

Sports Law in India: A Dire Need of the Hour

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ABSTRACT:

Sports and Games are very much part and parcel of one's life as a source of personal entertainment. Human beings are involved in sports activities since the ages. The need of the hour is to set strong and lucid policies to combat all the legal issues related to sports. In the past few years the Sports world has shattered by scandals and controversies which demand the formation of strong sports laws to overcome such shocking issues, to protect the players and to maintain the dignity of sports & games. In India laws related to sports are still not very clear and transparent. Sports law is employed in the field of Sports, physical education and its related field.

KEY WORDS: Sports Governance in India, Sports Law Federations, Harassment, Jurisdictions, Five Year Plans, National Sports Policy, Draft National Sports Development Bill, 2013.

INTRODUCTION

Sports are an integral part of our lives and are constantly looked at for encouraging the values of competition, integrity and team work. In the modern day and age with the increase in the various forms of sports played and the application of various scientific and technological principles has brought more complications than we could have ever imagined.¹

From the earliest days of human civilization till date, it is not remaining a mere source of entertainment and personal recreation, but has grown into a highly competitive industry with global pervasiveness. It is one of the largest revenue generating industries in the World comprising 3% of the World Trade.²

In the UK, sports provide employment to more than 420,000 people. An industry of billions of dollars with a pervasive global presence is bound to breed its own disputes and this resulted in the growth and development of sports law as a separate discipline in its own right.³

Since sporting activities have traditionally been recreational in nature, one constant theme in the evolution of sports over the past century is that it has become a means to demonstrate a nation's supremacy. Be it the US during the cold war era or China in contemporary times – countries have used sporting excellence as a signal of their overall might and world dominance. Even the United Nations, in its resolution 58/5 adopted by its General Assembly in 2003, has recognized sport as a means to promote education, health, development and peace. Closer home, we are a

country of one billion aspiring people trying to prove our supremacy to the world, and sport is increasingly being seen as a medium to express it. Given such widespread public involvement and association of national pride with sports, the State cannot remain oblivious to it. As an entity dedicated to public welfare, the State has a definite interest in the promotion and governance of sports.⁴

Sports is an area that was usually considered to be for entertainment, but now a days it's becoming a source of career building of the players to earn big money. There are number of companies and sports centres which are involved in this business day and night and has created number of jobs at a large scale. So, we can see in this back ground that not only players but also big multinationals who are being involved in the competition of making huge money. But till today in India we don't have any sports legislation to take care of number of problems.

Sports law means the law governing all the sports, at professional and at an amateur level. Despite of so many scams that took place in the field of various sports during the last few years, we still cannot find a stringent and serious enactment of sports law in our country. The fast and growing development in sports field needs a protection from the problems of anti-doping, sexual harassment and age fraud. In India sports is synonymous of controversy.

We can quote a number of examples like; sexual abuse in National Game Hockey for the sake of Money, Indian Premiere League (IPL) scam and Lalit Modi issue, Cricket Match Fixing, payment by bookie, sexual assault in different games, Corruption in Olympic federations and the famous Ruchika molestation case by DGP Rathore, doping test failure cases and many

more..... all are really shocking and shameful for the whole sports world. All these incidents exposed the maladministration and insularity of a defective sports system and hence exposed the grey area of a highly competitive world.

Sports Law is an umbrella term used to describe the legal issues applicable to amateur and professional sports. This concept of Law has drawn its elements from labour law, media law, contract law, competition law and tort law. Further, there are some of the decided cases under the Tort law (which again is uncodified law) and also under Indian Contract Act to govern the Players contract. In India, the provincial sports bodies work under non-profit making organizations under the Company Law Jurisdiction. Rules and regulations like statutory orders act only as secondary legislations supplementing laws. The Competition Law (2002) promotes Competition advocacy, forbids abuse of dominance and anti-competitive agreements.

In India sport has still to figures in the Concurrent list or Union List - I of the Seventh Schedule of the Constitution. In Indian Constitution, Entry 33 in the State List under Schedule VII deals with "Sports, Entertainments and Amusements". This Entry has provided a provision for the State as well as the Centre to make and enact laws on regulation, registration and recognition of associations involved in sports⁵. We can see that at the time of the formulation of our Constitution, "sports" were looked as a form of recreation on par with "entertainment and amusements".

