

Safeguarding Athlete Rights in Wrestling: A Critical Analysis under Sports Law

Saptasikha Dev¹, Dr. Partha Pratim Paul²

¹Research Scholar, Department of Law, Assam University, Silchar

²Head of the Department, Department of Law, Assam University, Silchar

Abstract

The rules of wrestling go beyond the match on the mat. Decisions of sporting bodies shape a wrestler's eligibility, selection, weight category, medical status, anti-doping obligations and safety. While these decisions may protect fair competition, to an individual athlete, they can have serious consequences. This paper, through the lens of Sports Law, examines the protection available to wrestler rights in India. The emphasis lies on fair procedures, protecting athletes, managing federations, regulating weight categories, fighting doping and seeking resolution. The study employs a doctrinal and analytical methodology, reflecting the paper's reliance on legislation, official sports normative acts, and judicial materials, inter alia the decision of the Court of Arbitration for Sport in Vinesh Phogat. The Wrestling Federation of India row and the National Sports Governance Act, 2025, are given specific focus. The paper argues that protections of athletes do not warrant the dilution of sporting rules. The rules should be accompanied by transparent procedures, accountable decision-making and remedies that are realistic within the short time frame of competitive sport. The recommendation is to create an athlete-centred regulatory paradigm that makes selection decisions reasoned, handles safeguarding complaints independently, considers weight-management practices an athlete-welfare matter, and internationally coordinates domestic remedies with international sports systems.

Keywords: Sports Law, Wrestling, Rights of Athletes, Safeguarding of Athletes, Procedural Fairness, Governance of Sports, Weight Categorization, Dispute Resolution.

1. Introduction

Over the years, the organized sport has grown more professional and commercially important, the legal study of sport has changed a lot. A present-day athlete isn't just governed by the laws of the game. Besides, the athlete could be subject to federation rules, eligibility requirements, anti-doping regulations, medical procedures, ethical codes and contracts. In such a situation, the sporting decision can have far-reaching consequences beyond the specific match. Selection can determine if an athlete is provided an international opportunity; a disciplinary order can affect a career; and a safeguarding complaint can involve the athlete's physical and mental safety.

Wrestling provides an exceptionally helpful environment to study these questions. The sport relies on strict technical rule, weight categories, and weigh-in rules. Wrestlers also work within the web of other national and international institutions. United World Wrestling (UWW) has rules and regulations on competition, medical, anti-doping, discipline, dispute resolution, safeguarding and other governance matters. The very existence of such rules is not a problem. A more important question is whether the

exercise of regulatory power is fair, transparent and accountable to the athletes who are made required to comply.

The Indian wrestling industry has provided many recent instances that can be used to assess this question. Concerns regarding the Wrestling Federation of India (WFI) brought federation governance and athlete safeguarding into the public discourse. UWW's takes on governance also demonstrated that national governance can have an impact on participation. UWW's blankets raised another problem: can the governance issue be treated as an administrative issue separated from the athlete's rights issue?

The disqualification of Vinesh Phogat at the Paris 2024 Olympic Games presents another but related issue. On 6 August 2024, she registered 49.9 kg at the first weigh-in. Before the final on 7 August, she was 150 grams overweight at the first attempt, and after the permitted repeat weigh-in, she was 100 grams overweight. This led to her disqualification by the UWW, and the dismissal of her application for relief by the CAS Ad Hoc Division. The case is legally significant, not for the existence of weight categories, but to question the repercussions of a strict rule when a tiny excess leads to Olympic final elimination.

The legal environment of India has also moved ahead. The National Sports Governance Act, which seeks to provide a framework for sports governance, ethics, safe sport and sports grievances and disputes, was promulgated on 18 August 2025. The Act and the rules made thereunder create a new framework for the consideration of protection of athletes within national sports bodies. This study thus poses a practical question about how to ensure that wrestling regulations are strict enough to uphold competitive integrity while also meaningfully protecting athletes.

2. Review of Literature

In recent times, literature on Sports Law treats athletes as having distinct rights instead of merely being regulated in sport. Recent work in legal writing on the Vinesh Phogat case has examined the balance between athlete responsibility and procedural fairness in applying weight rules. This work is relevant as it shows that a technical rule can raise a greater legal question of proportionality and available remedies. Studies on Indian sports governance have also examined federation autonomy and accountability tensions. Whatever policies float around in the media, it is essential that the Olympic and sports administration of India imbibes principles of transparency, good governance and institutional checks. These have become more important after the National Sports Governance Act instituted statutory mechanisms relating to governance and safe sport.

This study takes a narrower perspective. We deal with issues that are often considered in isolation, such as selection, safeguarding, weight-category rules, anti-doping and dispute resolution. We are conducting an assessment of the protection sailors receive when competing in gymnastics. It's especially important because, during one career, the same athlete may face all three whereas the institutions responsible for them might differ.

