ASCB/ACOS/Pol/23/04

23 May 19

**Army Sports Chairs**

**Army Sports Secretaries**

Copy to:

Director ASCB

Staff, HQ ASCB

**GUIDANCE FOR THE ASSURANCE OF ARMY REPRESENTATIVE[[1]](#footnote-1) SPORT**

References:

A. Army Sport Control Board Directive 2018/19.

B. AGAI Volume 1 Chapter 5 Sport (updated March 2017).

C. ACSO 3216 – The Organisation and Arrangement of Safety and Environmental Protection in Land Forces.

**Introduction**

1. In his Directive at Reference A, DASCB set out his direction for the conduct and delivery of sport in the Army, including the assurance[[2]](#footnote-2), compliance and governance of sport in accordance with Reference B. With regard to safety he specifically tasked Chairmen/Chairwomen[[3]](#footnote-3) of Army Sports Associations and Unions with the following:

a. to ensure the delivery of their sport, through the Secretary, is in accordance with National Governing Body (NGB) policy and guidelines and Reference B.

b. to ensure the Sport has in place an effective assurance mechanism to provide a safe environment.

2. Reference B[[4]](#footnote-4) has now been revised and defines policy for Sport Assurance across the 4 Lines of Defence. This note will clarify the process for assurance (of safety, risk to reputation and financial risk) in order for HQ ASCB and Sports Chairs to comply with the responsibilities as laid out in References A, B and C[[5]](#footnote-5).

3. Chairs of Army Sports Associations/Unions are responsible for all activity within their Sport; that it is necessary and sensible; and that risks have been mitigated to levels that are As Low as Reasonably Practicable (ALARP). Chairs should ensure that activity within their sphere of responsibility meets all applicable legislative, regulatory, NGB, Defence and Service standards. They should also encourage a sports safety culture that is just, flexible, reporting, questioning and learning.

**Safety Management**

4. **Sports Safety Management Plans (SSMP).** Each Sports Association/Union is to develop a SSMP for their association’s activity that clearly identifies governance, key roles, responsibilities and assurance[[6]](#footnote-6). The SSMP should only contain the specific detail of sports safety processes in use in the Association’s AOR. The effectiveness of the Association’s SSMP depends on interaction with other stakeholders and regulatory bodies; SSMPs must therefore include a description of interfaces with other stakeholders, such as those of National Governing Bodies (NGB), UK Armed Forces Sporting Associations and unit level sport. It is also fundamental that this SSMP is reviewed at least annually as part of the governance of the sport.

5. **Interfaces.**

a. **National Governing Body (NGB) Interfaces.** All Category 1 and 2 sports and the majority of Category 3 sports have an NGB as listed in JSP 660. Some of those NGBs have more developed SSMPs than others; as a guiding principle all association SSMPs are to meet the most stringent standards for safety management defined by either the NGB or other MoD policy where it demands a higher standard. SSMPs should detail linkages with NGB safety management and assurance processes where appropriate[[7]](#footnote-7).

b. **UK Armed Forces (UKAF) Sports Associations Interfaces**. Sports Associations and Unions are responsible for ensuring that, and explaining how, equivalent standards of sports safety management are applied whenever their association personnel are competing or training as part of a UKAF team[[8]](#footnote-8).

c. **Unit Level Sport Interfaces**. Sports Associations and Unions are not accountable for the conduct of unit level sport, that remains within the Duty of Care (DoC) of the Commanding Officers, however, they are the SMEs for the safe delivery and conduct of sport and can provide advice and guidance at any level. They have a duty to ensure that any sports safety direction from the NGB is cascaded down the chain of command through RC PD Branches and within the sport itself. In order to assist the Chain of Command who remain accountable for the safety of their personnel conducting unit level sporting activity, SSMPs for each association should be made available for the organisers of unit level sport teams and clubs as guidance for the delivery and governance of their particular sports[[9]](#footnote-9).

**Safety Risk Management**

6. **Risk Management**. Risk management involves: the identification of hazards; analysis and assessment of the Risk to Life (RtL); and the development of a resulting level of risk that leads to the identification and implementation of suitable controls to address the hazard and its associated risk.

