones hopes that the findings and outcomes in this Review will enable IMMAF, and the MMA community, to acknowledge the failures of the past and galvanize the sport to move forward with positive and tangible changes.

Engagement with IMMAF

These meetings, interviews and conversations with IMMAF staff and officials, and other individuals knowledgeable about the organisation and the MMA ecosystem helped the Review to build a deeper understanding of the organisation and how it had been operating. They also brought an opportunity to raise questions and concerns that had arisen from desk research and from the review of the documentation provided to date by IMMAF. Furthermore, most interviews were purposefully aligned with previous conversations with key individuals and careful examination to evidence collected in the meantime.

The topics covered in these meetings varied from individual to individual and included, but not limited to, the concerns, allegations and disclosures around the 2021 IMMAF Youth MMA World Championships, held in Sofia, along with:

- Other eventual safeguarding cases;

- The governance of IMMAF;
- The roles and responsibilities of each person;
- The interaction between teams and individuals (coaches, officials, referees, staff and volunteers);
- Personal experiences of complaints handling and integrity checks conducted by IMMAF;
- The interaction between IMMAF and its Member Federations;
- The IMMAF safeguarding structure;
- The understanding and enforcement of relevant policies, disciplinary procedures and regulations and experiences related to the culture of IMMAF and the sport more widely.

Throughout these meetings, or even after they have been completed and the Review requested relevant information to its work, IMMAF was given, at all times, the opportunity to provide any further information or put anyone else forward for an interview with the Review team, where they believed such additional engagement would be relevant to the abovementioned Terms of Reference.

It is important to emphasise that IMMAF CEO, Densign White, has supported this Review with a cooperative spirit for the outcome of its mission, presenting himself available to build bridges for our work, whether in the sources or individuals queried, readiness and willingness to the Review to take an active role to oversee and support the safeguarding procedures in Abu Dhabi. We didn't feel pressure from IMMAF to swiftly deliver this Review, although we have noticed from a number of queries some expectation and sense of urgency.

Moreover, in the build up to the 2023 IMMAF Youth MMA World Championships in Abu Dhabi, the Review was approached by the CEO, concerned with background, integrity and safeguarding checks for adults' accreditation to the event, asking for counselling to set up a swift procedure on this regard.

In this view, the Review drafted the form "DECLARATION OF HONOUR - Integrity Background Screening and Criminal Record Check" (at Appendix 4), to be immediately released as mandatory for event accreditation together with "The undersigned criminal record certificate, in date and duly validated according to the national legislation in place, issued by the police or by the appropriate national law enforcement agency, with no adverse information record against the undersigned".

The form was promptly disclosed to the IMMAF Member Federations, collected and checked by the IMMAF staff assigned with the accreditation and registration clearance for the event.

Confidentiality and Anonymity

All evidence was received from individuals on a confidential basis aligned with best practices and common standards on this field. Some individuals were extremely prudent, careful, doubtful and anxious about the risk of their engagement with the Review, their findings, outcomes and follow-up. Therefore, we have been increasingly careful when referring to anecdotes of individuals, sometimes using gender neutral language or omitting certain identifiable features wherever this was necessary to ensure anonymity, or removing any reference to reduce the risk of identification, when referring to specific individual submissions.

Taking this into account, individuals and organisations are only named where this is utterly indispensable to fulfil the Terms of Reference. It has been conducted an individual assessment in relation to each organisation and individual whose data features in this Review with a view to deciding whether they should be named, or whether they are identifiable either directly or indirectly. In doing so, it has been also taken into account the Review's obligations under data protection regulations, namely should IMMAF want to disclose this paper.

We have only named or identified individuals where we have considered it to be strictly necessary, fair and reasonable and where we considered that their identity cannot be removed without compromising the ability to deliver upon the Terms of Reference.

Framework for Fact Finding and Recommendations

It is important that all readers be mindful that the facts found and the conclusions reached in this Review are based solely on the evidence received from individuals' submissions or collected from reliable sources, such as official documents and court decisions.

It is also important to remind that it is out of this Review to decide whether any of the concerns, disclosures or complaints made about a particular team delegate, official or coach have any merit. It was carefully considered the weight that this Review should attach to the human narratives provided by all individuals whether in evidence shared or during meetings.

It was also painstakingly pondered the independent confirmation available, cross examination and double/triple check about certain issues, disclosures, themes or individuals that have punctuated some of those human narratives, where they are relevant to the Terms of Reference.

The standard of proof applied under this Review to the decision making was lying in between the criminal "beyond reasonable doubt" and the civil "balance of probabilities". Meaning that where findings have been made, it has done so on the "comfortable satisfaction" basis that something is more likely than not.

The recommendations formulating was steered by the following guiding principles:

- Recommendations SMART (Specific, Measurable, Achievable, Realistic and Time-bound) bearing in mind the size of IMMAF's membership and the fact it is a resourceless and young international sport governing body;
- Underpinned by a comprehensive welfare athlete-centred rather than coach-led cultural framework;
- Customized and stepwise approach rather than a blind "one-size-fits-all" application of "sports-wide" guidelines such as the IOC standards, although safe sport benchmark aligned;
- Implementation independent of third-party engagement or involvement of other organisations and stakeholders.

Towards a Safe Sport MMA Culture

Background

Safeguarding is everyone's responsibility and it is critical that organisations work together to prevent risk and protect people who need help and support, turning into meaningful actions a zero-tolerance approach to any kind of abuse in sport.

Under the responsibilities laid down in the TOR, where it is considered that "safeguarding is a collective responsibility across IMMAF and each directorate is accountable for its performance", the Review sought to assess whether wellbeing and welfare is (and has been) at the centre of the culture of IMMAF, its Member Federations, officials, staff, administrators and coaches, and if not, why not. Not only the wellbeing and welfare of athletes, but also other vulnerable people and adults at risk.

This required to investigate the adoption and application by IMMAF of safeguarding procedures, guidelines, complaints handling and disciplinary procedures, including how compliance with safeguarding standards by Member Federations and the individuals previously mentioned was monitored and assessed; and it required

to investigate the culture and practices of IMMAF in relation to its treatment of athletes and consideration of their welfare.

But first, what does safeguarding, safe sport, wellbeing, welfare and other relevant terms and concepts mean?

Terms and Concepts

Recent and non-recent incidents of harassment and abuse in a wide range of sports throughout a number of countries worldwide, have highlighted that athletes - from grassroots to elite level – even in their adulthood, are vulnerable to abuse.

On this purpose, usually in the aftermath of high-profile cases, statutory guidance have been issued by national governments, international organisations and sport governing bodies setting out a framework for safeguarding in sport.

In the UK, for instance, the [Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children HM Government](#) applies explicitly to sports organisations and to anyone working within these organisations, whether paid or a volunteer, forthrightly stating:

“Paid and volunteer staff need to be aware of their responsibilities for safeguarding and promoting the welfare of children, how they should respond to child protection concerns and how to make a referral to local authority children’s care or the police if necessary”.

Athletes, vulnerable people, adults at risk or other individuals may be targeted for harassment and abuse because of their sex, weakness, race, religion or belief, gender identity, sexual orientation, age, disability, appearance and athletic ability or for some other reason that makes them different or more vulnerable from their peers or adults in position of power, trust and influence.

Abuse can also take place within a family or in an institutional or other community setting but can also take place in a virtual setting e.g. chatrooms or involve some other type of electronic communication and is usually carried out by someone who is known or acquainted to the individual being abused. While harassment and abuse are often perpetrated by someone in a position of trust or power (perceived or actual), the aforementioned individuals may also be subjected to abuse including bullying, hazing and exploitation at the hands of their peers.

The psychological and emotional effects of abuse can be life-long, especially if the individual has not been able to disclose the abuse or seek and find support. Anyone who has been abused as a child or young person may find it difficult or impossible to maintain stable, trusting relationships, may become involved with drugs and experience mental health problems or self-harm.

Bearing this and the paramount importance of custody over the integrity of sport in mind, sports organisations have a duty of care to the children, vulnerable, young people and adults at risk who take part in their sport. Therefore, international sport federations, such as IMMAF, should, by all means, have defined safeguarding responsibilities and protecting the welfare and wellbeing of athletes that comes with the leading position of highest governing body for their sport.

Although sport can provide significant opportunity to someone who is motivated to abuse, sport organisations and settings can also offer a safe place for those experiencing abuse in a family or institutional setting outside sport.

It is acknowledged that people who have regular contact with youngsters and others at risk are well-placed to notice signs of abuse. This is particularly important where a child or adult is unable or finds it difficult to recognise and/or share concerns and is reliant on adults to be alerted to the possibility that they may be experiencing abuse.

Therefore, effective and swift information sharing along with reporting to statutory authorities is a vital part of safeguarding, and are two essential conditions for the proper compliance with the duty of care.

All sports organisations, most notably international sport federations, have an important leadership role in embedding a no-tolerance approach towards all forms of abuse and also taking tangible steps to prevent other forms of harm which include:

- Poor or unsafe practice;
- Discrimination, harassment and victimization;
- Bullying or hazing;
- Extremism.

[The International Olympic Committee \(IOC\) Consensus Statement: Harassment and Abuse in Sport \(2016\)](#) highlights that

“It is incumbent upon all stakeholders in sport both to adopt general principles for safe sport... and to implement and monitor policies and procedures for safe sport... which state that: all athletes have a right to be treated with respect, protected from non-accidental violence...”

In addition, the [IOC Basic Universal Principles of Good Governance](#) encompasses safeguarding and makes it compulsory for organisations that belong to the Olympic Movement to adopt these principles, implement relevant measures and monitor compliance.

An increasing number of international federations support the IOC consensus statement and principles of good guidance and started actively developing safeguarding policies and requiring all national Member Federations to implement equivalent standards to protect their athletes and other participants.

The prevention of harassment and abuse (described collectively as non-accidental violence) requires a systematic and co-ordinated approach, working together across the MMA community and with key statutory authorities and other relevant organisations. The effectiveness of safeguarding relies on ensuring everyone is involved and engaged and receives appropriate training and support.

[The IOC Consensus Statement \(2016\)](#) identifies five forms of harassment and abuse that apply to individuals, which may occur in combination or in isolation:

- Psychological;
- Physical;
- Sexual harassment;
- Sexual abuse;
- Neglect.

For the purposes of this Review, these concepts will be used in accordance with the definitions set out in that Statement aligned with the [IOC Guidelines for International Federations \(IFs\) and National Olympic Committees \(NOCs\) Related to Creating and Implementing a Policy to Safeguard Athletes from Harassment and Abuse in Sport](#), as a baseline, given it is a universal, easily accessible and living paper, based on consensus between a number of stakeholders, experts and representatives from sport and out of sport, vastly experienced in dealing with harassment and abuse, as follows:

“Harassment” as stated in Article 1.4 of the IOC Code of Ethics or “harassment and abuse” includes psychological abuse, physical abuse, sexual harassment and neglect. These forms of harassment and abuse may occur in combination or in isolation.

“Psychological abuse” means any unwelcome act including confinement, isolation, verbal assault, humiliation, intimidation, infantilisation, or any other treatment that may diminish the sense of identity, dignity and self-worth.

“Physical abuse” means any deliberate and unwelcome act – such as, for example, punching, beating, kicking, biting and burning – that causes physical trauma or injury. Such act can also consist of forced or inappropriate physical activity (e.g., age, or physique inappropriate training loads, when injured or in pain), forced alcohol consumption, or forced doping practices.

“Sexual harassment” means any verbal or physical conduct of a sexual nature, which is unwelcome, or where consent is coerced, manipulated or cannot be given. Sexual harassment can take the form of sexual abuse.

“Neglect” within the meaning of these Guidelines means the failure of a coach or another person with a duty of care towards the athlete, to provide a minimum level of care to the athlete, which is causing harm, allowing harm to be caused, or creating an imminent danger of harm.

Harassment and abuse can be based on any grounds including race, religion, colour, creed, ethnic origin, physical attributes, gender, sexual orientation, age, disability, socio-economic status and athletic ability. It can include a one-off incident or a series of incidents. It may be in person or online. Harassment may be deliberate, unsolicited and coercive. These often result from an abuse of authority, meaning the improper use of a position of influence, power or authority by an individual against another person.

Additionally, for the sake of clarity in this Review, further categories of abuse that apply to children, young people, vulnerable and adults at risk should be also enlightened:

Bullying

Bullying is an intentional behaviour usually repeated over time that hurts another individual or group.

Hazing

Hazing behaviours are known to occur in many different types of social groups, including team sports as a way of initiating a new person when they join the group or want to be socially accepted by their peers.

Poor Practice

Poor practice is the behaviour of an individual in a position of responsibility which falls below the required standard as set out in the codes or standards of conduct. Poor practice may not be immediately dangerous or intentionally harmful but is likely to set a poor example. Poor practice examples include, but are not limited to, the following:

- Name-calling including sarcasm and racism;
- Excessive monitoring of weight;
- Constant criticism;
- Exerting excessive pressure;
- Forcing a child to do something against their will;
- Use of inappropriate language;
- Harassment;
- Being ostracised or ignored.

Position of trust

A position of trust exists where an adult, by virtue of their role, is in a position of power or influence over another person. Although an adult engaging in any sexual activity with a young person would be committing a criminal offence, in some circumstances and jurisdictions, engaging in sexual activity within a relationship

of trust with a young person between the ages of 16-18 years is also a criminal offence. A number of legal and regulatory frameworks states that those in a position of trust in sports organisations, such as a coach or other person with a duty of care, cannot legally experience a sexual relationship with young people under the age of 18, who they have power or influence over, e.g. athlete/helper/volunteer.

Extremism

Extremism involves the vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This goes beyond terrorism and includes people who target the vulnerable, including the young, by:

- Seeking to sow division between communities on the basis of race, faith or denomination;
- Justifying discrimination towards women and girls;
- Persuading others that minorities are inferior; or
- Arguing against the primacy of democracy and the rule of law in our society.

Welfare and Wellbeing

Having covered, exemplified and detailed the most common terms in Safe Sport, it is important to briefly delve into a conceptual approach of Welfare and Wellbeing. Basically, it provides the framework for those who participate in sport, regardless of ability, can enjoy a positive and safe experience. In this context, it includes protection from conduct or practices that might risk causing physical, emotional, mental and sexual harm. This encompasses a huge variety of issues, from conduct that would amount to a criminal offence, to practices or behaviours that in isolation might not cause concern but when repeated over time amount to unacceptable and potentially damaging behaviour.