There are already four States which have enacted laws on regulating sports activity including registration, regulation and recognition of Sports Associations. These are Kerala,

Rajasthan, Himachal Pradesh and Uttar Pradesh. Uttar Pradesh has since repealed the Act.

HISTORICAL BACKGROUND OF SPORTS⁶

Artifacts and structures suggest sport in China as early as 2000 BC. Gymnastics appears to have been popular in China's ancient past. Monuments to the Pharaohs indicate that a number of sports, including swimming and fishing, were well-developed and regulated several thousands of years ago in ancient Egypt. Other Egyptian sports included javelin throwing, high jump, and wrestling.

Ancient Persian sports such as the traditional Iranian martial art of Zourkhaneh had a close connection to warfare skills. Among other sports that originate in ancient Persia are polo and jousting. Motorized sports have appeared since the advent of the modern age. Electronic sports are a recent development.

A wide range of sports were already established by the time of Ancient Greece and the military culture and the development of sports in Greece influenced one another considerably. Sports became such a prominent part of their culture that the Greeks created the Olympic Games, which in ancient times were held every four years in a small village in the Peloponnesus called Olympia.

Sports have been increasingly organized and regulated from the time of the ancient Olympics up to the present century. Industrialization has brought increased leisure time, letting people attend and follow spectator sports and participate in athletic activities. These trends continued with the advent of mass media and global communication. Professionalism became prevalent, further adding to the increase in sport's popularity, as sports fans followed the exploits of professional athletes – all while enjoying the

exercise and competition associated with amateur participation in sports.

DEFINITION OF SPORTS

According to UNICEF in its report on "Sport, Recreation and Play", *'Sport' is all forms of physical activity that contribute to physical fitness, mental well-being and social interaction. These include play; recreation; casual, organized or competitive sport; and indigenous sports or games.*⁷

According to MERRIAM-WEBSTER Dictionary, *"a contest or game in which people do certain physical activities according to a specific set of rules and compete against each other"*.⁸

According to OXFORD Dictionary, *"An activity involving physical exertion and skill in which an individual or team competes against another or others for entertainment."*⁹

According to Dictionary.com, *"an athletic activity requiring skill or physical prowess and often of a competitive nature, as racing, baseball, tennis, golf, bowling, wrestling, boxing, hunting, fishing, etc."*¹⁰

SPORTS LAW IN INDIA – AN OVERVIEW

Sports, games and physical fitness have been a vital component of our civilization. The intrinsic linkage between sports and games and the human quest for excellence was recognized ever since the inception of human civilization, reaching its epitome in the ancient Greek civilization, which was the progenitor of the Olympic movement. As stated in the **Olympic Charter**, Olympism is a "philosophy of life, exalting and combining in a balanced whole the qualities of body, will and mind".

In modern times, there has been increasing recognition of the role of Sports in Development. **The International Charter of Physical**

Education and Sport, UNESCO, 1978¹¹ states that *“Every human being has a fundamental right of access to physical education and sport, which are essential for the full development of his personality. The freedom to develop physical, intellectual and moral powers through physical education and sport must be guaranteed both within the educational system and in other aspects of social life.”*

The United Nations adopted the theme of “Sport for Development and Peace” in its Agenda in 2001, which demonstrated the close linkage between Sports development and Youth development, and Youth development and the achievement of the Millennium Development Goals.

The United Nations General Assembly celebrated 2005 as the “Year of Sport and Physical Education” thereby emphasizing the need to integrate sport and physical education into the overall development agenda. This initiative highlighted sports as:

- (i) being integral to quality education with mandatory physical education as a necessary pre-requisite to foster education, health and personality development;
- (ii) improving the health standards of people;
- (iii) achieving sustainable development through inclusive growth; and
- (iv) Building lasting peace.

The World Development Report 2007 entitled “Development and the Next Generation” published by the World Bank conveys a categorical message to governments and policy makers across the world that “Investing in young people is essential for development, as today’s young people are the next generation of workers, entrepreneurs, parents, active citizens, and leaders.”