3. Research Gap

While existing discussions offer insightful analyses of prevalent individual disputes and sports governance generally, they do not ideally serve to address the need for a focused study of the legal position of wrestlers. The connection between technical eligibility rules and athlete-protections principles needs more attention. The Vinesh Phogat controversy makes this tension visible in a very acute way, while the WFI controversy shows how governance and safeguarding can affect athletes even

before they compete.[2-4].

The research gap being addressed is the limited integration of technical regulation, athlete welfare and institutional accountability within a single Sports Law analysis of wrestling in India. Since the National Sports Governance Act, 2025 introduces a crucial statutory framework, the paper seeks to fill this gap with an analysis of the new regulatory framework. The paper analyses three practical concerns to examine whether the decision-making process is ‘fair’, whether the athlete is protected from ‘harm’, and whether an ‘effective remedy’ is available when things go wrong.

4. Objectives of the Study

To examine the nature and scope of athlete rights in wrestling from a Sports Law perspective.

To analyse the Indian legal and institutional framework applicable to wrestlers.

To examine procedural fairness in selection, eligibility and disciplinary decisions.

To assess athlete safeguarding and anti-doping protections.

To examine the legal implications of the Vinesh Phogat disqualification and WFI governance concerns.

To assess the significance of the National Sports Governance Act, 2025.

To suggest practical reforms for stronger protection of wrestlers in India.

5. Research Methodology

The paper adopts a doctrinal and analytical approach. The main sources comprise of Indian law, various government notifications, UWW regulations, the CAS award in Vinesh Phogat v United World Wrestling and International Olympic Committee, and relevant judiciary material. Academic articles and legal commentary are secondary materials. The research design is qualitative and does not claim findings from interview or survey. Wrestling serves as a focused case study which considered wider principles of Sports Law.

6. Athlete Rights in Wrestling

6.1 Selection and the Right to Transparent Decision-Making

One of the most important administrative decisions in the life of an athlete is selection. It is imperative that a federation maintain discretion since a sporting performance cannot always be reduced to numbers. However, discretion shouldn't become a reason for arbitrary decision-making. I think it is essential that the criteria are known before a selection process begins and that an athlete should understand why an adverse decision was taken.

Indian sports-governance litigation has raised questions of transparency and accountability again. The rulings discussed in Rahul Mehra v Union of India and S. Nithya v. Secretary to the Union of India, are relevant in this regard. Applied to wrestling, the practical principle is a simple: selection must be made upon identifiable standards and an athlete must have a timely opportunity to challenge any apparent divergence from those standards.

6.2 Procedural Fairness

It is essential to differentiate between a technical decision taken right away during the course of a contest and an administrative decision capable of prohibiting access of an athlete. A referee has to make a decision within a couple of seconds. A committee or a disciplinary body usually takes time and can therefore be expected to offer a greater level of procedural protection. If a decision can terminate an

athlete's participation or have a significant effect on his or her career, basic fairness should include notice of the rule being relied upon, reliable recording of the facts and access to a timely review.

Given that sport takes place in real time, this last point is particularly important. A remedy awarded half a year post-championship may be legally sound but practically vacuous. Given this, a mechanism for sports grievances should have short and clear timelines, and be able to grant interim relief, where there is a danger to participation in an event.

6.3 Athlete Safeguarding

The safety of sport is not secondary to sport governance. UWW's safeguarding framework caters to different forms of abuse including physical and psychological, sexual harassment, sexual abuse and neglect. Indian law too has moved towards a structured approach. The National Sports Governance Act, 2025 mandates the establishment of a code of ethics while extending safeguarding for vulnerable persons against abuse by persons occupying positions of trust, responsibility or authority. It also allows for a Safe Sports Policy and complaint resolution.

The challenge is frequently less about the lack of a specific rule than the athlete's belief in it. It is the prerogative of the federations to select wrestlers for training and competitions. An athlete might choose not to report wrongdoing if the same institutional structure manages his career and the handling of a complaint. A credible complaints mechanism needs confidentiality, protection against retaliation and a safeguarding function with sufficient independence from selection and disciplinary decision-makers.

6.4 Anti-Doping and Athlete Responsibility

The anti-doping regulation represents an important safeguard for the integrity of wrestling but it also reflects a balance of responsibilities and rights. Wrestlers must adhere to all rules regarding testing, whereabouts and prohibited substances. Simultaneously, they need to offer appropriate education and response to an allegation that is fair. Even with stringent anti-doping standards, a just disciplinary process is still necessary.

Punitive action should be complemented by preventive measures. Athletes, especially those travelling from national to international competition, need clarity on prohibited substances, therapeutic use exemptions and testing procedures. A rights-based approach to anti-doping therefore starts before a violation is alleged.

