SPORTS GOVERNANCE OBSERVER 2019

An assessment of good governance in six international sports federations

Report / October 2019



Jens Alm



SPORTS GOVERNANCE **OBSERVER 2019**

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The research in this report was based on the Sports Governance Observer methodology developed by Dr. Arnout Geeraert. See also: Geeraert, A. (2018). *Sports Governance Observer 2018. An assessment of good governance in five international sports federations.* Aarhus: Play the Game / Danish Institute for Sports Studies.

Content

Introduction	6
General findings and conclusions	8
Federation report: FIS	13
Federation report: FIVB	17
Federation report: FEI	21
Federation report: FIG	25
Federation report: IIHF	30
Federation report: IRI	34

Introduction

The first Sports Governance Observer (SGO) reviewing all 35 Olympic sports federations' governance standards on the basis of transparency, democratic processes, internal accountability and control¹, and societal responsibility², was published 2015³.

In 2018, a new and refined SGO tool was developed by Dr. Arnout Geeraert⁴, introducing a new set of 57 principles of good governance, measured through 309 indicators of good governance⁵. The indicators were dispersed over the same four dimensions as those used in the 2015 report.

Five international Olympic federations were selected for analysis in 2018: Fédération Internationale de Football Association (FIFA), Fédération Internationale de Natation (FINA), International Association of Athletics Federations (IAAF), International Handball Federation (IHF) and International Tennis Federation (ITF). The results showed that the level of good governance varies significantly across the surveyed federations.

In the Sports Governance Observer 2019 report, a further six⁶ international Olympic federations have been reviewed on the basis of the methodology outlined in the SGO 2018 report, namely the Fédération Equestre Internationale (FEI), the International Gymnastics Federation (FIG), the International Ski Federation (FIS), the Fédération Internationale de Volleyball (FIVB), the International Biathlon Union (IBU), and the International Ice Hockey Federation (IIHF).

The Olympic federations included in this report were selected on the basis of their SGO 2015 score, in order to survey if there have been governance progress and/or decline. In the 2015 SGO report FEI and FIS received high scores on the SGO index compared to the other Olympic federations, FIG and IIHF achieved a medium score, and FIVB and IBU were among those federations with the lowest scores. It was also taken into account that the chosen federations cover both the Summer or Winter Olympic programme, thus representing both ASOIF and AIOWF.

All federations were contacted in March 2019 to inform them about the research process and formally invite them to participate. It was explained that they would have the opportunity to provide feedback during the process. It was stressed that participation in the

¹ In the SGO 2015 report 'internal accountability and control' was referred to as 'checks and balances'

² In the SGO 2015 report 'societal responsibility was referred to as 'solidarity'

³ Geeraert, Arnout (2015) 'Sports Governance Observer 2015 - The legitimacy crisis in international sports governance', Copenhagen: Play the Game / Danish Institute for Sports Studies https://www.playthegame.org/knowledge-bank/publications/sports-governance-observer-2015-the-legitimacy-crisis-ininternational-sports-governance/6f53dabb-92fa-4f77-9d0a-a58300dd1195

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⁵ https://playthegame.org/knowledge-bank/downloads/sports-governance-observer-2018/205c4aa7-4036-4fe1-b570-a99601700e5d

⁶ Due to an unexpected lack of staff resources at Play the Game, International Shooting Sport Federation (ISSF) and International Surfing Association (ISA) that were also contacted in March 2019 (but did not respond) are not included in the study.

study was voluntary, but the federations were also informed that scoring would take place on the basis of publicly available data in case they declined to cooperate. FEI, FIS, and IBU agreed to participate in the study and have fully cooperated throughout the whole process. FIG declined to participate while FIVB and IIHF did not reply to our requests. FIG, FIVB, and IIHF have also had the opportunity to comment and review the final scores, but no feedback has been given. It is therefore important to underline that scores for the non-participating federations are solely based on the data found on each individual federation's website.

The aim of the Sports Governance Observer is to stimulate an open debate by providing an objective, reliable, and holistic overview of which elements of good governance are implemented by the included federations and which are not.

It should be underlined that benchmarking rules and procedures has its limitations. The Sports Governance Observer does not measure the real-life governance practices of the international federations. Rules and regulations can be bent and manipulated, if there is a willingness to do so among the power holders of the organisation.

However, Play the Game believes that having the right rules and procedures in place is prerequisite for obtaining good governance on a stable, sustainable basis. Without such rules and procedures in place, sport's governing bodies are at increased risk of falling into the hands of those who seek leadership position for their own personal gain, in disregard of the athletes to whom they own their privileged position.

Play the Game would like to thank FEI, FIS, and IBU for their cooperation and is thankful for the grant from the Danish Parliament that has co-financed this project.

General findings and conclusions

Table 1 presents the scores of the six surveyed international sports federations on the 57 SGO principles. It reveals that out of the six reviewed federations, FEI achieves the highest number of 'very good' scores on the 57 principles within the four dimensions of good governance while IBU achieves the highest proportion of 'not fulfilled' scores. The picture is more differentiated when looking at the dimension scores in figure 1.

The figure demonstrates that FEI achieves the highest SGO index score and performs best among the six federations on the dimensions of democratic processes and internal accountability and control, and together with FIS they achieve the highest score on the dimension of societal responsibility. In transparency, FIS achieves the highest score.

IBU achieves the lowest SGO index score and has the lowest score within transparency and societal responsibility, while FIVB achieves the lowest score on the democratic process dimension. FIG has the lowest score on internal accountability and control.

It should be noted in all fairness that the IBU following criminal investigations and exchange of the top leadership, has embarked on a reform process that was not completed by the time of the SGO benchmarking.

Table 1: Scores of the six surveyed international federations in SGO 2019

	Principle	FEI	FIG	FIS	FIVB	IBU	IIHF
	1. Legal and policy documents						
	2. General assembly agenda and minutes						
	3. Board and committee decisions						
2	4. Board member information						
iransparency	5. Information on member federations						
2	6. Annual general activity report						
2	7. Financial statements						
_	8. Remuneration reports and regulations						
	9. Conflicts of interest and risk assessment						
	10. Strategic plan						
	11. Allocated funds						
	12. Clear election procedures						
	13. Competitive elections						
j	14. Nomination committee						
220	15. Board and general assembly quorums						
נ נ	16. Term limits						
5	17. Member representation						
ביייים מונה או מכריזים	18. Regular board meetings						
3	19. Athletes' participation						
2	20. Referees' participation						
5	21. Coaches' participation						
)	22. Volunteers' participation						
	23. Employees' participation						
	24. Gender equality policy						
	25. The general assembly supervises the board						
	26. Board resignation procedures						
	27. Board eligibility rules						
	28. Clear governance structure						
	29. The board supervises management						
5	30. Internal audit committee						
miterinal accountability	31. Regular corruption risk assessment						
5	32. Financial control system						
3	33. Open tenders for major contracts						
י נ	34. Objective event allocation procedure						
5	35. Annual board self-evaluation						
5	36. External audit						
ב	37. Code of conduct						
	38. Conflict of interest procedures						
	39. Enforcement of code of ethics						
	40. Internal complaints procedure						
	41. Whistle-blower protection rules						
	42. Internal appeals procedure						
	43. Independent board members						
	44. Governance consulting for members						
	45. Mitigating health risks of sport						
	46. Sexual harassment policy						
	47. Anti-doping policy						
2	48. Social inclusion policy						
5	49. Anti-discrimination policy						
2	50. Gender equality policy						
-	51. Anti-matchfixing policy						
5	52. Environmental sustainability policy						
5	53. Dual careers policy						
3	54. Sport for all policy						
	55. Athletes' rights policy						
	56. Human rights policy						
	57. Corruption controls as funding requirement						