Keeping participants safe requires everyone engaging in the sport to maintain appropriate standards of behaviour and it requires a culture in which such values are not just promoted but implemented. Where standards are potentially breached, it is important that participants feel able to make disclosures to this effect. It is also important that IMMAF deals with such suspected breaches appropriately in order to send out the necessary signals to the MMA community that there will be appropriate consequences for proven breaches.

Whenever such failures to implement safeguarding policies and breaches to procedures, practices and regulations occur without swift and strong measures, jeopardizing the welfare and wellbeing of sport participants, a growing feeling of mistrust flourishes, nurturing a fertile ground of terror and impunity suitable to normalize a wide array of forms of abuse mentioned above.

Failures and breaches that can include, but are not limited to:

- No Welfare, Safeguarding or Integrity Officer in house;
- Inadequate safeguarding arrangements;
- Providing inadequate supervision and/or care;
- Failure to respond appropriately to concerns;
- Silencing, concealing or expelling anyone who raises a concern;
- Excluding parents from observing or asking questions about training;
- Inappropriate use of photographic equipment or materials in reserved areas, including live streaming with external access viewing;
- Providing coaching, or running a session for youth, without another responsible adult present;
- Exceeding level of competence and/or qualification;

- Employing practices that are inappropriate for the stage of psychological and physical development of the individual;
- Excessive training or competition;
- Inappropriate/excessive supporting or stretching.
- Leading to unsanctioned poor practices, significant risk factors for instances of abuse, often normalized and condoned by athletes, parents, employees, volunteers, staff, coaches and decision makers:
- Taking a child or adult at risk home or other secluded place unaccompanied by others;
- Engaging in rough, physical or sexually provocative games or activities;
- Sharing a room with a child or adult at risk;
- Stimulating, allowing or engaging in any form of inappropriate touching;
- Making sexually suggestive remarks;
- Reducing a participant to tears as a form of control;
- Allowing participants to use inappropriate language unchallenged;
- Allowing allegations made by a participant to go unchallenged, unrecorded or not acted upon;
- Carrying out personal care for a child or adult at risk that they can do unaided;
- Departing from the premises without first supervising the safe dispersal of children or adults at risk;
- Abusing a privileged position of power or trust;
- Resorting to bullying tactics, or verbal abuse;
- Causing a participant to lose self-esteem by embarrassing, humiliating or undermining the individual;
- Spending excessive amounts of time alone with children or adults at risk away from other adults;
- Engaging with children or adults at risk on 'one to one' personal electronic communications, including social networking platforms such as Facebook, Twitter, Instagram and other;
- Sending inappropriate text messages to children or adults at risk;
- Physical punishment (often in the form of further training requirements) for perceived transgressions;
- Physical chastisement involving physical contact between the coach and athlete;
- Requiring athletes to train on known injuries thereby causing avoidable pain and sometimes exacerbating injury;
- Enforcing excessive training loads and training hours leading to physical pain and exhaustion beyond acceptable boundaries;
- Over-stretching as a form of flexibility management;
- Withholding of food/water/access to the toilet during training;
- Provision of performance enhancing drugs;
- Setting a training regime that exceeds the capacity of a child's immature and growing body;
- Inflicting pain on a participant that is beyond an acceptable level of discomfort involved in physical preparation and training;

- Forcing a participant into a highly restricted and unhealthy diet that may lead to extreme or rapid weight loss.

For all the above, it is clear that there are many issues within the sport that must be carefully considered in order to ensure that all participants are able to enjoy their sport in a healthy, positive and safe environment.

However, it is only possible starting to trail this path, in each of its safeguarding policies and key dimensions, when sport governing bodies acknowledge and assume their duty of care towards the participants and their undisputable responsibility to implement a safeguarding policy and monitor compliance with it. Starting from the board down to the members.

Building a Safe Sport Environment

In recent years, numerous athletes and other sport actors have expressed concerns over the ways that concerns, disclosures and reports of sexual misconduct, abuse or harassment of athletes, vulnerable, volunteers and adults at risk were considered and acted on by sport organisations, from grassroots clubs to international federations.

Maltreatment can be experienced at any level of sports, beginner to elite. However, in the consensus statement on non-accidental violence in sport alluded before it is noted that research shows “the risk of experiencing psychological, physical and sexual violence rises as the athlete progresses up the talent ladder and performance pathway.”

Abuse and neglect experienced during a sports career can have long-lasting and serious consequences for athletes. Survivors and victims have shared some of the physical and mental health troubles they faced, which included living with chronic pain, having low self-esteem, suffering from disassociation, depression and post-traumatic stress disorder, and having suicidal ideations.

Thus, whenever a sport governing body does not follow through and enforce its own rules strongly enough by a due process of law, it creates a dangerous setting for potential complainants and victims, but also for victims of defamation, where they sort of recognise the existence of rules but also perceive people breaking them regularly and repeatedly. This has the obvious capacity to stifle a complaint, remaining and lingering unattended the serious consequences of abuse.

Whenever individuals in positions of power, such as high-performance sport directors, administrators, board members, directors, officials, team leaders or coaches, do not attempt to stop or report abusive behaviours, they legitimize these types of practices in the eyes of sports participants. But more than that, they may be perpetuating situations of abuse that might have been going on for a long time, undermining a safe sport environment and breaching basic principles of welfare and wellbeing.

PART 2

Safeguarding – Building and Increasing IMMAF Capacity

Overview and Foundations

Whereby this Review was able to find, IMMAF did receive, before 2021, formal complaints, alerts and data about other alleged serious cases, involving high-ranked individuals within its own structure, but this was not properly followed-up and we saw no evidence that the Board had ever asked for it. There was no demonstrable sense of enquiry about either safeguarding or complaints.

For the same reason it is also hard to understand why people who have been in positions of responsibility in the governance of IMMAF, who were aware of these cases, have remained silent, for years, without properly acting on them near other bodies, particularly the statutory authorities, in the face of the inaction of IMMAF that they are now criticising.

All organisations, and any individual in a leading role, should know and must ensure that any suspected abuse of children, vulnerable or adults at risk are referred to the statutory authorities (the Police and/or Children's or Adult Services) in line with the applicable reporting procedure and in line with local arrangements.

When pressed various participants about what IMMAF (board and staff) could and should have recognised the extent and details of safeguarding flaws, allegations, rumours and complaints, the Review team met, more than once, with the following passive rhetorical response "we only know what we know" or "without a formal report we cannot act upon" or "we cannot act upon rumours or hearsay". This is no answer. If the IMMAF board and staff had actively wanted to dig in and know in detail what was happening in its events, safeguarding procedures and Members Federations compliance on this regard, it could have easily found out, even with limited resources, as this Review did. **There were too many warning signs preventing IMMAF from been taken by surprise.**

It is also regrettable in this regard that the complainants, in particular those adults who are raising this issue two years after it took place couldn't be more diligent in the face of IMMAF's lack of response to their disclosure, in order to bring the matter to the competent statutory authorities (notably the police or local social services). It is reasonable to presume that these individuals knew that such events could be, most likely, related to criminal matter with potential need for specialised support to vulnerable victims, even if claiming fear of reprisals. By not doing so, they put other interests ahead of safeguarding the sport and the alleged victims, further undermining the reputation of IMMAF and MMA and themselves.

Despite the positive contributions of the CEO and some IMMAF staff members interviewed, the overall defensiveness and tendency to over-protect the organisation, in the face of some legitimate criticism about safeguarding, can hardly be said that could help to swiftly address these problems, tackle the critics and those raising these concerns for wider political disputes and, above all, to instil trust towards a safe MMA environment.

In order to lay the foundations for a safe sport environment, this Review covers the following main topics for change the game:

- Fostering a culture of safety and safeguarding;
- Eradicating abuse in MMA and supporting victims;
- Holding Member Federations accountable for creating and securing safe MMA environments;
- Improving the mechanisms for reporting harassment, abuse, maltreatment and sexual misconduct;
- Improving the regulatory sanctions for cases of abuse and the mechanisms for swift, fair and independent disciplinary action against all breaches related to safeguarding.

Therefore, the Review recommends to build a safe MMA environment:

Recommendation 1

That IMMAF must implement and adhere to universal standards for safeguarding in sport acknowledged by the international sport community, being the recommended basic baseline the [IOC Guidelines for International Federations \(IFs\) and National Olympic Committees \(NOCs\) Related to Creating and Implementing a Policy to Safeguard Athletes from Harassment and Abuse in Sport](#).

This requires IMMAF to have up to date child protection and safeguarding policies in place and to have a lead Safeguarding/Welfare Officer, trained and experienced in this field.

Recommendation 2

That IMMAF, with the support of safeguarding expertise, must implement and monitor mechanisms to prevent individuals in positions of authority, trust, power or influence - including but not limited to, sport directors, parents, administrators, board members, directors, team leaders or coaches - from practicing abusive behaviours for undue control over athletes, staff, volunteers, vulnerable and adults at risk, starting from those participating at IMMAF competitions.

Recommendation 3

That IMMAF, together with its members and relevant internal commissions, sets out, update and expand a safe sport education, awareness, prevention and training programme for athletes, coaches, parents, and any other individuals involved in the MMA sport system, starting from those participating at IMMAF competitions.

Recommendation 4

That IMMAF, in collaboration with its local events organising team, commits to support education, training and capacity building for volunteers on safe sport, with the goal of providing them the tools to better support athletes throughout the competitions under its jurisdiction.

Recommendation 5

That IMMAF, in collaboration with its members, and other relevant stakeholders:

- Includes athletes in all bodies and all decision-making processes regarding safe sport, welfare and wellbeing in MMA;
- Works to ensure that the specific needs and experiences of young athletes are taken into account in efforts to create a safe MMA environment.

It is clear that there are many issues within MMA and other sports, that must be carefully considered in order to ensure that all athletes are able to enjoy their sport in a healthy, positive and safe environment. However, our guiding principle for this first set of recommendations is that athlete's short-term success is not prioritised over their long-term well-being, in many cases in situations where they are too young, unaware or too powerless to make an informed contribution to decisions about training, their future or other issues related

to their sport participation. These measures can help to prevent maltreatment, poor practice, abuse, neglect or misconduct to be normalized in MMA and accepted as legitimate means to train successful athletes.

Moreover, it became increasingly evident that the prevailing culture failed to prioritize safeguarding, and put the interests and protection of the athletes at its centre. This is already evident from the tolerance to some of the behaviours described above and gaps in basic safeguarding policies.

Unlike other key areas of integrity, such as anti-doping and medical safety, which are far more developed within IMMAF and advanced in their decision-making structures, procedures, resources and information available, safeguarding has not received the same level of follow-up and amount of attention from the organisation's structure (board and staff).

Two primordial orders of reason can help to understand why this is happening.

Firstly, the fact that the IMMAF is a young international federation, and that youth MMA competitions are even younger.

Secondly, because in the proceedings for recognition by international umbrella organisations (IOC, WADA, GAISF, etc.), safeguarding does not yet enjoy the same strict and mandatory requirements, and priority as anti-doping or medical safety.

Additionally, we have carefully considered why welfare and safeguarding has not played a more central role in the culture of the sport, examining a number of features and factors that we believe have caused or reinforced this tendency. Generally, these features are not an issue in isolation. Combined and neglect, they have the capability to create a culture that fails to put the athlete's welfare or wellbeing at the centre of the sport.

Starting with the impression that we got from a number of individuals and interviewees about their conception and notion of safeguarding, representing a misunderstanding, however well-intentioned, sense of "caring", mainly about protecting children and vulnerable from the risk of sexual harm and protecting adults from possible exposure to allegations of abuse (for instance, training alone, giving a child a lift in a car, allowing a child to stay over, stay alone in close doors with a minor, etc.). For some, they understood the word only to be engaged when it was felt necessary to call the police or to contact a local authority over an allegation.

Safeguarding is plainly a broader concept covering any behaviours and practices which may cause harm or affect the welfare, safety, health and development of a child, vulnerable or adult at risk. It is an overarching term which includes child protection. It should engage proactive and reactive obligations that include policy development and implementation, complaints handling, risk assessment, education and training. Although all cases of child protection and abuse involve safeguarding, conversely not all safeguarding matters will involve abusive behaviours. As aforementioned, unintended behaviours and poor practice (which may not be considered abusive) have potential to cause harm and/or impact on the welfare and wellbeing and therefore are behaviours which also fall within the Terms of Reference of this Review.

This suggests that systems and structures in place have failed to deliver a holistic safeguarding framework and a culture with athlete welfare at its heart, urging a swift change from a reactive, damage-containing and politically-driven stance to a proactive, athlete-centred and action-oriented "zero tolerance" policy, fully embraced by all MMA community, from the IMMAF board, to staff and Member Federations.

It is therefore important that all they understand IMMAF's role in protecting athlete safety and that they understand their own role in safeguarding MMA.

This understanding should come from a combination of awareness, education, training, capacity building and experience. Education and training will include specific safeguarding training, but one also expects athlete welfare to be intertwined with the teaching of other skills to be developed and embedded in MMA coaches, athletes' entourage and other individuals vested in positions of power, authority and influence, in order to tackle the failures, flaws and shortcomings detected by the Review in the following core areas:

- Awareness, training & education;
- Policy development and implementation;
- Resourcing of safeguarding work;
- Consideration of athletes, victims and survivors;
- Recognise red flags;
- Collaboration, governance and oversight;
- Screening, background and integrity check;
- Complaints handling and disciplinary policy and procedures;
- Case management.

Awareness, Training & Education

It has become clear throughout this Review that MMA coach education had only concentrated on technical skills rather than gathering other relevant skills that could obviously impact on athlete welfare and that other participants in positions of authority, trust, power or influence within IMMAF. Coaches are not aware, trained or educated on safeguarding, and acquired none or inadequate/insufficient advice or guidance about:

- Principles or standards of conduct about what good coaching should look and sound like (and what bad coaching looks and sounds like). There was virtually no guidance about the boundaries between positive and disciplinarian styles of coaching and between disciplinarian and potentially abusive forms of coaching;
- How to foster an athlete-centred environment, how to involve athletes in decision-making and how to communicate with children and young people of different ages;
- How to adapt styles of coaching as the young child develops and matures into a young person and into an adult;
- How to communicate with parents at any level and about the type of information that parents should know about;
- Weight management, the relationship between weight and performance and how poor practice and/or ignorance could put athletes at risk of real mental and physical harm, including eating disorders;
- The circumstances in which an athlete should be weighed out of competition;
- The physical role of the coach, if any, in stretching, grappling and training on the ground and the risks associated;
- The significance and risks of growth maturation in males and females and how these might differ depending upon the age, culture, background and progression of the athlete;
- Appropriate training hours and loads for athletes of different ages and ability;
- Training and competing on injury;
- The relevant content of IMMAF's Child Protection and Health, Safety and Welfare Policies.

