Reforming Sports Governance in India
An Analysis of the National Sports Governance Act, 2025

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Abstract

The National Sports Governance Act, 2025 provides a system for governing national sports bodies in India.. This Act seek s to provide a balance between independence and accountability, athlete representation, ethical regulations and specialist decision making. This article provides a detailed analysis of the National Sports Governance Act, 2025. This analysis considers the structure of the Act and the phased implementation. The analysis will also consider previous legislation such as the National Sports Development Code, court cases regarding cricket and recent cases regarding the All-India Football Federation. This article will argue that although the Act does provide advantages regarding statutory oversight and athlete representation, there are still issues regarding ensuring independence, fair recognition and effective remedies. The influence of the executive regarding appointments, the inconsistency of implementation and issues with the tribunal will also be considered. Recommendations will be made regarding transparency of implementation, athlete protections with logical reasoning and independent decision making. This piece of legislation is new therefore this article will consider whether the law is well-designed.

Keywords: Sports Governance; National Sports Federations; Accountability; Athlete Representation; Sports Tribunal; Constitutional Law.

1. Introduction

Sports Governance in India has historically been varied. There are voluntary associations, international federation requirements, executive recognition, public funding, and judicial oversight. This can cause a problem as whilst there is a need for independence, the decision makers for national teams, public funding and opportunities for athletes have a big impact on the public. The National Sports Governance Act, 2025 (Act 25 of 2025) recognizes this issue.[1]

The legislation received assent on the 18th August 2025. The legislation has been implemented in phases (section 1(2)). Some sections and subsections of the legislation came into effect as of January 2026. There are rules that apply to national sports bodies, the Board and Tribunal, therefore it will need to be shown that all mechanisms are operating.[2]

[1] National Sports Governance Act, No. 25 of 2025, pmbl. (India).

[2] National Sports Governance Act, No. 25 of 2025, § 1(2) (India); Ministry of Youth Affairs & Sports, Notification S.O. 6152(E) (Jan. 1, 2026) (India).

2. Literature Review

There are generally four areas of sports governance: independence, corruption/conflict of interest, athlete representation and enforceability of decisions. Before this legislation, the main legislation was the National Sports Development Code of India, 2011. This however had many executive instruments so questions would often arise about whether it would be consistently enforced.

Court cases around cricket governance has shown the issues that can occur without checks and balances in place. The decisions made by the Supreme Court in 2016 and 2018 showed how useful the courts can be in reforming the structure of a sports body. The decision made in September 2025 regarding the All India Football Federation gives insight into federation constitutions and international obligations.[3]

The analysis by PRS Legislative Research outlines the key considerations for structuring the institution. This includes recognition of national sports bodies, the National Sports Board, regulations, athlete representation and specialized tribunal. This is useful secondary commentary but the legislation itself and gazetted rules must be followed.[4]

3. Research Gap

Much of the literature focuses on federation corruption and judicial oversight. Therefore there is a knowledge gap in how statutory oversight, independence and enforceable athlete representation are balanced. This means a detailed analysis must be made on how the safeguards, recognition standards, independence, availability of dispute resolution and how it relates to international sports law. The legislation is new so this is more focused on the design of the legislation.

4. Research Objectives & Research Questions

To identify the key changes made by the Act. Determine if the national sports bodies are accountable and independent. Determine if there are safeguards in place to ensure athlete representation and fairness. Analyse the structure of the tribunal and judicial review. Recommend ways to improve the legislation to make it legally viable and meet international sports standards.

The main question will be around whether the Act of 2025 provides the right balance between accountability, independence and fair decision-making focused on athletes. Other questions to consider are whether there is executive discretion, a fair recognition process, influence of athlete representatives and accessible dispute resolution.

5. Research Methodology

This article uses qualitative doctrinal research. The primary sources used were the Constitution of India, National Sports Governance Act, 2025, relevant commencement notices and 2026 subordinate rules. The secondary sources used were the PRS summary and government explanatory documents. General principles of international sports independence and fair process were used as a functional source. Different methods of analysis have been used including textual analysis, purposive analysis and institutional analysis. No findings were made through surveys or interviews therefore this article considers the structure of the legislation and any legal risks.

