What is Safe about Safe Sport? A Gendered Interrogation of Canadian University Safe Sport Policies in Higher Education

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Abstract

In this paper, we seek to examine how organizational norms and structures in Canadian university sport perpetuate a culture that does not adequately address maltreatment, harassment, and abuse that affect women athletes. Our critical policy analysis focuses on two interrelated questions. First, how do safe sport policies highlight gendering practices in university athletics? And second, how is safety problematized in safe sport policies? In addressing our research questions, we apply genderwashing as a conceptual framework, alongside Carol Bacchi's "What's the Problem" approach, to analyze the U SPORTS and one Canadian university's safe sport policy. Our analysis reveals that safe sport policies demonstrate genderwashing practices in their use of gender-neutral language. The use of gender-neutral language within these policies contributes to an erasure of women athletes' experiences and a reluctance to engage with issues of gender violence in sport. We suggest that addressing this issue will require a commitment to creating a safe sport culture that recognizes gender and other axes of identity as relevant to athletes' diverse experiences and understanding of safety within Canadian university sport.

Keywords: Bacchi, Canadian universities, gender, safe sport, UCC sport

Introduction

Across Canadian sport, hundreds of athletes have come forward to report issues of physical, sexual, and psychological abuse (Edwards et al., 2023; Willson et al., 2022), the majority of whom are women. While abuse in sport can be perpetrated at all levels against anyone of any age, research has demonstrated that it is more prevalent for women (Kerr, 2023; Kidd et al., 2022). Furthermore, oftentimes university athletes frequently lack clarity regarding the reporting structure and where to seek assistance. Even when athletes are able to make a complaint, many report being unsatisfied with the outcomes or with the penalties for the abuser (Kirby & Demers, 2013).

Recently, a flurry of media and scholarly attention has shone a light on abusive coaching practices. This media attention has further prompted engagement with safe sport policies (Gurgis & Kerr, 2021; Kerr et al., 2020; Mishna et al., 2019). The term "safe sport" is defined as a movement working to "rid Canadian sport of all forms of harassment, discrimination and abuse" (Sport Dispute Resolution Centre of Canada, n.d.). Despite safe sport guidance provided federally and provincially, many student-athletes in Canadian universities experience abuse, maltreatment, and harm from their coaches (Jewett et al., 2020).

As a result, we seek to examine how organizational norms and structures in Canadian university sport perpetuate a culture that does not adequately address maltreatment, harassment, and abuse that af-

fects women athletes. While we acknowledge that abuse and maltreatment occur in sport due to a variety of interlocking systems of oppression athletes may face based on their personal social location, we have chosen to highlight gender specifically. The reason for this analysis, in part, stems from the positionality of the researchers. As feminist researchers, we come to a research problem considering standpoint theory, in which we recognize the importance and relevance of lived experiences (Musingafi et al., 2021; Intemann, 2010). Our expertise in sport and policy analysis is related to gender and gendered analysis of power.

However, gender does not exist alone, and all athletes experience sport and sporting culture through their individual intersectional identities. Gender may intersect with other areas, such as race, sexuality, ability, and gender identity, impacting athletes' lived experiences of maltreatment. While we speak to gender most specifically, the policy implications and limitations discussed here can be applicable to all equity-deserving athletes and their unique intersectionality. Fundamentally, while gender is the vehicle in which we are broaching the discussion of oppression and violence within safe sport, it is not the only issue to be found.

In this paper, we focus on two interrelated questions: how do safe sport policies highlight gendering practices in university athletics, and how is safety framed in safe sport policies? In addressing these questions, we apply genderwashing as a conceptual framework to critically evaluate the rhetoric in U SPORTS and one Canadian university's safe sport policies. We chose these policies because U SPORTS is the governing organization that oversees university sport in its 56 member institutions in Canada. More than 14,000 students are involved in university sport across the country, and universities are the largest employers of coaching professionals in Canada (Owen, 2024). Therefore, we wanted to explore safe sport from both the university level and the governing body for university sport.

Building upon the work of Fox-Kirk et al. (2020), we use the concept of genderwashing as a framework to interrogate the discourse of safe sport and employ their definition:

> Genderwashing is the process whereby organizational rhetoric about equality differs from the lived experiences of marginalized workers creating the myth of gender equality while individuals in the organization continue to experience persistent gender discrimination due to organizational structure and cultural practices such as policies, procedures and norms. (p. 597)

Alongside genderwashing, we adopt Carol Bacchi's (2012a) *What's the Problem Represented to Be?* critical policy analysis as our methodological approach. These conceptual and methodological approaches work well together as they enable us to analyze the structural effects of policy introduction and highlight potential pitfalls regarding implementation. Specifically, we aim to show how current safe sport policies within U SPORTS and the university reflect genderwashing practices.