Such shortcomings miss to adequately address:

- The need to ensure that coaches engage more meaningfully in sports science influences and to learn more about the role of nutrition, training loads, injury prevention, weight management and training/competing on injury;

- How the coach/parent/athlete triangular relationship should work, how to deal with parents and keep them engaged and informed;
- What unacceptable coaching behaviour looks and sounds like, and what Positive Coaching means.

Parents who entrust their children to sporting ventures ought to have a sense of what poor coaching and safeguarding practices look like so that they can play their responsible part in addressing it.

The more information and understanding that parents and athletes have about safeguarding, good coaching practice and a safe training environment the more satisfied IMMAF could be that it was being proactive in respect of its safeguarding duties. Achieving this in practice is challenging.

Recently IMMAF has included and updated some information about safeguarding on its website, varying in prominence and content. This accessibility is to be welcomed, although a concerned parent cannot easily learn how to go about reporting a concern yet, assuming they knew how to recognise a concern. It is, however, unrealistic to expect the average parent to scour either a club or national federation for policies which might contain something of relevance to their child's welfare.

During the conversations and data/evidence collection, what has been prevailing in coaches, staff and individuals in positions of authority, trust, power or influence is more how to protect themselves from allegations, threats or reputational damages rather than on protecting the athletes.

While this self-centred and coach-lead mindset prevails, effective education, prevention and training on safeguarding will still be seen as expensive business and for decision-makers and those accountable for the finances, an expense with no return, rather than an investment to safeguard the integrity of sport and the credibility of the organisation before its members, stakeholders and sponsors.

If IMMAF wants to bring justice to the victims and protect the adults involved from humiliating gossip around serious issues that can irrevocably tarnish their reputation and professional career it needs to display resolve to walk the walk instead of talk the talk.

Recommendation 6

IMMAF should ensure that all coaches currently holding the highest level of qualification, and all national coaches registered for its competitions, receive training on the basis of the updated educational programme, in accordance with recommendation 3 of this Review, within a feasible time of its introduction and as a mandatory condition for issuing accreditation and clearance to attend IMMAF competitions.

Recommendation 7

IMMAF must produce and make available to the MMA community a Safeguarding Handbook, which should be reviewed and updated at least every four years and must include:

- IMMAF's Standards of Conduct;
- An explanation of all IMMAF's key policies affecting athletes' welfare and links to these policies;
- Information about the role of Safeguarding/Welfare Officer and obligations to report, and pathways for reporting safeguarding concerns;
- Any other information that IMMAF considers it is important for the MMA community to be aware of, in light of this Review.

Recommendation 8

IMMAF must make all its up-to-date safeguarding information, procedures, policy and contents available in a single dedicated area of its website that is easily visible, browsable and accessible to all².

Recommendation 9

The Safeguarding/Welfare Officer mentioned in the Recommendation 1 must assume overall responsibility for education and safeguarding training and that this is adequately co-ordinated with IMMAF Safeguarding Standards and Policy, and other relevant areas such as coach education, notably the corresponding staff members in charge.

Policy Delivery – Guidance, Steering and Oversight

Policy Development and Implementation

When athletes, victims and survivors of abuse say in court cases or parliamentary committees, has recently seen in the UK, Canada or USA there's no system to protect them, they aren't referring to the number of resources or programmes, because there are plenty of them, especially in those countries. They mean there's no authority to hold people accountable for their actions or to impose consequences, something that's completely non-existent or non-operational in a number of sport systems.

Whenever perpetrators of abuse in MMA, or in any other sport, as well as those who enable such maltreatment go unpunished, without being held accountable for their actions, allowing the culture of maltreatment stay in place and perpetrators to assume no consequences will result from their actions, it bluntly illustrates the long way for turning words into action.

The failure of sport governing bodies to treat the problem of abuse more seriously to effectively detect and deter abuse has contributed to the extent of it. If perpetrators think they can get away with it, they will do more of it. And this happened in cases brought before this Review and the evidence collected.

The world of sport has learned and experienced from a number of high-profile cases that perpetrators of abuse and sexual misconduct were allowed to quietly step down from their positions, therefore not facing allegations against them and/or suffering no consequences from documented cases of maltreatment. This situation has allowed them to find employment, positions or get elected in other sport organisations, putting other athletes, vulnerable and adults at risk, over a long period of time.

Gone should be the days when it is sufficient for sport organisations to point to the existence of safeguarding guidelines or complaints policy, as if that alone discharged their responsibilities in these areas. An organisation can have any number of impressive policies. It is the visible and consistent implementation of such policies at organisational level that matters.

As a matter of fact, IMMAF updated and made available on its website the [Safeguarding Guidelines](#), covering topics as:

- IMMAF Safeguarding Strategy;
- IMMAF Reporting Flowchart;

² Wrestling Canada Lutte (WLC), the national governing body for wrestling, [dedicated area for Safe Sport](#) is a good benchmarking, following the revamping of safeguarding practices after an [independent investigation](#) into the organisations' culture.

- Safeguarding for events - Structure and Procedures;
- IMMAF incident report.

The same has been done for the recent 2023 IMMAF Youth World Championships with information on safeguarding available in the [Event Handbook](#), and [mandatory form on criminal record check](#) previously mentioned, displaying some signs of willingness to address this area.

As mentioned earlier, and as recent international high-profile cases of abuse attest, the mere existence of policies, guidelines, standards and procedures don't ensure nothing about its compliance and enforcement. For a policy to work and don't become dead letter:

- It must be effectively disseminated to those required to comply with it. All policy should be accessible and if practicable, easy to understand;
- Its existence must be publicised to those liable to be affected by it;
- Those tasked with putting it into effect must be sufficiently trained in its content and this training must be refreshed;
- Those imposing it, must monitor compliance with it;
- Known non-compliance must be recorded so that it can be remedied and so that patterns of abuse or misconduct can be identified;
- It must be 'joined up' within the organisation and with those implementing the policy. For example, it must be developed and disseminated in conjunction with other functions of the organisation introducing the policy and those who are required to follow the policy, so as to ensure a wide understanding of the policy and that the policy does not conflict with other functions of the organisation or those implementing the policy.

We leave to each reader the appraisal about how IMMAF meet this, although for the evidence gathered and many of the behaviours reported consistently to the Review, policy was in place but it was either inadequate or too late coming into force, or it was ignored and/or poorly monitored and enforced.

It is also apparent from reading independent reviews on safe sport, safeguarding and wellbeing, in various sports and countries, that the scattering and multiplicity of documental and regulatory sources from sport organisations on this issue is a recurring problem, making it difficult to understand and operationalise policies.

Recommendation 10

IMMAF must review, develop and strengthen its current Safeguarding Guidelines that affect athletes' welfare and MMA safeguarding, updating them towards a robust, effective and actionable Safeguarding Policy and Procedures to address the issues identified in this Review.

This policy³ should set out clear guidance to the MMA community about what conduct is and is not acceptable and procedures in place, including but not limited to:

- Roles & Responsibilities
- Procedures for reporting
- Safeguarding responsibilities
- Recognition of signs and indicators of abuse

³ Although policies must be tailored to the reality of each sport and sports federation, there are benchmarks, adopted after high-profile cases and independent reviews, that can serve as guidance like the [British Gymnastics Safeguarding Policies and Procedures](#).

- Poor Practice
- Responding to a disclosure
- Information sharing and data protection
- Reporting concerns
- Complaints handling
- Case management
- Whistleblowing
- Responding to incidents
- Investigation
- Criminal Convictions
- Media Enquiries
- Compliance monitoring
- Enforcement oversight

For policy to be effective, it must be clearly disseminated to those who need to adhere to it and to those likely to be affected by it. This means ensuring that any combination of national federations, coaches, athletes, parents, safeguarding officers and relevant volunteers are aware of its contents.

The anecdotal information received suggested that where IMMAF policy did exist, it was not uncommon for athletes and parents to be unaware of its contents, including provisions directly relevant to athlete welfare. Some coaches expressed a similar lack of awareness about policies that were directly applicable to them, as the Review noticed on site at the 2023 IMMAF Youth World Championships.

Occasionally it strongly appeared that even within IMMAF, a lack of communication between staff meant that policy changes were not known about as widely as they should have been, notably more recently in the aftermath of the pandemic and updating on safeguarding.

Similarly, the Review formed a strong impression that many members were either unaware of the contents of the Standards of Conduct, Safeguarding Guidelines, disciplinary provisions and Competition Handbook or did not consider them a source of vital information.

Although such documents represent well-intentioned high-level tools to maintain ethical standards, the Review is bound to question their utility if they have remained obscure within federations, coaches and the overall MMA community.

All in all, there remain doubts whether the available policy and regulations and whether that changes in policy, relating to the care and welfare of the MMA community had been disseminated to Member Federations effectively, given there was a very real dearth of any evidence that coaches, officials, athletes and team personnel were educated or refreshed in the content of safeguarding policies.

This has meant that even where behaviours were identified in IMMAF policies as inappropriate, the participants were not adequately informed about the contents of these policies and their relevance to their role.

Given these findings about the prevalence of policy breaches, it would appear as though policy and policy updates are not properly reaching these groups, or if it is reaching them, some are plainly ignoring or not reading the contents.

Taking Action

Once policies have been developed and disseminated, it is essential that compliance with the policies is monitored and appropriate remedial action taken if breaches of the policies occur. If this does not happen effectively then, one could argue, there is a little point in having the policies in place at all.

It is important to recall that membership should require all members to comply with and be trained in the IMMAF safeguarding policies. This meant that coaches, officials, medical staff and team personnel were obliged to stay informed. It also meant expressly that National Federations were under a mandatory responsibility to ensure their officials and staff, including coaches and volunteers were trained in those policies.

This is obviously a considerable undertaking, although one without which it is not possible to achieve results in this area, particularly in an international sports federation which, according to the information conveyed to this Review, assigns, or intends to assign, safeguarding responsibilities to its national federations. Previously we identified a number of standards and policies which set out expected conduct from federations, coaches and staff but which we have not seen consistently informed, disclosed, followed or enforced, to name a few:

- Not to abuse or misuse any relationship of trust or position of power or influence;
- Not to behave or conduct themselves in any other manner which is unbecoming;
- To conform to the Standards of Conduct, behaviour, equality of treatment, etiquette and good manners specified in the Safeguarding Guidelines, in IMMAF Regulations or policies;
- To promptly report, and provide full particulars to IMMAF of concerns, evidence or other information concerning any abuse or neglect of a child or vulnerable adult or other matter within the scope of the IMMAF Safeguarding Guidelines;
- No Participant should victimise or attempt to victimise or encourage the victimisation of any individual (or their parents, guardians or dependents) for raising concerns or making a complaint, neither instrumentalize, manipulate or delay to report any case for political or personal dispute reasons;
- Participants must not conceal or attempt to conceal evidence of poor practice, abuse or misconduct by themselves or others;
- Participants who act as a coach, and where applicable those employing or supervising coaches, must
 - a) conform to IMMAF standards and policies of coaching best practice
 - b) hold coaching qualifications appropriate to the activities they are performing and only coach those disciplines, skills and activities for which they are both qualified and capable
 - c) not disparage or intimidate athletes or seek to poach athletes from their club or national federation.
- Not behave or conduct themselves in any other manner which could bring the sport of MMA, IMMAF, or its members into disrepute or damage the reputation of IMMAF;
- Not make offensive or abusive remarks/jokes, derogatory comments, suggestive comments, or use unnecessary aggression or intimidation, or carry out unwelcome flirting, sexual advances or unnecessary touching, malicious gossip or call people by offensive nicknames within the MMA environment.

Despite the lack of specificity and development of IMMAF Safeguarding Guidelines and some disciplinary provisions to address the above into detail, the reader of these various sources of conduct related information should, at the very least, have understood, that physical, emotional and sexual abuse of athletes, volunteers and staff constituted a serious breach.

Likewise, it is difficult to see how anyone reading this could think that shouting at athletes or belittling them was anything other than a breach of professional standards, or could think that a national coach with a criminal conviction for raping a minor – publicly available in a court ruling database – participating for several times in IMMAF competitions has not been bound, along with his national federation, to a proper disciplinary procedure following an immediate provisional suspension and report to the police.

Any adult participant witnessing such conduct should know that breaches of conduct should be immediately reported, without adverse repercussions or victimisation rebounding on the athlete or person reporting.

Reactive actions in the wake of a complaint - or, even worse, minimizing a report, disclosure or alert and failing to properly follow it up - and informally asking a national federation to take action or to confirm that they have policies does not constitute an acceptable system for monitoring compliance with a policy, especially a policy which is designed to protect children and vulnerable and notably where a sport governing body, like IMMAF, doesn't have the means to audit Members Federations' safeguarding or welfare related policy in any consistent or systematic way and certainly not in a proactive way.

Regulations, disciplinary sanctions, standards and guidelines serve little purpose if breaches are not sufficiently recognised, managed and properly addressed.

This means that if they are breached, there are, or should be tangible disciplinary consequences which can include, remedial action, suspension of membership or expulsion from IMMAF through a fair and due process of law. In that sense they are designed to regulate the conduct of members even though IMMAF might not be considered an official regulator and in most cases is not the relevant employer of the person whose conduct is in question. Had the basic principles contained within the Standards been followed, the complaints that emerged and have been brought to this Review would have been prevented.

Furthermore, those seeing and hearing such alleged punishable behaviours but neither immediately querying and/or formally reporting it, nor seeking appropriate follow-up before public authorities in the event of IMMAF inaction, are behaving in an emotionally abusive and negligent fashion themselves, most notably in case of involving minors and vulnerable people.

It is by no means acceptable that the IMMAF, knowing of the existence of a national coach with a court conviction for raping a minor, as evidence brought to the Review, does not immediately exert the disciplinary mechanisms foreseen to suspend such a coach and sanction the respective national federation through a due process of law. Nor is it in any way acceptable that IMMAF, knowing about this situation, condones the president of that federation serving on the body with statutory powers to enforce disciplinary procedures.