Not relevant	Not fulfilled	Weak	Moderate	Good	Very good
	0-19 %	20-39 %	40-59 %	60-79 %	80-100 %

Table 2: Scores on the five surveyed international federations in SGO 2018⁷

	Principle	FIFA	IAAF	FINA	IHF	ITF
	Legal and policy documents	, , ,		,	,	
Transparency	Legal and policy documents General assembly agenda and minutes					
	Board and committee decisions					
	Board and committee decisions Board member information					
	5. Information on member federations					
	Annual general activity report					
	7. Financial statements 8. Remuneration reports and regulations					
	S. Remainer attorn reports and regulations Conflicts of interest and risk assessment					
	10. Strategic plan					
	11. Allocated funds					
	12. Clear election procedures					
	13. Competitive elections					
S	14. Nomination committee					
Se	15. Board and general assembly quorums					
ces	16. Term limits					
o o	17. Member representation					
<u>.</u>	18. Regular board meetings					
rati	19. Athletes' participation					
100	20. Referees' participation					
Democratic processes	21. Coaches' participation					
ă	22. Volunteers' participation					
	23. Employees' participation					
	24. Gender equality policy					
	25. The general assembly supervises the board					
	26. Board resignation procedures					
	27. Board eligibility rules					
	28. Clear governance structure					
	29. The board supervises management					
₹	30. Internal audit committee					
pili	31. Regular corruption risk assessment					
ıta	32. Financial control system					
Jnc	33. Open tenders for major contracts					
S	34. Objective event allocation procedure					
_ a	35. Annual board self-evaluation					
Internal accountability	36. External audit					
	37. Code of conduct					
=	38. Conflict of interest procedures					
	39. Enforcement of code of ethics					
	40. Internal complaints procedure					
	41. Whistle-blower protection rules					
	42. Internal appeals procedure					
	43. Independent board members					
	44. Governance consulting for members					
	45. Mitigating health risks of sport					
>	46. Sexual harassment policy					
ij	47. Anti-doping policy					
sib	48. Social inclusion policy					
Societal responsibility	49. Anti-discrimination policy					
esp	50. Gender equality policy					
=======================================	51. Anti-matchfixing policy					
eta	52. Environmental sustainability policy					
oci	53. Dual careers policy					
Š	54. Sport for all policy					
	55. Athletes' rights policy					
	56. Human rights policy					
	57. Corruption controls as funding requirement					

 $^{^7}$ Geeraert, A. (2018). Sports Governance Observer 2018. An assessment of good governance in five international sports federations. Aarhus: Play the Game / Danish Institute for Sports Studies.

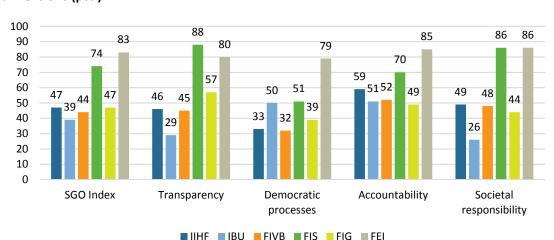
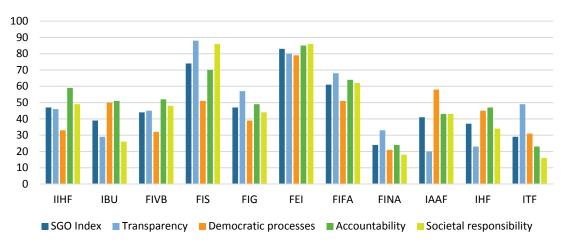


Figure 1: Scores of the six surveyed international federations in SGO 2019 on the SGO index and dimensions (pct.)

In comparison to FIFA (football), FINA (swimming), IHF (handball), IAAF (athletics), and ITF (tennis) that were surveyed in the SGO 2018 report, FEI and FIS surpass FIFA on the SGO index score (see figure 2).

Furthermore, FEI achieves higher scores than FIFA on all dimensions, while FIS scores better on transparency, internal accountability and control, and societal responsibility. On democratic processes the two organisations have the same score. On the other end of the scale, FINA has the lowest SGO index of the 11 surveyed federations, and also the lowest score on the dimension of democratic processes. ITF has the lowest score on internal accountability and control and societal responsibility, while IAAF achieves lowest score on transparency.





 $^{^8}$ Geeraert, A. (2018). Sports Governance Observer 2018. An assessment of good governance in five international sports federations. Aarhus: Play the Game / Danish Institute for Sports Studies.

The strengths and deficits of the six reviewed federations (FEI, FIG, FIS, FIVB, IBU, and IIHF) on the four dimensions of good governance are discussed in more detail below. While the SGO 2019 scores – just like the scores in the 2018 study – vary greatly, there are common patterns among the six surveyed federations. Starting with the positive ones, the federations have:

- clear governance structures according to the principle of separation of powers.
- a code of conduct applicable to the board, management and personnel including an obligation to board members to notify breaches of the code of conduct to appropriate internal persons or entities, and a general obligation for the board members to act with integrity.
- steps to ensure that applicable rules of conduct are adequately checked and that transgressors face consequences.
- established procedures for processing complaints of applicable rules of conduct, and the organisations' decisions can be contested through internal or external mechanisms.

Regarding the deficits, the six benchmarked federations:

- do not report on corruption risks, including conflicts of interest, meaning for instance that the latest annual reports do not explore the corruption risks faced by the organisations and their aim to control these risks
- do not, with the exception of FEI, have a nomination committee that oversees the appointment of senior officials and identifies gaps relating to the skills, expertise and differentiated composition of the board
- have no procedures to ensure that a proportion of the board members are independent
- do not establish in their internal regulations or statutes that the board is obliged to do
 an annual self-evaluation, and there is no data that indicates that the six federations'
 boards have conducted a self-evaluation of their own composition and performance
 within the last twelve months.

Federation report: FIS

Key results 2019

Figure 3: FIS' SGO 2019 index score

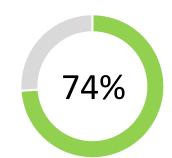
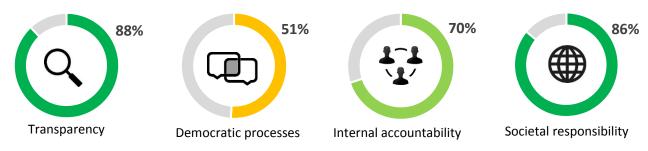


Figure 4: FIS' scores on the four SGO dimensions



Background: FIS' SGO 2015 scores

In the SGO 2015 report, the International Ski Federation (FIS) achieved a score of 61% on the SGO index and was ranked as the third highest scoring federation only outpaced by FEI and FIFA. In 2015, FIS scored high on transparency (77%) and societal responsibility (75%). On the internal accountability dimension, it achieved a score of 58%, while the weakest score was on the democratic processes dimension (35%).

The report showed that FIS in terms of transparency published its statutes, sports rules, board decisions and reports from its standing committees on its website. The study also showed that the organisation's decisions could be contested through internal or external mechanisms.

Other strengths were that FIS implemented a policy on promoting sport for all, and offered consulting to its member federations in the areas of management or governance. However, regarding the democratic process dimension, FIS had no term limits for senior officials, a shortfall in relation to athletes' representation within the organisation, and weaknesses in relation to the internal audit committee...

Main findings FIS

The key results above graphically summarise the results of the SGO 2019 benchmarking. It shows that the FIS score on the SGO 2019 index is 74%, which corresponds to a 'good' label. The transparency dimension returned the highest results of the four dimensions at 88% (very good) closely followed by the societal responsibility dimension with an 86% score (very good). FIS' score on the internal accountability and control dimension is 70% (good) while its score on democratic processes is 51% (moderate).