We begin with an overview of the sports landscape, followed by a critical policy analysis examining how the term "safe sport" has been introduced in Canada. Following this, we share our understanding of Carol Bacchi's work in her "What is the problem represented to be" (WPR) analysis.

Discursive Context of Safe Sport

Understanding the discourse of safe sport within the context of public movements sheds light on how genderwashing practices occur in organizations. The #MeToo social movement emerged during the late 2010s and highlighted the breadth and impact of sexual violence and harassment (Bachynski, 2020). The reason we begin with the #MeToo movement here is that the call for radical change in sports' organizational practices has played a significant role in highlighting issues of violence against women athletes, which in turn has influenced the discourse of safe sport. The trial of Larry Nassar, a doctor accused of abusing hundreds of young gymnasts for decades, became one of the largest sex abuse scandals in American sports history (Bachynski, 2020; Fisher & Anders, 2020). The media scandal and subsequent trial prompted conversations on the issue of sexual abuse across national sport organizations, demonstrating the scope of the ongoing social movement.

The impact of the #MeToo movement and the Larry Nassar trial brought further attention to the abuse and maltreatment happening in Canadian university sport. As an example, in December 2019, Dave

Scott-Thomas, a long-time star running coach at the University of Guelph, was fired for unprofessional conduct (Duhatschek, 2021). An investigation by the Globe and Mail in 2020 found that Scott-Thomas allegedly groomed an athlete for a sexual relationship beginning when she was a teenager. When questioned, the university said it received a complaint in 2006 from a family member of a student-athlete, which led to Scott-Thomas' suspension for a couple of weeks (Doyle, 2020). However, during the more current investigation, the university received additional information that "made it clear that Scott-Thomas had lied repeatedly in 2006 about several significant matters" (Ewing, 2020, para. 8). It is worth noting that Scott-Thomas has received the U SPORTS Coach of the Year award 35 times during his time at the University of Guelph.

High-profile cases such as this one and the negative media coverage stemming from the coach's alleged conduct led the U SPORTS organization to make changes to its safe sport policies and procedures. In February 2020, U SPORTS changed its policies, such as modifying the Code of Ethics and adopting a Policy Against Maltreatment in Sport. Furthermore, they updated their Harassment and Discrimination Policy to better align with Canada's emerging Abuse-Free Sport program. However, while these policies were developed at the national level, there remains limited understanding about the adoption, implementation, education, and awareness of these policies at the local level.

While current policies may support, define, and seek to implement safe sport practices, it is important to recognize how university sport also intersects with institutional policies and practices around safety across campuses. The discourse of campus safety is a hot topic in Canadian universities in the summer of 2024, not least because of how university administrators are using the discourse of safety to counteract the legitimacy of student activism on campus. Regarding sexual violence on campus, Jeffrey et al. (2023) reported that "23.2% of women reported experiencing sexual violence at least once in the past 12 months on a university/college campus" (p. 104). These findings are in line with previous data of students' vulnerability to experiencing sexual violence while attending universities in North America (see Muehlenhard et al., 2017 for a meta-analysis).

Involvement in sport and sporting culture has been linked to sexually aggressive behaviors and attitudes (McCray, 2015), and athletes are more likely to perpetrate sexual violence than non-athletes (Young et al., 2017; McCray et al., 2023). As high rates of victimization at universities and high rates of student-athlete perpetration suggest, the interuniversity sport landscape is intertwined with the broader campus culture, which normalizes and condones violence. For example, Fogel (2017) mentioned that in reading media reports of more than 100 cases of sexual violence on Canadian university campuses over a ten-year span, 23% involved university athletes as alleged perpetrators. As competitive athletes account for only 1-3% of the university student population in Canada, these findings suggest they are overrepresented in reported cases of sexual violence. However, these findings may similarly suggest that athlete perpetration is more likely to be covered by media reporting, due to athletes being "more newsworthy" than non-athlete perpetrators (Fogel, 2017). Regardless, the connection between sporting culture and sexual violence is well-established and requires continued study.

