



# Trinidad and Tobago Football Association Safeguarding Children and Vulnerable Persons Policy and Framework

*Safeguarding is everyone's  
responsibility*



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Short Title; TTFA Safeguarding Policy and  
Framework 2024

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# Section I Definitions



## 1 Definitions

**Academy:** Any entity that is involved in the training of children (Under 18) or youth players (Age restricted), to participate in football without an adult team as part of the same organisation.

**Allegation:** a claim or assertion that someone has done something illegal or wrong, typically one made without proof.

**Background Check:** shall mean a criminal/judicial background check of a typical standard for employment, provided.

**Bullying:** (or cyberbullying if conducted online) is unwanted, repeated and intentional, aggressive behavior usually among peers, and can involve a real or perceived power imbalance. It can include actions such as making threats, spreading rumours or falsehoods, attacking someone physically or verbally and deliberately excluding someone.

**Child:** a person under the age of 18 years.

**Child abuse:** an act or omission that harms a child. Abuse towards a child can be carried out by an adult or by another child. It can be physical, emotional, sexual or by neglect. Abuse can take place in person or online.

**Child grooming** refers to actions or behaviors used to establish an emotional connection with a minor, and sometimes the child's family, to lower the child's inhibitions with the objective of sexual abuse. It can occur in various settings, including online, in person, and through other means of communication.

**Child protection:** refers to the action taken in response to a specific concern for a child or children who may be suffering or are at risk of suffering harm or abuse.

**Club:** Any entity that is involved in senior (adult) organized or association football. A club may

or may not also be involved with the training of children or youth players to participate in youth football and therefore may or may not have an academy.

**Concern:** an expression of worry or anxiety.

**Emotional abuse** - is the persistent emotional maltreatment of a child or person.

**Electronic communication:** includes but is not limited to phone calls, video calls, texts, social media platforms (e.g., Facebook, Twitter, Instagram, WhatsApp, Snapchat, etc.), fitness applications, emails, and direct messaging that occurs between an adult and an athlete.

**FIFA:** Fédération Internationale de Football Association.

**Neglect** - is the failure to provide for a child's / person's basic needs when by persons those responsible for their care and the to protect a child / person from exposure to danger.

**Official:** any board member (including the members of the Council), committee member, referee, assistant referee, coach, trainer or any other person responsible for technical, medical or administrative matters in TTFA, a member association, a league or a club as well as any person obliged to comply with the FIFA, CONCACAF or TTFA Statutes.

**Safeguarding:** the action taken to ensure that all vulnerable persons are safe from harm when involved in football. It means proactively doing everything possible to minimize risk and prevent poor practices and abuse.

**Suspicion:** A feeling, thinking or believing that someone is guilty of something whether true or not.

**Physical abuse:** is the deliberately physically hurting a child / person and includes any punishment in which physical force is used and intended to cause some degree of pain or discomfort.

**Poor practice:** is any behavior that falls below the standards set and expected by the organization (usually in the form of a code of conduct) or that fail to deliver the expected standards.

**Poor practice with Safeguarding Concern:** Any Poor Practice which compromises the wellbeing and or safety of a child or which causes a child or a vulnerable person to suffer distress.

**Sexual abuse:** is the inducement or coercion of a child / person to engage in any unlawful sexual activity inclusive of such nonpenetrative acts as kissing, rubbing and touching private body parts.

**Team:** the group of players who take to the field to play.

**TFFA:** Trinidad and Tobago Football Association.

**Vulnerable person:** A person who belongs to a group within society or an organization that is either oppressed or more susceptible to harm.

**Youth Players:** Any player that plays on an age restricted team including and up to Under Twenty 23 players.



# Section II

## Introduction



## 2 Acknowledgements

The Trinidad and Tobago Football Association would like to acknowledge the following organisations and their contributions to the development of our safeguarding policy and framework. The TTFA safeguarding team has spent long hours perusing and learning from current safeguarding policies and frameworks from a range of organisation. However, during the development of our policy document, the following organisations and the policies were instrumental, as we looked to them for guidance.

- All India Football Federation, “AIFF Child Safeguarding Policy and Framework.”
- Confederation of North, Central America and Caribbean Association Football, “CONCACF Safeguarding Regulations.”
- English Football Association, “Football’s safeguarding children policy.”
- Irish Football Association, “Safeguarding Children and Young People Policy and Procedures for Affiliated Football.”
- Fédération Internationale de Football Association, “Safeguarding Toolkit.”
- Union of European Football Associations, “UEFA Child Safeguarding Toolkit”

### 3 Understanding Grooming (or Entrapment) Within Sport

The majority of adults involved in programmes with children or young people participate with the main aim of providing a fun, positive experience for those with whom they work. However, others (though thankfully a tiny minority) may use football as a way of gaining access to children and young people for inappropriate reasons such as sexual abuse. In order to gain access to children and young people those who commit offences often first earn the trust of people surrounding the young person. This may include representatives of the Association, the club, coaches and volunteers, parents and guardians and other children and young people. This process is referred to as 'grooming'.

Groomers can also use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a child or a young person. Those who commit offences often portray themselves as caring and trustworthy individuals so they are freely entrusted with the care of children and young people. Once they have gained access to children and young people, they befriend them in order to break down any pre-existing barriers.

As soon as a trusting friendship has been established, they manipulate and control children and young people into satisfying their needs. The TTFA has a zero-tolerance policy as it relates to grooming.

# Section III

## Policy and Framework



## **4 Policy**

### **1.**

The TTFA is committed to facilitating football, futsal and beach soccer in a fun, safe and respectful environment for all children. We recognise the children's right to be free from all forms of abuse and acknowledge our duty of care to safeguard them.

### **2.**

Persons bound by this Policy shall protect, respect and safeguard the integrity and personal dignity of others.

### **3.**

Persons bound by this Policy shall not use offensive gestures and language in order to insult someone in any way or to incite others to hatred or violence.

Persons found in violation of this article shall be sanctioned with an appropriate fine of at least TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of 5 years.

### **4.**

Persons bound by this Policy must refrain from all forms of physical or mental abuse, all forms of harassment, and all other hostile acts intended to isolate, ostracise or harm the dignity of a person.

Persons found in violation of this article shall be sanctioned with an appropriate fine of at least TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of 5 years.

### **5.**

Threats, the promise of advantages, coercion and all forms of sexual abuse, harassment and exploitation against children, youth players and vulnerable groups are particularly prohibited.

Persons found in violation of this article shall be sanctioned with an appropriate fine of at least TTD 10,000 as well as a ban on taking part in any football-related activity.

### **6.**

All officials, members of staff, volunteers and persons involved in football working with children, youth players and vulnerable groups are required to acquire a TTFA Safeguarding License.

Unlicensed individuals are not allowed to work with children, youth players or vulnerable groups on behalf of or under the scope of the TTFA.

Persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **7.**

Unlicensed individuals are also not allowed to register as a member of staff of any team, academy or club staff under the scope of the TTFA.

The TTFA Safeguarding Manager can request that license academies or clubs produce the license for any person working with children or youth players on behalf of their organisation in the course of an investigation of a breach of this policy.

Clubs / academies and or persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **8.**

All first-time license applicants must complete the TTFA Level 1 safeguarding workshop, as part of the license process.

## **9.**

All TTFA individual license are valid for a period of 2 years.

## **10.**

Individual licenses can be renewed once upon expiry, by completing any TTFA safeguarding workshop or submitting a certificate of completion from any TTFA recognised safeguarding course. The TTFA Safeguarding Manger will publish on the TTFA website a list of recognised courses.

## **11.**

Upon expiry of renewed license persons must reapply for a new safeguarding license. There shall be no second renewal.

## **12.**

All Clubs, Academies, Youth Teams involved in football, working with children, youth players or vulnerable groups are required to acquire a TTFA Academy License to participate in TTFA licensed, managed or endorsed tournaments, competitions, or events.