Recommendation 11

IMMAF must increase and improve its direct contact and collaboration with Member Federations on safeguarding to disclose, implement and monitor compliance with the provisions set out in the Safeguarding Guidelines and the Safeguarding Policy and Procedures advisable in the Recommendation 10, providing policy updates.

Resourcing of Safeguarding Work

It was obvious from the information provided by IMMAF and by interviewees that it placed significant reliance on Members Federations to deliver safeguarding at national level, although throughout the period of the Review it was not found any mandatory requirement or tangible guidelines for any member of IMMAF to appoint an Integrity/Safeguarding Officer or a mere Single Point of Contact as the main liaison at national level to ensure that safeguarding matters are handled appropriately and that appropriate safeguarding policies are put in place.

Additionally, we do understand that IMMAF does not have infinite resources and has to prioritise what it invests in, notably in the so-called integrity area. However, it seems that the issue of resourcing to develop and enforce safeguarding policies was not even raised or considered systematically, despite some submissions pointing out the issue has been vaguely internally addressed every so often, notably after IMMAF's successful WADA Code signatory.

Yet, there has been no real evidence or suggestion that in any point in time, prior to 2023, the IMMAF board wanted to fully address or develop Safeguarding, neither it did not have the finances to do so, although the figure of the Safeguarding Officer, and its responsibilities, is somehow detailed in the 2023 Safeguarding Guidelines, although just for IMMAF competitions.

Needless to say, in view of all the above, that this falls way short of what is expected from a safeguarding officer, particularly in an international federation, even one with few resources, and in view of the encountered issues mentioned in this Review.

Neither this fulfils the basic guidelines from the IOC stated in the Guidelines for International Federations (IFs) and National Olympic Committees (NOCs) Related to Creating and Implementing a Policy to Safeguard Athletes from Harassment and Abuse in Sport, according to Recommendation 1, as follows:

“Establish appropriate mechanisms to provide support and information to persons involved in an alleged incident of harassment and abuse (“concerned persons”) including the appointment of someone who is responsible for following up on all alleged incidents of harassment and abuse (e.g. a “Welfare/Support Officer”).

Such person should be trained and experienced in the field of safeguarding from harassment and abuse (e.g. medically and/or legally), and his/her responsibilities should, in particular, include playing a central role in: (i) the reporting and investigation procedures, (ii) determining whether information of a case should be disclosed to the competent local authorities, and (iii) providing support to any concerned persons throughout the reporting and investigation procedures”.

International Federations, by the nature of its pyramidal structure, operations based on voluntary work and legal status has to repose significant trust in its Member Federations to deliver safeguarding but if it is going to do that, it needs an accountable system in place to monitor and support those members. This costs money that most international federations, like IMMAF, don't have or are not willing or prepared to spend, reason why the role of this “Welfare/Support Officer” can be so influential in small International Federations, as IMMAF, to move safeguarding up in its agenda and develop a thorough work in this area, long overdue.

Therefore, the essential Terms of Reference for a Safeguarding Officer need to be wider:

- Developing and managing all systems for safeguarding complaints and concerns associated with IMMAF environments and activities. This included responsibility for the overall management of all such complaints, overseeing effective communications with the Member Federations and other relevant stakeholders, leading on all cases of suspected abuse, auditing records, and facilitating lessons learned. Oversees the investigative processes underlying complaints work. Deals with complaints himself and liaised with the disciplinary committee and statutory agencies, where necessary;
- Developing, training and supporting a skilled and competent safeguarding team across IMMAF events and activities. This means developing and supporting the events local organising team and volunteers and any other personnel within IMMAF and at national federation level with safeguarding duties;
- Overall responsibility for all relevant policy, practices, awareness, prevention, education and training plans, activities, contents and safeguarding sessions under IMMAF's responsibility;

- Assisting IMMAF to put in place policies and implementation plans for safeguarding and promoting welfare;
- Be the first point of contact for IMMAF staff and volunteers, children and parents for any issue concerning safeguarding, poor practice or potential/alleged abuse;
- Ensures that all incidents are correctly reported, recorded and referred in accordance with best practices and IMMAF guidelines and policies;
- Ensures that all relevant IMMAF staff, board members and volunteers access appropriate safeguarding training;
- Ensures that IMMAF procedures for safe recruitment of staff and volunteers are followed and all appropriate existing staff or volunteers have up-to-date criminal records or Disclosure and Barring Service (DBS) disclosures;
- Maintains local contact details for Children's Social Care Services, the Police and Local Authority Safeguarding panels;
- Ensures that codes of conduct are in place for IMMAF staff, board and commissions' members and volunteers/officials;
- Advises IMMAF management, particularly the CEO, on safeguarding issues;
- Ensures confidentiality is maintained and information is only shared on a genuine 'need to know' basis;
- Attends IMMAF management and board meetings to provide an update on safeguarding.

Recommendation 12

IMMAF must deploy sufficient staff with appropriate expertise and training to devise and effectively deliver its Safeguarding Policies and Procedures mentioned at Recommendation 10 and support the safeguarding of athletes and vulnerable at its events.

To carry out this recommendation, particularly regarding their events (but not limited to) the wider engagement of national federations with experience and expertise in safeguarding, would seem to be a positive strategy as reported in the Appendix 3 related the safeguarding task force teamed-up with the Review team to follow the 2023 IMMAF World Youth Championships.

Despite the issue of competition manipulation and betting integrity is out of the TOR of this Review, it stands undoubtedly as one of the main modern threats to sport integrity, tarnishing the reputation of sport organisations and the lives of those shattered by this scourge, which sport governing bodies need to tackle, most notably those bound by the [Olympic Movement Code on the Prevention of the Manipulation of Competitions](#).

Considering, as far as this Review could realize, such area of sport integrity is not developed by IMMAF and given the resource-constrained circumstances, the appointment of an Integrity Officer, with proven experience, who could complement safeguarding with competition manipulation, widening the scope of this recommendation, may be considered at an early stage of development.

Consideration of Athletes, Victims and Survivors

A basic principle for an effective and compliant safeguarding policy must be a wide and efficient dissemination, reaching out those required to comply with it, as previously outlined. All policy should be accessible and if practicable, easy to understand, most notably to athletes and vulnerable, preventing and reporting instances of abuse.

However, the duty of care underpinning any safeguarding policy doesn't end, notably when protection fails, in bringing justice (disciplinary or criminal) to the victims and survivors of maltreatment, enforcing sanctions and provisional measures.

Provisional measures are born out of the idea of protecting victims and preventing alleged abusers to staying close to risky circumstances, mainly while investigations (criminal and/or disciplinary) are conducted, considering some of the following factors:

- The seriousness of the allegations, facts and circumstances;
- The safety and well-being of participants and the sports community;
- Potential risks and harm due to action or lack of action; and
- The best interest of the sport and those who participate in it, including the views of the individuals directly affected.

Thus, duty of care must take into due consideration other provisional measures than temporary suspension, change of duties, restrictions on contact, lodging, travel, communications or activities, and monitoring for the alleged abusers, setting out eligibility conditions and criteria to providing mental health, social, and legal supports to victims, upon report, before, during and after they've gone through a complaint management process.

Recommendation 13

That IMMAF actively collaborates with its Athletes' Commission, legal authorities (i.e., police and social care) and child protection stakeholders to ensure access to independent mechanisms that provide legal, mental health and social services and other specialised resources deemed necessary to support survivors of abuse, according to criteria and guidelines publicly known to the MMA community.

Recognise Red Flags

It has been already set out, occasions when IMMAF was, or should have been, aware of issues relating to athletes and vulnerable welfare that had been identified and raised to IMMAF staff, according to pieces of evidence provided to and collected by this Review. If these alerts had been appropriately managed, they would have afforded IMMAF important opportunities to assess culture and patterns of behaviour within the sport and the policies, measures and procedures to effectively address them. These include:

- The measures in place to educate coaches, parents, athletes and sport participants alike as to what is, and is not, acceptable behaviour by adults in a coaching and competition environment;
- The measures in place to safeguard athletes, vulnerable and adults at risk from harassment and abuse, to include the circumstances in which inappropriate, or perceived inappropriate, behaviour is reported;
- The pathways available to any MMA sport participant or any other concerned party, to report such concerns as there may be;
- The regulations, procedures and guidelines that IMMAF is statutorily obliged to follow, enforce and comply for any allegation, disclosure or alert of abuse, and how this is easily understood by sports participants and properly and adequately monitored.

Given the above, IMMAF should have recognised that there were issues that needed to be properly investigated and addressed, before the crisis around 2021 Youth MMA World Championships, which resulted in this Review. Instead, the responses to some of these issues were defensive, vague, reactive, lenient and less than rigorous, as set out before, even from individuals with skills and certified expertise in safeguarding matters. Even now in the interviews to this Review.

The way in which an organisation follows-up reports and alerts and responds to concerns and criticism, can be a litmus test of leadership and of culture. It can also be a test of how decisions are made within an organisation, the engagement of staff and those who receive and act upon a report/complaint, and whether these decisions are appropriate, effective and accountable.

We've listened that without a formal complaint there would not have been any further investigation arising. Leaving aside the fact that even under IMMAF's own policies and regulations, it does not require a formal complaint for an investigation to take place, the organisational response, seemed to be feeble, if not complacent, given the reputational risk engaged and the seriousness of the issues that had been raised in 2021.

Even now, after evidence and a disclosure has come forward, and an Independent Review set up, we consider that this Review received inconsistent and incomplete information from individuals involved in this case as to exactly all what was reported, how many reports have been received and referred to the CEO and/or the IMMAF board, who was involved and who was ultimately responsible for the decisions made to act upon the concerns raised on abuse, neglect and sexual misconduct related to the 2021 IMMAF Youth MMA World Championships in Sofia.

Overall, this suggests a lack of stewardship and an organisational failure, until very recently, to appreciate the central importance of safeguarding, and athlete and vulnerable welfare, illustrated by the unreadiness to handle complaints, build and manage a case, open and conduct an investigation or fully cooperate with an Independent Review, at different levels of IMMAF.

Not just a failure from the organisation, but also from those who, two years later, rush to criticise, forgetting the leading roles they played in IMMAF, but above all forgetting the moral obligation they had to raise this issue and refer the case to the legal authorities in the face of the lack of action they now regret, putting the interest of the victims and the MMA above anything else.

An organisation too focused on contain personal, professional and reputational damages, pushing back against what were seen as hostile media stories and disclosures or internal political disputes rather than understanding the victims' perspective and implement long overdue remedies.

An organisation where factions weaponize safeguarding for wider political disputes, and much probably will do the same with this Review.

This is not new as clearly illustrated in the documentaries "[Athlete A](#)" or "[Over the Limit](#)". Like other sport organisations dealing with the consequences of overlooking safeguarding, IMMAF did not pay enough attention to the warning signs available to the organisation, to its staff and to the MMA community and is now, like others before, crossing the Via Crucis, of having failed to invest adequately in safeguarding, coach education, policy implementation and complaints handling.

Current policies, systems and structures to protect vulnerable and deal with welfare are not robust enough to deliver the right culture, and IMMAF is far from monitoring the efficacy of the systems that are in place and does not adequately reflect upon what is required to prioritise safeguarding.

Instead, the focus has been on increasing financial stability, competition and sport development and other relevant areas for recognition at the worldwide sport community like medical safety and antidoping. It did this by supporting higher levels of participation and membership, both of which rose. If the financial stewardship has eventually improved, the cultural leadership has still to grow in order to, unflinchingly and no strings attached, keep abusive behaviour and those who encourage, condone and practice out of any place in MMA, and certainly not in the IMMAF structure.

Recommendation 14

That IMMAF, in collaboration with its relevant internal commissions, notably Athletes' Commission, members, statutory authorities and child protection stakeholders, works to ensure that the specific needs and experiences of young athletes, vulnerable and adults at risk are taken into account in efforts to create and improve a safe MMA environment.

Compliance – Enforcement, Complaints Handling and Case Management

It's not uncommon circumstances where the safeguarding policies themselves may be strong and follow the best practices, but the implementation of those policies is not happening in a way that is meeting needs of victims, complainants and respondents, falling in one of the classic tricks with these sorts of procedural policies where everything can sound good on paper and seem to make sense, forgetting that until you actually walk through the process in real life, you may not pick up on issues, inconsistencies or tweaks that need to be made when it comes to governance, enforcement and oversight of policies.

Despite ill-developed and insufficient, it cannot be said that the IMMAF did not have guidelines, procedures and disciplinary rules in place in the area of preventing and sanctioning abuse, in 2021 or now. The biggest weakness has been the lack of control over the enforcement, compliance, monitoring and governance of these policies.

Additionally, IMMAF misses to provide clear guidance on safeguarding processes and responsibilities and help make those processes, notably for those involved, as effective, swift, transparent and fair as possible.

Whenever misses a clear strategy and guidance around how athletes, coaches, administrators, staff, disciplinary bodies, volunteers and other individuals should all interact in a safe sport environment, leaving a vacuum of understanding, accountability and enforcement about behavioural and disciplinary norms, the personality of those in position of power and influence determines the culture.

This worsens when these individuals did not feel part of decision making and did not feel able to voice their true feelings and opinions for fear of negative consequences or reprisal and this extends to deliberately declining to seek psychological support, file a report or share a concern. This also worsens if those individuals, particularly the athletes, don't feel they have a strong voice on the board.

Moreover, the lack of safeguarding expertise on the IMMAF board and staff didn't turn easy a culture shift or move safeguarding up in the organisation priorities and in that sense safeguarding "has not been in the list", enabling a fertile ground for some of the shortcomings previously mentioned, poor practices and wanton behaviour towards alerts, disclosures or complaints of abuse and sexual misconducts like those at the 2021 IMMAF Youth Championship, turning clear the room for urgently required improvement to the way in which safeguarding cases are managed and resourced and the alerts, concerns and disclosures followed and acted on.

With this comes failing to invest adequately in safeguarding, coach education, policy implementation and as one shall soon see, complaints handling. The policies, systems and structures in place to deal with safeguarding and abuse are not robust enough to deliver the right safe sport culture and IMMAF has no means or expertise to monitoring the efficacy of the systems in place. IMMAF did not seem, up to very recently, to adequately reflect upon what is required to prioritise safeguarding, concretely (but not limited to) if one looks at the board meetings minutes.