Sport as Gendering Practice

Sport is a heavily gendered experience, as witnessed across participation in binary categories (Birrell, 2000; Messner, 2011), the exclusion of women's experiences in sport (Kidd, 2013), and the centering of patriarchal values within larger sport culture (Ramaeker & Petrie, 2019). The division of men and women into binary categories in sport has a long history, with connections traced back to the ancient Olympic games (Birrell, 2000; Kidd, 2013). Modern-day sport and sporting culture are often seen as being "universal" (Harmon, 2020, p. 255) and viewed as an opportunity for individuals to develop social skills and build community connections (Harmon, 2020; Kidd, 2013; Valtonen & Ojajärvi, 2004). Therefore, inclusion and participation in sport are considered valuable and meaningful experiences. However, access to and participation in sport remain uneven across gender lines and are skewed to favor male participation (Harmon, 2020; Metcalfe & Lindsey, 2020; Scraton, 2018).

Female athletes report experiencing psychological, emotional, physical, and sexual abuse at higher rates than male athletes (Gurgis et al., 2022; MacPherson et al., 2022; Willson et al., 2022; Willson & Kerr, 2023). Despite this, research into women athletes' experiences does not always take a gendered perspective in its consideration of athlete experience. For example, while Willson & Kerr (2022) identify gender as a factor in increased discrimination and eating disorder behaviors, they do not discuss how

gender is relevant to specific forms of abuse, such as body shaming, and how this connects to gendered (or gendering) practices. Additionally, the specific gendered experiences of female athletes participating in university athletics remain understudied (Harmon, 2020; Willson et al., 2022). Our study seeks to explore some of these gendered effects in sport through a critical policy analysis, as we illustrate below.

Adopting a WPR Approach to Critically Analyse Safe Sport Policies

Carol Bacchi's (2009) WPR methodological approach to policy analysis rests on two main assertions. The first assertion is that, rather than evaluating policies for their ability to solve specific problems, researchers should instead consider the ways in which policies construct problems. Instead of viewing policies as a response to a particular issue, Bacchi contended that the way a particular policy is constructed offers insight into how both problems and solutions are created. The second assertion she makes is that problematizations, rather than problems, are central to this methodological approach. Studying problematizations, Bacchi (2012b) contends, highlights how politics shape our lives.

A WPR approach is attentive to how policies affect people's lives, such as the power inequalities that policies may produce between genders. Bacchi and Eveline (2010) contended that we need to pay attention to how "gender differentiation is continually 'done' through the implication of bodies in institutional and organizational processes, constituting power effects of asymmetries and inequalities" (p. 95). They agreed with Benschop and Verloo's (2011) contention that negative attitudes related to gender, both implicit and explicit, offer insight into the "gendering of organizations" (p. 289). By tracing the discursive nature of policies and their subsequent practices, it is possible to understand their gendered effects.

Analyzing policies discursively Bacchi (2017) maintains, enables us to better comprehend the ways in which discursive practices gender women and men in a hierarchy. She sees "gendering as 'a practice of subordination,' constituting 'women' and 'men' in a relation of inequality" (Bacchi, 2017, p. 21). Furthermore, Bacchi was concerned with how policies work to govern people in diverse ways, depending on their social identities. Indeed, she argues that, as governing texts, policies constitute our subjectivities in diverse ways. In sum, policies are akin to legislative tools that act as governing practices that affect people differently depending on their social location. A discursive approach illustrates how gender relations are shaped by regulations and policies.

Because policies shape our lives in particular ways, Bacchi argued that there is a need to consider the effects of power. Following Foucault (1987), Bacchi viewed power as something that is produced rather than as something that is possessed. Rather than thinking in terms of outcomes or impacts, Bacchi considered how policies shape people and what effects policies produce. This means moving away from fixed categories to considering how policies may have gendering, racing, or classing effects.

The WPR approach concentrates on the following guiding questions that help researchers deepen their analysis of the ways in which policy problems are created (Bacchi, 2009).

Table 1

WPR Guiding Questions

Question 1	What's the 'problem' represented to be in a specific policy?
Question 2	What presuppositions or assumptions underlie this representation of the 'problem'?
Question 3	How has this representation of the 'problem' come about?
Question 4	What is left unproblematic in this problem representation? Where are the silences? Can the 'problem' be thought about differently?
Question 5	What effects are produced by this representation of the 'problem'?
Question 6	How/where has this representation of the 'problem' been produced, disseminated, and defended? How could it be questioned, disrupted, and replaced?

Bacchi later added step seven, as follows: "Apply this list of questions to your own problem representations" (Bacchi & Goodwin, 2016, p. 20). The reason for this additional step was to encourage researchers to engage in self-problematization. This is a version of reflexivity that encourages us to think through our own assumptions. She maintained that there is a need to see to what extent researchers may be operating with assumed, unquestioned knowledge or within specific governmental rationalities (Bacchi, 2012a). It

also encouraged rigor in WPR by applying questions one to six for any "replaced" problem's proposed policy.