The Report emphasizes that “countries need to seize this window of opportunity to invest in the future before the ageing process closes it.”

FIVE YEARS PLANS VIS-A-VIS SPORTS

In India, the integration of physical education and sports with formal education was emphasized in the First Five Year Plan itself. The Lakshmi Bai National Institute of Physical Education (LNPIE) at Gwalior and the National Institute of Sports (NIS) at Patiala were established in the Second Five Year Plan. The National Coaching Scheme and the Rural Sports Programme were started in the Third Five Year Plan and expanded during the Fourth and Fifth Five Year Plans. Talent spotting and nurturing was emphasized in the Sixth Five Year Plan. The Seventh Five Year Plan focused on the creation of sports infrastructure. The development of Rural Sports through a Special Area Games Approach was the thrust of the Eighth Five Year Plan. The Ninth Five Year Plan emphasized the need for modern sports infrastructure. The Tenth Plan sought to promote both the broad-basing of sports and the promotion of excellence in sports. However, these high and ambitious objectives could not be realized in significant measure both because of policy lacunae and because of the inadequacy of budgetary support to sports from the Union Government and State Governments.¹²

EFFORTS OF GOVERNMENT TO RAISE THE STANDARDS OF SPOTS IN INDIA

Serious concern has been expressed in various Parliamentary Committee Reports over the raising of the standards of sports in India. **The Standing Committee on Human Resource Development** in its Thirty Fourth Report (1995) on India’s performance in International Sports made wide ranging

observations and recommendations. **The Parliament Standing Committee on Human Resource Development** studied a wide range of issues concerning Sports in 1998 and emphasized the need for bringing about reforms in sports management and governance in order to make it more dynamic, responsive, responsible and result-oriented.

The Department Related Parliamentary Standing Committee on Demands for Grants (2006-07) of the Ministry of Youth Affairs and Sports, in its 176th Report recommended that the Ministry should provide *“funding for rural sports infrastructure development to patronize the rural sports under its direct supervision”*.

Above all in 2006, national recognition was accorded to **Sports for All in Rural and Urban Areas** (point 13; item 48) in the revised Twenty - Point Programme.

NATIONAL SPORTS POLICY

Physical Education and Sports have been receiving support under successive Five Year Plans, but received attention as a subject of policy only after India hosted the I Xth Asian Games in 1982. The National Sports Policy, 1984 was the first move towards developing a conducive policy framework for the development and promotion of sports in the country. The policy emphasized the need to develop sports infrastructure and make physical education and sports an integral part of the school curriculum. This resolve was reiterated in the National Policy for Education (NPE), 1986. This policy has been reformulated several times laying down the specific measures to be taken by the various agencies, which are involved in promoting sports in the country. Further, the Sports Authority of India (SAI) was created in 1984 to spot and nurture talent and promotes excellence in sports. In 1992, an Action Plan was

devised in the shape of the National Sports Policy, 1992 to move towards realizing the objectives of the 1984 Policy.

The National Sports Policy 2001 was focused on the twin objectives of “Broad-basing of Sports” and “Achieving Excellence in Sports”. On the broad-basing front, the policy emphasized that the primary responsibility for the creation of sports infrastructure at the grassroots level and the promotion of rural sports lies with State Governments. The policy also underlined the role of Panchayat Raj Institutions (PRIs), Local Bodies and Local Clubs in promoting sports culture at the grassroots level. As regards the promotion of excellence in sports, the policy emphasized the role of the Indian Olympics Committee (IOC) and National Sports Federations (NSFs) in strengthening talent identification, athlete development and competition systems. The policy explicitly stated that the Union Government shall only play a supplementary role in regard to promoting excellence in sports, the primary responsibility vesting in IOA and NSFs. The policy also referred to the promotion of sports tourism and innovative resource mobilization efforts for sports, especially from corporate houses, through an appropriate package of fiscal incentives.