Dimension 1: Transparency

FIS achieves high scores for transparency where it achieves the score 'very good' on 11 of the 13 principles. The organisation publishes key documents such as statutes, internal regulations, sports rules, and organisation chart on its website. It also publishes board and standing committee decisions on its website and information about its board members. Moreover, FIS reports on the remuneration of board members and management, and its remuneration policy. The organisation publishes details on allocated funds on its website, which shows the amount of allocated funding per member federation and funded development projects, along with the criteria that determine the amount of funding allotted to member federations and development projects.

Still, there is room for improvement. The most recent annual report does not provide an (anonymised) overview of the declaration of conflicts of interest and its decisions in which conflict of interest were involved. Neither does the multi-annual policy plan outline envisioned actions or key performance indicators that establish concrete operational goals.

Dimension 2: Democratic processes

In comparison to the transparency dimension, the results within the democratic processes dimension are more varied and there are principles that are not fulfilled. However, there are areas where FIS performs well. Board members are for example (re-)appointed according to clear and democratic procedures.

Furthermore, the organisation ensures the participation of athletes in its policy processes and the multi-annual policy plan is adopted in consultation with athletes. FIS also undertake other actions aimed at involving athletes in its decisions-making procedures. It has implemented a gender equality policy, where FIS undertakes action aimed at reconciling professional and family responsibilities and promoting gender equality internally.

On the negative side, there are gaps in how the organisation undertakes steps to ensure that elections of senior officials are open and competitive. There are no rules established to ensure that all candidates standing for election pre-send their programme to the member federations. There are neither established rules restricting contributions from private actors to the campaign of a presidential candidate, nor an established system by which an officially announced candidates that meet a number of specific criteria receive funding.

Moreover, FIS has not established term limits for its board members. (However, in 2018 the Congress approved a proposal of maximum tenure of 12 years for FIS council members, and the matter is referred to its Working Group for Governance.)

Furthermore, the Council does not meet five times per year and have no internal regulations established making this a requirement. There is no document outlining an annual schedule for meetings on for example the budget, annual report, and self-assessment.

Dimension 3: Internal accountability and control

FIS achieves high scores on a high proportion of the principles within the internal accountability and control dimension. For example, they apply a clear governance structure according to the principle of separation of powers. FIS also has an internal finance commission, which tasks inter alia include the assessment regarding the systems of internal control, the assessment of and recommendations regarding risk management and governance. The organisation also regularly conducts a corruption risk assessment and it implements a financial control system. This includes for instance a system, in which agreements or payment on behalf on the organisation must be signed by at least two persons. Internal regulations establish separation of duties, so that the same person cannot both initiate and approve payment, and that the same person cannot receive, record and deposit funds. Furthermore, FIS organises open tenders for major commercial and procurement contracts, and decisions on the allocation of major events are made through a democratic, transparent, and objectively reproducible process.

In other areas, however, there are some deficits. The board does not annually evaluate its own composition and performance, meaning that the organisation does not have internal regulations established stating that the board has to conduct an annual self-evaluation. Nor do the statutes and/or internal regulations establish that the board must organise an annual appraisal with management to discuss individual performance, which it has not done within the past 12 months. Another area in which FIS has a shortfall is in how the general assembly supervises the board appropriately. Neither the statutes nor internal regulations have established that the general assembly must approve the multi-annual policy plan proposed by the board. Nor has the FIS Congress approved a multi-annual policy plan or an annual policy plan. Moreover, there is room for improvement in relation to the procedures regarding the premature resignation of board members. For instance, there are no established procedures regarding the premature resignation of board members in case of repeated absenteeism or in case of conflicts (such as incompatible views).

Dimension 4: Societal responsibility

As was the case with the transparency dimension, FIS achieves high scores in the societal responsibility dimension and score 'very good' on 10 of the 14 principles. The organisation offers consulting to its member federations in the areas of management or governance including the organisation of workshops or training sessions, tailored (one-on-one) advice and the distribution of templates or good practices. FIS has also implemented a policy aimed a mitigating the health risks of sporting activities, where it for instance has conducted an analysis of the specific risks associated with the sports represented by FIS and

carried out an evaluation of the impact of its relevant actions. Moreover, the organisation implements policies on combating sexual harassment in sport and combating discrimination in sport. FIS has also implemented a policy for the promotion of environmental sustainability, incorporating the use of an environmental management system (ISO 20121 or similar) in its hosting agreements for its major events. The organisation formally considers environmental criteria when evaluating bids to host its major events, and provide guidance for (potential) hosts on environmental sustainability.

On the downside, FIS has not carried out evaluations of the impact of relevant actions within the areas of dual career of athletes, social inclusion through sport and human rights. The area of human rights is one of few areas within the societal responsibility dimension where FIS does not perform that well. The organisation does not formally consider human rights as criteria when evaluating bids to host its major events, nor does it incorporate specific human rights requirements in the host agreements of its major events or provide guidance for (potential) hosts on human rights issues. Finally, FIS has no formal policies in its statutes or internal regulations, which require entities that receive funding to implement anti-corruption controls related to the relevant transaction or project. Nor do their statutes and internal regulations establish formal policies stating that the transaction cannot go ahead if adequate anti-corruption controls are not in place and the receiving entity refuses to implement theses.

Federation report: FIVB

Key results 2019

Figure 5: FIVB's SGO 2019 index score

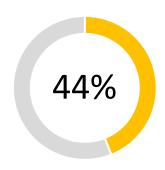
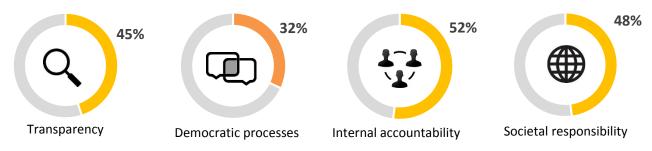


Figure 6: FIVB's scores on the four SGO dimensions



Background: FIVB's SGO 2015 scores

In the SGO 2015 report, the Fédération Internationale de Volleyball (FIVB) achieved an SGO index score of 38%. The organisation scored quite equally between the dimensions of transparency (41%), democratic processes (36%) and internal accountability and control (38%). There were, however, no reliable data available for benchmarking FIVB on the societal responsibility dimension.

FIVB's most notable governance strengths included that the organisation published statutes, sport rules, organisational chart, and information about its member federations on its website. Furthermore, FIVB had robust procedures in relation to elections on the basis of secret ballots and the organisation had also adopted a code of ethics.

But the SGO 2015 analysis also revealed governance deficits. For instance, FIVB did not publish its board decisions on its website and there were no contact details to board members and senior officials on the website. Nor did they report on remuneration for board members and senior officials. Furthermore, there were no data on whether the decisions on the allocation of major events were made through a democratic, transparent, and objec-

tively reproducible process. Finally, the organisation did not formally make an effort to involve athletes in its decision-making processes, and there were weaknesses in relation to the audit committee and its tasks.

Main findings FIVB

The key results above graphically summarise the results of the SGO 2019 benchmarking. It shows that the FIVB SGO 2019 index score is 44%, which corresponds to a 'moderate' label. On three of the dimensions; transparency (45%), internal accountability and control (52%), and societal responsibility (48%) the organisation scores 'moderate', while FIVB on democratic processes (32%) have a 'weak' score.

Dimension 1: Transparency

With regard to the transparency dimension, FIVB publish its statutes, internal regulations, sports rules and organisational chart on its website. The organisation also publishes information about its member federations. Furthermore, FIVB publishes general activity reports on its website, which contain a report on the activities of all standing committees and also include information on the championships and events (co)organised by the organisation.