We addressed Step 7 by engaging in ongoing conversations about how our own experiences, thinking, and research interests influence our understanding of the discourse of safe sport. Our research positionalities influenced our approach; Hayley Baker's research focus is on gender and sport, whereas Rita Gardiner focuses on issues related to leadership and policy issues in higher education. Kasey Egan is currently engaged in a study that explores the concept of safety in university discourses. All three authors have previously conducted research examining sexual violence policies at universities and their enactment in practice, which has informed our work here. Furthermore, the WPR approach is not meant to be prescriptive, meaning that a researcher only takes up questions deemed relevant to their specific context (Reimann, 2023). Based on the goals of our research, we have chosen to focus on questions one, two, three, and four. These questions were most relevant to our discursive analysis of the university and U SPORTS's safe sport policies.

Bacchi (2009) described Question One as a "clarification exercise" (p. 2). Therefore, we chose to focus on Question One as a strong foundational phase of our analysis, as it helped us understand how safe sport is understood as a problem within university athletics. Further, we explored how each policy proposes to address the problem as it is represented. Subsequently, Question Two allowed us to examine how the problem of safe sport is constructed within each of the policy documents. Question Three enabled us to undertake a genealogical analysis of how the representation of the problem of safe sport emerged. Question Four was selected because it begins to bring out "the critical potential of a WPR approach…" (Bacchi, 2009, p. 12). Specifically, by focusing our analysis on what has been left silenced within the policy documents, we were able to identify other factors that fail to be examined or recognized due to the representation of the problem in the policy.

Methodological Approach

Our critical policy analysis approach had two phases. During phase one, we first completed an environmental scan to determine which policies would be included in the analysis. By searching Canada's U15 athletic websites, we were able to gain insight into how these university websites were displaying information about safe sport knowledge and practices. Next, we individually reviewed each policy document in its entirety and then met to discuss our findings. Our initial findings indicated that the policies at U SPORTS needed to be included in the analysis, due to their relevance to the issue of safe sport and authority over university athletics. Moving to phase two, we then conducted a more in-depth analysis of one university's safe sport policy, which we regarded as an exemplar due to its comprehensiveness and accessibility. Analyzing how the university created and implemented the safe sport policy allowed us, by extension, to consider how U SPORTS governed safe sport practices at universities, given that U SPORTS is the overarching body. In the following section, we examine the safe sport policies as they relate to the guiding questions from Bacchi.

Question One: What's the 'Problem' Represented to be in the Policy?

We used this question to identify the problem representations within each policy and to understand how safe sport is defined. We also applied this question to understand how the safe sport policies proposed to change and address maltreatment in university athletics. It was revealed that the "problem" represented in the policy is that some athletes may not be safe in sport due to the risk of bullying, harassment, and maltreatment within athletics, athletic departments, or team environments.

Question Two: What Deep-seated Presuppositions or Assumptions (Conceptual Logics) Underlie this Representation of the "Problem" Known as Safe Sport?

We used question two to explore the assumptions that exist in the problem representations. Specifically, we examined the background knowledge that may be taken for granted within the problem representations identified in Question One. Safe sport, in its current form, assumes that safety as a concept is not influenced or impacted by an athlete's race, gender, sexuality, class, or level of ability. This assumption suggests that there are no grey areas within or between sports. Across the diverse fields of athletics, it also assumes that safe sport is achievable. However, different sports and those who play on teams may

have varied ideas about what constitutes safety in their specific context and how this is best achieved. The discourse of safe sport sets up a binary between safe/unsafe, further suggesting that each athlete experiences safety similarly, which serves to ignore the gender hierarchy, as well as other intersectional factors, such as race, Indigeneity, sexuality, disability, or class. In short, the discourse of safe sport relies on an assumption of each athlete's equal status, paying scant attention to equity issues.

Question Three: How has this Representation of the 'Problem' Come About?

The third question has been applied in our analysis to help us understand the historical development of the problem. The question is used to not only understand the origins of the problem representations but also the current practices but also offers insight into how the problem of safe sport is understood and its evolution over time (Bacchi, 2009).

Table 2 illustrates the representation of safe sport that emerged through a genealogical investigation into the history of safe sport in Canada and highlights its various stages of implementation. It is noteworthy that the discourse of safe sport originated in the United States, where it was first used to investigate the problem of hazing in sport (Johnson et al., 2020). This discourse has undergone major changes in focus as it has been applied to the university context, as demonstrated in later sections of this analysis.