Unlicensed Clubs, Academies, Youth Teams are not allowed to work with children, youth players or vulnerable groups on behalf of or under the scope of the TTFA or to participate in TTFA organized or endorsed tournaments, competitions, or events. The TTFA Safeguarding Manager can request that academies or clubs produce their academy license in the course of an investigation of a breach of this policy.

Clubs / academies and or persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **13.**

All Academy License are valid for a period of 3 years.

## **14.**

All persons or organisations that propose to organise a Youth League / Tournament / Football festival, football showcase or any other football related activity involving the training or playing of football matches either recreationally, competitively or for the purpose of scouting, that involves working with children, youth players or vulnerable groups are required to acquire a TTFA Event License and or Event Endorsement.

Unlicensed or Unendorsed Youth Leagues / Tournaments / Football festivals are not allowed to work with children, youth players, or vulnerable groups on behalf of or under the scope of the TTFA.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **15.**

All Event License are valid for a period of 1 year.

## **16.**

Organisations or persons that are licensed to host football related events by the TTFA are prohibited from registering and allowing the participation of unlicensed persons or academies in their league, competition or event. The TTFA Safeguarding Manager can request that leagues, event license holders produce registration records for any person club, academy or team in the course of an investigation of a breach of this policy.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **17.**

TTFA licensed youth clubs, youth teams, academies are prohibited from participating in unlicensed or unendorsed tournaments, leagues or festivals of any kind or football matches of a recreational or competitive nature organized by any other name. TTFA licensed clubs / academies can only participate in TTFA licensed or endorsed activities.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **18.**

All clubs, academies, youth teams travelling outside of Trinidad and Tobago with children, youth players or vulnerable groups are required to acquire TTFA Travel Authorization.

Clubs, academies, youth teams and are not allowed to travel outside of Trinidad and Tobago with children, youth players or vulnerable groups, without TTFA Travel Authorisation.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of five years.



## **19.**

Travel authorisation are only granted for one time use. It can only be used for the activity that is specified and approved for in the application.

## **20.**

All TTFA licensed match officials, including but not limited to, Referee Assessors, Referees, Assistant Referees, Fourth Officials, Match Commissioners, Venue Coordinators are not permitted to participate in any unlicensed league, match, tournament, showcase or football, Futsal or Beach Soccer related event.

Persons found in violation of this article shall be sanctioned with an appropriate fine of at least TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **21.**

All TTFA full members that have duly satisfied the membership criteria and are allowed to vote at the TTFA annual general meeting, are not required to obtain a TTFA event license for the hosting of leagues or tournaments or any other football related event.

## **22.**

The TTFA will not tolerate any form of retaliation against person for reporting a concern.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a maximum of ten years.

## **23.**

A safeguarding license cannot be withheld from an organisation or person for any other consideration other than legitimate safeguarding concerns.

## **24.**

Where a license is not granted on the basis of safeguarding concerns, these concerns must be communicated to the person / organisation at the time the license is denied.

## **25.**

A person or organisation can reapply for a safeguarding license once they have addressed or taken the necessary action to address the safeguarding concern.

## **26.**

Where a person and or organisation is being investigated for abuse, the TTFA, shall impose conditions on that persons or organisations license to work with children, youth players and vulnerable groups. These restrictions would include but not be limited to the following;

- Supervision requirements
- Reporting requirements
- Age group restrictions
- Restrictions to specific groups

## **27.**

Every licensed academy, club, or organization that plays or participates in football shall have a designated and qualified Club Safeguarding Officer.

## **28.**

The Club Safeguarding Officer shall submit to the TTFA Safeguarding Manager, the academy club, safeguarding policy and code of conduct.

## **29.**

The Club Safeguarding Officer shall make a suitable and sufficient annual assessment of—

- the risks of safeguarding incidents to which their athletes may be exposed to whilst they are involved in football for the purpose of identifying what measures are necessary for compliance with FIFA, CONCACAF and TTFA Safeguarding Policies or any other statutory provision.

Any assessment referred to in paragraph (1) shall be reviewed by the academy, club, or organization who made it if—

- there is reason to suspect that it is no longer valid; or
- there has been a significant change in the matters to which it relates, and whereas a result of any such review, changes to an assessment are required, the academy, club, or organization concerned shall make them; or
- Upon the guidance or directive of the TTFA's Safeguarding Manager based on amendments to FIFA, CONCACAF and TTFA Safeguarding Policies or any other statutory provision.

The academy, club, or organization shall keep a record of –

- the findings of the assessment; and
- any group of their athletes identified by the assessment as being exposed to a Safeguarding risk.

The Safeguarding Manager shall have the authority to request the submission of such an assessment compiled by an academy, club, or organization for review and approval to in accordance with the relevant provisions.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of a maximum of TTD 500 and the suspension of license until such time as the relevant compliance requirements have been satisfied.

## **5 Unprofessional Conduct**

### **1.**

Officials shall not communicate with players privately through social media, email, telephone, any type of electronic messaging services, video chat, voice call or in any manner whatsoever to children, youth or vulnerable players, without the knowledge and consent of the parents or guardian and the management of the club, academy, youth team or TTFA.

Persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

### **2.**

Officials shall not build relationships with a child, youth player or vulnerable person in an effort to gain access to time alone with her/him without the knowledge and consent of the parents or guardian and the management of the club, academy, youth team or TTFA.

Spending any amount of time alone with a child, youth player or vulnerable person without the expressed consent of both the parent or guardian and the club, academy youth team or TTFA, is a violation of this policy.

Persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

### **3.**

Officials shall not take a child, youth players or vulnerable person on any field trip without the knowledge and consent of the parents or guardian and the management of the club, academy, youth team or TTFA.

Taking a child, youth player or vulnerable person on a field trip without the expressed consent of both the parent or guardian and the club, academy youth team or TTFA, is a violation of this policy.

Persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

### **4.**

Officials shall not provide a child, youth players or vulnerable person with any individual or personalised coaching attention and or counselling or advice without the knowledge and consent of the parent or guardian and the management of the club, academy, youth team or TTFA.

Providing a child, youth player or vulnerable person with personalised or individual attention, counselling or advice without the expressed consent of both the parent or guardian and the club, academy youth team or TTFA, is a violation of this policy.

Persons found in violation of this article shall be sanctioned with an appropriate fine of at least TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

### **5.**

Officials shall not discuss with a child, youth players or vulnerable person topics related to sex, gender, safe sex practices sexual orientation or sexual preference.

Only qualified personnel authorised by the club, academy or TTFA, with the consent of the parents or guardians are allowed to discuss or provide advice to children and youth players on topics related to sex, gender, safe sex practices, sexual orientation or sexual preference.

Discussing with a child, youth player or vulnerable persons topics related to sex, sexual orientation, safe sex practices, gender, sexual preference, is a violation of this policy.

Persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 5,000 and are subject to a ban on taking part in any football-related activity for a maximum of five years.

## 6.

Physical contact during sport should always be intended to meet the athlete's needs, not the adults.

Appropriate physical contact is contact intended to:

- Coach an athlete to develop a sports skills or technique,
- Prevent an injury or accident from occurring,
- Treat an injury until a licensed medical or athletic training provider can takeover,  
or
- Otherwise meet the requirements of the sport. Any adult engaging in physical contact with

an athlete must:

- Explain to the athlete the nature and reason for any physical contact reinforcing the teaching or coaching.
- Unless the situation is an emergency, ask the athlete for permission.
- Encourage the athlete to voice their concerns if any physical contact makes them feel uncomfortable or threatened.

Non-medical contact should not involve touching:

- Genital area
- Buttocks
- Breasts
- Any other part of the body that might cause an athlete distress or embarrassment

Any physical contact should only take place in an open or public environment and not in secret or out of the sight of others. For the avoidance of doubt, adults should follow the procedures set forth in Section (Interactions) below.