The National Sports Policy aims to pursue inclusion of “Sports” in the Concurrent List of the Constitution of India and introduction of appropriate legislation for guiding all matters involving national and inter-state jurisdiction. In specific terms, the objectives of National Sports Policy includes Broad basing of Sports, Integration with education, development of infrastructure, excellence in Sports, Development of National Sports Federations, Scientific back up to Sports Persons, ensure access to high quality of Sports equipments, training and development of

Coaches, Sports Scientists, Judges, Referees and Umpires, Incentives to Sports Persons, Integrated development of the Sports and Tourism sectors and Resource mobilization for Sports.¹³

The Comprehensive National Sports Policy 2007, aimed at building on previous sports policies with a view to accomplishing the unfinished agenda and addressing the emerging challenges of India in the 21st century, most particularly the national goal of emerging as a global, economic power in the near future. The 2007 Policy fully recognized the contribution of physical education and sport to personal development, especially youth development, community development, health and well-being, education, economic development and entertainment; and in the promotion of international peace and brotherhood, which is the spirit of Olympism.¹⁴

SPORTS LAW AND WELFARE ASSOCIATION OF INDIA

The Sports Law and Welfare Association of India is a national non-profit and professional organization which work with the common goal of understanding, advancement, and ethical practice of Sports Law in India for the promotion of Sports, by bringing Legal Practitioners and Sports persons together. The Sports Law and Welfare Association of India has developed links and carries out consultancy work with many organizations and partners. The Association provides consultancy on various matters including Regulation of sports governing bodies, General sport and law issues, Intellectual property issues in sport, Online Advocating in legal disputes of sports in Court on behalf of sports persons and sports bodies, etc. The Sports Law and Welfare Association of India aims at the discussion of legal problems affecting sports and to promote the exchange of

a variety of perspectives and positions of sports law and provide a forum for lawyers representing Athletes, Teams, Leagues, Conferences, Civic Recreational Programs, Educational Institutions and other Organizations involved in Professional, Collegiate, Olympic, Physical Education and Amateur Sports.¹⁵

MAIN ISSUES TO BE DEALT WITH

- Indian sports policy - competition law etc.
- Regulation of sports governing bodies
- General sport and law issues
- Sports injuries - issues of liability
- Health and safety issues in sports
- Employment issues in sports - e.g. discrimination
- Working with children in sport
- Intellectual property issues in sport
- Online Advocating in legal disputes of sports in Court on behalf of sports persons and sports bodies
- Harassment in Sports
- Organizational matter
- Alternate dispute resolution.

MAIN AIMS OF SPORTS LAW AND WELFARE ASSOCIATION OF INDIA

- To provide Educational Opportunities and disseminate data and information regarding specific areas of sports law.
- To provide a forum for lawyers representing Athletes, Teams, Leagues, Conferences, Civic Recreational Programs, Educational Institutions and other Organizations involved in Professional, Collegiate, Olympic, Physical Education and Amateur Sports.

- SLAWIN's role is to foster the discussion of legal problems affecting sports and to promote the exchange of a variety of perspectives and positions of sports law.
- To promote and, where necessary, establish rules of ethics for sports persons and practicing professional of law, its members involved in sports law.
- To produce high quality research in the field of sport and the law.
- To publish widely and disseminate research findings.
- To provide up to date information on current sports law issues including a resource of sports law material.
- To provide consultancy to sportsmen and sports bodies concerning sports law issues.
- To promote undergraduate and postgraduate study, research and continuing education in sports law.
- To promote ethical solutions to legal issues in sports and notions of "Fair-Play".
- To positively address all issues of discrimination in sports.

SPORTS ARBITRATION AND MEDIATION COMMISSION OF INDIA (SAMCI)

The Government of India, Ministry of Youth Affairs & Sports is in ardent need to facilitate Sports Bodies and national Sports promotion organisation to reform and modernize them to meet the challenges of modern day sports in the wake of high competition and commercialization. Even after the XIX Commonwealth Games, 2010, Delhi, the need to regulate sports has also become a necessity of a "Sports Regulatory Framework" prevailing in different countries. The intervention

of the Indian Courts, in Indian Sports regulatory organisation, made it even more necessary to modernize their structures, systems and processes, and become more sportsperson centric and more transparent and accountable in their functions.