Table 2
History of Safe Sport in Canada

Date	Description
April 2018	The Provincial/Territorial Working Group on Safety, Integrity, and Ethics in Sport was formed. This working group is tasked with tracking and addressing ongoing and emerging issues to protect the integrity of sport and the safety of all participants on and off the field (Stevens, 2022).
June 2018	Former Minister of Sport Kirsty Duncan announces stronger government measures to support the elimination of harassment, abuse, and discrimination in the Canadian Sport System (Canadian Heritage, 2018).
September 2018	AthletesCAN, the association of Canada's national team athletes, hosts a Safe Sport Partners Workshop to investigate strategies that address abuse, harassment, and discrimination in sport (Stevens, 2022).
2019	A 2019 study on Canadian National Team athletes revealed that 75% of athletes experience at least one harmful behavior in their careers, with psychological harm and neglect being the most common, followed by sexual and physical harm (Willson et al., 2022).
February 2019	AthletesCAN Safe Sport Working Group is formed. The goal of the working group is to provide critical feedback on Canada's safe sport environment. (Stevens, 2025).
May 2019	The Government of Canada announces funding to National Sport Organizations (NSOs), National Multisport Service Organizations (MSOs), and Canadian Sport Centers and Institutes to provide mandatory training on harassment, abuse, discrimination, and maltreatment. (Canadian Heritage, 2019).

Date	Description
June 2019	The Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS) is developed and recognized as "the core document that sets harmonized rules to be adopted by sport organizations that receive funding from the Government of Canada to advance a respectful sport culture that delivers quality, inclusive, accessible, welcoming, and safe sport experiences" (version 6.0). The Code of Conduct was drafted by the Canadian Centre for Ethics in Sport, by request of Sport Canada (Sport Dispute Resolution Centre of Canada, 2022).
December 2019	The Universal Code of Conduct to Prevent and Address Maltreatment in Sport was published (Stevens, 2022).
2021	The National Sport Organizations (NSOs) are mandated through Sport Canada to implement the following as a condition of funding: mandatory training and education, adherence to the Universal Code of Conduct for Maltreatment in Sport, and mandatory independent third-party complaint intake and management. However, at the university level, there are no requirements outside of institutional implementation.
May 2022	The Universal Code of Conduct to Prevent and Address Maltreatment in Sports (UCCMS) was updated and published on May 31, 2022, by the Sport Dispute Resolution Centre of Canada (SDRCC) and became effective November 30, 2022 (Stevens, 2022).
November 2022	The UCCMS was adopted by U SPORTS with defined boundaries. It includes U SPORTS staff, Board, and participants of National Championships and FISU events. Complaints that fall outside UCCMS will be investigated by Sport Law (U SPORTS 3rd party Investigations group).
May 2023	Federal Minister of Sport St-Onge announces new measures to improve accountability and foster a safe and sustainable culture change in sport (Canadian Heritage, 2023).
May 2023	U SPORTS makes a public statement applauding new measures for accountability and safe culture in sport (The Sport Information Resource Centre, 2023).
2024	U SPORTS and Universities have safe sport policies to guide responses to violence, harassment, maltreatment, and abuse.

Table 2 provides insight into how the problem of safe sport developed across various organizations, illuminating its evolution from the national sport level to the university setting. What we noted is that during a short period time span, the discourse of safe sport has undergone significant changes, such as in handling complaints from athletes. These changes may be because of public pressure, media allegations, and criminal prosecutions of sports personnel. It is important to note that these changes are often a reactionary measure, as witnessed in the aforementioned University of Guelph coaching scandal. A close reading of the timeline suggests that many of these changes occurred after the #MeToo movement galvanized the public to think about gender violence in diverse organizations.

We also observe that there are multiple policy actors involved from sports and governmental agencies and their partners. Importantly, the evidence suggests that student-athletes were already working on the issue of developing strategies to address abuse, harassment, and discrimination as early as 2018, indicating the problem of *unsafe* sport for athletes predates the conversation on *safe* sport. Further, Table

2 highlights how much of the previous safe sport action by USPORT has been a reaction to government measures and mandates.

Question 4: What is Left Unproblematic in this Problem Representation of Safe Sport? Where are the Silences? Can the "Problem" of Safe Sport be Conceptualized Differently?