- Rubdowns, massages and athletic training modalities are not allowed except by a licensed massage therapist or other certified professional, who are authorised by the TTFA or the Management of the academy or club to perform these functions. Coaches cannot perform rub downs, massages or athletic training modalities, including without limitation taping, bandaging or stretching, even if they possess the relevant license or certification, without the express written consent of their executive body. Where the coach leads the executive or the club or academy, these activities are expressly forbidden.

- All one-on-one meetings, training or other individual sessions between an adult and an athlete must be held in a manner that is observable and interruptible.
- If a session cannot be held in this manner (for example, if physical training or bandaging requires additional privacy to protect the athlete) a second adult should be present at the session and able to observe and interrupt if necessary.
- Staff members may arrange with hotel or practice facility(ies) for specific accommodations in case an individual session (*such as in the case of a mental health therapy session where additional privacy*) is needed. If such an accommodation is requested, staff must notify the Head Coach and Manager in writing no less than twenty-four (24) hours prior to such individual session.

Persons found in violation of the physical contact guidelines shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## 7.

### Communications

All Electronic Communications between adults and athletes must follow the following guidelines:

- Must be open and transparent.
- Applicable to communications involving underage athlete's, a parent/guardian, another adult family member of the athlete, or another non-athlete adult member of the athlete's Delegation must be copied or included on the communication.
- This includes all communication initiated by an athlete (if the athlete's initial communication has not complied with the above the response must do so).
- All communication should be professional in nature.

In addition, the following are expressly prohibited **AT ALL TIMES**:

- The use of Electronic Communication platforms that automatically delete messages or images (e.g. Snapchat or similar platforms) for any communication with an athlete.
- Publicly posting any photograph of an athlete without appropriate prior consent
- Publicly posting any personally identifying information about an athlete (*other than name if on uniform and visible in the image*) without appropriate prior consent.

Persons found in violation of the communication guidelines shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **8.**

Only staff or Officials, or adults who are part of an athlete's delegation, may be present in a locker room or changing room while athletes are changing in or out of uniform.

No cell phones, cameras or other devices capable of recording video or audio may be used in locker rooms or changing rooms while athletes are in a state of undress.

Under no circumstances may an unrelated non-athlete adult be in a state of partial or full undress (showing private body parts) in the presence of any athlete.

Persons found in violation of the changing rooms guidelines shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **9.**

Non-athlete adults shall not share a hotel room or other sleeping arrangement with an athlete (*unless such adult is the legal guardian, sibling, or is otherwise related to the athlete*).

Meetings with an athlete (or more than one athlete) may not be conducted in a hotel sleeping room or other room configured for sleeping.

Athlete or groups of athletes may not visit the home of an official unless written consent is obtained from each individual parent or guardian and the club, youth academy, youth team or TTFA has consented to such a visit.

Persons found in violation of these guidelines shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **10.**

Children, youth players and vulnerable persons, should not be forced, coerced or asked to play or train while injured without the approval and under the supervision of the medical staff. In situations where the club, academy, youth teams may not have a medical staff the parent must

provide either a fit to play certificate or written informed consent form.

Persons found in violation of these guidelines shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **11.**

Relationships between members of staff and players of the same team, club or academy, are only permitted when they meet all of the following criteria

- Both parties are over 18 years old
- The relationship is consensual
- The relationship existed before one or both parties became part of the same team, club or academy

Because of the power imbalance that exists between members of staff and players. Members are staff are prohibited from entering into a new relationship with their players.

Persons found in violation of these guidelines shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.

## **12.**

After a concussion, officials should not allow a player to return to activities without the approval and under the supervision of the medical staff. In situations where the club, academy, youth teams may not have a medical staff the parent or guardian must provide either a fit to play certificate or written informed consent form.

Persons found in violation of these guidelines shall be sanctioned with an appropriate fine of TTD 5,000 as well as a ban on taking part in any football-related activity for a maximum of five years.



## **6 Prohibited Persons**

### **1.**

Persons with previous history of abuse and or conviction of abuse against children or vulnerable groups will not be permitted to work with children, youth players or vulnerable groups on behalf of or under the scope of the TTFA.

Clubs, academies, youth teams are not allowed to employ or engage the services of persons with previous history of abuse and or conviction of abuse against children or vulnerable groups either full time, part time or on a volunteer basis.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 15,000 and may be subjected to a ban on taking part in any football-related activity for a maximum of ten years.

### **2.**

Persons with previous history of and or conviction of Human Trafficking will not be permitted to work with children or vulnerable groups on behalf of or under the scope of the TTFA.

Clubs, academies, youth teams and youth clubs are not allowed to employ or engage the services of persons with previous history of and or conviction of Human Trafficking either full time, part time or on a volunteer basis.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 15,000 and may be subjected to a ban on taking part in any football-related activity for a maximum of ten years.

### **3.**

Persons with previous history of and or conviction of Sexual Harassment or Sexual Grooming will not be permitted to work with children or vulnerable groups on behalf of or under the scope of the TTFA.

Clubs, academies, youth teams and youth clubs are not allowed to employ or engage the services of persons with previous history of and or conviction of Sexual Harassment or Sexual Grooming either full time, part time or on a volunteer basis.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 15,000 as well as a ban on taking part in any football-related activity for a maximum of ten years.

#### **4.**

Persons charged or convicted of any other offence not related to children, youth players or vulnerable persons will be referred by the Safeguarding Manager to the Safeguarding Vetting Committee (SVC). The committee will determine if a license shall be granted.

#### **5.**

Persons can appeal decisions of the Safeguarding Vetting Committee to the Ethics Committee.

## **7 Implementation**

As part of our Policy, we shall:

- Map out, identify and establish partnerships with local child protection authorities/agencies and civil society organisations with expertise in this area that can provide help and advice.
- Ensure appropriate and immediate action is taken to address allegations of abuse through referral of concerns to the relevant statutory authorities.
- Develop an action plan to promote and install safeguarding measures across the organisation, projects, events and activities of the TTFA.
- Train Safeguarding Officer to be deployed in clubs, academies, leagues and member associations.
- Prevent the employment/deployment of unsuitable individuals (staff and volunteers) in football, futsal and beach soccer through safe recruitment and screening procedures.
- Ensure everyone understands their roles and responsibilities in respect of safeguarding in football, futsal and beach soccer and provide all staff and volunteers with appropriate training when joining the organisation, as well as provide further training from time to time and updates regularly (at least once annually).
- Manage concerns of Poor practice and breaches of the code of conduct through the office of the TTFA Safeguarding Manager, with independent advice from the external expert advisory group or TTFA Legal Counsel.

- Require all members of staff, officials and volunteers to comply with this Policy and sign the Code of Conduct.
- Ensure that the children are informed of their rights and educate them on how to seek assistance when they have concerns or need help.
- Ensure inquiry, disciplinary and appeals processes are in place through the TTFA judicial process to appropriately manage allegations, reports and cases where staff, volunteers or licensed officials, clubs, leagues and member associations have been found to have breached this policy and the code of conduct. Case management and support for victims of abuse (or alleged victims), and those accused, shall be undertaken by the relevant authorities. Any internal TTFA inquiry shall be put on hold until statutory investigations are complete so that internal processes do not compromise statutory or criminal investigations.
- Ensure that confidential and accurate records of concerns, allegations, and reports and submitted evidence provided are maintained and securely stored as well as submitted to law enforcement agencies as and when required and demanded by them.
- Ensure that we continuously evaluate how children are involved in football, futsal and beach soccer in Trinidad and Tobago and review our safeguarding practices regularly, (at least every two years), to ensure that we learn and improve safeguarding, in keeping with evolving best practices and national legislations. Furthermore, we shall proactively consult with children and local agencies and partners to ensure the policy keeps in mind the best interest of the child.
- TTFA commits to promoting a culture of respect and has zero-tolerance towards any form of abuse or retaliation at all levels of our sports. This framework, and its accompanying policy, code of conduct, procedures and guidelines, shall be widely promoted and made available on the TTFA website.