6.5 Weight Categories, Health and the Vinesh Phogat Case

Weight categories are important for wrestling. There is a justifiable reason for their existence; competitors should not be placed at an unfair physical disadvantage through a significant bodily disparity. It wouldn't be easy to justify relaxing weight limits on the whole. The tricky part is the penalty for a missed weigh-in, when the excess is relatively very low.

The CAS Record indicates that Phogat weighed 49.9 kg at the first official weigh-in, then at the second weigh-in, recorded 50.15 kg and then 50.1 kg. The rule as applied by the UWW provided for elimination if the relevant weigh-in failure occurred, and the CAS rejected the sought relief.[4] The decision therefore confirms the legal force of the rule, while it also raises a policy question: should every failure, regardless of margin and circumstance, have the same sporting consequence?

The solution must not be a random exception set up for a specific athlete. If a review mechanism is accepted as desirable, it must be effectively written into the rules beforehand and will apply uniformly to all competitors. It can only address objectively verifiable issues, for example in relation to the measurement, equipment or narrowly defined exceptional situations. One way to preserve the rule while

giving the regulator a way to deal with genuinely unusual cases would be to include such a mechanism in advance.

A health aspect is also involved. Cutting weight can involve dehydration and a noticeable restriction of food and fluids. The media have paid considerable attention to the physical dangers of excessive weight-loss in weight-class sport. The regulatory scheme should thus not regard compliance with weigh-in as totally distinct from athlete welfare. The regulatory framework must include safe weight-management protocols with education and medical surveillance.

7. Indian Legal and Institutional Framework

7.1 Constitutional and Public Law Principles

The legal character of sports federations and the source of the power being exercised determines their constitutional position. However, whenever public authorities or recognised sports bodies are exercising regulatory functions that impact upon athletes, the principles of equality, non-arbitrariness and fairness are useful standards. A court should make a distinction between those decisions which require sporting knowledge and those which are administrative or discriminatory or infected with procedural defects. The mere existence of sports autonomy should not take every administrative decision beyond scrutiny.

7.2 National Sports Governance Act, 2025

The National Sports Governance Act, 2025 places importance on athlete rights as its stated aim includes welfare measures for sportspersons, ethical practices, good governance, fair play and sports grievance and disputes resolution. Section 12 requires a Code of Ethics and specifically provides for protection of vulnerable persons from abuse by persons holding or exercising trust, responsibility or authority. Section 13 calls for Safe Sports Policy as well as protection and safety of women and minor athletes.[5]

Nevertheless, the Act shouldn't be judged only by the wording of the statute. The practical value will depend upon sports bodies implementing the same and the grievance mechanisms being accessible. The Ministry of Youth Affairs and Sports has subsequently notified Rules and further provisions under the Act in 2026, including Rules concerning national sports bodies and the National Sports Tribunal. This makes the present one particularly significant period to judge how this new framework will play out in practice.

The most significant advantage of the new regime for wrestlers could be the shift from informal expectations of good governance to definitive legal standards. At the same time, it should also be able to afford proper respect for technical sporting matters. The more effective approach is to ensure the exercise of sporting power is transparent and accountable rather than replacing sporting expertise with general administrative control.

8. Case Studies

8.1 Vinesh Phogat: Eligibility, Consequence and Remedy

The Phogat controversy should not be simplified to the argument that the sportswoman was 'only 100 grams' over the weight limit. In a sport where body weight matters, the weight limit serves a competitive purpose. A better legal question is about the structure of the consequence. On the first day, Phogat's eligibility was taken, irrespective of her second day's weight, and she was eliminated from the final. The CAS upheld the applicable rule and did not grant the relief related to the medal.

The future rule-making, the case suggests, should draw a distinction between three matters; the weight limit itself, the procedure to measure it, and the consequence of failing it. The initial one might stay

stringent. The second must be scientifically accurate. It is possible to investigate the third through policy without weakening the first. Dividing regulatory issues would clarify the debate and avoid making athlete protection an argument against competitive equality. Keyword separation would make the debate clearer and prevent the opposition from dismissing athlete protection on the grounds of competitive equality.

Another lesson is about remedies. The CAS process that took place at the Olympics was necessarily rapid as the final was close. Because sports disputes require rapid decision-making, specialist mechanisms must be used. A right that does not have an expeditious remedy will have little value in the sporting world. An athlete may only get to participate in an event once in a lifetime.

8.2 WFI Governance and Athlete Safeguarding

The allegations against the WFI show why athlete rights and federation governance cannot be seen in isolation. In 2023, the UWW made remarks about governance issues and athlete protection, after which the world governing body provisionally suspended WFI. The incident shows that institutional instability can become a problem for athletes' rights itself when it comes to selection, representation and confidence in safeguarding.