7. **Risk Assessment**. All sport association activity is to be risk assessed and recorded by the nominated/appointed person managing the activity and the appropriate control measures implemented before any activity takes place utilising one of the MOD recognised formats: MOD Form 5010 Risk Assessment or MOD Form 5015 (Military Training for Land Systems) which are both available from JSP 375, the Army Safety Centre (ASC) website and, in greater detail, within Reference C. The nominated/appointed person must be Suitably Qualified and Experienced (SQEP) as an SME for the activity being undertaken and risk assessed[[10]](#footnote-10). A risk assessment looks at what could cause harm to people, in order to assess whether enough precautions have been taken in order to prevent harm[[11]](#footnote-11). It will help organisations plan, deliver and review activities and, in the case of sport, help protect association members, as well as complying with Departmental and NGB policy and the law. In many cases, easy and cost effective measures can be put in place to control risks. For sport there are 3 specific areas of risk assessment that should be covered:

a. **Generic**. This should include generic sporting activities as well as manual handling and COSHH assessments, as appropriate to each sport;

b. **Site Specific**. These could be amalgamated with the generic risk assessments for sport conducted at a Home for Sport. Changing facilities should be considered in these risk assessments;

c. **Dynamic**. Sometimes termed ‘daily risk assessment’, this is arguably the most important level of risk assessment. The assessment is often completed by the event organiser, and close to or on the actual day of the event, and should provide a direct linkage to the Sport Association/Union in terms of accountability who will have briefed the event organiser on the levels of risk that have been deemed Tolerable and ALARP. Under no circumstances should an event be allowed to take place where the levels of risk assessed on the dynamic risk assessment exceed those levels from the generic and site specific assessments accepted by the Sport Chair. Weather and local environment must be considered as part of this risk assessment.

**Assurance Activity**

8. **Authorisation to Participate in Service Sport.** Regardless of the level of sporting activity, once authorised by one of the appropriate bodies listed above, the release of Service Personnel (SP) to participate in an authorised Service sport is held by the individual’s CO/OC. In all cases, participation is to be recorded on unit Part One Orders.

9. **Duty of Care.** As stated in Ch 4, Para 14 of Reference C, whilst Duty Holding (DH) will not apply to sport as National Governing Bodies (NGBs) set the safety standards required for their sport, it remains a chain of command responsibility to adhere to their legal DoC[[12]](#footnote-12) obligations when their soldiers participate in sport. In certain circumstances, the Army may wish to impose stricter standards in some areas, such as mandating the ability to swim prior to conducting sailing.

10. **Assurance Processes**. In accordance with Reference C, assurance processes provide a mechanism to ensure that activity is being conducted appropriately. Assurance against sports safety principles, tolerance and thresholds is essential. The Army has adopted a Defence-wide approach to assurance which describes 1st – 4th Lines of Defence Assurance, allowing a spectrum of internal assurance activity; in the case of Army Representative Sport this will be achieved through a programme of audits conducted by the Sports Associations and Unions Chairs, HQ ASCB[[13]](#footnote-13) and NGBs where applicable. Annex D to Reference B outlines the responsibilities at each Line of Defence. It should be noted that DASCB’s intent is not to create excessive amounts of work for those involved in running sport, it advocates the requirement to conduct a simple review of sport delivery using good judgment and SME knowledge and produce sufficient auditable records to help ensure our Service personnel and those involved in organising and competing in sport are properly protected[[14]](#footnote-14).

11. **Self-Assurance (1st Line of Defence).** This is assurance provided (internally) by those delivering the output. This will form the basis of an organisation’s self-declaration of conformity and provide the basis for Continuous Improvement[[15]](#footnote-15). Safe delivery of Army level sport clearly relies upon sufficient, qualified and experienced officials who are Suitably Qualified and Experienced Personnel (SQEP). Army level Associations/Unions are to conduct self-assurance (using Annex A attached as a guide[[16]](#footnote-16)) at least annually before undertaking any specific events or activity[[17]](#footnote-17). This is to be formally recorded[[18]](#footnote-18) and held by the Secretary. Within this process they are to ensure that they have detailed written procedures for managing their sport. This must include as a minimum:

a. Risk assessment[[19]](#footnote-19),

b. A Sport Safety Management Plan (SSMP)

c. A strategic or management plan (5 year plan)

d. A comprehensive event administrative instruction for each event to include: any authority for travel; selection or eligibility criteria; NGB specific rules; clarification of officials; medical provision and safety considerations[[20]](#footnote-20); and, guidance on the completion of accident and incident reporting.

e. A suitable committee structure identifying key roles and responsibilities with appropriate TORs.