Question four was applied to help identify what was not being problematized. First, our policy analysis uncovered that there was little acknowledgment of gender hierarchy in sports' organizations. Further, there was silence about how people are subordinated in diverse ways due to their social location. While we focus on gender, discussions of race, class, sexuality, and ability are also absent from the policy. As previously discussed, the university policy we examined included no acknowledgment of different sporting cultures that may be operating within the same university. Similarly, the U SPORTS policy treats all sports as monolithic. Yet different sports have different ideas of how much, if any, violence is appropriate on or off the field. This lack of awareness about diverse cultural approaches within sport is surprising, given that the U SPORTS policy was written by an institution and policy actors who are actively involved in sporting culture. What remains unproblematized here is the narrative that all of sport culture is "universal" (Harmon, 2020), and by extension, that safe sport can offer a universal solution.

The policies also promoted the notion of shared responsibility when it came to safe sport. When considering how the problem of safe sport could be conceptualized differently, we were left wondering: if everyone is responsible, who is responsible? The lack of accountability that the shared responsibility discourse provides may cause ambiguity around who will address the issue and in what way. This lack of clarity results in a reactive approach to the handling of complaints.

Discussion

This paper has contributed to the goal of the special issue to critically examine higher education policies through a detailed exploration of safe sport policies, one from USPORT and a large Canadian university. Within this section, we offer examples of how each of the policies signifies genderwashing practices. Specifically, we will detail the assumptions made in the policies, the use of gender-neutral language, and the erasure of experience as it relates to safe sport.

Assumptions within the Policies

One of the basic assumptions of sport is that athletes are not equal, as the very act of competing is meant to determine who is the "best," the winner and the loser. Division and hierarchy are inherent in the culture of sport. Yet, the way that safe sport is conceptualized in the policies suggests that athletes are equal, which ignores the gendered nature of sport.

Another observable assumption within the policies is that safe sport can be implemented successfully, irrespective of context. Additionally, policies often rely on the myth that all individuals will experience safe sport in the same way, and that safety is both universally achievable and reinforced through policy. While this assumption goes beyond a gendered assumption, the erasure of gender is particularly problematic, as this segregation is foundational to how sport is organized, as witnessed in the gender segregation of athletes, teams, and programs. The result is a failure of safe sport policies to account adequately for how an athlete's gender may influence the likelihood of experiencing abuse, maltreatment, or harm at university. It also ignores the forms of abuse may take and how these methods of abuse are inherently gendered. As previously discussed, sexual violence is more likely to be experienced by women athletes (Gurgis et al., 2022; MacPherson et al., 2022; Willson et al., 2022 Willson & Kerr, 2023), as is body shaming (Willson & Kerr, 2022). If gender were *not* relevant to sporting practices, the sport would not persist in binary segregation of gender.

Additionally, within the U SPORTS policy specifically, it was highlighted that the organization expects all participants, including member institutions, regional associations, coaches, officials, athletes, athletic directors, institutional representatives, volunteers, and others connected to athletic programs, to uphold the core values of honesty, integrity, fair play, sincerity, and honorability. Thus, the problem represented is also that some participants are not upholding the organization's core values. Accordingly, U

SPORTS policies have outlined the standards and expectations for all involved in university athletics and the procedures for addressing allegations of breaches of the standards. As a result, there is an assumption that universities will follow these procedures. However, there is no oversight as to how each individual university applies and implements these procedures, processes complaints, or supports equity-deserving athletes.

Gender-Neutral Language

What became evident throughout each of the policies is that gender-neutral language was used consistently. The use of gender-neutral language reflects the policies inherent framework of genderwashing, which erases or ignores the gender of the individuals (i.e., victim/survivor and perpetrator/abuser). For instance, the U SPORTS policy uses terms such as "student-athlete" (U SPORTS, 2019), or "complainant" (U SPORTS, 2019). Similarly, the university's policy uses the term "student-athlete" or the university's mascot (i.e., Wildcats) to refer to the entirety of the student-athlete population. These identifiers flattened student athletes into a monolithic identity.

Further, our analysis indicates a homogenization across institutions, which can perpetuate structures of inequity (Viczko et al., 2019). In particular, the gender neutrality apparent in the policies we examined serves not only to downplay its importance for any one sport but also leads to the erasure of gender in how the problem is conceptualized. This gender-neutral policy approach is problematic because it serves to ignore "the category of gender and gendered power relations" (Aavik et al., 2022, p. 174).