## 8 Application

### 1.

This policy and framework was developed to ensure that all vulnerable persons are safeguarded in the delivery of our sport and provided with a healthy and safe environment. The policy applies to

all persons playing football, without discrimination of any kind. We acknowledge that some persons can be particularly vulnerable to abuse (e.g. disabled children, or those on elite pathways), and we accept the responsibility to promote their inclusion, safety and well-being across our game.

This Policy applies but is not limited to the following people:

- Administrators
- Analyst
- Coaches / Assistant Coaches
- Coach Educators
- Committee Members
- Consultants
- Contractors
- Coordinators
- Drivers
- Equipment Managers
- Grounds Staff
- Implementing Partners
- Interpreters
- Liaisons
- Managers / Assistant Managers
- Match Commissioners
- Media Officers
- Medical staff
- Parent Volunteers
- Peer/ Youth Mentors
- Player agents
- Referees / Instructors / Assessors
- Security
- Sport Scientist
- Subcontractors
- Trainers

- Volunteers
- any person who is working closely with the child.

The above list is not exhaustive and may include any other actors as may be required for this Policy to be applied, from time to time.

## **2.**

The scope of applicability also applies to all TTFA members, leagues, clubs, academies, and programmes and to all other persons or organisations participating in association football according to FIFA rules.

## **3.**

TTFA requires all entities to adopt their own Safeguarding Policy and to provide the TTFA with the contact of their Safeguarding Officer. All clubs and academies, are also expected to have a Safeguarding Policy that is in compliance with the TTFA's policy and to comply with all national child rights and child protection laws.

## **4.**

The rules of conduct defined, in section three parts 4, 5 and 6 of the present policy shall be included in all TTFA members, leagues, clubs, academies, and programmes, within their respective applicable regulations unless such rules of conduct are already included within their respective regulations currently in place.

## **5.**

A TTFA Ethics Committee is entitled to investigate the conduct of persons who are bound by this policy. The person remains bound by the policy at the time proceedings commence or any time thereafter.

Persons bound by this Policy where such conduct:

- a) has been committed by an individual who was licensed, elected, appointed or assigned by TTFA
- b) Participates or organizes football related events played by association rules or involves TTFA Licensed clubs or registered players
- or c) is related to the use of TTFA funds.

## **9 Applicability in time**

### **1.**

This Policy applies to conduct whenever it occurred, including before the enactment of this Policy. An individual may be sanctioned for a breach of this Policy only if the relevant conduct contravened the Policy applicable at the time it occurred. The sanction may not exceed the maximum sanction available under the then-applicable Policy.

## **10 Scope of the Policy, omissions, custom, doctrine and jurisprudence**

### **1.**

This Policy governs every subject to which the text or the meaning of its provisions refers.

### **2.**

If there are any omissions in this Policy with respect to procedural rules, and in case of doubts regarding the interpretation of the Policy, the TTFA Ethics Committee shall decide on its interpretation.

### **3.**

During all its operations, the TTFA Ethics Committee may draw on precedents and principles already established by sports law or the relevant statutory provisions.

## **11 Basis for sanctions**

### **1.**

A TTFA Ethics Committee may pronounce the sanctions described in this Policy, the FIFA Disciplinary Code and the FIFA Statutes and Regulations.

### **2.**

Unless otherwise specified, breaches of this Policy shall be subject to the sanctions set forth in this Policy, whether acts of commission or omissions, whether they have been committed deliberately or negligently, whether or not the breach constitutes an act or attempted act, and whether the parties acted as principal, accomplice or instigator.

## 12 Type of sanctions

### 1.

Breaches of this Policy or any other TTFA codes of conduct or rules and regulations by persons bound by this Policy are punishable by one or more of the following sanctions:

- a) warning;
- b) reprimand;
- c) compliance training;
- d) return of awards;
- e) fine;
- f) social work;
- g) match suspension;
- h) ban from dressing rooms and/or substitutes' bench;
- i) ban on entering a stadium;
- j) ban from working with youth players (male, female or both)
- k) ban from working with vulnerable persons (including adults)
- l) ban on taking part in any football-related activity.

### 2.

The specifications in relation to each sanction in the FIFA Disciplinary Code shall also apply.

## 13 Suspension of sanctions

### 1.

Upon request from the relevant party, the TTFA Ethics Committee can decide to suspend the sanction provided for by art. 12 (l) of the Policy. The probationary period shall from one to five years.

### 2.

If the person benefiting from a suspended sanction commits any other breach of this Policy during the probationary period, the suspension shall automatically be revoked and the original sanction fully applied and added to the sanction imposed for the new breach

## **14 Determining the sanction**

### **1.**

When imposing a sanction, the TTFA Ethics Committee shall take into account all relevant factors in the case, including the nature of the offence; the substantial interest in deterring similar misconduct; the offender's assistance to and cooperation with the Ethics Committee; the motive; the circumstances; the degree of the offender's guilt; the extent to which the offender accepts responsibility.

### **2.**

In case of mitigating circumstances, and if deemed appropriate taking into account all circumstances of the case, the TTFA Ethics Committee may go below the minimum sanction and/or decide to hand down alternative sanctions as provided under article 11, paragraph one.

### **3.**

Unless this Policy mentions otherwise, the TTFA Ethics Committee shall decide the scope and duration of any sanction.

### **4.**

Sanctions may be limited to a geographical area or to one or more specific categories of match or competition.

### **5.**

The TTFA Ethics Committee may recommend to the responsible TTFA, CONCACAF and or FIFA body that it share information on a case with the appropriate public authorities.

## **15 Repeated breaches**

### **1.**

Repeated breaches shall be considered aggravating circumstances, allowing the TTFA Ethics Committee to apply the maximum limit provided for a violation of the relevant rule, as specified in this Policy.



## **16 Concurrent breaches**

### **1.**

Where more than one breach has been committed, the sanction other than monetary sanctions shall be based on the most serious breach, and increased as appropriate, depending on the specific circumstances.

## **17 Limitation period for prosecution**

### **1.**

As a general rule, breaches of the provisions of this Policy may no longer be prosecuted after a lapse of ten years.

### **2.**

The limitation period, when applicable, shall be extended by half its length if a formal investigation is opened before its expiration.

### **3.**

The limitation period, when applicable, shall be interrupted where criminal proceedings are formally opened against a person bound by this Policy during such proceedings.

### **4.**

In case of repeated breaches, the limitation period as described above shall start only after the last of the repeated breaches has ended.

### **5.**

Offences relating to threats, the promise of advantages, coercion and all forms of sexual abuse, harassment and exploitation are not subject to such limitation period.

## **18 General Duties**

### **1.**

Persons bound by this Policy shall be aware of the importance of their duties and concomitant obligations and responsibilities. In particular, persons bound by this Policy shall fulfil and exercise their duties and responsibilities diligently.

## **2.**

Persons bound by this policy shall respect TTFA's regulatory framework to the extent applicable to them.

## **3.**

Persons bound by this Policy shall appreciate the impact their conduct may have on TTFA's reputation, and shall therefore behave in a dignified and ethical manner and act with complete credibility and integrity at all times.

## **4.**

Persons bound by this Policy must refrain from any activity or behaviour or any attempted activity or behaviour that might give rise to the appearance or suspicion of improper conduct as described in the sections that follow.

## **19 Discrimination and defamation**

### **1.**

Persons bound by this Policy shall not offend the dignity or integrity of a country, private person or group of people through contemptuous, discriminatory or denigratory words or actions on account of race, skin colour, ethnicity, nationality, social origin, gender, disability, language, religion, political opinion or any other opinion, wealth, birth or any other status, sexual orientation or any other reason.