The way as this 2021 case unfolds should serve as an eye-opener and a learning process for the organisation to realize why safeguarding cannot be seen as business as usual, just lying on the goodwill of some people, without the effective oversight of a comprehensive and actionable widely-disclosed policy.

Recommendation 15

That IMMAF, pursuant Recommendation 5, introduces effective oversight and governance pathways to ensure that the views and interests of athletes, parents and other sport participants are known to the Board and are taken into account in relevant decision making on safeguarding policies, and appoints a board member with relevant professional expertise in safeguarding and athlete welfare in charge of this area.

Screening, Background and Integrity Check

The Screening Policy concerns the background screening procedures for positions in a sport organisation with the aim of ensuring a safe, positive and healthy environment for all individuals in the organisation and at their events. The screening policy focuses on the documentation, vetting and background and integrity check requirements for positions based on the risk level and conflict of interest assessment and the procedures for monitoring, reassigning, dismissing or expelling individuals once in a position in the organisation, either as an employee, staff, board member, officer or committee member.

It has numerous strengths:

- It applies to individuals who are in positions of power, influence, trust and authority at the organisation and (but not limited to) who work closely with athletes and vulnerable persons;
- While Member Federations might have their own policies, they could at minimum be in compliance with the Screening Policy of their International Federation;
- Risk level of position can be periodically reviewed or when the individual resigns (whichever is earlier);
- Can lead to refusal to hire, appoint, dismiss or suspend an individual into a position if they:
 - ✓ Have been charged with or convicted of a relevant offence including but not limited to sexual offences, sexual offences against a minor or vulnerable person, criminal offence involving accessing, making or distributing pornography
 - ✓ Have a conflict of interest, impediment and/or incompatibility to hold a position (elected, hired or appointed) in the organisation
 - ✓ Upon completion of the vetting procedure and documentation assessment are not fit for purpose.

Had IMMAF been such a policy effectively in place⁴, it would most likely have been able to detect, prevent and act upon the following without the need for a late warning in 2021:

- Instances of high risk of abusive behaviour and sexual misconduct by individuals serving on IMMAF bodies;
- Cases of conflicts of interest, incompatibilities and impediments of individuals serving on IMMAF bodies.

⁴ IMMAF has available a [Code of Practice for Dealing with Conflicts of Interest](#) where states: "In order to ensure that any potential conflicts are identified and declared as early as possible, a register of interests will be developed and maintained by the Chief Executive Officer and used for reference if and when any potential conflicts may occur." However, as IMMAF shared with this Review, this register is not active.

Nonetheless, and even without a Screening, Background and Integrity Check Policy, and despite the circumstances associated with the resignation of the former chairman of the IMMAF Disciplinary Committee and his team, which this Review has not been able to clarify in full extent⁵, it is in no way acceptable that a president of a member federation can sit (and be re-elected) on an IMMAF disciplinary body as this is a blatant case of conflict of interest.

Recommendation 16

That IMMAF approves, implements, discloses and establishes the necessary oversight mechanisms for the enforcement of a Screening, Background and Integrity Check Policy for all individuals serving at IMMAF in elected, hired or appointed positions.

The Nominations Committee shall apply this policy and propose to the statutory IMMAF decision-making bodies the validation/invalidation of each individual in a duly substantiated and documented opinion.

Complaints Handling and Disciplinary Policy and Procedures

For the purposes of this Review, complaints on asserted violations of the IMMAF Code of Ethics and other IMMAF Rules and Procedures shall result in a formal disciplinary procedure⁶ conducted by the IMMAF Disciplinary Committee⁷ according to the [IMMAF Disciplinary Regulations](#).

It would, therefore, to be expected, in light of these rules, that allegations and complaints brought to the IMMAF's attention about alleged instances of safeguarding, abuse and sexual misconduct on the sidelines of the 2021 IMMAF Youth World Championship be dealt with in accordance with these procedures.

Instead, the consultant who received this complaint – with certified expertise on safeguarding - suggested to IMMAF to set up a task force with a member from SAFE MMA and the former chair of the Disciplinary Committee, both with criminal investigation experience, to investigate and build the case.

However, with the resignation of the former chair of the Disciplinary Committee, this task force was never even set up and no enquiry leading to the opening of disciplinary proceedings was carried out, in accordance with the aforementioned IMMAF regulations, either against a coach convicted of raping a minor, his federation or those in charge.

Ultimately there was no formal disciplinary proceedings to address this case, when they should have been immediately initiated. Formal disciplinary proceedings would consist of formulating allegations, presenting available evidence to a Panel, fact finding, hearings and determining the outcome and any sanction through a due process of law.

⁵ As the former chair of IMMAF Disciplinary Committee was not available to meet with this Review.

⁶ 1.1.14 The IMMAF excludes from the delegation to Constituent Bodies the jurisdiction and authority to act in respect of the following, unless otherwise directed in writing by the IMMAF Disciplinary Committee: this next paragraph will have to be considered in relation to the specific competition rules.

- (a) breaches of IMMAF Anti-Corruption and Betting, Medical and Anti-Doping;
- (b) all cases under investigation by the Police;
- (c) safeguarding cases;**
- (d) any other matter deems sufficiently serious, at the discretion of the IMMAF Disciplinary Committee.

⁷ The IMMAF Disciplinary Committee is responsible for the management and resolution of any asserted violations of the IMMAF Code of Ethics and other IMMAF Rules and Procedures, except for asserted violations of anti-doping rules which come under the jurisdiction of the IMMAF Anti-doping Disciplinary Committee. Any complaints, disputes or appeals arising from decisions of the IMMAF Disciplinary Committee will be settled by the IMMAF Arbitration Panel which is independent of the Disciplinary Committee.

In the end, the coach in question has simply been removed from IMMAF events in circumstances where the question of whether they had breached IMMAF regulations, policies and procedures has not been investigated at all. IMMAF was unable to enact the formal disciplinary proceedings available under their regulations.

There were no proceedings and measures against the federation in question, while its president discreetly stepped down from the position held on the IMMAF Disciplinary Commission, when it should be clear that:

- The question of whether alleged misconduct by a national coach should affect his/her National Federation membership of IMMAF, is a matter for IMMAF, most notably when this coach registers, enrolls and participate in international events under the jurisdiction of IMMAF, with a criminal conviction for rape available in a publicly-open judicial database;
- The question of whether alleged misconduct by a national coach should affect his or her employment, is a matter for the National Federation.

Given the gravity of the concerns contained in this case, people involved and widespread claims of false rumours, hearsay, lack of evidence, defamatory purposes, failure to act upon and discontent about complaints handling, this Review was unable to reach a clear understanding of why a formal disciplinary hearing and proceeding was not immediately initiated pursuant to IMMAF statutory provisions, particularly where, apparently, there were unresolved conflicts of evidence and the reputation of some IMMAF staff undermined.

Obviously, formal disciplinary proceedings are expensive and time-consuming, whereby resolving complaints informally might be tempting. However, Disciplinary panels had available to them the widest range of sanctions as well as the ability to resolve conflicts of evidence, make findings of fact about what has taken place and decide whether any standards or rules has been breached, according to a due process of law, thus upholding the credibility of the institutions and the right of defence and hearing of all those involved.

Sweeping issues under the rug, barely touching the surface of problems, instead of addressing concerns and treat members, respondents and complainants equitably and fairly, has been proved in a wide array of high-profile cases in a number of sports around the world as a damning and far more expensive strategy over time, with a staggering amount of cases unreported where people who bring forward concerns are automatically classified as “problematic” or “rumour-mongers” instead of being properly listened, thus feeding an increasing culture of fear, opacity and risks for vulnerable where justice is not served, while keeping abusers untouchable.

How we respond to complaints is an essential part of this culture shift. There are very substantial grounds for the complainants to react because the process and decisions made in this case do not appear to have obviously followed any fair and due process, whether in act upon the alerts raised, the investigation or the “disciplinary” action that followed.

Culture shapes the context within which people judge the appropriateness of their behaviour. An organisation’s culture will influence human behaviour, integrity and deliver of values through sport, and it is vital to recognise the danger of cultural slippage. Procedures which are understood, accepted and followed by all adults, notably those in positions of power, associated with the organisation is integral to this, and strong governance and leadership are vital.

A complainant and a respondent did not, apparently under the way this case has been handled, have any right of answer to any material put forward in response to a safeguarding complaint. A sport which does not provide a fair and independent disciplinary process is failing towards its members.

The core reason for this is that the process of carrying out a review/investigation is not an open, independent and impartial process in which the persons to be affected by it are given any opportunity of challenge to the

case against them or say on the outcomes imposed upon them. In the end everything was held informally with no due process of law.

Whatever route IMMAF has chosen to follow it denied the subjects of the investigation – if any investigation really took place - input and challenge, a right to be heard, a right to know the case against them and then a right of appeal.

This isn't only an IMMAF issue. It's a business of better governance of international sport governing bodies issue and one that is being passed up the chain because accountability on safe sport is not part of today's sports culture yet, as seen in a number of recent independent reviews on this regard.

Recommendation 17

That in any safeguarding case where sanctions are imposed that they are only reached after contested hearings in which the basis of sanctions are explained and justified against relevant criteria.

Recommendation 18

That the Regulations, policies and/or practices of IMMAF on safeguarding cases to be investigated, reported upon and determined as to recommendations by one or more persons with decision-making powers be replaced with a process of investigation that ends with disclosure and a contested hearing in an open forum.

Recommendation 19

That the IMMAF disciplinary processes are improved, updated, reviewed and re-written so as to reframe or create a set of requirements:

- An independent disciplinary panel and appeal panel, made up of people checked as being qualified, experienced and fit for purpose to carry out these functions;
- Any sanction ruled by IMMAF ought to be subject to review by an independent person, panel or tribunal under the judicial processes whether or not the body appealing has been disaffiliated or not;
- IMMAF and its administrative decisions are capable of challenge if they do not comply with the IMMAF Regulations and/or Procedures;
- Decisions not to pursue a safeguarding investigation and/or inquiry are capable of being challenged by review by either an independent disciplinary officer or IMMAF's prosecutorial team;
- A legal support for that disciplinary and appeal panel which is independent of IMMAF either by being embedded in the panel/appeal panel or being a distinct and separate legal office;
- Prosecutorial resources provided by IMMAF for bringing disciplinary and safeguarding cases which involve either allegations of safeguarding or breaches of the Regulations capable of leading to a suspension or complex factual or legal dispute;
- Appoint an independent disciplinary officer to oversee the decision to prosecute cases and to have the power to consolidate or limit sequential complaints;
- Remove any involvement of the Board, the CEO or other management from the prosecutorial decisions of the disciplinary and/or safeguarding teams;
- Any complaints (as opposed to challenges on outcomes) as to the disciplinary process should be referred to a board member or, preferably, an independent person who should react to them, reporting to the board, and should not be resolved as a management issue by the CEO;
- Complaints against IMMAF are resolved independently of IMMAF.

Case management

All in all, after desk research, investigation, collect evidence, analyse interviews and cross data, we consider:

- First, we doubt the process for reporting safeguarding concerns is clear, simple and widely known;
- Second, we doubt the investigation process adopted to safeguarding concerns, alerts and disclosures follow current best practice;
- Third, we doubt the structures of IMMAF for addressing safeguarding concerns follow best practice.

The procedures provided no guidance for decision-makers on the approach to be taken in cases where the respondent (often a coach) disputed the complaint or allegation. For example, there was no reference about how to investigate a complaint.

There was no suggested framework for applying any concept of burden or standard of proof or what to do when an allegation appeared to consist of one person's word against another, especially where one is a child or young person.

This void in policy and guidance risked an inconsistent approach to complaints handling and may cast doubts as to the correct approach to take in some cases.

In addition, essential complaints handling guidance was absent from IMMAF's written policies, procedures and statutory provisions.

This is paramount if IMMAF wants to minimise the risk of incidents going unreported or insufficient investigations into notified allegations and to ensure safeguarding of children or adults at risk, mitigate the risk of counterclaims being made against IMMAF and to improve the turnaround of cases by having a transparent and robust process that allows a level of mediation and/or sanction.

One of the themes identified in some submissions to this Review was the sense that IMMAF did not investigate and acted upon complaints. Some asserted that the complainant had not been contacted to provide further evidence, full information or develop, explain or clarify their complaint and for IMMAF to gather the best evidence upon which to base an investigation. Others expressed surprise or concern that the person in question (often a minor) was not spoken to and there was a strong sense that IMMAF failed to investigate robustly and had not pursued relevant lines of enquiry, including contacting identified witnesses or victims.

There's no guidance in IMMAF policy about the approach investigators or decision makers should take to conflicts of evidence and there was even no case file here to suggest how investigators had in fact approached such conflicts. IMMAF could have resolved conflicting or inconsistent evidence by seeking further information from other individuals to obtain a more complete and clear picture.

The absence of useful information about how to approach the assessment of available evidence, how to decide the forum for determining a complaint, the relevance of whether a complaint could be substantiated and how and in what circumstances to identify the appropriate outcome, all compromises the application of safeguarding policies. It also compromises the appropriate and consistent resolution of some safeguarding complaints.