Therefore, a robust dispute resolution mechanism, especially a strong grievance redressal mechanism for athletes is being thought to be framed. It is neither feasible nor desirable that Government shall take upon itself the burden of intervention when dispute arise with in National Sports Federations or when complaints are received about ineffective or inappropriate deployment of funds, mistakes in management, prejudice or bias in the selection of national teams / athletes, undemocratic or unethical electoral practices and lack of openness and transparency in functioning.

To resolve such dispute and ensure the development of sports in conformity with the Olympic Charter and in keeping with the aims and objects of Comprehensive Sports Policy, and an independent arbitration and mediation mechanism may be established on the lines of similar initiatives taken in the United Kingdom (The UK Sport Dispute Resolution Panel) and Australia (The National Sports Dispute Centre).

A draft of the "Sports Tribunal of India Act, 2010" has submitted on behalf of the Sports Law India and All India Council of Physical Education, to the Indian Olympic Association on their request. The Indian Olympic Association has incorporated the Sports Arbitration as the, "Arbitration Commission of the Indian Olympic Association" in their General Board Meeting held at Jharkhand. This Arbitration Commission of the Indian Olympic Association has also been accorded by the International Olympic Committee. Now on the promulgation

of the, “Arbitration Commission of the Indian Olympic Association” all the Sports Dispute will be resolved in accordance with the, “Arbitration Commission of Indian Olympic Association” and thereafter as per the, “Court of Arbitration for Sports” of the Rule - 59 of the Olympic Charter in India.¹⁶

NATIONAL SPORTS DEVELOPMENT BILL, 2013¹⁷

Government has been highlighting for some time now the need for bringing about reforms in the management and governance of sports in order to make it more responsive, responsible and result oriented. Salient Features of the National Sports Development Bill, 2013 are as follows:

- a. Duties have been imposed on the National Olympic Committee including performing functions according to the Olympic Charter, responsibility for bidding for international multi-sport events, in-house mechanism to address grievances, conduct National games at regular intervals, constitute Athletes Commission and function as a public authority under the RTI and submission of report to the Parliament.
- b. An Appellate Sports Tribunal is proposed to be established with the selection committee consisting of the Chief Justice of India or his/her nominee judge, Secretary, Department of Sports and President, National Olympic Committee.
- c. An Ethics Commission has been proposed which shall enforce a Code of Ethics which shall be in accordance with the International Olympic Committee’s code and principles, enshrined in the Constitution of India;
- d. A Sports Election Commission has been proposed under the Bill to conduct free and fair elections to the National Olympic Committee, National Sport Federations and the Athletes Commission.
- e. A two-fold system for functioning of National Sport Federations has been introduced i.e. recognition and accreditation of the National Sport Federations.
- f. Recognition of a National Sport Federation is dependent upon recognition from the International Federation and/or the National Olympic Committee.
- g. All federations seeking direct or indirect funding shall need to be accredited by the Government and shall have to comply with the accreditation requirements as stated in the Bill; All applications for accreditation have to be decided in 90 days from the date of receipt. Otherwise, the accreditation would be deemed to have been granted;
- h. In order to represent India in international events and to have a right for a particular sport federation to use ‘India’ or ‘Indian’ in the sport scenario, the federation shall have to comply with Chapter IV (Unethical practices in Sports) and Chapter IX (Applicability of Right to Information Act).
- i. The right to represent India has been reserved to the citizens of India.
- j. All accredited National Sport Federations need to have the following clauses in their MOA/AOA or Bye-Laws amongst others:
 - Office Bearer shall retire at the age of 70 year.
 - Athletes nominated by the Athletes Commission shall be included in the decision making process of the executive board.