Persons and or organisations found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 and may be subjected to a ban on taking part in any football-related activity for a maximum of five years.

## **20 Duty of confidentiality**

### **1.**

Depending on their function, information of a confidential nature divulged to persons bound by this Policy while performing their duties shall be treated as confidential or secret by them, if the information is given with the understanding or communication of confidentiality and is consistent with TTFA principles.

### **2.**

The obligation to respect confidentiality survives the termination of any relationship which makes a person subject to this policy

Persons found in violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 and may be subjected to a ban on taking part in any football-related activity for a maximum of two years.

## **21 Duty to report**

### **1.**

Persons bound by this Policy who become aware of any infringements of this Policy shall inform, in writing, the secretariat, Safeguarding Manager or the Chairman of the TTFA Ethics Committee directly.

Failure to report such infringements shall be sanctioned with an appropriate fine of TTD 10,000 and may be subjected to a ban on taking part in any football related activity for a maximum of two years.

## **22 Duty to cooperate**

### **1.**

Persons bound by this Policy shall assist and cooperate truthfully, fully and in good faith with the Safeguarding Manager and TTFA Ethics Committee at all times, regardless of whether they are involved in a particular matter as a party, as a witness, or in any other role. This requires, inter alia, full compliance with the TTFA Ethics Committee requests, including without limitation requests to clarify facts; provide oral or written testimony; submit information, documents or other material; and disclose details regarding income and finances, if the TTFA Ethics Committee deems it to be necessary.

### **2.**

Persons bound by this Policy who are required to cooperate with the TTFA Ethics Committee in a specific case, regardless of whether they are involved as a party, as a witness, or in any other role, shall treat the information provided and their involvement strictly confidentially, unless otherwise instructed by the TTFA Ethics Committee.

### **3.**

Persons bound by this Policy shall not take any action actually or apparently intended to obstruct, evade, prevent, or otherwise interfere with any actual or potential investigation and or the TTFA Ethics Committee proceedings.

### **4.**

In connection with any actual or potential investigation and or TTFA Ethics Committee proceedings, persons bound by this Policy shall not conceal any material fact; make any materially false or misleading statement or representation; or submit any incomplete, materially false or misleading information or other material.

### **5.**

Persons bound by this Code shall not harass, intimidate, threaten or retaliate against someone for any reason related to that person's actual, potential or perceived assistance to or cooperation with an investigation and or the TTFA Ethics Committee.

### **6.**

Violation of this article shall be sanctioned with an appropriate fine of TTD 10,000 and may be subjected to a ban on taking part in any football-related activity for a maximum of five years

## **23 Competence of the TTFA Ethics Committee**

### **1.**

Where such conduct affects a league, tournament, a single club, or several members from the same regional association, a member, individual player or groups of players and where said conduct is not directly related to TTFA matters, the TTFA Ethics Committee shall be entitled to investigate and judge the case when said conduct has not been investigated and judged, and/or cannot be expected to be investigated and judged, by the relevant judicial bodies of the association or confederation concerned. In particular, should no proper proceedings be taken at national and/or confederation level within three months as from when the matter became known to the TTFA Ethics Committee, the TTFA Ethics Committee shall be entitled to investigate and judge the respective matter.

## **24 Composition of the TTFA Ethics Committee**

### **1.**

The composition of the TTFA Ethics Committee shall be in accordance with the TTFA and FIFA Statutes.

## **25 Deputising**

### **1.**

If the chairperson of the TTFA Ethics Committee is prevented from acting (whether due to personal or factual circumstances), one of the deputy chairpersons shall replace him. In the event that the deputy chairpersons are also prevented from acting, a member of the committee, on the basis of seniority, shall act as chairperson in accordance with the TTFA Statutes.

## **26 Secretariats**

### **1.**

The General Secretariat of TTFA shall provide the Ethics Committee with a secretariat with the necessary staff to fulfill their duties and responsibilities. The secretariat for the TTFA Ethics Committee shall take care of the respective filing of the case files, which must be kept for at least ten years.

### **2.**

The Safeguarding Manager as Chief of Investigation, shall take charge of the administrative and legal work related to proceedings and provide support for the completion of its tasks; in particular, it shall draft the minutes, final reports and any other document required.

### **3.**

The TTFA Safeguarding Manger shall perform the duties and responsibilities of the Chief of Investigation.

### **4.**

The secretariat of the TTFA Ethics Committee, under the authority of the chairperson of the Ethics

Committee, shall take charge of the administrative and legal work related to proceedings and provide support to the Ethics Committee for the completion of its tasks; in particular, it shall draft the minutes and any other document required by the chairperson of the Ethics Committee.

## **27 Independence**

### **1.**

The members of the TTFA Ethics Committee shall manage their investigations and proceedings and render their decisions entirely independently and shall avoid any third-party influence. The members of the Ethics Committee and their immediate family members shall not belong to any other judicial body within TTFA, to the TTFA Council or to any standing committee of TTFA, in accordance with the Statutes of the TTFA.

### **2.**

The members of the TTFA Ethics Committee shall not belong to any body or carry out any position with regard to FIFA, a Confederation or a Member Association, other than being member of a judicial body at FIFA, confederation or national level.

## **28 Withdrawal**

### **1.**

A member of the TTFA Ethics Committee shall decline to participate in any investigation or adjudicatory proceedings concerning a matter where there are serious grounds for questioning his/her impartiality.

### **2.**

The foregoing shall apply, in particular, in the following cases:

- a) if the member in question has a direct interest in the outcome of the matter;
- b) if the member has a personal bias or prejudice concerning a party; or personal, first-hand knowledge of disputed evidentiary facts material to the proceedings; or has expressed an opinion, other than as part of the proceedings in question, concerning the outcome of the proceedings; or when the immediate family of the member is a party to the subject matter in controversy, is a party to the proceedings or has any other interest that could be substantially affected by the outcome of the proceedings and his impartiality;

c) if the member has already dealt with the case in a different function other than his function as a member of the TTFA Ethics Committee.

**3.**

Members who decline to participate shall notify the chairperson immediately.

**4.**

An objection against a member of the TTFA Ethics Committee believed to be biased must be submitted within five days following the identification of the grounds for non-participation, failing which, such objection shall be deemed waived. The claim must cite the grounds and, if possible, be substantiated.

**5.**

The chairperson of the TTFA Ethics Committee shall decide whether any such claim is valid if the member in question has not declined to participate of his own accord. If the objection is against the chairperson, the chairperson or the deputy chairperson of the TTFA Appeals Committee shall decide.

## **29 Confidentiality**

**1.**

The members of the TTFA Ethics Committee and the members of the secretariats shall ensure that everything disclosed to them during the course of their duty remains confidential, in particular, deliberations and private personal data in compliance with the TTFA, CONCACAF and FIFA Data Protection Regulations.

**2.**

Notwithstanding par. 1 above, the Ethics Committee may, if deemed necessary and in an appropriate form, inform the public about or confirm ongoing or closed proceedings, and rectify information that is wrong or rumours. Any release of such information shall respect the presumption of innocence and the personality rights of those concerned.

**3.**

The TTFA Ethics Committee may, in an appropriate form and/or via the website [thettfa.com](http://thettfa.com), inform the public about the reasons for any decision and/or the closure of any investigation. In particular, the chairperson of the Ethics Committee may decide to publish the decision taken, partly or in full

provided that the names mentioned in the decision (other than the ones related to the party) and any other information deemed sensitive by the chairperson of the TTFA Ethics Committee are duly anonymised.

#### **4.**

In the event of a breach of this article by member of the TTFA Ethics Committee, the relevant member shall be suspended by a decision taken by the majority of the other members of the respective chamber.

### **30 Parties**

Only the person accused of a breach are deemed to be parties.

### **31 Representation**

#### **1.**

During any dealings with the TTFA Ethics Committee, parties and other persons bound by this Policy may have legal representation at their own cost and expense.