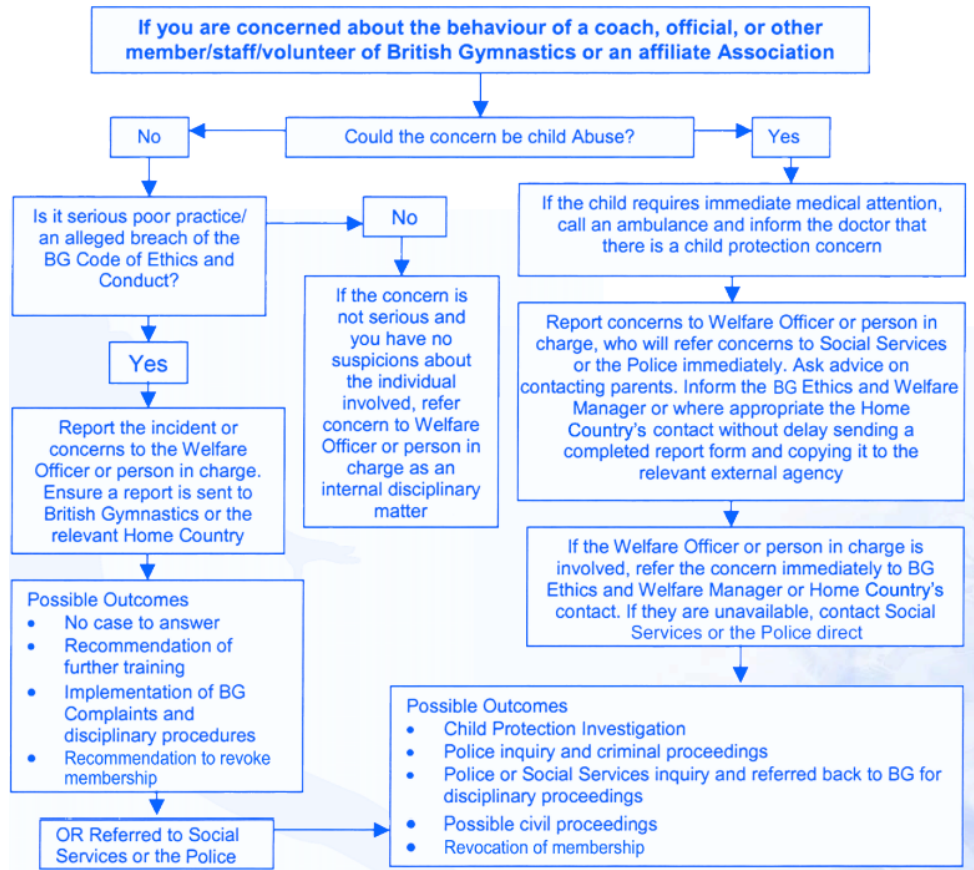
From the review of accounts and evidence submitted, one can conclude, with a comfortable satisfaction standard, that IMMAF didn't consistently take sufficient and diligent steps, upon receipt or been made aware of complaints or disclosures, to ask Member Federations about any relevant previous issues or additional concerns, in particular, judicial or administrative sanctions that clearly might have posed a danger to minors and vulnerable people participating their competitions.

Recommendation 20

IMMAF must provide clear guidance in its internal policies and disciplinary procedures about how to investigate complaints and concerns.

Parents, coaches, athletes and all sport participants should be aware of these policies, particularly the procedures for raising a complaint or concern.

This chart can be seen as an easy-understandable example:



Recommendation 21

IMMAF must ensure that it notifies all complainants and respondents involved in any complaint about the actions, developments and outcomes in a consistent, clear and prompt manner.

In issues concerning sexual allegations, the willingness and tangible steps taken by IMMAF, but also by complainants, alleged victims or third parties to immediately contact statutory agencies (police and social care) appeared to be faltering, fearful and absent or non-existent, failing confident to act upon disclosures, or even alleged “rumours” and ultimately missing at prioritizing the paramount child/vulnerable protection and criminal issues arising in such cases, notably in the wake of resulting criminal convictions.

IMMAF might feel deterred from a heavier handed approach to disciplinary act upon a disclosure or complaint by a fear that it may reduce membership as well as by the resource implications.

This Review acknowledges this may be seen sometimes as a delicate issue. However, it would not be in the interests of an international sport federation, notably a rising one like IMMAF aspires to, to dissuade from membership of a governing body as that would remove an important layer of support, education and protection.

Nor should the requirements be so onerous as to obstruct new members willing and able to develop the sport worldwide. That said IMMAF is under an indisputable duty to implement a policy and to safeguard its members, staff, athletes, coaches and other sport participants diligently acting upon each and any of its members about any safeguarding complaint or concern brought (formally or informally) to its knowledge, through proper procedures widely known by all the MMA community.

Recommendation 22

IMMAF must require its Member Federations to have a complaints policy for safeguarding concerns and must make this a clear requirement within the relevant policies and standards for membership.

After reviewing IMMAF's policies, guidelines and statutory documents we consider that the organisation does not adopt and does not follow best practice in relation to its policies or procedures on safeguarding, missing to provide clear and accessible information about:

- What is a safeguarding concern?
- How should a safeguarding concern be addressed and investigated?

IMMAF has a confused and inconsistent approach to what it views as a safeguarding concern and does not follow the current best practice, given the absence of clear definition and guidance to what is a safeguarding issue and should amount to 'abuse' triggering a safeguarding response.

This stands in contrast, for example, to the clarity of the Child Protection in Sport Unit (CPSU) definition:

“Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm”.

CPSU definition is consistent with its [Standards for Safeguarding and Protecting Children in Sport](#) which starts with the uncontroversial statements of principle that:

“Children and young people have a right to enjoy sport, free from all forms of abuse, exploitation and poor practice.

All children and young people have equal rights to protection from harm.

All children and young people should be encouraged to fulfil their potential, and inequalities should be challenged.

Everybody has a responsibility to support the care and protection of children.

Sporting organisations have a duty of care to children and young people who take part in sport.”

By following a robust definition, like this, IMMAF could use and clarify examples of what is abuse in the context of MMA that the CPSU provide. For example, the CPSU provide definitions of '[Emotional Abuse](#)' which include a range of behaviours.

Recommendation 23

That IMMAF re-assesses its policies and regulations and adopt a current meaning of 'abuse' triggering a safeguarding concern and a response that follows the guidance of current best practices.

Above this Review has given three orders of reasons to consider why IMMAF doesn't follow best practice in reacting to or investigating safeguarding concerns.

As to the reporting process we consider that there ought to be a single destination of reporting in respect of all safeguarding concerns. A single line should be capable of being drawn from the reporter of the concern

to the IMMAF Safeguarding Office from all reporting sources. The purpose of that single destination of reporting is that:

- All reports are centrally known and recorded;
- All reports are given proper weight;
- An ‘intelligence picture’ can be composed by IMMAF preventing siloes and patchy responses.

Once a report of a safeguarding concern is received by IMMAF, the process to be followed needs to be clear, undoubtful and fair to everyone until the very end, according to Recommendations 20 and 21, where any sanctioning of a participant or federation or any other member should only occur after there has been an opportunity for a contested hearing before an impartial disciplinary body and where any interim sanctions should be imposed by such body or chair of such body with a review period and a right of challenge, following Recommendation 18, and not any other third-person or body of IMMAF, because such procedure would not allow:

- Any independent judgement that person or body on the facts;
- Any representations that person or body by concerned parties;
- Any involvement of any person independent of IMMAF in the decision on sanction;
- Any justification for sanction or representations on it.

Has seen in the circumstances around how IMMAF disciplinary tackled and acted upon the concerns raised related to the 2021 IMMAF Youth MMA World Championships and how the complaints were reported, both fall quite far from this and the current best practices in place to [report](#) and [investigate](#) a safeguarding disclosure.

Intimately related to this is the widespread and clear dissemination of information on how to submit a complaint or report, whereby each complainant knows where to report, how to report and what need to be included in the report. This is a must for any safeguarding policy.

Here is a table prepared using information from Office of the Sport Integrity Commissioner (OSIC), available at the [Report Online](#).

What is a complaint?	An individual who files a complaint agrees to act as a complainant throughout the complaint management process.
What is a report?	An individual who files a report may choose to remain anonymous or to not act as a complainant throughout the complaint management process. A report leads to an initial review, but does not necessarily engage the formal complaint management process.
Is it possible to remain anonymous?	Yes, but only for a report. Complaints cannot be submitted anonymously. However, the Office of the Sport Integrity Commissioner may not be able to follow up on information provided in an anonymous report.
What information must be included in the form?	At a minimum, the complaint/report form requires the following information: <ul style="list-style-type: none"> • type of report (complaint or report); • type of involvement in the incident (victim, witness, person who heard about it, etc.); • identity of the sport organization; • sport level (national, provincial, university, etc.); • details about the incident; • respondent’s role; and • contact information for the individual submitting the report or complaint, if it is not an anonymous report. Further details, such as supporting documents for the complaint or report, may be provided but are optional.

The same goes for what follows when a complaint is received and the overview of the process management, again arranged on the same source (OSIC) [Guidelines Regarding Initial Review & Preliminary Assessment of Complaints](#); and OSIC [Guidelines Regarding Investigation of Complaints](#).

Step	Description
1. Initial review	When a complaint is received, a case file is opened. The Office of the Sport Integrity Commissioner (OSIC) examines the complaint to ensure that all necessary information is provided, with no omissions that would prevent the process from continuing. The OSIC must also determine whether the complaint process should be expedited.
2. Preliminary assessment	The OSIC must conduct a preliminary assessment of every complaint received. The purpose of this assessment is to evaluate the complaint procedurally to determine what is the appropriate process for it and whether, on its face, it indicates a potential violation of the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS) by a respondent who is under the OSIC’s authority.
3. Preliminary assessment outcome	Preliminary assessment outcomes include the following: <ul style="list-style-type: none"> • the complaint is accepted and, by agreement of the parties, moves to mediation; • the complaint is accepted and moves to the investigation stage; or • the complaint is not admissible before the OSIC, and the case is closed (if appropriate and the complainant consents, the complaint may be referred to another organization).
4. Initiation of an investigation and assignment of an independent investigator	An investigation may be initiated following the preliminary assessment or the mediated outcome of a complaint. The OSIC is responsible for determining the scope of the investigation, developing the investigation plan and mandate, and assigning the independent investigator. When assigning an investigator, the OSIC must consider the following: <ul style="list-style-type: none"> • absence of conflict of interest or apprehension of bias; • availability; • geographical location; • official languages; and • areas of experience, expertise and specific skills desired, given the nature or circumstances of the complaint. <p>The complainant and the respondent have the right to challenge an investigator’s role with the OSIC on the grounds of conflict of interest or reasonable apprehension of bias. The OSIC assesses this challenge, and if it believes that the investigator cannot effectively fulfill their role, it hires another independent investigator to carry out the investigation.</p>
5. Review and analysis	The independent investigator gathers and verifies the evidence. They then review all of the evidence and make findings of fact using the “balance of probability” standard. The independent investigator then applies the UCCMS or any other applicable code or policy to the facts and determine whether a breach of the relevant code or policy has occurred (whether the complaint is substantiated, partially substantiated or unsubstantiated).
6. Investigation report	After the review and analysis, the independent investigator submits a written investigation report to the OSIC. This report must include: <ul style="list-style-type: none"> • an overview of the process used to investigate the allegations; • a summary of the evidence obtained and the resulting findings of fact; • an analysis of the facts about each of the allegations with respect to the UCCMS or any other applicable policy or code; • conclusions – whether an alleged violation of the UCCMS or any other applicable policy or code is substantiated or unsubstantiated; and • any mitigating or aggravating circumstances identified. <p>The OSIC reviews the investigation report to ensure that it contains the required elements and that the investigation was conducted in accordance with its policies and procedures.</p>
7. Communication of the investigation report	The OSIC provides the Director of Sanctions and Outcomes (DSO) with the investigation report, along with its recommendations regarding sanctions. The parties to the investigation receive a copy of the final investigation report from the DSO.

8. Challenge of a finding	Any party who objects to a step or procedure during the course of an investigation must notify the OSIC and may notify the independent investigator. Such an objection does not constitute a challenge. A challenge regarding an investigation step or procedure must be made to the Safeguarding Tribunal with respect to the investigation report's finding(s) once it or they have been communicated by the DSO.
9. Investigation outcome	<p>If the investigation's findings are not challenged, an investigation may have one of the following outcomes:</p> <ul style="list-style-type: none"> • mediation, with the consent of the parties; • sanctions imposed by the DSO, in the case of a substantiated allegation of a violation of the UCCMS or any other relevant policy or code; • closure of the complaint by the OSIC, in the case of an unsubstantiated allegation of a violation of the UCCMS or any other relevant policy or code; or • initiation of other applicable procedures by the parties and/or the OSIC.

Recommendation 24

IMMAF introduces, widely disclosing to all members, a comprehensive safeguarding reporting system, where:

- Makes clear and states plainly that all safeguarding complaints and reports should be made to the Welfare/Safeguarding Officer through a single route, and clear reporting mechanism, preferably an online platform;
- Introduces a new and clear investigation process which follows the preparation of evidence for a contested hearing before a disciplinary panel and not a single person's determination, removing the powers of sanction from any other than a disciplinary body; such powers should be passed to a disciplinary panel or its Chair, with provision for emergency interim sanctions and appeals therefrom;
- Makes available a reporting/complaint follow-up with a pathway for complaints relating to safeguarding concerns or breaches.

Wherever there are multiple routes for disclosing complaints, it is incumbent upon the receiving organisation to log and triage them consistently. Failure to do this has the potential to put and leave participants at risk and to allow inappropriate or abusive practices to remain unchecked. It also diminishes confidence in IMMAF's willingness or ability to take safeguarding concerns seriously. As a result, the risk of concerns and complaints being overlooked or neglected is great.

As mentioned, complaints should arrive at IMMAF via a single route and be effectively triaged by the Welfare/Safeguarding officer, promptly logged and recorded on the relevant system.

There was sufficient evidence to conclude that this was not a common practice and some complaints, concerns and reports were received but no action taken or no conclusion reached. Besides the inconsistencies in the procedures and practices in place to receive complaints, there was no effective and robust software to record them within the case management system. In other words, case recording and management systems were limited.

[An effective case recording and management system for safeguarding](#) complaints allows for sophisticated electronic searches using multiple criteria which can easily be exported and analysed either to consider aggravating/mitigating factors to handle a disciplinary sanction or to properly share information with law enforcement or other statutory authorities, compliant with privacy and data protection regulations. It also allows for all communications, documents and decisions to be located together in one file. This means it should no longer be necessary to locate decisions in minutes or to try and identify process and dates from

letters and emails or across management systems, facing the risk of backlogs and led astray any investigation, disciplinary procedure and case management.