Importantly, we want to acknowledge that the use of gender-neutral language may sometimes work to undo harmful gendered assumptions about victimization. This assumption is an important consideration in policy creation as well as practice to reduce undue harm to victims who fall outside of traditional narratives of feminine victimhood, including gender-nonconforming athletes and male athletes. Outdated beliefs that center CIS heterosexual victimization are problematic and limited and fall into patriarchal narratives of victimhood that is, "the ideal victim."[1] However, the erasure of women and their higher likelihood to experience victimization, particularly in a male-dominated field such as university sport, is better characterized as a form of genderwashing rather than gender progress. The use of gender-neutral language in these policies results in the erasure of all athletes' gendered experiences in sport. Sport is gendered, and athletes' experiences within sport are deeply interconnected to gender and gendering practices.

Silencing and Erasure of Experience

Gender, along with other aspects of identity, are acknowledged as protected classes within the policy (U SPORTS, 2019). However, nowhere in the policy is there an overt acknowledgment of *why* certain identities require specific protection. Failure to acknowledge why a gendered individual requires protection from gendered violence results in the erasure of the causes of this violence.

Without directly naming the reason(s) specific groups and aspects of identity (namely gender) have been centered as being othered ("protected"), the policy enacts genderwashing. The erasure of gender dynamics remaining unnamed and unaddressed in the policy reinforces unequal power relations between and across genders (Fox-Kirk et al., 2020). How can one be protected from violence, maltreatment, and harassment if the *reason* one needs protection remains unnamed? Without consideration of misogyny in safe sport policies, they remain genderwashed and demonstrate a failure to enact what they promise, becoming non-performative (Ahmed, 2014, 2021).

Compounding this issue within the policies is that there is no clear acknowledgment of organizational responsibility, which becomes an act of institutional silencing (Ahmed, 2021). For example, the U SPORTS policy states that a host institution's policy will come into effect if there is a breach. However, it does not mention or specify how the implementation is to be monitored. Nor is there any information from U SPORTS regarding the reporting and tracking processes of complaints across university sport. The result may be policy failures going unaddressed, as there is no clear set of procedural guidelines out-

[1] "The Ideal Victim" (IDV) narratives refers to the pervasive cultural myth that "valid" sexual assault happens to a well-behaved, white, middle-class, able-bodied woman who is blitz attacked by a stranger at night. The use of IDV in judicial practices in Canada is well recorded and assumes disbelief of all victims who do not fit the basic expectations of the myth (see Balfour, Du Mont & White 2018).

lined nor any consequences for universities' failures to enact safe sport policies despite the U SPORTS mandate.

Further, the assumption of gender neutrality (or color neutrality, etc.) that emerges through these safe sport policies supposes that all athletes are equal. Yet the lived experiences of those who engage in university sport suggest that this assumption is erroneous. Hence, one of the key findings that emerges from our critical policy analysis is that institutional gender inequities, both on and off the field, influence athletes' experiences within sport in different ways.

Overall, the current safe sport policies designed to protect those involved in Canadian university athletics are examples of genderwashing. Our policy analysis thus reveals assumptions that the processes and terms outlined in each policy showcase, alongside gender-neutral language, and the erasure of diverse safe sport experiences.

Recommendations

Increased Research

There has been limited research on how sport administrators are addressing different forms of sexism, racism, homophobia, and ableism through safe sport policies and initiatives (Gurgis et al., 2022). To avoid these limitations, having more input from student-athletes from different sports could be of value. Taking an intersectional approach to policymaking could help guarantee that diverse experiences are acknowledged. Research should further explore how specific groups of athletes are experiencing sport and sporting culture to address the monolithic framing of sports and safe sport. A better understanding of what differing athletes may need to *be* safe in sport is essential. One avenue of consideration could be a participatory action-based research project, undertaken in collaboration with a specific team or department of athletes to better inform and shape safe sport policy. Special attention should be placed on marginalized athletes and their experiences within university sport.

Institutional Responsibility

While much has been written about athletes' challenges and experiences, this study seeks to expand exploration toward institutional responsibility for ensuring safe sport experiences for women athletes at Canadian universities. If universities are to be leaders in abuse-free sport, they must first develop a better understanding of the landscape of policy needed to support a fair, inclusive, and accessible culture. Second, there needs to be an acknowledgment that a safe sports environment is not something that is easily achieved in practice, given the everyday violence that is normalized in many sports. Institutions need to address the culture of violence found within sport and sporting culture. As previously mentioned, male student-athletes are overrepresented in the perpetration of sexual violence. Institutions must begin to address sexual and gender-based violence in sport as a social and cultural problem that the university participants are a part of and enable.