On the other hand, FIVB does not publish the agenda and minutes of its general assembly on its website. Nor does the organisation report on corruption risks, including conflicts of interest. There are also deficits in relation to the information about its board members on the organisation's website, where it is not possible to find information on the term of current or previous board members. Moreover, the organisation's website does not provide biographical information about each individual board member, including at least their professional background, and it does not provide information on other positions in sports organisations held by each individual board member.

Dimension 2: Democratic processes

Of the four SGO dimensions, the democratic processes dimension appears to be the most problematic one for FIVB. There are deficits with regard to whether the board meets regularly to discuss relevant issues according to established procedures, as there is no annual meeting schedule for discussions on budget, policy plan and self-assessment. Nor do the organisation's statutes or internal regulations establish that the board must meet at least five times per year. Furthermore, there is no formal (written) policy that outlines objectives and specific actions aimed at encouraging equal access to representation for women and men in all stages of the decision-making process,. There is no data on whether the multiannual policy plan is adopted in consultation with internal stakeholders such as athletes, coaches, and referees.

While there is room for improvement, it should also be noted that there are positive sides. The organisation's statutes establish that the members of the general assembly have the possibility to vote in absentia via mandate. The statutes also contain procedures for the appointment and reappointment of all members of the board, and that the elections take place based on secret ballots. Moreover, FIVB has established rules that ensure that all candidates standing for election announce their candidacy at least three months before the election, and the organisation has also established in its statutes a quorum for the general assembly. Finally, FIVB implements gender sensitive procedures for identifying candidates for positions awarded as part of the electoral procedures.

Dimension 3: Internal accountability and control

Among the four SGO dimensions, FIVB achieves the highest score on the dimension of internal accountability and control, where the organisation performs very well within a number of principles. For instance, the organisation defines in its statutes under which circumstances a person is ineligible to serve as a member of the board due to a serious conflict of interest or integrity issue. There is also regulation in place implementing integrity checks for all candidates standing for election. Moreover, the organisation has established procedures regarding the premature resignation of board members both in case of repeated absenteeism and in case of unethical conduct as established by the code of ethics. The code of conduct that applies to the board members contains a general obligation to act with integrity, rules on expenses, and rules on accepting gifts. The FIVB has also established procedures for the processing of complaints of applicable rules of conduct and it has clearly defined rules for submitting and investigating complaints. Finally, the organisation's decisions can be contested through internal or external mechanisms.

Although FIVB scores high within a number of principles, the benchmarking also reveals some deficits in relation internal accountability and control. One of them is in relation to whether the board supervises management appropriately. Neither the statutes nor the internal regulations establish that the board must organise an annual appraisal with management to discuss individual performance and conduct an annual self-evaluation - and the board does not evaluate its own composition and performance. Moreover, the statutes and internal regulations do not establish that corruption risk assessments must be carried out periodically and every time a significant change or event occurs (e.g. changes to the structure or activities of the organisation or revelation of corruption). There are also no data on whether the FIVB has conducted a corruption risk assessment in the past 48 months that identified and assessed risks. Another deficit is that the organisation does not organise open tenders for major commercial procurement contracts. Neither the statutes nor internal regulations establish that at least two people must evaluate tenders and formally approve the awarding of the contract, and that those who approve the placement of the contract are not the same people who requested the placement of the contract. Another shortfall is that the awarding of hosting privileges of major events is made by the FIVB President.

Dimension 4: Societal responsibility

Within the dimension of societal responsibility, the analysis discloses that FIVB achieves high scores on a couple of principles. One of them is the organisation's aim at mitigating the health risks of volleyball activities, as FIVB undertakes actions aimed at preventing or mitigating the specific risks associated with the sport, and has conducted an analysis of the specific risks in volleyball. Furthermore, although the organisation does not have a formal (written) policy that outlines objectives and specific actions aimed at preventing, detecting, and combating doping practices, it undertakes actions aimed at raising awareness of anti-

doping rules, undertake actions aimed at educating athletes on the dangers of doping use, and implement formal procedures establishing its cooperation with the WADA. Another area in which FIVB performs well is in combating match-fixing. The organisation has implemented disciplinary rules to combat match-fixing, including provisions banning any member of the federation from placing a bet related to youth leagues and a competition or match that he or she may (in)directly influence. Moreover, the rules include provisions banning any member of the federation from spreading confidential information, which might be used in the framework of a bet, and establish the obligation for every member of the federation to report any request to unduly influence competitions or matches organised by the federation. Finally, FIVB achieves high scores with regard to the fact that the organisation requires entities that receive funding to implement anti-corruption controls - herein internal regulations establishing that the transaction cannot go ahead if adequate anti-corruption controls are not in place and the receiving entity refuses to implement these.

One area with room for improvement is regarding gender equality. FIVB has no formal (written) policy that outlines objectives and specific actions aimed at promoting gender equality in volleyball. Nor does the organisation raise awareness via educational materials for all decisions makers on the importance of having a diverse representation on decisionmaking organs throughout volleyball. There are also deficits regarding environmental sustainability. There is no formal (written) policy that outlines objectives and specific actions aimed at promoting environmental sustainability. The organisation does not formally take environmental criteria into account when evaluating bids to host its major events, nor does it incorporate specific environmental sustainability objectives in the host agreement of its major events. The same pattern is found within the area of human rights. In addition to the deficits mentioned above, FIVB does not provide guidance for (potential) hosts on human rights issues, and the organisation does not cooperate with other organisations (other than its member organisations or regional federations) on promoting and safeguarding human rights. Another weak area is the dual careers of athletes. FIVB lacks a formal (written) policy that outlines objectives and specific actions aimed at helping athletes combine their sporting career with education and work, and the organisation does not undertake actions (not related to the exchange of best practices or cooperation with other organisation) aimed at promoting and supporting the inclusion of the concept of dual careers in the activities of its member federations.

Federation report: FEI

Key results 2019

Figure 7: FEI's SGO 2019 index score

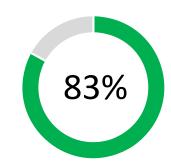
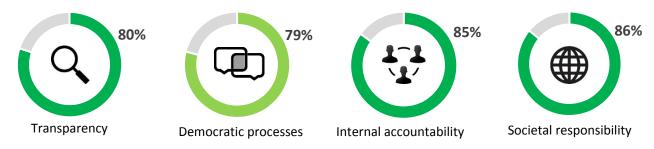


Figure 8: FEI's scores on the four SGO dimensions



Background: FEI's SGO 2015 scores

In the SGO 2015 report, the Fédération Equestre Internationale (FEI) achieved an SGO index score of 76%, which made FEI the best performing federation among the 35 federations benchmarked in 2015. It achieved the highest score within the internal accountability and control dimension (88%) followed by transparency (77%), democratic processes (70%) and societal responsibility (68%).

On a general level, FEI performed very well in the SGO 2015. With regards to transparency, the organisation published an annual general activity report including complete, objective and understandable information on accounts, assets, events, revenue, sponsoring, development of sport and programmes. FEI also published annual reports of all the standing committees online. Athletes were represented within a specific athletes' committee and the chairman/-woman of the athletes' committee was a member of the organisation's governing body and elected by athletes. Moreover, FEI had state-of-the art procedures regarding the implementation of an ethics code. There were, however, weakness in relation to the allocation of hosting rights to major events and the regulations and reports on remuneration.

Main findings FEI

The key results above graphically summarise the results of the SGO 2019 benchmarking. It shows that FEI's score on the SGO 2019 index is 83%, which corresponds to a 'very good' label. FEI scores 'very good' on three of the four SGO dimensions, namely transparency (80%) internal accountability (85%), and societal responsibility (86%) while the organisation achieves a 'good' label within the dimension of democratic processes (79%).