12. **Internal Assurance (2nd Line of Defence).** This is the oversight (of first line) provided by HQ ASCB in order to ensure adherence to wider MoD policy and, that those involved, are complying with the Army’s policy for Sport. HQ ASCB (Safety & Assurance Officer) will conduct an assurance check on representative sports on a rolling cycle not less than once every 3 years[[21]](#footnote-21). Assurance visits will generally be prearranged to coincide with the staging of an Army representative fixture[[22]](#footnote-22) and will be initiated by the submission of a self-assessment questionnaire. A draft copy is attached at Annex B. Records of assurance[[23]](#footnote-23) will be retained by Safety & Assurance HQ ASCB.

**Summary.**

13. Assurance is a positive declaration of conformity to a set standard. It is about providing confirmation that activity takes places in accordance with the regulations and policies which apply to that standard. Commanders at all levels in the Army will wish to know that their organisations have, in achieving the objectives set, done so in compliance with the regulations and policies relevant to those objectives. Put simply: ‘*that the Army does the right things and does them properly*’. In many ways this is about `risk-based assurance` and DASCB set out the requirement for Chairs, supported by Secretaries, to deliver their sports in accordance with his Directive to ensure the safe delivery of sport.

14. HQ ASCB Safety Assurance Officer is now well into the programme of assurance visits and Chairs are requested to assist in ensuring that their sport is organised and delivered in accordance with the Directive and that any assurance issues are staffed to HQ ASCB as applicable.

C BROADFOOT MBE

Lt Col (Retd)

Safety & Assurance Officer ASCB

Annexes:

A. Assurance Responsibilities – Check Sheet

B. ASCB Assurance - Self-Assessment Questionnaire

C. Example Assurance Visit Summary Sheet

Annex A to

ASCB/Pol/23/07 Dated 23 May 19

**ASSURANCE RESPONSIBILITIES – CHECK SHEET**

1. As introduced at [para 5.022](#p5022)[[24]](#footnote-24), assurance processes provide a mechanism to ensure that activity is being conducted appropriately. To provide a handrail for those engaged in authorising, organising or assuring sport activity, the table below provides a list of requirements which will help to assure sport in the Army.

|  |  |  |  |
| --- | --- | --- | --- |
| **1st Line of Defence** – assurance provided internally by those responsible for delivering the output. | | | |
| **Ser** | **Activity** | **Refer to** | **✓ 🗶** |
| 1 | Completion of the Sports Appointment Course (as required) | [5.037](#p5037) |  |
| 2 | Completion of a Risk Assessment for all activity | [5.149](#p5149) |  |
| 3 | Compliance with the Safe System of Training  *(Safe People, Safe Practice, Safe Equipment, Safe Place)* | [5.147](#p5147) |  |
| 4 | Compliance with NGB Rules & Regulations (specific to sport)  *(Unless the MOD or single Service requires a higher standard)* | [5.023a(1)](#p5023a1) |  |
| 5 | Production and compliance with a Sports Directive or Management Plan | [5.021h](#p5021h) |  |
| 6 | Production of a detailed Administration Instruction (for specified events) | [5.144c](#p5144c)&[5.145e](#p5145e) |  |
| 7 | Ensuring activity is correctly authorised and recorded | [5.054](#p5054) |  |
| 8 | Utilising SQEP individuals (Coaches and Officials) to supervise activity | [5.101](#Coaches_and_Officials) |  |
| 9 | Provision of adequate first aid and medical arrangements | [5.154](#p5154) |  |
| 10 | Authorised use of Service travel entitlements | [5.123c](#p5123c) |  |
| 11 | Discourage Substance Misuse and report offenders | [5.085](#p5085) |  |
| 12 | Adherence with Army Sponsorship regulations (where applicable) | [5.126](#Sponsorship) |  |
| 13 | Adherence with Army Hospitality and Gifting regulations | [5.129](#p5129) |  |
| 14 | Completion and submission of accident reports - Army Form 510 (as reqd) | [5.164](#Reporting_Occurences) |  |
| 15 | Completion and submission of near miss reports - Army Form 510 (as reqd) | [5.164](#Reporting_Occurences) |  |
| 16 | Report fatalities and listed injuries (VSI, SI) and complete a Learning Acct | [5.164](#Reporting_Occurences) |  |
| 17 | Submit activity reports (when requested) | [5.163c](#p5163c) |  |
| **2nd Line of Defence** – Oversight (of first line) provided from within the chain of command in order to ensure policy compliance. | | | |
| 19 | A chain of command management check of those delivering the respective sport activity against the criteria listed at serials 1-18 above. | [5.023b](#p5023b) |  |
| **3rd Line of Defence** - An assessment, achieved through internal audit, of the effectiveness of control, risk and performance frameworks. | | | |
| 20 | Assurance conducted more centrally within the Army by organisations such as the Army Inspectorate or Army Training Branch. In addition, the Physical Development Audit (PDA) and Formation Sports Reports (see [Part 8](#Part_8)) are processes that help to inform this level of assurance. | | |
| **4th Line of Defence** - Assurance conducted by external auditors and regulators. | | | |
| 21 | Assurance activity conducted by an organisation external to the MOD. An example might be a NGB conducting an audit or assessment of an Army Sport Association’s/Union’s practices or procedures. | | |