#### **2.**

The parties and other persons bound by this Code are free to choose their own legal counsel or representation.

#### **3.**

The TTFA Ethics Committee can limit the number of legal representatives of a party if deemed excessive.

### **32 Failure to cooperate**

#### **1.**

If the parties or other persons bound by this Policy fail to cooperate in any manner or are dilatory in responding to any request from the TTFA Ethics Committee or Chief of Investigation, the chairperson of the Committee issuing the request may, after warning them, charge them with a violation of art.22 of the present Policy.

#### **2.**

To the extent the parties fail to cooperate, the Chief of Investigation, in preparing a final report based On the file in his possession, and the TTFA Ethics Committee, in reaching a decision based on the file in its possession, may take into account that behaviour and add the failure to cooperate as an



additional charge for violation of art. 22 of the present Policy.

### **33 Notification of decisions and other documents**

#### **1.**

Decisions and other documents shall be communicated and notified by email, and may be followed by registered letter.

#### **2.**

All of the parties shall be notified of the decisions.

#### **3.**

Decisions and other documents intended for persons bound by this Policy may be addressed to the person directly and/or to the club concerned on condition that it forwards the documents to the intended recipient. In the event that the documents were not also or solely sent to the party concerned, these documents shall be considered to have been communicated properly to the ultimate addressee four days after communication of the documents to the club.

#### **4.**

Notification of a decision shall be effected by publication on the TTFA webpage where:

- a) the whereabouts of the party are unknown and cannot be ascertained despite making reasonable enquiries;
- b) service is impossible or would lead to exceptional inconvenience; or
- c) a party has not provided a means of contact despite being instructed to do so.

#### **5.**

Notification via the TTFA webpage is deemed accomplished on the day of publication.

### **34 Effect of decisions**

#### **1.**

Decisions passed by the TTFA Ethics Committee shall come into force as soon as they are communicated.

#### **2.**

The TTFA Ethics Committee may rectify any obvious errors at any time.

### **35 Various types of proof**

## **1.**

Any type of proof may be produced.

## **2.**

Types of proof include, in particular:

- a) documents;
- b) reports from officials;
- c) declarations from the parties;
- d) declarations from witnesses;
- e) audio and video recordings;
- f) expert opinions;
- g) all other proof that is relevant to the case

## **3.**

During the investigation, where oral testimony is given, such testimony may be given in person, by telephone or via video.

## **36 Anonymous participants in proceedings**

### **1.**

When a person's testimony in ethics proceedings conducted in accordance with this Policy could lead to threats to his person or put him or any person particularly close to him in physical danger, the chairperson of the TTFA Ethics Committee or his deputy may order, inter alia, that:

- a) the person not be identified in the presence of the parties;
- b) the person not appear at the hearing;
- c) the person's voice be distorted;
- d) the person be questioned outside the hearing room;
- e) the person be questioned in writing through the chairperson of the competent chamber or his deputy;
- f) all or some of the information that could be used to identify the person be included only in a separate, confidential case file.

### **2.**

If no other evidence is available to corroborate the testimony provided by the person concerned, such testimony may only be used in the context of imposing sanctions under this Policy if:

- a) the parties as well as their legal representatives had the opportunity to pose questions to the person concerned at least in writing; and
- b) the members of the judicial body had the opportunity to interview the person concerned directly and in full awareness of his identity and to assess his identity and record in full.

### **3.**

Disciplinary measures shall be imposed on anyone who reveals the identity of any person granted anonymity under this provision or any information that could be used to identify such person.

## **37 Identification of anonymous participants in proceedings**

### **1.**

To ensure their safety, persons granted anonymity under art. 36 shall be identified behind closed doors in the absence of the parties. This identification and procedure shall be conducted by the chairperson of the competent chamber alone, his deputy or all the members of the competent chamber together, and shall be recorded in minutes containing the relevant person's personal details.

### **2.**

These minutes shall not be communicated to the parties.

### **3.**

The parties shall receive a brief notice which:

- a) confirms that the person concerned has been formally identified; and
- b) contains no details that could be used to identify such person.

## **38 Inadmissible evidences**

### **1.**

Proof that has been obtained by means or ways involving violations of human dignity or that obviously does not serve to establish relevant facts shall be rejected

### **2.**

The TTFA Ethics Committee shall have absolute discretion regarding proof.

### **39 Standard of proof**

#### **1.**

The members of the TTFA Ethics Committee shall judge and decide on a balance of probabilities.

### **40 Burden of proof**

The burden of proof regarding breaches of provisions of the Code rests on the TTFA Ethics Committee.

### **41 Beginning and end of time limit**

#### **1.**

Time limits notified directly to the party or to a representative appointed by the party shall commence the day after receipt of the notification.

#### **2.**

Where a document is sent to a person through the respective club and is not also sent to the person concerned or his legal representative, the time limit shall commence four days after receipt of the document by the club responsible for forwarding it. Where the document was also sent to the person concerned or his legal representative, the time limit shall commence on the day after receipt of the document in question.

#### **3.**

If the last day of the time limit coincides with a public holiday the person required to comply with the document by a certain deadline, the time limit shall expire on the next working day.

### **42 Compliance**

#### **1.**

The time limit has been met only if the action required has been carried out before expiry of the

Time limit.

**2.**

The document must be submitted by email, to the email address indicated in the correspondence sent from the respective secretariat, to the relevant body no later than midnight on the last day of the time limit.

**3.**

Costs and fees payable are considered to have been paid in time if the payment has irreversibly been made to TTFA's account by midnight on the last day of the time limit.

## **43 Extension**

**1.**

Time limits set forth in this Policy may not be extended.

**2.**

Time limits set by the TTFA Ethics Committee may be extended upon reasoned request. A time limit may only be extended for a second time in exceptional circumstances.

**3.**

If an extension of the time limit is refused, two extra days may be granted. In emergencies, the refusal to grant the extension may be announced orally.

## **44 Suspension or continuation of proceedings**

**1.**

In the event that a person bound by this Policy ceases to serve in his function during proceedings, the TTFA Ethics Committee shall remain competent to continue investigatory proceedings and/or render a decision.

**2.**

In the event that a person bound by this Policy ceases to serve in his function, the Chief of Investigation may initiate and conduct the investigation, create a final report and hand it over to the TTFA Ethics Committee. The Ethics Committee may suspend the proceedings or take a decision as to the substance and impose appropriate sanctions.

## **45 Procedural costs**

### **1.**

The procedural costs are made up of the TTFA Ethics Committee's costs and expenses incurred in connection with the investigation and adjudicatory proceedings.

## **46 Procedural costs in case of closure of proceedings or acquittal**

### **1.**

Except as otherwise provided herein, in the event of closure of proceedings or acquittal, the procedural costs shall be borne by TTFA.

### **2.**

A party may be ordered to pay the procedural costs in part or in full in the event of closure of proceedings or acquittal if he culpably caused the proceedings to be initiated or hindered the conduct of the proceedings.

## **47 Procedural costs if sanctions are imposed**

### **1.**

Procedural costs shall be borne by the party that has been sanctioned.

### **2.**

If more than one party is sanctioned, the procedural costs shall be assessed proportionally in accordance with the degree of guilt of the parties.

### **3.**

Part of the procedural costs, in particular the costs of the investigation proceedings, may be borne by TTFA, as appropriate in respect of the imposition of sanctions.

### **4.**

The procedural costs may be reduced or waived in exceptional circumstances, in particular taking into account the party's financial circumstances.

## **48 Procedural compensation**

### **1.**

No procedural compensation shall be awarded in proceedings conducted by the TTFA Ethics Committee.

## **49 Right to submit complaints**

### **1.**

Any person may file a complaint regarding potential breaches of this Policy with the Chief of Investigation. Complaints can be submitted orally or in writing, including available evidence.

### **2.**

There is no entitlement for proceedings to be opened following submission of a complaint.