Dimension 1: Transparency

Within the transparency dimension, FEI achieves high scores on a number of principles. The organisation publishes the agenda and minutes of its general assembly on its website. The agenda contains the various agenda items with a word of explanation, the list of topics up for discussion, and a specification of which items that are to be put to vote. FEI also publishes information about its board members on its website including the start and end date of the mandate of each individual member, the duration and number of previous mandates, and information on other positions in sports organisations held by each individual board member. Furthermore, it publishes general activity reports on its website containing a report on the activities of all standing committees. Finally, FEI also publishes financial statements that are externally audited according to recognised international standards.

Although FEI in general perform very well within the transparency dimension, there is room for improvement. The multi-annual plan does not include long-term financial planning and does not outline key performance indicators that establish concrete operational goals. Moreover, the recent annual report does not provide an (anynomised) overview of declarations of conflicts of interest and the decisions in which conflicts of interest were involved.

Dimension 2: Democratic processes

Just like the transparency dimension, FEI achieves high scores within the dimensions of democratic processes. The organisation undertakes steps to ensure that elections of senior officials are open and competitive and it has established rules that requires all candidates standing for election to pre-send their programme/letter of motivation to the Nomination Committee. The organisation has also established rules that require an open recruitment process in which any board vacancies are published online. The rules secure that all candidates who meet the eligibility requirements can apply and that clear deadlines are set.

Furthermore, FEI has a nomination committee, which oversees the appointment of senior officials, and internal regulations, which establish that the tasks of the nomination committee include identifying gaps relating to skill, expertise, and differentiated composition of the board. The organisation's statutes ensure that elections take place on the basis of secret ballots and that members of the general assembly have the opportunity to vote in absentia via a mandate. Another strength is that FEI has implemented gender sensitive procedures

for identifying candidates for positions awarded as part of the organisation's human resources policies and undertakes actions aimed at the reconciliation of family responsibilities and professional or elective obligations for board members and staff.

The few shortfalls within the democratic processes dimension are related to a lack of formal (written) policies that outline objectives and specific actions aimed at involving various stakeholders in the policy process, such as coaches, volunteers, and employees. For instance, the adoption of the multi-annual policy plan is not done in consultation with referees, coaches, and volunteers.

Dimension 3: Internal accountability and control

The analysis reveals that FEI is performing very well within the internal accountability and control dimension. FEI has established procedures regarding the premature resignation of board members and the statutes clearly describe the situations in which the general assembly has to vote to suspend or remove an office holder elected by the general assembly. In the internal regulations, procedures are established regarding the premature resignation of board members in case of repeated absenteeism.

Moreover, the organisation defines in its internal regulations the circumstances in which a person is ineligible to serve as a member of the board due to a serious conflict of interest or integrity issue. The internal regulations also establish that integrity checks must be implemented for all candidates standing for election. The board supervises the management appropriately and has conducted an appraisal with the management during the past 12 months.

Another strength is that the organisation recognises a code of conduct applicable to the members of the board, management and personnel, and FEI also takes steps to ensure that applicable rules of conduct are adequately checked and that transgressors face consequences. The internal regulations, for instance, establish that the entity tasked with investigating breaches of the rules of conduct is appointed by the general assembly and has the authority to investigate suspected breaches on its own initiative as well as following a complaint.

FEI organises open tenders for major commercial and procurement contracts where the internal regulations establish that at least two persons must evaluate tenders and formally approve the awarding of the contract, and that the people, who request the placement of the contract, cannot approve the placement of the contract.

One of few governance deficits within the internal accountability and control dimension is that the board does not evaluates its own composition and performance. Another shortfall is that the organisation does not have procedures that ensure that anyone who in good faith reports a concern are protected from retaliation or negative consequences. Nor does the internal regulations establish that external procurement experts must assist in evaluating bidding dossiers for major events. Finally, FEI has not implemented procedures to ensure that a proportion of the board members are independent.

Dimension 4: Societal responsibility

In addition to transparency and internal accountability and control, FEI also performs very well within the dimension of societal responsibility (86%). It performs very well in areas such as offering consulting to its member federations in the areas of management or governance, which includes workshops, training sessions, and tailored (one-one-one) advice.

FEI achieves high scores regarding mitigating the health risks of equestrian activities. The organisation undertakes actions aimed at preventing or mitigating the specific risks and has conducted analyses of the specific risks associated with the sports organised by the federation.

FEI shows strength on combating sexual harassment and the internal regulations has established procedures for processing complaints about unwanted sexual behaviour. Another strength is in the area of match-fixing. FEI has a formal (written) policy that outlines objectives and specific actions aimed at combating match-fixing, undertakes actions aimed at promoting the exchange of best practices, and undertakes actions to educate elite athletes, promising young athletes, coaches, referees, trainers, and clubs about risks relating to match-fixing.

Moreover, the benchmarking reveals that FEI achieves high scores regarding the promotion of environmental sustainability. The organisation takes environmental criteria into account when evaluating bids to host its major events and provides guidance for (potential) hosts on environmental sustainability. Finally, FEI requires entities that receive funding to implement anti-corruption controls and the organisation have internal regulations or formal policies establishing that the transaction cannot go ahead if adequate anti-corruption controls are not in place and the receiving entity refuses to implement these.

Although the organisation on a general level achieves very high scores within the dimension, there is room for some improvement. For instance, the organisation lacks a formal (written) policy that outlines objectives and specific actions aimed at helping athletes combine their sporting career with education or work. There is also no policy for the promotion and safeguarding of human rights and FEI does not formally take human rights criteria into account when evaluating bids to host its major events. The organisation does not incorporate specific human rights requirements in the host agreement of its major events, and it does not provide guidance for (potential) hosts on human rights issues.

Federation report: FIG

Key results 2019

Figure 9: FIG's SGO 2019 index score

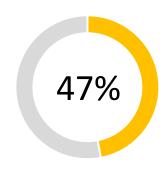
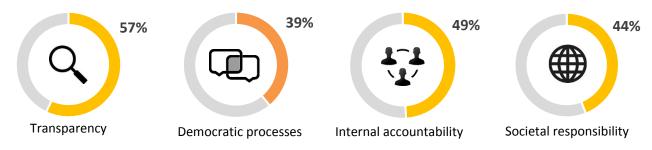


Figure 10: FIG's scores on the four SGO dimensions



Background: FIG's SGO 2015 scores

In the SGO 2015 report, the International Gymnastics Federation (FIG) achieved an SGO index score of 45%. The organisation performed best within the democratic process dimension (53%) followed by the transparency dimension (48%), while it achieved lower scores on internal accountability and control (42%) and societal responsibility (39%).

With regard to transparency, the analysis found that FIG published the agenda and minutes of its general assembly on its website. Other governance strengths included elections based on secret ballots, clear procedures detailed in the organisation's governing documents, state of the art opportunities for athletes to be represented within the organisation, and that the fact that the organisation's decisions could be contested through internal channels specified in its governing documents. The benchmarking also revealed a number of governance deficits. Most notable was the lack of an independent Ethics Committee, weak procedures for securing a democratic, transparent, and objectively reproducible process for deciding on the allocation of major events, and a lack of data on whether the organisation adopted an integrated internal control and risk management system.

Main findings FIG

The key results above graphically summarise the results of the SGO 2019 benchmarking. It shows that FIG's score on the SGO 2019 index is 47%, which corresponds to a 'moderate' label. On three of the dimensions – transparency (57%), internal accountability and control (49%), and societal responsibility (44%) – the organisation achieves a 'moderate' score, while FIG on democratic processes (39%) have a 'weak' score.

Dimension 1: Transparency

On average, FIG's scores within the transparency dimension are at a moderate level. On certain aspects, FIG performs 'very good' while other aspects are 'not fulfilled'. Strengths include, for instance, the publication of the agenda and minutes from general assembly meetings and the board and standing committee decisions on its website. Furthermore, the organisation publishes information about its board members on its website listing the start and end date of the mandate of each individual member of the board, the duration and the number of pervious mandates, and information on other positions in sports organisations held by each individual board member. Finally, the organisation publishes information about its member federations on its website.