Annex B to

ASCB/Pol/23/07 Dated 23 May 19

**HQ ASCB (Assurance) Sports Association**

**Assurance Self-Assessment Questionnaire**

Name of Sport:

Name of Assessor:

Date of Assessment:

| **Section** | **Y/N** | **Comments** |
| --- | --- | --- |
| **POLICY** | | |
| Does the Association have a Sport Safety Management Plan (SSMP) |  |  |
| Does it reflect the Association’s activity? |  |  |
| When was the SSMP last updated? |  |  |
| Is the SSMP effective; what amendments are under review? |  |  |
| Do members know how to access the SSMP including Risk Assessments? |  |  |
| Are safety positions within the committee filled[[25]](#footnote-25)? |  |  |
| Are safety matters discussed at committee meetings such as Executive Committee Meetings? Is this frequent enough? |  |  |
| Are safety matters resolved effectively? If not, what could be done to improve this? Can you provide evidence of resolution of safety matters? |  |  |
| Is Army Sport policy complied with in financial terms; are travel policies adhered to? |  |  |
| **RESPONSIBILITIES** | | |
| Has the Chairman been formally appointed by ASCB? |  |  |
| Does the Chairman have a copy of the ASCB Directive and are his TORs clearly laid out and effective. |  |  |
| Do Committee members have any specific safety and assurance responsibilities within their TORs? |  |  |
| Is this a sufficient number of committee members? |  |  |
| Do they have TORs? |  |  |
| When were TORs last reviewed? |  |  |
| Are all Association members aware of their health and safety /duty of care responsibilities? How is this recorded? |  |  |
| Is this a RtL sport, what additional safety measures are in place[[26]](#footnote-26) and is the Chairman aware of his responsibilities? |  |  |
| Who are the SQEP qualified personnel, who is providing 1st line assurance of the activity? |  |  |
| **SAFE PERSONS** | | |
| Is there a policy to determine how sportsmen/women are ‘fit to participate’ for your sport? (e.g. evidence of swim test, med chit). |  |  |
| How do you record this information? |  |  |
| Have COs correctly authorised individuals to participate[[27]](#footnote-27) and are they of a suitable standard of competence for the event. |  |  |
| **SAFE EQUIPMENT** | | |
| Does the Association use safety/protective equipment? |  |  |
| If so, does the Association have a policy statement and equipment list for equipment procurement? |  |  |
| If so, does the Association have a Maintenance Log[[28]](#footnote-28)? |  |  |
| If so, is there a record of all personnel responsible for the maintenance of safety/protective equipment? |  |  |
| **SAFE PRACTICE (Supervision and Instruction/Coaching)** | | |
| Does the Association meet the levels of supervision when conducting sporting activity within National Governing Body regulations/guidelines? |  |  |
| Have Association members completed any specific induction training? |  |  |
| Have committee members received sufficient training (including refresher training) to carry out their roles? |  |  |
| Have instructors/coaches been qualified within National Governing Body frameworks? Are they current? |  |  |
| **SAFE PLACE** | | |
| Are the risk assessors competent (either through training or experience)? |  |  |
| Have Generic Risk Assessments been carried out? Are they current? |  |  |
| Have Site Specific Risk Assessments been carried out? Are they current? |  |  |
| Does the Association have a set format (e.g. Daily Risk Assessment or brief template) for conducting Dynamic Risk Assessments? |  |  |
| Does the Association have an Emergency Plan? |  |  |
| Are incidents/accidents reported? How? |  |  |
| **REVIEW** | | |
| Does the Committee review key documents such as the SSMP? |  |  |
| Does the Committee review risks? |  |  |
| Are these reviews effective? |  |  |
| **General Data Protection Regulation (GDPR)** | | |
| Do you have any assets that meet the criteria for registration on the Army Info Asset Register? |  |  |
| Do you collect any personal data? If yes, do you issue a Privacy Notice? |  |  |
| Do you store any personal data of your athletes/members on civilian laptops? If yes, is the laptop encrypted? |  |  |
| Do you understand the requirements of ACSO 2190 – Army Data Protection Policy? |  |  |
| Do you have any third party providers who you pass personal data to? If yes please provide details. |  |  |