- The total strength of the athletes in the executive body shall not be less than 25% of the voting rights.
- Ensure that representation of either gender is not less than 10% of the membership in the General Body.
- A person against whom criminal charges have been framed under the Criminal Procedure Code (section 228) shall be ineligible to contest elections of the NOC/NSF.
- A person who has served as an Officer Bearer on the executive body of a NSF/NOG for 2 consecutive terms shall be ineligible to stand for election.
- However, the President shall be eligible to hold office for 12 years or three terms of office of four years each with or without break.
- k. An Office Bearer of one NSF shall be ineligible to hold post of an Office Bearer in another NSF.
- l. All cases where the NOG/NSF are parties shall, with the leave of the Hon'ble Supreme Court or the Hon'ble High Court as the case may be, be transferred to the Appellate Sports Tribunal.
- m. An Athletes Commission has been proposed to be set up in each NOG/NSF within six months of promulgation of this Act; The Athletes Commission shall also advise the NOG/NSF on development of the sport, training and competition schedules, athlete's grievances, selection and technical criteria, logistics and administration support amongst others.

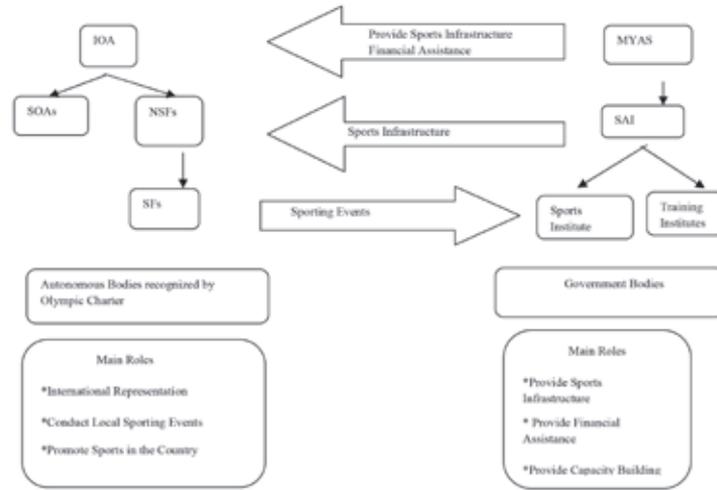
SPORTS GOVERNANCE IN INDIA – CURRENT MODEL

The model in India has stakeholders such as Ministry of Youth Affairs and Sports (MYAS), Indian Olympic Association (IOA), State Olympic Association (SOA), National Sports Federation (NSF), Sports Authority of India (SAI), etc. The role of every stakeholder is well-defined.

In accordance with the Olympic Charter that restricts government influence of sports federations, the sports bodies in India are autonomous entities. While the IOA is the umbrella body under which all the NSFs and SOAs conduct various sporting events in the country, government bodies operate under MYAS, playing a support role such as training and infrastructure management. In addition, there are federations for non-Olympic sports such as Board of Control for Cricket in India (BCCI) for cricket. These federations are directly affiliated to their respective international federations. Similar to the IOA and NSFs, government intervention is restricted by the charter of their respective international federations.

All the sporting governing bodies are registered as societies under the Societies Registration Act XXI of 1860. They are recipients of government aid in multiple forms ranging from direct financial assistance (as in case of NSFs) to indirect subsidies in the form of tax benefits (as in the case of BCCI). As a precondition for receiving direct financial aid, a body is supposed to have a government appointed observer who oversees its internal processes such as utilization of funds, team selections, etc. Almost all sports federations have eminent politicians or retired bureaucrats elected as their office bearers with the anticipation of utilizing their political clout in various matters.¹⁸