[3] S.C.C. 535 (India); Bd. of Control for Cricket in India v. Cricket Ass'n of Bihar, (2018) 9 S.C.C. 624 (India); All India Football Fed'n v. Rahul Mehra, 2025 INSC 1131 (India).

[4] PRS Legislative Research, *The National Sports Governance Bill, 2025: Bill Summary* (2025), https://prsindia.org/billtrack/the-national-sports-governance-bill-2025. prsindia.org

6. Legal & Constitutional Issues

6.1 Recognition, Oversight & National Sports Board

The Act provides statutory recognition and oversight for national sports bodies. A key element of this is the National Sports Board. This provides a formal structure to replace purely administrative recognition. To ensure the Board is legitimate, there should be transparency on appointments, clear criteria, logical decisions, proportionate penalties, and availability of review. The Board Rules (2026) outline that a chairperson and 2 Members will be appointed by the Central Government from a recommended panel.[5]

6.2 Regulation & Athlete Representation

There are general provisions for bodies and executive committees. Athlete representation, ethical regulation and grievance procedures are also provided for. Section 4 is an important part as formal representation can challenge the secrecy. However it must be more than just numbers. They should have timely access to information, no retaliation, voting rights and influence. Ethical and dispute committees should also be considered for independence. Consider how they have been appointed, their terms of office, conflict of interest and recusals.[6]

6.3 Constitutional Principles

Article 14 and 21 provide a foundation for fairness, no unfairness and dignity. Article 19 may be relevant for independence of association. However this does not mean that all decisions made by private federations will be seen as state actions. Whether this can be subject to judicial review depends on the type of body, duty and public law principles. It is best to keep constitutional arguments against the State separate from statutory and contractual rights against sports bodies.[7]

6.4 Sports Tribunal

Section 17 provides for a National Sports Tribunal to be established with a qualified person as Chairperson and further members. This can provide a specialist body but must be affordable. The tribunal should have clear jurisdiction, logical decisions, enforceability and be compatible with international appeals. Great care must be taken to ensure what is not included in the statute. Not all issues affecting athletes will be subject to the tribunal. The rules of the tribunal were notified in 2026.[8]

6.5 Financial Integrity, Data Protection & Public Oversight

It is important that the regulation is legitimate. This can be done through public oversight, independent audits, transparency on procurement and control of conflicts of interest. Section 29 provides for accounts and auditing of the Board. Section 30 provides for athlete wellbeing, data protection and appropriate technology. This does not create a full data protection code for all sports bodies. Other relevant laws and subordinate rules should be considered.[9]

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[5] National Sports Governance Act, No. 25 of 2025, §§ 5–15, INDIA CODE (2025); National Sports Governance (National Sports Board) Rules, 2026 (India).

[6] National Sports Governance Act, No. 25 of 2025, § 4, INDIA CODE (2025).

[7] INDIA CONST. arts. 14, 19, 21, 226; Zee Telefilms Ltd. v. Union of India, (2005) 4 S.C.C. 649 (India).

[8] National Sports Governance Act, No. 25 of 2025, § 17, INDIA CODE (2025); National Sports Governance (National Sports Tribunal) Rules, 2026 (India).

[9] National Sports Governance Act, No. 25 of 2025, §§ 29–31, INDIA CODE (2025)

7. Landmark Case Law

7.1 Zee Telefilms Ltd. v. Union of India

The Supreme Court held that the BCCI was not a 'State' as defined by Article 12. This shows we cannot assume all sports federations are constitutional authorities. If there are enforceable public duties this could fall under public law.[10]

7.2 BCCI v. Cricket Association of Bihar

This case shows the willingness of the judiciary to challenge serious governance issues, conflict of interest and structure. The direction in 2016, approval of a new constitution in 2018 and consideration of amendments in 2022 shows there can be multi stages to reform.[11]

7.3 All India Football Federation

The decision made by the Supreme Court regarding the AIFF on the 19th September 2025 shows the practical issues faced when trying to balance federation constitutions, athlete representation, international obligations and judicial oversight. This can be used as a useful comparison.[12]