Annex C to

ASCB/Pol/23/07 Dated 23 May 19

|  |  |
| --- | --- |
|  | **Sport Assurance – ASCB Assurance - Visit Summary** |

|  |  |
| --- | --- |
| Sport Union or Association: |  |
| Date/s & Sports Activity Details[[29]](#footnote-29): |  |
| Sports Secretary Details: |  |
| Assurance Self-Assessment Completed: |  |
| Main NGB Details: |  |
| Sport Safety Management Plan Held (Including last Review & Risk Assessments): |  |
| Safety Equipment Controls (As Applicable): |  |
| Is this a RtL sport and is the Committee aware of their responsibilities? |  |
| Reporting of Accidents/Incidents: |  |
| Is Army Sport policy complied with in financial terms: |  |
| Training/Supervision Needs: |  |
| Delivery Confidence Assessment & Follow on Plans (as applicable): |  |
| Visiting Sports Assurance Officer: |  |

1. Representative level includes Corps and Army representation. [↑](#footnote-ref-1)
2. Described as `*an evaluated opinion, based on evidence gained from review, on an organisation`s governance, risk management and internal control framework*`. [↑](#footnote-ref-2)
3. Now known as `Chairs` throughout this document. [↑](#footnote-ref-3)
4. AGAI Vol 1 Ch 5 Para 5.023. [↑](#footnote-ref-4)
5. It, in no way, ever seeks to replace these crucial documents or NGB guidance and direction. It aims to be a document utilised conterminously will all other associated documentation when dealing with Sport. [↑](#footnote-ref-5)
6. Secretaries can engage with the ASCB Assurance Officer on any advice on the template/details required. [↑](#footnote-ref-6)
7. Advice can be sought from the Assurance Officer. [↑](#footnote-ref-7)
8. The Assurance Officer remains available for advice or to visit as applicable. [↑](#footnote-ref-8)
9. This can be eased by interface within the new ASCB website. [↑](#footnote-ref-9)
10. Advice is available from Unit Safety Advisors. [↑](#footnote-ref-10)
11. This may also necessitate the need for a central risk register. [↑](#footnote-ref-11)
12. Irrespective of DH, Commanding Officers have both a moral and legal obligation to ensure the safety or well-being of others, otherwise known as Duty of Care (DoC). This obligation to provide a ‘safe system of work’ covers many activities that a unit will face. [↑](#footnote-ref-12)
13. Assurance Officer now well underway with visits. [↑](#footnote-ref-13)
14. Chapter 2 of Reference C discusses the `Culture of Safety` in the Army; anyone involved in the delivery of sport should always read and understand this area of ensuring safety. [↑](#footnote-ref-14)
15. This is also the handrail document that the ASCB Assurance Officer will utilise when visiting sports. [↑](#footnote-ref-15)
16. Extract from Annex D to AGAI Volume 1 Chapter 5 Sport (updated March 2017). [↑](#footnote-ref-16)
17. This will also form the start point for the Assurance Officer to conduct his actual visit to a sporting activity – via respective Secretaries. [↑](#footnote-ref-17)
18. Ecopy sent to ACOS Assurance HQ ASCB. [↑](#footnote-ref-18)
19. As defined in JSP 375.

    2, Vol 1, Chap 8, risk assessment is a subjective, but logical process. [↑](#footnote-ref-19)
20. A nominated individual checking all safety areas prior to commencement of sport activity. [↑](#footnote-ref-20)
21. After the actual Sporting Event Secretaries will also be sent the `One Page Summary` (example template at Annex C). [↑](#footnote-ref-21)
22. This can also be a Committee Meeting or office call if there is a gap between self-assessment and actual sport event. [↑](#footnote-ref-22)
23. The Assurance One Pager Document. [↑](#footnote-ref-23)
24. AGAI, Vol 1, Ch 5 Sport refers throughout. [↑](#footnote-ref-24)
25. In line with JSP 660 Policy Direction. [↑](#footnote-ref-25)
26. As applicable. [↑](#footnote-ref-26)
27. Is this recorded on Unit Part One Orders. [↑](#footnote-ref-27)
28. [↑](#footnote-ref-28)
29. This is purely an abridged summary of a number of areas captured – a means of closing on an assurance audit after the self-assessment and then sports event. [↑](#footnote-ref-29)