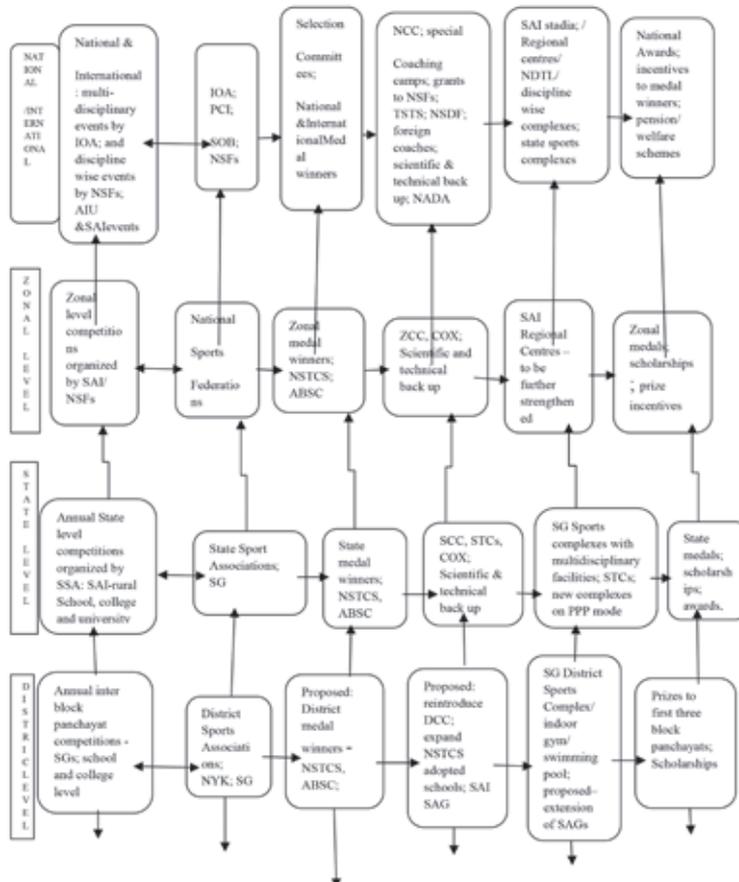
A broad level graphical representation of the arrangements amongst them is as follows:

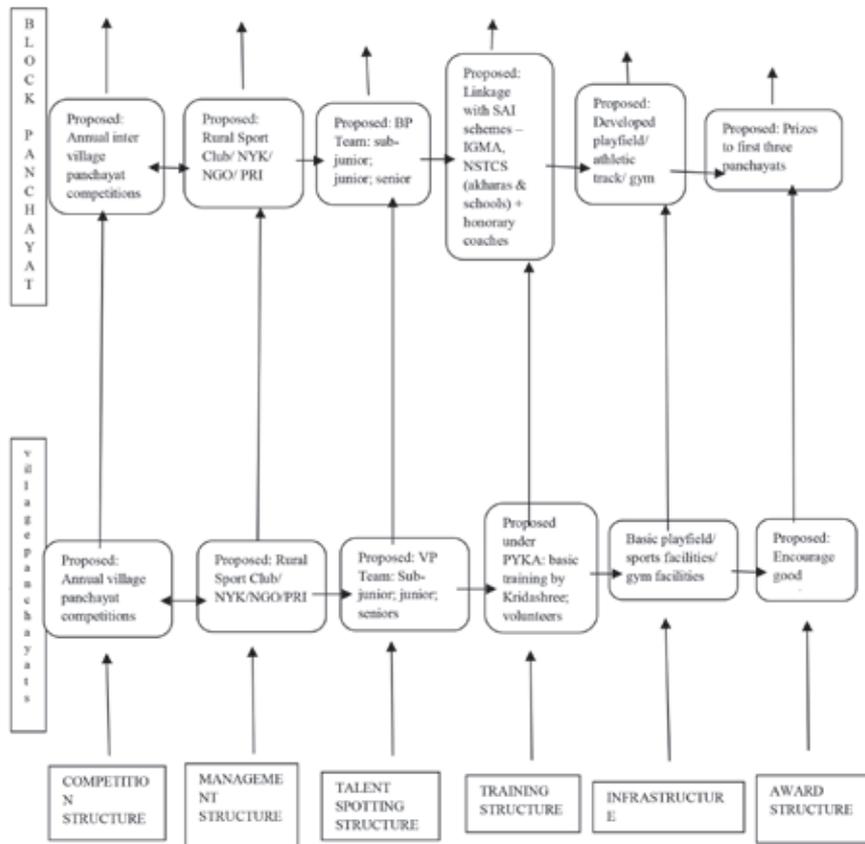


Current Indian Model of Sports Governance

ANNEXURE 1, SOURCE: Jitendra Chaudhary and Jayat Ghosh, “Governance of Sports in India”, Available at: tejas.iimb.ac.in/articles/Tejas_September%20Edition_Article%201.pdfz