In other areas within the transparency dimension, there is room for improvement. The organisation does not publish financial statements that are externally audited according to recognised international standards on its website. Nor does the organisation report on corruption risks, including conflicts of interest. The analysis also reveals deficits when it comes to publishing its strategic plan on its website as no multi-annual policy plan has been found.

Dimension 2: Democratic processes

On the democratic processes dimension, FIG achieves high scores on a number of principles. The organisation achieves a 'very good' score in relation to (re-)appointing board members according to clear and democratic procedures, where the rules governing elections ensure that the member federations directly elect at least 75% of the members of the boards. The rules governing elections also ensure that elections take place based on secret ballots. Moreover, the benchmarking reveals strengths when it comes to ensuring that elections of senior officials are open and competitive. This includes campaign funding rules that restrict contributions from private actors to the campaign of a presidential candidate and a system in which candidates, who have been officially announced and meet a number of specific criteria (e.g. backing by a specific number of member federations), receive funding. Another governance strength is that FIG has establishes a quorum (a minimum number of attendees required to conduct business and to cast votes) in its statutes for both the board and the general assembly. Finally, the organisation ensures the participation of athletes and referees in its policy processes and both categories are formally represented within the organisation via a consultative body.

In other areas of the democratic processes dimension, FIG achieves rather weak scores. The organisation has no nomination committee that oversees the appointment of senior officials. There are also deficits with regard to the principle emphasising that the board should meet regularly and the fact that there are no regulations establishing the procedure for drawing up the agenda for board meetings and establishing the board meeting proceedings. In addition, the board does not have a document outlining an annual meeting schedule that arranges meetings on the budget, policy plan, annual report, and self-assessment. Although the organisation has implemented term limits, it is possible for board members to stay in office for 24 years (three mandates per function) and for the president, it is possible to stay in office for 12 consecutive years. Furthermore, the statutes establish that the general assembly only meets every second year and do not give members of the general assembly the opportunity to vote in absentia (e.g. by proxy via communication technology or via a mandate).

Dimension 3: Internal accountability and control

FIG achieves moderate scores on the internal accountability and control dimension. However, within certain areas the organisation performs 'very well'. An example of this is the fact that the organisation applies a clear governance structure according to the principle of separation of powers, and the fact that it has a code of conduct applicable to the members of the board, management and personnel.

The code of conduct contains a general obligation to act with integrity, rules on expenses, rules on accepting gifts, rules on conflicts of interest, and an obligation to notify breaches of ethics to appropriate persons or entities. Moreover, the organisation takes steps to ensure that applicable rules of conduct are adequately checked and that transgressors face consequences.

FIG establishes procedures for processing complaints of applicable rules of conduct including clearly defined rules for submitting and investigating complaints. In addition, FIG has established procedures to ensure whistleblower protection ensuring that no person who, in good faith, reports a concern shall be subject to retaliation or negative consequences. Furthermore, FIG has established procedures that enable persons to file an anonymous complaint and to ensure reports on such complaints and related investigations must be kept confidential to the extent possible, and enables persons to file an anonymous complaint.

In other areas, however, there are some governance deficits. For instance, there is no internal financial or audit committee responsible for the assessment of and recommendations regarding risk management and governance, and which oversees the internal audit process. There is no data suggesting that the organisation regularly conducts a corruption risk assessment (or that it has done so within the past 48 months), or that it has evaluated the suitability and effectiveness of the existing controls to mitigate these risks. There are also shortfalls with regard to the implementation of a financial control system. The statutes and internal regulation do not establish, for example, a financial threshold for contracts with external parties, whether management or the board must make the decision, or include a separation of duties, so that the same person cannot both initiate and approve payments.

Another governance lack is the fact that FIG does not organise open tenders for major commercial and procurement contracts and that the organisation's statutes and internal regulations do not establish that at least two persons must evaluate tenders and formally approve the awarding of the contract. Finally, there are also deficits in relation to ensuring that the decisions on the allocation of major events are made through a democratic, transparent, and objectively reproducible process.

Dimension 4: Societal responsibility

With regard to societal responsibility, FIG has a formal (written) policy that outlines objectives and specific actions aimed at combating sexual harassment within gymnastics. The organisation also has a code of conduct, which outlines rules aimed at promoting the physical integrity of athletes. Moreover, FIG has internal regulations establishing procedures for processing complaints about unwanted sexual behaviour and rules for submitting and investigating complaints.

Another strength is the fact that FIG has implemented an anti-doping policy aimed at raising awareness of anti-doping rules and educating athletes on the dangers of doping use. The organisation has a policy on social inclusion through sport including a formal (written) policy that outlines objectives and specific actions aimed at improving the social, cultural, educational, or psychological circumstances of marginalised and/or fractured communities through sport and promotes the exchange of best practices on social inclusion among its member federations.

Another area where FIG performs very well is sport for all. FIG has a formal (written) policy that outlines objectives and specific actions aimed at promoting sport for all, it cooperates with other organisations (other than its members organisations or regional federation) in order to promote sport for all, and it has carried out evaluations of the impacts of its relevant actions.

Although FIG performs well within a number of areas of the societal responsibility dimension, there are some deficits. The analysis found no data suggesting that FIG has a formal (written) policy outlining objectives and specific actions regarding the consulting of its member federations in the areas of management or governance. Nor is there any information that suggests that FIG provides any form of consulting to member federations through knowledge transfer.

There are also shortfalls when it comes to the areas of combating match-fixing and environmental sustainability. The organisation, for instance, does not formally consider environmental criteria when evaluating bids to host its major events and does not undertake actions aimed at promoting the exchange of best practices on environmental sustainability among its member federations. The same pattern is found within the area of human rights.

FIG has no formal (written) policy aimed at helping athletes combine their sporting career with education or work, and the organisation does not undertake actions aimed at promoting the exchange of best practices on dual careers with its member federations.

Another deficit is the fact that the organisation does not require entities that receive funding to implement anti-corruption controls and has no internal regulations or formal policies requiring FIG to determine whether entities, which receiving funding, have anti-corruption controls in place to manage corruption risks.

Federation report: IIHF

Key results 2019

Figure 11: IIHF's SGO 2019 index score

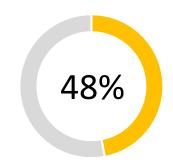
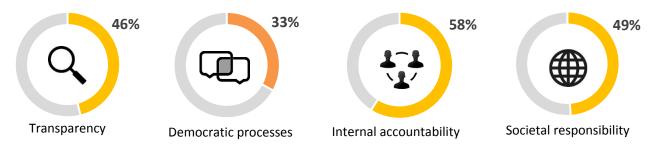


Figure 12: IIHF's scores on the four SGO dimensions



Background: IIHF's SGO 2015 scores

In the SGO 2015 report, the International Ice Hockey Federation (IIHF) achieved an SGO index score of 53%. The dimension with the highest score was transparency (58%) while IIHF achieved the same score within the dimensions of democratic processes (50%) and internal accountability and control (50%). There were, however, no reliable data available for benchmarking IIHF on the societal responsibility dimension.

Regarding the transparency dimension, IIHF published externally audited annual financial reports on its website – including reports from the past three years. The analysis also revealed that the IIHF's general assembly is required to meet at least once a year and there are clear procedures enshrined in the statutes for convening emergency and special meetings. In addition, the SGO 2015 report outlined that the organisation has an internal audit committee, whose tasks include overseeing the internal audit and assessing the quality of the internal control system, including risk management. Governance deficits included the lack of an ethics committee, main event reports with detailed and relevant information on its website, and term limits for elected officials.