The case management system should record any complaint received and action taken from IMMAF to each individual, thus helping a better risk management and to make a proper decision regarding the case at stake based on the background, such as:

- Refer the matter to the police or Children’s Social Care/Designated Officer or such other organisation(s) as may be appropriate;
- Carry out further investigations;
- Require protective measures;
- Recommend that no further action be taken;
- Impose limited sanctions including but not limited to:
 - ✓ Removal of eligibility to participate in or be selected for competition or other MMA-related activity for a specified period
 - ✓ Suspending or removing from office one or more officials of an organisation
 - ✓ Withdrawal of some or all of MMA support or membership related benefit
 - ✓ Conditions relating to the respondent’s participation in MMA activities
 - ✓ Formal warning
- Require the respondent to make improvements which may include but is not limited to:
 - ✓ A personal development plan
 - ✓ Requirement to complete a period of mentoring and/or supervision and/or mentoring
 - ✓ Requirement to prove competence for any MMA-related activity
 - ✓ Advice or directions on future conduct
 - ✓ Engaging a relevant official, employee or other service provider
- Agree control measures designed to limit the safeguarding risk posed by the respondent or any other individual (subject to the full co-operation of the respondent and/or the registered or member organisation);
- Require the respondent (and/or any other relevant individual(s)) to undergo a criminal record check;
- Require the respondent to undergo a risk assessment conducted by a person specified by IMMAF;
- Any other action the IMMAF considers appropriate bearing in mind the case in question.

Recommendation 25

IMMAF must ensure its case record and management system for complaints is fit for purpose and enables a record to be kept of the nature and number of complaints received in order that complaint handling performance can be monitored and patterns of behaviour identified.

PART 3

Summary of Recommendations and Implementation

This Review considers the implementation of these recommendations long overdue, needed and urgent, and that it may require the provision of safeguarding expertise.

The Review has been also conscious as the outset of the investigation that community and competitive MMA cannot function without heavy reliance upon volunteers and its members. IMMAF has to repose significant trust in its members to deliver safeguarding but if it is going to do that, it needs an accountable system in place to monitor and support those members and their officer. **This costs money that the organisation is not ready to spend.**

However, it is not never too late to remind how sensitive, yet conversely so critical, this issue is to remain overlooked. We acknowledge that it would not be in the interests of an international sport federation, notably a rising one like IMMAF, to implement a stringent safeguarding strategy that might deter current and upcoming members.

Neither the safeguarding requirements be so onerous as to obstruct new members willing and able to develop the sport worldwide. That said IMMAF is under an indisputable duty to implement a policy and to protect its members, staff, athletes, coaches and other sport participants from abuse, diligently acting upon each and any of its members about any safeguarding complaint or concern brought (formally or informally) to its knowledge, through proper procedures widely known by all the MMA community.

Implementation

The acceptance of any Recommendations, which are listed below by specific topic areas, and their effective implementation, turning words into deeds, on which the IMMAF should be held accountable, will therefore depend on a cooperative approach by IMMAF members and stakeholders and plainly must take account of the resources of time and finance available, matters which are out of this Review consideration.

To assist in that process, and to give proper purpose to the Review, we finally recommend that a plan of implementation, with a roadmap and a timeline for each of the Recommendations should be widely discussed, agreed and approved by the competent statutory bodies of IMMAF.

Recommendation 26

The IMMAF Board must assume responsibility and take leadership of the implementation of these recommendations and publish, every six months, the progress made to fulfil the Review's recommendations, establishing a deadline by which time each one should have been implemented.

This Review should be made publicly available on IMMAF website and disclosed to all members.

Overview and Foundations

Recommendation 1

That IMMAF must implement and adhere to universal standards for safeguarding in sport acknowledged by the international sport community, being the recommended basic baseline the [IOC Guidelines for International Federations \(IFs\) and National Olympic Committees \(NOCs\) Related to Creating and Implementing a Policy to Safeguard Athletes from Harassment and Abuse in Sport](#).

This requires IMMAF to have up to date child protection and safeguarding policies in place and to have a lead Safeguarding/Welfare Officer, trained and experienced in this field.

Recommendation 2

That IMMAF, with the support of safeguarding expertise, must implement and monitor mechanisms to prevent individuals in positions of authority, trust, power or influence - including but not limited to, sport directors, parents, administrators, board members, directors, team leaders or coaches - from practicing abusive behaviours for undue control over athletes, staff, volunteers, vulnerable and adults at risk, starting from those participating at IMMAF competitions.

Recommendation 3

That IMMAF, together with its members and relevant internal commissions, sets out, update and expand a safe sport education, awareness, prevention and training programme for athletes, coaches, parents, and any other individuals involved in the MMA sport system, starting from those participating at IMMAF competitions.

Recommendation 4

That IMMAF, in collaboration with its local events organising team, commits to support education, training and capacity building for volunteers on safe sport, with the goal of providing them the tools to better support athletes throughout the competitions under its jurisdiction.

Recommendation 5

That IMMAF, in collaboration with its members, and other relevant stakeholders:

- Include athletes in all bodies and all decision-making processes regarding safe sport, welfare and wellbeing in MMA;
- Work to ensure that the specific needs and experiences of young athletes are taken into account in efforts to create a safe MMA environment.

Awareness, Training & Education

Recommendation 6

IMMAF should ensure that all coaches currently holding the highest level of qualification, and all national coaches registered for its competitions, receive training on the basis of the updated educational programme, in accordance with recommendation 3 of this Review, within a feasible time of its introduction and as a mandatory condition for issuing accreditation and clearance to attend IMMAF competitions.

Recommendation 7

IMMAF must produce and make available to the MMA community a Safeguarding Handbook, which should be reviewed and updated at least every four years and must include:

- IMMAF's Standards of Conduct;

- An explanation of all IMMAF's key policies affecting athletes' welfare and links to these policies;
- Information about the role of Safeguarding/Welfare Officer and obligations to report, and pathways for reporting safeguarding concerns;
- Any other information that IMMAF considers it is important for the MMA community to be aware of, in light of this Review.

Recommendation 8

IMMAF must make all its up-to-date safeguarding information, procedures, policy and contents available in a single dedicated area of its website that is easily visible, browsable and accessible to all.

Recommendation 9

The Safeguarding/Welfare Officer mentioned in the Recommendation 1 must assume overall responsibility for education and safeguarding training and that this is adequately co-ordinated with IMMAF Safeguarding Standards and Policy, and other relevant areas such as coach education, notably the corresponding staff members in charge.

Policy Development and Implementation

Recommendation 10

IMMAF must review, develop and strengthen its current Safeguarding Guidelines that affect athletes' welfare and MMA safeguarding, updating them towards a robust, effective and actionable Safeguarding Policy and Procedures to address the issues identified in this Review.

Taking Action

Recommendation 11

IMMAF must increase and improve its direct contact and collaboration with Member Federations on safeguarding to disclose, implement and monitor compliance with the provisions set out in the Safeguarding Guidelines and the Safeguarding Policy and Procedures advisable in the Recommendation 11, providing policy updates.

Resourcing of Safeguarding Work

Recommendation 12

IMMAF must deploy sufficient staff with appropriate expertise and training to devise and effectively deliver its Safeguarding Policies and Procedures mentioned at Recommendation 10 and support the safeguarding of athletes and vulnerable at its events.

Consideration of Athletes, Victims and Survivors

Recommendation 13

That IMMAF actively collaborates with its Athletes' Commission, legal authorities (i.e., police and social care) and child protection stakeholders to ensure access to independent mechanisms that provide legal, mental health and social services and other specialised resources deemed necessary to support survivors of abuse, according to criteria and guidelines publicly known to the MMA community.

Recognise Red Flags

Recommendation 14

That IMMAF, in collaboration with its relevant internal commissions, notably Athletes' Commission, members, statutory authorities and child protection stakeholders, works to ensure that the specific needs and experiences of young athletes, vulnerable and adults at risk are taken into account in efforts to create and improve a safe MMA environment.

Compliance – Enforcement, Complaints Handling and Case Management

Recommendation 15

The IMMAF, pursuant Recommendation 5, introduces effective oversight and governance pathways to ensure that the views and interests of athletes, parents and other sport participants are known to the Board and are taken into account in relevant decision making on safeguarding policies, and appoints a board member with relevant professional expertise in safeguarding and athlete welfare in charge of this area.

Screening, Background and Integrity Check

Recommendation 16

That IMMAF approves, implements, discloses and establishes the necessary oversight mechanisms for the enforcement of a Screening, Background and Integrity Check Policy for all individuals serving at IMMAF in elected, hired or appointed positions.

Complaints Handling and Disciplinary Policy and Procedures

Recommendation 17

That in any safeguarding case where sanctions are imposed that they are only reached after contested hearings in which the basis of sanctions are explained and justified against relevant criteria.

Recommendation 18

That the Regulations, policies and/or practices of IMMAF on safeguarding cases to be investigated, reported upon and determined as to recommendations by one or more persons with decision-making powers be replaced with a process of investigation that ends with disclosure and a contested hearing in an open forum.

Recommendation 19

That the IMMAF disciplinary processes are improved, updated, reviewed and re-written so as to reframe or create:

- An independent disciplinary panel and appeal panel, made up of people checked as being qualified, experienced and fit for purpose to carry out these functions;
- Any sanction ruled by IMMAF ought to be subject to review by an independent person, panel or tribunal under the judicial processes whether or not the body appealing has been disaffiliated or not;
- IMMAF and its administrative decisions are capable of challenge if they do not comply with the IMMAF Regulations and/or Procedures;
- Decisions not to pursue a safeguarding investigation and/or inquiry are capable of being challenged by review by either an independent disciplinary officer or IMMAF's prosecutorial team;

- A legal support for that disciplinary and appeal panel which is independent of IMMAF either by being embedded in the panel/appeal panel or being a distinct and separate legal office;
- Prosecutorial resources provided by IMMAF for bringing disciplinary and safeguarding cases which involve either allegations of safeguarding or breaches of the Regulations capable of leading to a suspension or complex factual or legal dispute;
- Appoint an independent disciplinary officer to oversee the decision to prosecute cases and to have the power to consolidate or limit sequential complaints;
- Remove any involvement of the Board, the CEO or other management from the prosecutorial decisions of the disciplinary and/or safeguarding teams;
- Any complaints (as opposed to challenges on outcomes) as to the disciplinary process should be referred to a board member or, preferably, an independent person who should react to them, reporting to the board, and should not be resolved as a management issue by the CEO;
- Complaints against IMMAF are resolved independently of IMMAF.

Case management

Recommendation 20

IMMAF must provide clear guidance in its internal policies and disciplinary procedures about how to investigate complaints and concerns.

Parents, coaches, athletes and all sport participant should be aware of these policies, particularly the procedures for raising a complaint or concern.

Recommendation 21

IMMAF must ensure that it notifies all complainants and respondents involved in any complaint about the actions, developments and outcomes in a consistent, clear and prompt manner.

Recommendation 22

IMMAF must require its Member Federations to have a complaints policy for safeguarding concerns and must make this a clear requirement within the relevant policies and standards for membership.

Recommendation 23

That IMMAF re-assesses its policies and regulations and adopts a current meaning of 'abuse' triggering a safeguarding concern and a response that follows the guidance of current best practices.

Recommendation 24

IMMAF introduces, widely disclosing to all members, a comprehensive safeguarding reporting system, where:

- Makes clear and states plainly that all safeguarding complaints and reports should be made to the Welfare/Safeguarding Officer through a single route, and clear reporting mechanism, preferably an online platform;
- Introduces a new and clear investigation process which follows the preparation of evidence for a contested hearing before a disciplinary panel and not a single person's determination, removing the powers of sanction from any other than a disciplinary body; such powers should be passed to a disciplinary panel or its Chair, with provision for emergency interim sanctions and appeals therefrom;
- Makes available a reporting/complaint follow-up with a pathway for complaints relating to safeguarding concerns or breaches.

Recommendation 25

IMMAF must ensure its case record and management system for complaints is fit for purpose and enables a record to be kept of the nature and number of complaints received in order that complaint handling performance can be monitored and patterns of behaviour identified.

Implementation

Recommendation 26

The IMMAF Board must assume responsibility and take leadership of the implementation of these recommendations and publish, every six months, the progress made to fulfil the Review's recommendations, establishing a deadline by which time each one should have been implemented.

This Review should be made publicly available on IMMAF website and disclosed to all members.

PART 4

Appendices

Appendix 1: Terms of Reference



SAFEGUARDING INVESTIGATOR

TERMS OF REFERENCE

ROLE

1. The role of the Safeguarding investigator is to:

- Advise the Board on the most appropriate policy and operational framework for safeguarding within IMMAF;
 - To investigate safeguarding concerns and complaints.
 - To form an independent safeguarding committee.
- Ensure that safeguarding children and adults is embedded into IMMAF's work on registration, inspection and monitoring;
- Ensure alignment and consistency of IMMAF's approach across all regulated services;
- Provide strategic oversight for all aspects of safeguarding work across the organisation and ensure our policies and procedures are up to date and effective in protecting people who use services from potential or actual harm ;
- Provide assurance that the agreed policies, procedures and standards for IMMAF's work on safeguarding are being adhered to by IMMAF staff;
- Initiate improvements in IMMAF's working practices, systems and procedures to support effective safeguarding practice in IMMAF's statutory and regulatory roles to protect people from potential or actual harm;
- Identify, respond and escalate, as appropriate, organisational risk within IMMAF related to safeguarding;



- Raise the profile of children and adults' safeguarding in all IMMAF's work and promote proactive communications and raise awareness both internally and externally;
- To monitor and evaluate performance, including scrutiny of performance data, understanding what is driving performance levels and making recommendations to improve performance.

RESPONSIBILITIES

2. Safeguarding is a collective responsibility across IMMAF and each directorate is accountable for its performance. Within this, the responsibilities of the Investigator are:

- To ensure implementation of the IMMAF safeguarding protocol, monitor the effectiveness and impact of the protocol both internally and externally and recommend and implement improvements where needed;
- Use the IMMAF governance structures to ensure that safeguarding issues are considered and addressed at the appropriate level;
- To ensure that appropriate data is collected about safeguarding children and adults' activity in a way that supports IMMAF's statutory and regulatory roles;
- To ensure that the training programmes are in place to enable IMMAF staff to fulfil their duties and responsibilities in relation to safeguarding;

EVALUATION

3. The criteria for the success of the investigator will be;
- Quality assurance and monitoring confirms a consistent approach within IMMAF to the identification, decision-making, recording and management of safeguarding cases;



- Quality assurance and monitoring confirms that the safeguarding protocol is being implemented consistently internally and externally.

Appendix 2: Disclaimer

Introduction

This interview with _____ will be conducted by myself, João Paulo Almeida, and Joana Gonçalves in the capacity of IMMAF safeguarding investigators.

The date is _____ and the time is _____ (London time), located at *Microsoft Teams* online platform.