SPORTS DEVELOPMENT MATRIX





SPORTS DEVELOPMENT MATRIX

(IOA – Indian Olympic Association; NSF – National Sports Federation; SSA – State Sports Association; AIU – All India Universities; SAI – Sports Authority of India; NYK – Nehru Yuva Kendra; VP – Village Panchayat; BP – Block Panchayat; GG – State Government; IGMA – Indigenous Games & Martial Arts; NSTCS – National Sport Talent Contest Scheme; ABSC – Army Boys Sports Company; TSTS – Talent Search & Training Scheme; STC – SAI Training Centres; SAG – Special Area Games; COX – Centres of Excellence; NSDF – National Sports Development Fund; NDTL – National Dope Testing Laboratory; NADA – National Anti-Doping Agency; SOB – Special Olympic Bharat; PCI – Paralympics Committee of India)

ANNEXURE 2, SOURCE: Ministry of Youth Affairs and Sports, Department of Sports, Available at: <http://yas.nic.in/sports/national-policies> (Accessed on 8.10.2016).

CONCLUSION

Sports are the fabric which connects the society and maintain friendly ties between the countries. The primary aim behind any sport is to provide entertainment to its audience. To protect the interest of sportspersons and to put restrictions on some irregular activities through a proper regulatory mechanism.

It is quite evident that our culture and our attitude towards sports is the biggest stumbling block in improving sporting standards. The change has to begin from the primary education level to build a sporting culture in the country.

The education system should be revamped to give sports an equal importance in the holistic upbringing of a child. The state and its entities must provide at least basic, bare minimum facility, quality of infrastructure at the grassroots level, in villages and small towns.

India is such a diverse country and in this era when the whole world has become global village, transportations and communication is not an issue. So development of sports has rocked the India. India is now emerging as a hub of Sports, so to protect the atmosphere of healthy sportsmanship, to tackle problems that relate to protection of the rights as well as the dignity of the players, a stringent and lucid Sports Law became the dire need of the hour.

REFERENCES

- Shivankar Sharma and Pranav Menon, "A Comparative Study of the Application of Strict Liability Principles in Sports: Critiquing Anti-Doping Policies; Examining 'Illicit Crowd Chanting' and Match Fixing", *Nirma University Law Journal*: Vol.4, Issue-1, July-2014 at 79.
- Prof. Dr. Amaresh Kumar, "Sports Law India Present and Perspective", R.K. JAIN - Sports Law Knowledge Lecture & Seminar - www.sportslawindia.info (2011) at 12.
- Department of Culture, Media and Sport figures – Available at: www.culture.gov.uk (Accessed on 16.9.2016).
- Jitendra Choudhary and Jayat Ghosh, "Governance of Sports in India", Available at: tejas.iimb.ac.in/articles/Tejas_September%20Edition_Article%201.pdf (Accessed on 23.9.2016).
- Article 246 of Constitution of India, Schedule Seventh, List II, Entry 33.
- Available at: <https://en.wikipedia.org/wiki/Sport> (Accessed on 8.10.2016).
- Sport, Recreation and Play – UNICEF at 1. Available at: http://www.unicef.org/ceecis/5571_SPORT_EN.pdf (Accessed on 8.10.2016).
- Available at: <http://www.merriam-webster.com/dictionary/sport> (Accessed on 8.10.2016).
- Available at: <https://en.oxforddictionaries.com/definition/sport> (Accessed on 8.10.2016).
- Available at: <http://www.dictionary.com/browse/sport> (Accessed on 8.10.2016).
- The International Charter of Physical Education and Sport, UNESCO, 1978, (Adopted by the General Conference at its twentieth session, Paris, 21 November 1978).
- Draft Comprehensive Sports Policy 2007, Ministry of Youth Affairs and Sports, Department of Sports. Available at: <http://yas.nic.in/sports/national-policies> (Accessed on 8.10.2016).
- Supra* Note 2 at 16.
- Supra* Note 12 at 17.
- Available at: <http://www.sportslawindia.info> (Accessed on 10.10.2016).
- Supra* Note 2 at 19.
- Available at: <http://pib.nic.in/newsite/PrintRelease.aspx?relid=97118> (Accessed on 10.10.2016).
- Supra* Note 4.