8. Critical Analysis

The strongest element of this Act is that it moves away from a fragmented administrative oversight and provides a clear statutory structure. It recognises that federations have consequential public duties to perform but also the importance of international sports independence. Having athlete representation and decision makers can provide positives as a safeguard. However there are four issues to consider. Firstly there may be issues with independence due to the influence of the executive. Secondly recognition and exemption powers must be transparent with logical decisions. Thirdly athlete representation may be tokenistic if the members do not have influence. Finally the tribunal may not have real value if there are issues with jurisdiction, affordability, accessibility and enforceability. These areas should be monitored and decisions should be published and independently assessed.

9. Key Findings

- The 2025 Act is a major legal change. However due to the phased implementation great care must be taken to ensure the law is in operation.
- Accountability and independence do not necessarily conflict as there can be reasonable oversight to ensure legitimate independence.
- Athlete focused governance does not just mean having a number of representatives. Information rights, fair process and remedies are key.
- Precedents have been set showing the importance of considering specific public law issues. This also demonstrates that using ad hoc litigation will not be a sustainable solution.
- The new statutory structure should be analysed to ensure there are clear indicators of transparency during implementation.

10. Limitations

This article uses doctrinal research therefore no primary interviews, athlete surveys, audit of federation finances or analysis of tribunal decisions over time have been carried out. Rules, notices and practices may have changed since research was completed. Therefore a full assessment of compliance cannot be carried out.

[10] Zee Telefilms Ltd. v. Union of India, (2005) 4 S.C.C. 649 (India)

[11] Bd. of Control for Cricket in India v. Cricket Ass'n of Bihar, (2016) 8 S.C.C. 535 (India); Bd. of Control for Cricket in India v. Cricket Ass'n of Bihar, (2018) 9 S.C.C. 624 (India); Bd. of Control for Cricket in India v. Cricket Ass'n of Bihar, 2022 SCC OnLine SC 1223 (India).

[12] All India Football Fed'n v. Rahul Mehra, 2025 INSC 1131 (India).

Citations have been done in a Bluebook style. Abbreviations, pinches and amendments should be checked for the specific journal.

11. Recommendations

- The Central Government and relevant bodies should provide a clear summary of the implementation.
- This should include what has been implemented, what rules are in force and what bodies have been appointed. Reasons should be given for recognition, suspension and exemption.
- Athlete committees should be transparently chosen with protections in place to prevent conflict. Governance bodies should publish annual reports on compliance, audited accounts and anonymized grievance statistics.
- The tribunal should be affordable, have clear jurisdiction, interim relief and logical decisions that are published with appropriate data protection.
- Periodic independent reviews should be carried out to ensure statutory objectives are being met without impacting legitimate independence.

12. Conclusion

The National Sports Governance Act, 2025 provides an opportunity to provide statutory structure and move away from reactive governance. Ultimately this Act will not be judged on the creation of a Board and Tribunal but whether athletes can receive fair decisions, sports bodies are independently and transparently run and regulators only use their powers within legal limits. This project should be measured on fair process, independence, fair decisions and effective remedies. This is only the beginning of reforming sports governance.

Reference

Act

1. INDIA CONST. arts. 14, 19, 21, 226.
2. National Sports Governance Act, No. 25 of 2025, INDIA CODE (2025).

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1. Zee Telefilms Ltd. v. Union of India, (2005) 4 S.C.C. 649 (India).
2. Bd. of Control for Cricket in India v. Cricket Ass'n of Bihar, (2016) 8 S.C.C. 535 (India).
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2. National Sports Governance (National Sports Bodies) Rules, 2026, G.S.R. 18(E), Gazette of India, Extraordinary, pt. II, sec. 3(i) (Jan. 12, 2026) (India).
3. National Sports Governance (National Sports Board) Rules, 2026, G.S.R. 404(E), Gazette of India, Extraordinary, pt. II, sec. 3(i) (May 25, 2026) (India).
4. National Sports Governance (National Sports Tribunal) Rules, 2026, G.S.R. 405(E), Gazette of India, Extraordinary, pt. II, sec. 3(i) (May 25, 2026) (India).
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