Main findings IIHF

The key results above graphically summarise the results of the SGO 2019 benchmarking. It shows that the IIHF's SGO 2019 index score is 48%, which corresponds to a 'moderate' label. The organisation achieves the highest score within the dimension of internal accountability and control (58%) followed by societal responsibility (49%) and the transparency dimension (46%). The weakest dimension for IIHF is democratic processes (33%).

It should be noted that IIHF have a couple of policies: IIHF Policy on Sexual Harassment, IIHF Financial Regulations, Pre-election procedures, and IIHF Procurement Guidelines that are not included in the SGO 2019 analysis. These policies are referred to in other IIHF documents, but as they are not available on the website, and the IIHF has not answered to our invitations to contribute, it has not been possible to include them in the analysis.

Dimension 1: Transparency

With regard to transparency, IIHF publishes its statutes, internal regulations, and sports rules. It also publishes some information about its board members on its website including biographical information about each individual board member, such as their professional background, and information on other positions held by each individual board member. Moreover, IIHF publishes financial statements that are externally audited according to recognised international standards - including the three most recent financial statements - on its website. Finally, the organisation also publishes general activity reports on its website including a report on the activities of all standing committees and information on the championships and events (co-)organised by IIHF.

There is, however, room for improvement. The organisation does not publish board and standing committee decisions on its website, nor is there any information on whether IIHF reports on corruption risks, including conflicts of interest. The latest annual report does not explore the corruption risks faced by the organisation and how it aims to control these risks. Is has also not been possible to find a strategic plan or a multi-annual policy plan on the website. The only thing found is the President's platform for 2016-2020. Another deficit is that the organisation does not publish details on allocated funds on its website including information on the amount allocated per member federation and funded development project and the deliverables of the funded development projects.

Dimension 2: Democratic processes

The democratic processes dimension is the weakest and IIHF only achieves a score of 33%. There are, however, some areas in which the organisation performs well. These include the fact that board members are (re-)appointed according to clear and democratic procedures and that the general assembly represents all affiliated members and meets at least once a year (twice a year in the case of IIHF). There is also a quorum for the general assembly and congress may only vote if a quorum representing a majority of the voting entitlement is present at the beginning of the congress meeting. Furthermore, athletes, coaches, and referees are all formally represented within the organisation via consultative bodies.

However, the analysis reveals a number of deficits. The organisation has no nomination committee that oversees the appointment of senior officials and identifies gaps relating to the skill, expertise, and differentiated composition of the board. The board does not meet regularly to discuss relevant issues according to established procedures. There is, for instance, no document outlining an annual meeting schedule that arranges meetings on the budget, policy plan, annual report, self-assessment, appraisal of the management, and preparation of the general assembly.

Another shortfall is in relation to the organisation's procedures to ensure that elections of senior officials are open and competitive. Relevant information may be found in IIHF's Preelection guidelines, but the document is not available on the organisation's website. Moreover, there is no quorum for the board, and although IIHF has term limits (12 years as President, Vice-president and Member), it is possible for a council member to serve in office for 36 years. Finally, the organisation does not have a formal (written) policy that outlines objectives and specific actions aimed at encouraging the equal access to representation for women and men in all stages of the decision-making process.

Dimension 3: Internal accountability and control

IIHF achieves high scores on a number of principles in the internal accountability and control dimension. For instance, internal regulations establish procedures regarding the premature resignation of board members in case of unethical conduct. Moreover, the organisation's statutes define the circumstances in which a person is ineligible to serve as a member of the board due to serious conflicts of interest or integrity issue. The organisation's statutes also establish that integrity checks are to be implemented for all candidates standing for election.

The organisation applies a clear governance structure according to the principle of separation of powers. IIHF also has an internal audit committee and the statutes establish that the committee's tasks include the assessment of and recommendations regarding risk management. Another governance strength is that the organisation has a code of conduct applicable to the members of the board, management, and personnel. This code of conduct contains a general obligation to act with integrity, rules on expenses and accepting gifts, and an obligation to notify breaches of the code to appropriate internal persons or entities.

However, in other areas of the dimension, there are some deficits. One of them is how the general assembly supervises the board appropriately. It is not outlined in the statutes that the general assembly must approve the multi-annual policy plan proposed by the board. Nor is there any data found that confirm that the general assembly has approved an annual policy plan or budget based on the multi-annual policy plan or long-term financial planning in the past twelve months.

There are shortfalls in regard to the board's annual evaluation of its own composition and performance and in relation to whether the board supervises management appropriately. Finally, there are some shortcomings regarding whistleblower protection, as the organisation does not have procedures that ensure that no person, who reports a concern in good

faith, will be subject to retaliation or negative consequences. There is no data found on procedures that enable persons to file an anonymous complaint.

Dimension 4: Societal responsibility

Regarding the dimension of societal responsibility, IIHF offers consulting to its member federations in the areas of management and governance. The organisation has also implemented a policy aimed at mitigating the health risks of sporting activities in which IIHF undertakes actions aimed at preventing or mitigating the specific risk associated with ice hockey and have carried out an evaluation of the impact of its relevant actions.

Moreover, IIHF has implemented an anti-doping policy, in which the organisation undertakes actions aimed at raising awareness of anti-doping rules and educating athletes on the dangers of doping use. IIHF also achieves high scores in relation to combating match-fixing. Within this area, the organisation has rules and provisions banning any member of the federation from spreading confidential information, which may reasonably be expected to be used in the framework of a bet. These rules also include provisions establishing the obligation for every member of the federation to report any request to unduly influence competitions or matches organised by the federation.

IIHF undertakes actions aimed at promoting sport for all and it cooperates with other organisations (other than its member organisations or regional federations) in order to promote sport for all.

Although IIHF performs very well within a number of principles in the dimension, there are some shortfalls. The organisation has no policy to promote gender equality in ice hockey, and there is no data suggesting that IIHF raises awareness on the importance of having a diverse representation on decision-making organs throughout ice hockey via educational materials for all decision makers.

With regard to environmental sustainability, IIHF has some procedures, for instance the IIHF Guidelines for Sustainable Events. However, the organisation does not incorporate the use of an environmental management system (ISO 20121 or similar) in its hosting agreements for its major events, and there is no information on whether the organisation formally considers environmental criteria when evaluating bids to host its major events. The analysis reveals deficits in regard to human rights. IIHF does not have a formal (written) policy that outlines objectives and specific actions aimed at promoting and safeguarding human rights, it does not formally consider human rights criteria when evaluating bids to host its major events, and it does not incorporate specific human rights requirements in the host agreements of its major events. Finally, the organisation does not require entities that receive funding to implement anti-corruption controls.

Federation report: IBU

Key results 2019

Figure 13: IBU's SGO 2019 index score

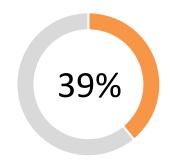
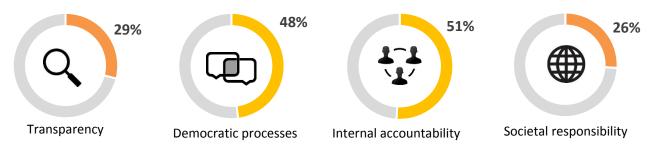


Figure 14: IBU's scores on the four SGO dimensions



Background: IBU's SGO 2015 scores

In the SGO 2015 report, the International Biathlon Union (IBU) achieved an SGO index score of 39%. The dimension with the highest score was transparency (48%). The organisation performed basically at the same level within the dimensions of democratic processes (38%) and societal responsibility (39%), while it achieved a low score (29%) on internal accountability and control.