### **3.**

Any person bound by this Policy who lodges a complaint against a person whom he knows to be innocent or in any other way takes malicious steps related to the initiation of proceedings under this Policy shall be sanctioned with an appropriate fine of TTD 10,000 as well as a ban on taking part in any football-related activity for a minimum of two years.

## **50 Preliminary investigations**

### **1.**

The Chief of Investigation shall carry out an initial evaluation of the complaint.

### **2.**

The Chief of Investigation may initiate preliminary investigations into a potential breach of this Policy based on a filed complaint and shall act upon the instructions of the TTFA Legal Counsel or Chairman of the TTFA Ethics Committee. This shall include, in particular, collecting written information, requesting documents and obtaining witness statements.

### **3.**

The Chief of Investigation may initiate preliminary investigations at his own discretion and at any time.

## **51 Opening of investigation proceedings**

### **1.**

If the preliminary investigation is found to establish a prima facie case, the Chief of Investigation

shall open investigation proceedings. The TTFA Ethics Committee shall examine aggravating and mitigating circumstances equally.

**2.**

The parties shall be notified of the opening of investigation proceedings and the possible rule violation. Limited exceptions to this rule may be made for safety and security reasons or if such disclosure would interfere with the conduct of the investigation.

**3.**

The Chief of Investigation shall report to the TTFA Ethics Committee regularly on non-opened cases.

## **52 Initiation of investigation**

**1.**

The Chief of Investigation shall decide on the initiation of investigation proceedings.

**2.**

Grounds do not need to be given for the initiation of investigation proceedings and the decision may not be contested.

## **53 Duties and competences of the Chief of Investigation**

**1.**

The Chief of Investigation may investigate potential breaches of provisions of this Policy on its own initiative or based on complaints at his full and independent discretion.

**2.**

If the Chief of Investigation deems that there is no prima facie case, it shall not open any investigation proceedings and it shall close the case. In addition to the internal closure of the proceedings, either may

- (i) send a closing letter to the interested party reminding him of his duties, and/or
- (ii) send a closing letter to the interested party informing him that no breaches of the Code have been found. The Chief of Investigation may communicate in this respect where deemed relevant.



### **3.**

Once the investigation has been completed, the Chief of Investigation shall prepare a final report on the investigation proceedings stating the relevant rules that have been breached for which they require a judgment by the TTFA Ethics Committee. The report, together with the related investigation files, shall be forwarded to the TTFA Ethics Committee. Should a hearing be conducted, one or more members of the investigating officers may present the case before the Ethics Committee.

### **4.**

If proceedings have been closed, the Chief of Investigation may reopen the investigation if new facts or evidence come to light that suggest a potential breach.

### **5.**

As part of the investigatory process, the Chief of Investigation may also investigate breaches of provisions of the TTFA Disciplinary Code which concern immoral or unethical conduct.

## **54 Conduct of proceedings**

### **1.**

The Chief of Investigation may lead the investigation proceedings himself or may assign this role formally to the deputy or any qualified safeguarding officer. This person shall be designated the investigating officer.

## **55 Competences of the investigating officer**

### **1.**

With the assistance of the secretariat, the investigating officer shall investigate by means of written enquiries and written or oral questioning of the parties and witnesses. He may also undertake any further investigative measures relevant to the case; in particular, he may verify the authenticity of documents relevant to the investigation by procuring affidavits.

### **2.**

The Chief of Investigation, may ask another Safeguarding Officer to assist him conduct the investigation alongside him. The Investigating Officer may also ask the Chief of Investigation to

assign additional officers. The Chief of Investigation, where that is the case, may also assign additional members at his own discretion. If the Chief of Investigation is acting as the investigator, he may, in complex cases, engage third parties with investigative duties. The enquiries to be made by such third parties must be clearly defined. Where the Chief of Investigation is not acting as the investigating officer, the investigating officer may submit the respective request to the Chief of Investigation.

### **3.**

If the parties and the other persons bound by this Policy fail to cooperate in establishing the facts of the case, the Chief of Investigation may impose a warning, and in case of recurrence, to impose disciplinary measures, including a ban on taking part in any football-related activity of up to 90 days. If the Chief is acting as the investigating officer, the chairman of the TTFA Ethics Committee shall decide.

## **56 Conclusion of investigation proceedings**

### **1.**

If the Chief of Investigation considers the investigation to be adequate, he shall inform the parties that the investigation proceedings have been concluded, and shall forward the final report together with the investigation files to the TTFA Ethics Committee.

## **57 Final report**

### **1.**

The final report shall contain all the relevant facts and relevant evidence gathered and mention the possible rule violation.

### **2.**

The final report shall be signed by the Chief of Investigation. If the Chief of Investigation did not act as the investigating officer, the Chief of Investigation shall also sign the final report.

## **58 Plea bargain (application of a sanction by mutual consent)**

### **1.**

At any time during the investigation, but at least when the case is about to be decided by the TTFA Ethics Committee or before the hearing as provided by art 66 of the present policy, the parties may enter into an agreement with the Chief of Investigation, for the application of a sanction by mutual consent.

**2.**

Should the chairperson of the TTFA Ethics Committee consider that the agreement complies with this Policy and the sanction settled is correctly applied, the agreement becomes immediately effective and the settled sanction becomes final and binding, and is not subject to any further appeal.

**3.**

Should any monetary sanction provided by the plea agreement not be fully executed by the party concerned within 15 days of the date of the decision, the agreement is automatically revoked.

**4.**

Should any compliance training and/or social work provided by the plea agreement not be fully executed by the party concerned within the terms established within the agreement, the agreement is automatically revoked.

**5.**

Whenever the plea agreement is revoked, the TTFA Ethics Committee shall decide the case within the 60 days that follow on the basis of the file, and no further plea agreement will be allowed between the parties concerned and the Chief of Investigation.

**6.**

No plea agreement shall be allowed concerning sanctions related to infringements of sexual abuse and sexual assault.

## **59 Duties and competences of the TTFA Ethics Committee**

**1.**

The chairperson of the TTFA Ethics Committee shall examine the final report and investigation files with the assistance of the secretariat.

**2.**

If the Chairman of the TTFA Ethics Committee deems that there is insufficient evidence to proceed, he may close the case and shall inform the party accordingly.

**3.**

If the chairperson of the TTFA Ethics Committee deems that the matter should be adjudicated, he shall proceed with the adjudicatory proceedings and request that the secretariat send a copy of the final report and investigation files to the parties concerned.

## **60 Adjudicatory proceedings**

**1.**

The chairperson of the TTFA Ethics Committee shall inform all the parties concerned that the case shall be decided either on the basis of the report of the Chief of Investigation together with the investigation files or – upon the request of any party concerned – of a hearing to be scheduled.

**2.**

If there is no request for a hearing, the chairperson of the TTFA Ethics Committee shall inform the parties of the proceedings and the Chief of Investigation that the case shall be decided on the basis of the existing documents and submissions and shall establish a final deadline to file their respective final requests.

**3.**

Should a hearing be held, the secretariat of the TTFA Ethics Committee shall inform all the parties concerned and shall forward to them a procedural order, with the rules of the hearing, established by the Chairperson of the Ethics Committee.

**4.**

All the parties in the proceedings and their representatives, as well as the representatives of the Chief of Investigation are entitled to attend the hearing to discuss and submit orally their respective requests.

**5.**

As part of the adjudicatory process, the Ethics Committee may also rule on breaches of provisions of the TTFA Disciplinary Code which concern immoral or unethical conduct.

## **62 Jurisdiction of the chairperson of the TTFA Ethics Committee ruling alone**

### **1.**

The chairperson of the TTFA Ethics Committee may take decisions alone in cases related to breaches sanctioned only with monetary sanctions or when the sanction to be imposed is a warning, reprimand or compliance training in accordance with his Policy.