The optimal regulatory response might not be more daily government control. It is essential to make clear who is responsible for what: federations are responsible for administering the sport; serious allegations should be handled by independent mechanisms; and statutory authorities should flag up violations of minimum governance standards. A rugby-and-football-like alliance would permit sporting expertise and public accountability to coincide.

9. Comparative Perspective

India doesn't need domestic legislation reproducing every international rule as UWW already has a comprehensive international framework concerning competition, safeguarding, anti-doping, discipline and dispute resolution. A more practically useful task could be to create a domestic floor of protection in respect of recognised sports bodies.

We can consider a three-level model. Technical issues like competition rules should generally be left to specialist sports structures. Domestic legal standards should govern and protect compliance. Disputes will follow the clearly defined internal and national remedies but will not preclude access to international mechanisms where relevant regulations provide for it. This would avoid situations where an athlete is passed from one institution to another without a clear answer as to which institution the grievance belongs.

10. Recommendations

1. Before an event, set criteria for selection and trial, and publish them, and require written reasons if the final decision materially departs from these.
2. Formulate a grievance procedure that is time-bound to handle disputes regarding selection, eligibility and discipline with the power to grant interim relief where the participation in a forthcoming event is at stake.
3. Set up a separate safeguarding function allowing confidential reporting with strong retaliation protection.
4. A charter outlining minimum rights regarding information, safe participation, representation, and remedies should be adopted by wrestlers.

5. While the weight categories should be maintained strictly, the evidence base rule-making process should also examine the appropriateness of a narrowly defined review procedure to measurement or exceptional circumstances.
6. Weight management education should be part of athlete support and service programmes.
7. Bolster education on anti-doping before and during international competition to ensure athletes understand testing, therapeutic use exemptions and appeal procedures.
8. Include athletes in governance structures. The National Sports Governance Rules of 2026 include provisions for inclusion of sportspersons of outstanding merit in national sports associations; this inclusion must not be mere membership but meaningful participation.
9. Clearly define rules for the managing of athlete's medical and performance information, including the restriction of access and disclosure.
10. Make it clear how federation level grievance mechanisms, the National Sports Tribunal and international sports dispute mechanisms relate to each other to give athletes a predictable remedy pathway.

11. Discussion

The paper examined issues that all pointed to one common problem – the athlete is often at the centre of a regulatory system, but has the least control over how that system will be designed. Rules are absolutely important for wrestling to function. An uneven set of rules is also undertaken where manual time is not a right we will get. The answer is therefore not to choose sporting autonomy or athlete rights. If the limits of regulatory discretion are clarified, the two can act together.

The Vinesh Phogat event in this respect separates the validity of a rule from the policy outcomes of that rule. The applicable weight requirement was upheld by CAS decision. This doesn't stop the sport from pondering whether future rule changes might provide a carefully-framed review mechanism. Likewise, the controversy surrounding WFI does not imply that national federations must lose all autonomy. When an institution exercises power over athletes, autonomy requires accountability.

India can utilize the National Sports Governance Act, 2025 to make this difference clearer. The safe-sport provisions and grievance procedures can provide a common baseline while sport-specific organisations can continue to determine technical matters. Whether the protections can be used by athletes without incurring inordinate costs, delays or institutional backlash will ultimately determine the efficacy of the framework.

The primary claim made within the paper is, therefore, modest though significant: safeguarding is part of sporting integrity. A wrestler who is protected from abuse, who is informed on the rules of the sport, who is heard in a serious dispute and given a realistic remedy is likely to have confidence in the sporting institution. Safeguarding these rights should not be seen as an impediment to competitiveness excellence, but rather as one of the conditions for making sporting regulation credible.

12. Conclusion

Wrestling shows how technical regulation is related to the rights of athletes. The legitimacy of weight categories, selection procedures, anti-doping requirements and safeguarding rules depends in part on how they are enforced, even though they serve legitimate purposes. Indian experience very recent makes this clear. The WFI incident highlighted the linkages between governance and athlete welfare, and the Vinesh Phogat case taught us how the application of a technical eligibility rule can have an extraordinary

consequence for an individual athlete.[2-4]

The National Sports Governance Act, 2025 is an important opportunity to shore up the domestic framework. As it stresses on ethics, safe sport and grievance redressal, it can enhance accountability in sports. The big challenge now is implementation. In wrestling, priorities should include transparent selection, independent safeguarding, prompt resolution of disputes, evidence-based weight management practices and meaningful athlete representation.

A third-party enforcement approach to wrestling regulation does not require softer rules. It needs improved rules and improved procedures. Genuine competition standards should be able to be enforced by sporting bodies. However, the standards should be known to athletes, the process by which decisions are made should be understood, and they should be able to access a remedy in the event of a serious error or governance failure. This balance facilitates a more sustainable basis for both wrestling-related growth and Sports Law development in India.

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