Our analysis also shows that there were many actors involved in the creation of safe sport policies. These actors included not only member organizations like Canadian universities but also federal organizations, such as Abuse-Free Sport. Through our analysis, we noted possible conflicts of interest that may arise. For example, the Board of Directors of U SPORT comprises individuals who work at universities, including those in charge of athletic programs and, in some cases, university presidents. These individuals may also have responsibility for ensuring the creation and implementation of safe sport policies within their organization. When an incident occurs and receives media attention, the institution may choose reputation management control instead of focusing on the victim/survivor's needs. This dynamic places the individual tasked with dealing with the complaint in a potential conflict.

Enhanced Clarity

To advance safe sport policies, there needs to be clearer definitions of the different types of abuse in sport, as well as specific consequences for these behaviors (Gurgis & Kerr, 2021). Scholars have advocated for the implementation and evaluation of culturally relevant safe sport policies and adequate procedures, as well as education and discipline strategies based on the gaps in current policies (McRae et al., 2024). As

it currently stands, however, by not acknowledging how gender informs university athletes' experiences, the ways in which gender is directly related to harassment and discrimination remain ignored. The result is a form of institutional genderwashing within the policies that have real effects on the lives of athletes.

Limitations

The limitations of this article are that, although we conducted an initial environmental scan of U15 websites, we only studied in detail the policies from one university site. Future research may want to build on this analysis by considering other higher education institutions (HEIs) in Canada, either universities or colleges, and conduct a comparative analysis between policies. Such work could hopefully contribute to creating a more nuanced understanding of how USPORT governs safe sport policies and practices across a multitude of different university sites.

In writing this paper, we have also had to confront the limitations of our thinking. Through Bacchi's encouragement to think through how a researcher's assumptions influence their problematizations, we have had substantial discussions and several disagreements about what constitutes safety in sport. Through reflection upon our assumptions, we have become more cognizant of how policies govern our lives in diverse ways. However, we recognize that a further limitation of this study is that in highlighting gender, other intersectional factors have not received as much attention. Our positionality as cis-gendered white women is another limitation in trying to understand how safe sport impacts the athletic community as a whole.

Areas for Future Research

While our critical policy analysis is focused on gender, the erasure of inequities within the university institution extends beyond. Race, sexuality, ability, and Indigeneity have been erased by institutional practices within universities, resulting in significant undue harm to marginalized members of the university community beyond sport (Ahmed, 2021). Future research on this topic could consider a specific and nuanced examination of how differing equity-deserving athletes have been "washed" from the policy. For example, recent work undertaken by McRae and colleagues (2024) considered the issue of safe sport through the lens of race and Indigeneity. Their findings suggest that, to be representative, safe sport policies must take the experiences of athletes from marginalized groups into account.

This work initiates a discussion on how safe sport policies do not adequately serve women athletes and how they may be improved to consider gender in a meaningful way. Further discussion of how sport is racing, classing, and beyond is necessary but outside the scope of this paper. We urge future researchers to begin to unpack how safe sport fails other groups of marginalized and intersectional athletes to implement meaningful change that moves away from what McRae and colleagues (2024) described as a "catch-all" policy to consider the specific needs of athletes in equity-deserving groups. A comparative analysis of Canadian universities' safe sport policies may also provide insight into how the issue of intersectionality in athlete positionality has been addressed in policy development.

Conclusion

Safe sport, in its current form, is limited by its inherent assumptions that safety is universally felt, understood, and achievable. However, these assumptions contradict the current literature and media attention on athletes' experiences within Canadian university sport. Upon review, equity-deserving athletes are more likely to experience abuse, maltreatment, and harassment in varsity athletics. Due to the expertise found within our research team, gender was the most appropriate inroad for this initial exploration.

Our critical policy analysis sought to examine how organizational norms and structures in Canadian university sport perpetuate a culture that does not adequately address maltreatment, harassment, and abuse that affects women athletes. Using Bacchi's WPR approach, we have demonstrated that current safe sport policies within U SPORTS and the university we explored reflect genderwashing practices. These practices were evident in the policy's use of gender-neutral language, the assumptions made, and the erasure and silencing of experience. Based on our analysis, we have recommended increased research, institutional responsibility, and enhanced clarity to advance current safe sport policies.

Given the emerging discussion of safe sport and its ambiguity, further considerations of *what* safe sport is and what it looks like to different athletes are still required. We suggest that addressing this issue

will require a commitment to creating a safe sport culture that recognizes varied individualized experiences and understandings of safety within Canadian university sport. In sum, without a commitment to unpacking and decentralizing current structures of power, what is safe about safe sport policies?

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