### **2.**

The chairperson of the TTFA Ethics Committee is also responsible for ratifying the plea agreement entered into between the parties and the Chief of Investigation, where applicable.

## **63 Right to be heard**

### **1.**

Before the TTFA Ethics Committee issues any final decision, the parties are entitled to submit their position, to present evidence and to inspect evidence to be considered by the TTFA Ethics Committee in reaching its decision. These rights may be restricted in exceptional circumstances, such as when confidential matters need to be safeguarded, witnesses need to be protected or if it is required to establish the elements of the proceedings.

## **64 Rejection of motions for the admission of evidence**

### **1.**

In accordance with arts 38 and 39 and other relevant provisions of the Policy, the chairperson of the TTFA Ethics Committee may reject the substantiated motions for the admission of evidence submitted by the parties.

### **2.**

The parties shall be informed if their motion has been rejected with a brief outline of the grounds of the decision. The rejection may not be contested.

## **65 Composition of the panel**

### **1.**

The Chairman of the TTFA Ethics Committee shall decide the composition and number of

members in the panel and shall provide them with the relevant files. The parties shall be informed of the composition of the panel.

**2.**

Without prejudice to art. 62, the panel's decisions shall be deemed to be legally valid if at least two members are present.

## **66 Hearings, principles**

**1.**

Hearings shall be conducted behind closed doors, at a location to be determined by the Chairman of the TTFA Ethics Committee.

**2.**

Hearings of the Ethics Committee are not open to the public, except in cases when it has been duly requested by the defendant. The chairperson or his nominee decides, at his own discretion, under what conditions a public hearing may take place.

**3.**

Misconduct by the party that took place after the submission of the final report may be addressed by the Chief of Investigation during its closing statement. In this sense, the Chief of Investigation may present the relevant facts and evidence, mention the possible rule violation and submit a recommendation to the Ethics Committee on the appropriate measures. The party shall have the right to respond to these new charges during the hearing. In the absence of a hearing, the Ethics Committee may submit its recommendation within two days after the party's position, who will have then the right to reply in written form in compliance with the deadline granted by the Ethics Committee.

**4.**

If there is no hearing, the Chairperson shall schedule the deliberations and decide on the number of members and the composition of the panel. The parties shall be informed to this effect.

## **67 Hearings, procedure**

### **1.**

The chairperson of the Ethics Committee shall conduct the hearing in whatever manner he deems appropriate, provided it is consistent with this code.

### **2.**

It is the responsibility of the parties to ensure the appearance of the witnesses requested by them and to pay all costs and expenses associated with the parties' and the witnesses' appearance.

### **3.**

Witnesses called by the parties and/or by the Chief of Investigation need to appear in person.

### **4.**

Wherever possible, the hearing shall proceed according to the following sequence:

- a. testimony of any witnesses called by the accused and approved by the TTFA Ethics committee;
- b. testimony of any witnesses called by the Chief of Investigation and approved by the Ethics Committee;
- c. testimony of any witnesses called by the Ethics Committee;
- d. closing statement by the Chief of Investigations;
- e. closing statement by a legal representative, if any, of the accused;
- f. rebuttal statement by the chief of investigations and the parties, if applicable;
- g. final opportunity for the accused to speak.

## **68 Deliberations**

### **1.**

After the hearing, the TTFA Ethics Committee shall withdraw to deliberate on its decision in private.

### **2.**

If circumstances permit, the deliberations and decision-taking may be conducted via telephone conference, video conference or any other similar method.

**3.**

Deliberations shall be conducted without interruption, unless there are exceptional circumstances.

**4.**

The Chairperson shall decide in which order the various questions will be submitted for deliberation.

**5.**

The TTFA Ethics Committee is not bound by the legal assessment of the facts submitted by the Chief of Investigation. In particular, the Ethics Committee may extend or limit the rule violations pointed out by the Chief of Investigation.

**6.**

The members present shall express their opinions in the order set out by the chairperson, who always speaks last.

**7.**

A member of the secretariat shall be present during the deliberations.

## **69 Taking the decision**

**1.**

Decisions shall be taken by the majority of the members present.

**2.**

Every member present shall vote.

**3.**

In the event of a tied vote, the chairperson shall have the casting vote.

## **70 Grounds of decision**

**1.**

The TTFA Ethics Committee shall communicate its decision in full, written form.

**2.**

In case of urgency, or under any other special circumstances, the Ethics Committee may notify



only the terms of the decision to the party, which become immediately applicable. The full, written decision shall then be notified within the next 60 days.

## **71 Form and content of the decision**

### **1.**

The decision shall contain:

- a. the composition of the panel;
- b. the names of the parties;
- c. the date of the decision;
- d. a summary of the facts;
- e. the grounds of the decision;
- f. the provisions on which the decision was based;
- g. the terms of the decision;
- h. notice of the channels for appeal.

### **2.**

The decision shall be signed by the Chairperson and transmitted by the secretariat.

## **72 Enforcement of decisions**

### **1.**

It is the responsibility of the TTFA, as well as of the relevant football officials, to make sure that the decisions taken and notified by the TTFA Ethics Committee are properly implemented, as required by the TTFA and FIFA Statutes.

## **73 Appeal Committee**

### **1.**

An appeal may be lodged by the party concerned, having a legally protected interest justifying amendment or cancellation of the decision, to a TTFA Appeal Committee against any decision taken by the TTFA Ethics Committee.

### **2.**

Further provisions relating to lodging an appeal and proceedings before the Appeal Committee are

set out in the FIFA Disciplinary Code.

## **74 Appeals Committee**

### **1.**

Decisions taken by the TTFA Ethics Committee are final, subject to appeals lodged with the TTFA Appeals Committee in accordance with the relevant provisions of the TTFA and FIFA Statutes.

### **2.**

The aforementioned decisions may also be appealed at the TTFA Appeals Committee by the Chief of Investigation.

## **75 Review**

### **1.**

The Chief of Investigation may reopen a case that has been closed following a decision by the TTFA Ethics Committee if a party discovers significant new facts or proof that, despite the investigation, could not have been produced sooner and would have resulted in a different final decision. In case of such reopening, the provisions regarding investigation proceedings shall apply.

### **2.**

A request for review shall be made by the party concerned within ten days of discovering the reasons for review, or it will not be admitted.

### **3.**

The limitation period for submitting a request for review is one year after the enforcement of the decision.

## **76 Conditions, jurisdiction, procedure**

### **1.**

At any time during an investigation, the Chief of Investigation may apply provisional sanctions in order to ensure that investigation proceedings are not interfered with or when a breach of this

Policy appears to have been committed and a decision on the merits of the case may not be taken early enough.

## **2.**

The interested party may file an appeal against the provisional sanctions with the Chairperson of the TTFA Ethics Committee within five days of the notification of the provisional sanctions.

## **3.**

The Chairperson of the TTFA Ethics Committee shall decide on the appeal without delay based on the file or he may decide to hear the interested parties or their representatives.

## **77 Duration**

### **1.**

Provisional sanctions may be valid for a maximum of 90 days. In exceptional circumstances, the provisional sanctions may be extended by the chairperson of the Ethics Committee upon the request of the chairperson of the Chief of Investigation for an additional period not exceeding 90 days.

### **2.**

The duration of provisional sanctions shall be taken into account in the final decision.

## **78 Exemption from liability**

Except in the case of gross negligence or malicious intent, neither the members of the TTFA Ethics Committee nor the secretariat staff may be held personally liable for any deeds relating to any procedure.

## **79 Official languages**

### **1.**

This Policy exists in the official language of English

### **2.**

In the event of any discrepancy between any translation, the English version shall be authoritative.

## **75 Adoption and Enforcement**

### **1.**

This Policy comes into force, January 1<sup>st</sup> 2024

**2.**

The procedural rules enacted in this Policy shall come into force immediately, and apply to all proceedings for which Ethics Committee have not been formally opened, on the date stipulated under par. 1 of the present article.