One of the organisation's main strengths in the SGO 2015 report was that the elections were made on the basis of secret ballots and clear procedures were in place regarding the objectivity of elections. IBU also performed well in terms of elections of the president and governing bodies. Its finances were also externally audited according to international recognised standards, and IBU allocated specific resources for the global development of grassroots activities and consolidated these under a comprehensive strategy. In regard to deficits, the organisation did not publish reports of its standing committees on its website, and the organisation had neither term limits, a gender equality policy nor environmental requirements for its major events.

Main findings IBU

The key results above graphically summarise the results of the SGO 2019 benchmarking. It shows that the IBU score on the SGO 2019 index is 39%, which corresponds with a 'weak' label. The organisation achieved the highest score within the dimension of internal accountability and control (51%) followed by democratic processes (48%), while IBU achieves lower scores on transparency (29%) and societal responsibility (26%).

Although the IBU score in the SGO 2019 is considered 'weak' (39%), it is important to underline that there is work in progress to achieve better governance within IBU. Since the previous president and secretary general came under criminal investigation in 2018, a new president was elected and a new general secretary hired, a deliberate process has been started to make changes in order to raise the governance standards within the federation.

IBU will hold an extraordinary Congress in October 2019 (the first congress under the new presidency). The sole purpose of this extraordinary Congress is the adoption of reforms in order to meet governance and integrity standards, which includes a complete overhaul of the IBU constitution comprising the establishment of a Biathlon Integrity Unit. Another topic includes the approval of a multi-annual policy plan (the first one ever), where athletes and other stakeholders have been included in the development process. Thus, it is of importance to stress that the IBU results reflect the organisation's governance standards before the extraordinary Congress.

Dimension 1: Transparency

Regarding transparency, IBU publishes its statutes, internal regulations, sports rules, and organisation chart on its website. The organisation also publishes minutes of all board meetings in the past 12 months on its website, containing an explanation behind the rationale of certain (key) decisions. Another strength is that the organisation publishes information about is members (national federations) on its website with basic information and contact details for each member federation.

However, there is certainly room for improvement within the transparency dimension for the organisation. IBU has not published the agenda or minutes from its latest general assembly meeting on its website. And the IBU does not publish general activity reports on its website and it has not been possible to find financial statement that are externally audited according to recognised international standards. Moreover, the organisation does not publish regulations and reports on the remuneration - including compensation and bonuses of its board members and management and details on allocated funds on its website.

Dimension 2: Democratic processes

The benchmarking reveals a couple of strong areas for IBU on the democratic processes dimension. One of them is that board members are (re-)appointed according to clear and democratic procedures, where the rules governing election ensure that the member federations directly elect at least 75% of the members of the board and that elections take place on the basis of secret ballots.

The main strength for IBU regarding democratic processes is the involvement of stakeholders in its policy processes. Athletes, coaches, and referees are formally represented within the organisation via consultative bodies, and the upcoming multi-annual policy plan is adopted in consultation with athletes, coaches, referees, and employees. IBU has also undertaken other actions (surveys) aimed at involving the stakeholders. Furthermore, the organisation has also established rules that ensure that all candidates standing for election announce their candidacy at least three months before the election takes place, and its statutes include a quorum for the board.

Governance deficits within the dimension include the fact that IBU has not established rules that ensure that all candidates standing for election must pre-send their programme to the member federations. The organisation has not established rules to secure an open recruitment process in which candidates, who meet eligibility requirements, can apply, all board vacancies are published online, and clear deadlines are set.

The organisation has no nomination committee that oversees the appointment of senior officials, its statutes and internal regulations do not establish a quorum for the general assembly, and IBU has not established term limits. Moreover, the organisation does not have a formal (written) policy that outlines objectives and specific actions aimed at encouraging the equal access to representation for women and men in all stages of the decision-making process. Nor does the organisation implement gender sensitive procedures for identifying candidates for positions awarded as part of electoral procedures or human resources policies.

Dimension 3: Internal accountability and control

Among the four SGO dimensions, IBU achieves the highest score within the dimension of internal accountability and control. The organisation's statutes establish that the general assembly must approve the annual budget and the financial statements, and the general assembly has approved financial statement the past twelve months.

The organisation has established procedures regarding the premature resignation of board members in case of repeated absenteeism and unethical conduct. The procedures clearly outline the situations in which the general assembly has to vote on the issue. IBU's internal regulations define the circumstances in which a person is ineligible to serve as a member of the board due to serious conflicts of interest or integrity issue and establish that a person, who is employed by a company that has commercial relationship with the organisation, cannot serve as a board member.

IBU also applies a clear governance structure according to the principle of separation of powers, and the internal regulations establish a system in which agreements or payments on behalf of the organisation must be signed by at least two persons. Moreover, the organisation has a code of conduct applicable to the members of the board, management, and personnel, and IBU takes steps to ensure that applicable rules of conduct are adequately checked and that transgressors face consequences. The internal regulations furthermore establish that the entity tasked with investigating breaches must be independent. IBU also

performs well within the area of ensuring whistleblower protection and it has established procedures to ensure that it is possible to file an anonymous complaint and that reports of concerns and related investigations are kept confidential.

In regard to the deficits within the internal accountability and control dimension, IBU's statutes and internal regulations do not determine that management must regularly and periodically (at least four times a year) report to the board about the organisation's operational management and financial situation. Nor do they establish that the board must organise an annual appraisal with management to discuss individual performance.

Another shortfall is that IBU's statutes and internal regulations have not established a financial threshold for contracts with external parties, outlining whether management or the board must make the decision, or established a separation of duties, so that the same persons cannot both initiate and approve payments. Furthermore, there is no information on whether IBU organises open tenders for major commercial and procurement contracts and ensure that at least two persons evaluate tenders and formally approve the awarding of contracts.

The organisation's statutes and internal regulations do not ensure that the criteria for a bid for major events are communicated to its members in good time (at least one year before the event is awarded), that bidding dossiers are reviewed and evaluated and that scores are assigned on the basis of pre-established and objective criteria. Finally, the internal regulations (or statutes) do not establish that the board has to conduct an annual self-evaluation.

Dimension 4: Societal responsibility

Among the four SGO dimensions, societal responsibility is where IBU achieves the lowest score. However, there are some strengths. The organisation implements an anti-doping policy and undertakes actions aimed at educating athletes on the dangers of doping. Furthermore, the organisation's internal regulations establish procedures for processing complaints about discrimination including rules for submitting and investigating complaints and rules for the establishment of an independent tribunal.

The organisation also raises awareness of the importance of having a diverse representation on decision-making organs throughout sport via educational materials for all decisionmakers. IBU also performs fairly well within the area of combating match-fixing. The established rules include provisions banning any member of the federation from spreading confidential information that may reasonably be expected to be used in the framework of a bet. The rules also include provisions establishing the obligation for every member of the federation to report any requests to unduly influence competitions or matches organised by the federation and the procedure for punishing any violations of the above rules.

The weak areas within the dimension include the fact that IBU does not offer consulting to its member federations in the areas of management or governance. Nor do they implement a policy aimed at mitigating the health risks of sporting activities. IBU also lack a policy on social inclusion through sport, it does not promote the exchange of best practices on social

inclusion among its member federations, and it does not undertake actions aimed at improving the social, cultural, educational, or psychological circumstances of marginalised and/or fractured communities through sport.

IBU has not implemented a policy for the promotion of environmental sustainability and it does not incorporate specific environmental sustainability objectives in the host agreement of its major events or provide guidance for (potential) hosts on environmental sustainability. Another deficit is the lack of a policy on promoting the dual career of athletes, and a policy on promoting sport for all.

Finally, IBU does not require entities that receive funding to implement anti-corruption controls and there is no internal regulations establishing that the transaction cannot go ahead if adequate anti-corruption controls are not in place and the receiving entity refuses to implement these.