Disclaimer

Please note that you are about to be interviewed under an ongoing independent review to the IMMAF safeguarding policies and the management of a specific case related to the participation of a national coach at IMMAF events, convicted with a sentence ruled by a Court of Law.

As independent safeguarding investigator appointed by IMMAF, according to the Terms of Reference follow attached, we wish to interview you under the sole scope of this independent review with a view to gathering your relevant inputs for this purpose.

You are kindly reminded that, for the purpose of this review, your full cooperation is quite relevant (including, without limitation, by providing truthful, accurate and detailed answers to the questions asked of you today).

The findings of this review, and the answers and information you provide in this interview, may be not used as evidence to support a charge of breach by a third party neither they could be used to support a charge against you, but rather to collect data and gather information about IMMAF safeguarding policies and the abovementioned specific case.

Following today's interview, we will ask you to sign a Written Statement setting out details of the information you provide to us in this interview, which may not be used as part of an investigation and/or in any resulting disciplinary proceedings. You will have the opportunity to fully review any draft statement prepared and to amend or correct as you see fit to ensure that you are happy to sign the statement confirming that it is true to the best of your knowledge and belief, and that you have not wilfully stated in it anything which you know to be false or do not believe to be true.

For the purpose of our records, we are going to record this interview. If it becomes necessary, a transcript may be produced and a copy can be furnished to you. This interview may not be produced in any subsequent proceedings.

If at any time, you would like to have a break in the interview or request that the recording is switched off for any reason, please let us know.

Do you understand this caution?

Signature: _____

Appendix 3: 2023 IMMAF Youth MMA World Championships Report

2023 IMMAF YOUTH WORLD CHAMPIONSHIPS

2 – 5 AUGUST, ABU DHABI

COMPETITION SAFEGUARDING FACTSHEET

Competition Organiser: IMMAF

Competition Venue: Mubadala Arena (www.mubadala-arena.ae)

Competition Platform: www.smoothcomp.com

Accommodation: Millennium Al Rawdah Hotel

Age categories: Youth C 12 – 13 years old | Youth B 14 – 15 years old | Youth A 16 – 17 years old

Safeguarding Team invited to attend and support the event:

João Paulo Almeida | Joana Gonçalves - IMMAF Independent Review – attended from 31st July to 4th August

Kevin Moran | Tim Murphy - Irish MMA Association – attended from 1st August to 5th August

Introductory notes:

- Safeguarding team was welcomed and introduced by IMMAF CEO Mr. Densign White the day before competition started, and then at the dress rehearsal to the local organising team, volunteers, staff, directors and referees.
- The safeguarding team sought, whenever possible, to take a diligent, proactive and collaborative stance with the local organisation team, security, IMMAF staff and volunteers, following each competition day from the weigh-ins to the last combat.
- The safeguarding team worked together on an action plan, underpinned by an ongoing collaboration to monitor critical risk analysis parameters and being physically present at sensitive areas and moments, holding a daily debriefing meeting.
- From this work stems the table below encapsulating the vulnerabilities detected, the corrective measures proposed and their follow-up:

2023 IMMAF YOUTH WORLD MMA CHAMPIONSHIPS - SAFEGUARDING DIARY					
DAY	FIELD OF ACTION	CONCERNS	PROPOSED MEASURES	FOLLOW-UP	TIMELINE
D1	Weigh-in procedures	Area for female athletes didn't guarantee enough privacy	Change room set for day 2 - female W-I must not be at the room entrance	Room set change	From day 2
		There were no separate rooms according to the IMMAF Amateur MMA Weigh in procedure "For World and Continental Championships, separate rooms for men and women must be available for the unofficial and official weigh-in."	The use of a separate room (next door) for medical check only for days 2,3 and 4	Second room used for medical check and clear circulation	From day 2
		Sports Director attendance pursuant to the IMMAF Amateur MMA Weigh in procedure "Control of the weigh-in shall be the responsibility of the Sports Director of the IMMAF"	not confirmed		
	Medical clearance	<ul style="list-style-type: none"> ○ Few doctors available for the medical clearance process ○ Accumulation of athletes and bottlenecks after weigh-ins ○ Messy and unwieldy process 	<ul style="list-style-type: none"> ○ Provide more doctors for a smoother medical check ○ Engagement of the local organizing team to run the process ○ Tighten up control over the admission of athletes upon entrance to weigh-ins and medical clearance rooms ○ Set up a rope and pole barrier system for athletes' circulation from the weigh-ins to the medical clearance and way out 	IMMAF catered for medical shortage The local team, in collaboration with the safeguarding team, led the process of the athletes' circulation from weigh-ins to medical clearance, collection of forms and check-out, implementing the proposed measures	From day 2
	Warm-up Area	Athletes undressing in the room	<ul style="list-style-type: none"> ○ Strengthen the communication among teams and team leaders ○ More staff control (local organizing / volunteers team) in the room needed 	Availability to take action accordingly	Afternoon only
		Mobile phones often used inside the room			
		Media presence - overwhelming and uncomfortable for young athletes	Alerts made in relation to this. Media personnel was not checked in advance	Not taken	
		Access to the room not checked. People without badges inside. Older athletes inside	Set security patrol in both access doors and accreditations confirmed at all times	Availability to take action accordingly	Afternoon only
		Private changing/medical/staff room for the local team (UAE)	Requested further information about this	Explanation: "due to UAE being LOC of the event"	

		Spotted a case of medical treatment being provided to an athlete in the warm-up area, with medical material scattered on the mats	Alert to compliance officer and IMMAF staff Requested to immediately clear the site	Availability to take action accordingly	Immediately
	Accreditation /Access Areas	<ul style="list-style-type: none"> o Clear lack of access control in different designated areas o Poor accreditation checking upon entrance o Circulation of young athletes from the local ju-jitsu club in private areas 	Strengthen the security, especially in warm-up area, competition access and athletes' hall	Availability to take action accordingly	Not until day 2
	Overall Organisation/Team	Lack of enough signalize/information and awareness related to circulation, access, rules and conduct. It was not clear Team Leaders had properly been instructed prior to the event in this regard	Not requested, but necessary in every event: Daily meetings with Team Leaders and Coaches play a pivotal role in the event management assessment	By the end of day 1, there was an informal meeting with all Team Leaders at the venue. The meeting was conducted by IMMAF CEO and Event's Compliance Officer. Awareness was made on access areas and conduct rules were clarified	End of day 1
D2	Weigh-in procedures	Medical check format, circulation and exit control	Identified on day 1	Meaningful improvements in the weigh-ins with the local organizing team taking over, more doctors for clearance, separated rooms, cleared paths for way in and way out with rope barriers	From the start of the day
		Director of Competitions attendance	Not confirmed		
	Warm-up Area	Evidence of major failures in the accreditation process and leaks in the badge management as seen with the Bulgarian case	Taken immediate action and removed the person from athletes warming-up area	Actions taken by the SFG team, with the support of the event's compliance officer. However, it was not identified how the person in question (not registered for the event) had 2 different accreditations, notably VIP + Event Organizer, which provided him full access to all areas	Immediately
		Local athletes from the ju-jitsu club still circulating in the private areas	Reinforce the security and provide clear instructions about event outsiders' circulation	Some efforts were made by staff team and volunteers, however, not fully succeeded	Throughout the day
		Still people taking pictures in the warm-up area	Reinforce presence of staff/volunteers in warming-up area and asked the team to take action immediately. Additionally, Team Leaders need clear instructions	Kevin's volunteer team came later to give a hand	Later on

	Accreditation/Access Areas	Lack of access control to designated areas	Identified on day 1	Improvements in athletes' paths from the warm up area to the arena and the way back	From the start of the day
	Overall Organisation/Team	Some coaches were under the impression that the dress code (i.e. long trousers for coaches) was related to safeguarding guidelines, when that was not the case. It is actually a IMMAF dress code, in line with other international federations	Clear information to be given re dress code before the championships. This was in fact mentioned at the coaches meeting before the event but some coaches seemed to ignore		
D3	Weigh-in procedures	<ul style="list-style-type: none"> o Event handbook contained some out-of-date information and a Brazilian athlete, (as other athletes from same category) followed came in one day prior to weigh in and compete. o Such mistake from the organisation put the athlete in a very unfordable situation, since he was already trying to reach the weight and for this reason, had to maintain it for additional 24 hours. The child looked very tired and dehydrated by then already 	Clear and regular communication with team leaders about competition schedule (among other issues) is crucial. Additionally, national teams must be notified regarding any changes, following previously established measures, for instance, deadline for considering changing day of competition, in order to protect athletes' health at all times	IMMAF CEO was present at the time and referred to the event handbook as the official information. However, the information available was not aligned with the schedule changes	The athlete only competed the day after
	Warm-up Area	Significantly less incidents of athletes changing clothes in the area but there were a small number of cases	Keep communicating and raising awareness on that issue	Safeguarding on hand to indicate to the athletes in question that they need to go to the changing rooms	
	Accreditation/Access Areas	Spotted the continued use of photocopied credentials	Despite the alerts around people clearance and safety, seemed that problem wouldn't be solved.	None	
	Overall Organisation/Team	<ul style="list-style-type: none"> o Security/access protocols significantly stronger in the last two days of competition compared to the first two. o Strictly checking all credentials before allowing access to the backstage and field of play area 			

D4	Anti-Doping	<ul style="list-style-type: none"> ○ IMMAF official escorted selected athletes directly from cage exit to anti-doping room. ○ Only anti-doping officials and IMMAF officials were granted access to room with selected athletes and their coach. ○ Anti-doping team were very experienced, process ran smoothly, despite some language barrier with some of the athletes. 	<ul style="list-style-type: none"> ○ Only issue seen was the language barrier between an athlete and coach from Uzbekistan and the anti-doping official but given the number of countries participating in these championships, languages barriers are always likely to be an issue. ○ Didn't cause any major problems, it just meant that the process took longer than it otherwise would have 		
Additional Comments		Safeguarding team of volunteers was only created after the start of the championship	<ul style="list-style-type: none"> ○ This sub-team made up of the eventvolunteers should be formed before the start of the championship and given clear guidelinesas to their role and how they should act. ○ There should be a Head of Safeguarding role created for every championship. This person should lead and direct the safeguarding team with everything set up and reviewed prior to the start of the championship. Kevin Moran (Child Protection Officer, Irish MMA Association) effectively took on this role at this championship. This person needs to empower the team to enforce the guidelines and should be available if any issue needs to be escalated 		
		Day 1 were effectively a dress rehearsal with regards to the rest of the championship re dress codes, security procedures, credentials,etc.	This should not be the case. Volunteers teams should be well briefed before the championship and be clear on what is expected of them. Coachesand team managers should be clear beforehand on what is expected of them and what sanctions will be levied against them if they are not		
		Overall there were continuous improvements across multiple areas as the championship progressed. A goal for IMMAF would be to haveall these things in place from the very start of thenext championship			

Overall Remarks and Final Recommendations

- Teaming-up the Independent Reviewer with a Member Federation with safeguarding expertise, not only enabled the detection of areas for improvement in near future and remedy of shortcomings in real time throughout the event, as displayed willingness to pave this way in a professional and stringent manner to address safeguarding, safe sport and welfare.
- A preliminary briefing with the local organizing team and the volunteers on safeguarding turns out to be quite important for an effective compliance, together with a daily debriefing with Team Leaders/Head Coaches where welfare and safeguarding, together with other operational issues, might be shared, clarified and improved.
- The engagement of people with expertise in safe sport, as well as a very experienced local organizing team, became an important asset to swiftly address problems and implement remedies, helping the fact that many of these people speak the same language (Portuguese) including the Compliance Officer.
- Increased and easier to understand signage¹, enhanced security control checks and stricter management of the accreditation system prove crucial to ensure better protection of children and vulnerable from any unauthorised person or video/image recording in restricted areas.



¹ Like this picture example

Appendix 4: Declaration of Honour

DECLARATION OF HONOUR Integrity Background Screening and Criminal Record Check

Full name of the undersigned	[enter text]
Full address of the undersigned (Street, city and home country)	[enter text]
Is the undersigned acting as:	<input type="checkbox"/> Coach <input type="checkbox"/> Volunteer <input type="checkbox"/> First-aider, medical support staff <input type="checkbox"/> Referee <input type="checkbox"/> Manager <input type="checkbox"/> Official <input type="checkbox"/> Other: _____
Is the undersigned currently subject to any legal proceedings? (If yes, please contact IMMAF)	<input type="checkbox"/> Yes <input type="checkbox"/> No
I, the undersigned,	[enter name]
born in,	[enter place of birth]
on,	[enter date of birth]
ID CARD / Passport No	
Declare on my honour:	<p>a. never having any criminal records relevant to my sport activity, most notably sexual offences, nor having been subject to any criminal investigations or criminal proceedings, warrant or arrest, surrender procedure, nor having been subject to preventative detention, to a prison sentence, to a criminal fine, to any other criminal sanction nor having been subject to any civil / administrative proceedings and disciplinary measures relating to my sporting activities, nor currently being subject to any such investigation, proceedings or measures described above;</p> <p>b. never having been or currently not being subject to investigations, enforcement proceedings or sanctions by a criminal authority or sport governing body (including IMMAF);</p> <p>c. never having been subject to a refusal or a withdrawal of registration, authorisation, membership or licence to carry out my activity or profession, or to the withdrawal, revocation or termination of registration, authorisation, membership or licence, or expulsion by a regulatory or government body;</p>
Possible remarks or comments of the undersigned (on the items above, in particular if one of the above items cannot be confirmed by the undersigned)	
	[enter text]

<p>By signing this declaration of honour, the undersigned commits to inform the IMMAF without delay in case one the elements covered by this declaration should change in the future.</p> <p>By signing this document, you confirm that the information entered on this form is true, updated and accurate</p> <p>The undersigned recognises and accepts that if this declaration of honour becomes or is incorrect, his/her professional propriety/repute shall be compromised.</p> <p>By signing this declaration of honour, the undersigned commits to deal with the IMMAF in an open and cooperative way and to disclose appropriately and in due course any information of which the IMMAF would reasonably expect notice.</p>	
<p>Please attach the following <u>mandatory</u> document: <input type="checkbox"/></p> <p>The undersigned criminal record certificate, in date and duly validated according the national legislation in place, issued by the police or by the appropriate national law enforcement agency, with no adverse information record against the undersigned</p>	
Function	[enter text]
Place of signature	[enter text]
Date of signature	[enter text]
Signature	[enter text]