

## KNOWLEDGE OF TORT LIABILITY AMONG GAMES MASTERS IN SECONDARY SCHOOLS IN MAKURDI, NIGERIA

\***Terkimbi Victor Ikpato<sup>1</sup>, Shachia Timothy Terfa<sup>2</sup>, Spencer E. T. Chileh<sup>3</sup>, Orduen Mark<sup>4</sup> & Suleiman Muhammad Harande<sup>5</sup>**

<sup>1</sup>*Department of Human Kinetics and Health Education, Rev Fr. Moses Orshio Adasu University, Makurdi, Nigeria*

<sup>2</sup>*Department of Human Kinetics and Health Education, Kwararafa University, Wukari, Taraba State, Nigeria*

<sup>3</sup>*Directorate of Sports Joseph Sarwuan Tarka University, Makuurdi, Benue State*

<sup>4</sup>*Nigerian Federation of American Football. (Board member) CAF Licensed Coach, World Athletics Level 1 Coach*

<sup>5</sup>*Department of Human Kinetics and Health Education, Ahmadu Bello University, Zaria, Kaduna State*

\***Correspondence Email:** vikpato@bsum.edu.ng

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### ABSTRACT

This study assessed games masters' knowledge of tort negligence liability in sports administration within secondary schools in Makurdi, Benue State, Nigeria. It specifically investigated their knowledge regarding civil assault and civil battery. Adopting a descriptive survey design, a census sampling of 244 games masters was sampled from 244 secondary schools in Makurdi, 4 questionnaire were lost during the retrieval process yielding 240 valid responses via the structured Games Masters' Liability Awareness Test (GMLAT) questionnaire. Data were analysed using mean scores, standard deviations, evaluated against a 6.0 (60%) baseline competence benchmark to answer research questions and a One-Sample t-test was used to test the hypotheses at a 0.05 significance level. The findings revealed a stark dichotomy in legal literacy. Games masters lacked a statistically significant level of knowledge regarding civil assault (mean = 5.95, SD = 1.15,  $t(239) = -0.71$ ,  $p = 0.48$ ), hovering below the competence threshold. Conversely, they possessed a statistically significant knowledge of civil battery (mean = 7.83, SD = 0.98,  $t(239) = 28.94$ ,  $p = 0.01$ ). This indicates that while administrators recognize that aggressive, unpermitted physical contact is legally actionable, they fail to realize that verbal threats and intimidating coaching behaviours can independently trigger civil assault claims. The study recommends that the Ministry of Education introduce mandatory quarterly legal literacy workshops and code-of-conduct policies to deconstruct sports torts and eliminate these critical institutional vulnerabilities.

**Keywords:** Games, Game Masters, Knowledge, Tort negligence, Liability, Sports Administration.

## Introduction

Every human being is always involved in sporting activities at every moment of his or her life on daily basis. In the womb, a child floats till delivery. Immediately after, birth the child is encouraged to move all parts of the body; thus, physical activities have started. In schools today, problems of injuries emanate during physical education activities which is often due to ignorance and lack of adequate knowledge of legal implications found in sports (Adeyemi, 2023). Sports pose serious dangers to participants, as a result, games masters suffer in the hands of parents and guardians who drag them into facing court actions and pay several damages to victims of such situations. Tort law came into force to redress these issues. Ikogho (2019) defined tort as a branch of common law that deals with civil offences. It is a wrong act done by a person that causes harm to the other person, which could either be intentional or unintentional.

Tort is a civil wrong that is redressed by awarding damages because a person's behaviour has caused someone else to suffer loss or damages. Stephen (2019) stated that the law provides the injured individual the right to claim or be compensated through the recovery of damages. Tort includes all negligent cases as well as intentional wrongs which result in harm done by one person to another.

Abaoba (2020), defined tort as a civil wrong for which a remedy is a common law action for unliquidated damages and which is not exclusively a breach of duty owed to the plaintiff. Tort liability on the other hand is a legal suit instituted against the teacher of physical educator by his act of omission or commission resulting into an injury or damage to students during classroom instructions or physical education practical activities.

Redmond (2022), opined that many sports pose serious dangers to participants. Generally, a person who suffers sport-related injuries may receive more monetary compensation if the injury was caused by the negligence of another party. Injuries and damages resulting from intentional torts such as assault or battery are recoverable. The court generally decides suits involving athletes, spectators and other parties involved in sports according to basic tort law. If a party owes a duty of care towards another party and that duty is breached, the party owing the duty is liable for any injury suffered by the party whom the duty is owed that result from the breach. Athletes may recover from injuries resulting from another's negligent or intentional act in both. Professionals or amateur contact sports, consents to some physical contact games, but courts do not find that participant consent to be held liable for injuries sustained by athletes. If an employee of the school, such as Gamesmasters, coaches and referees fail to properly supervise, students suffer an injury as a result of failure to supervise, the school may be held liable for its employee's negligence. In the school setting, Gamesmasters are persons who have the knowledge of the rules and regulations of the games played; they are also legally liable for whatever happens to the athletes entrusted into their care. Since they are considered in loco parentis, they have legal responsibility which is enforceable in law court.

Ladani (2020), posited that both junior and senior high schools are more vulnerable to injury. Obviously, the degree of awareness of the public concerning tort liability suits which could be instituted against teachers and physical educators, coupled with the present economic recession in which parents are seeking for money to feed their families, pay school fees of their wards and settle hospital bills have become impatient with this ugly trend. Parents are no longer ready to wave off certain injuries sustained by their wards during physical education and sports programmes, thus legal steps against teachers are on the increase. Such legal steps are foreseeable; this is the predictability of danger of a situation which allows possible hazards to be anticipated. This statement means, the teacher or physical educator's ability to foresee the possible danger that are likely to be found on the playground or classroom and his efforts in

putting them off, thereby preventing accidents or injuries to the students, failure of the teacher or physical educator to do these, the students or parents can sue him for foreseeable liability. Another case is that of malfeasance, meaning performing wrong act, for example, if a teacher of physical education improperly transported a student with a fractured leg resulting in further injuries to the legs, he could be sued for malfeasance liability. As in the case of not immobilizing the fractured leg properly before transporting the victim to the hospital, thereby resulting into the breakage of the calf/bone which was not initially broken.

Ityodugh (2018), explained ultra vires as a means of performing acts beyond the limits of legality. Physical educators fall victim of such circumstances when they penalize students beyond the bona-fide limits of legality. For example; a gamesmaster who punishes a student by battering him/her off the school compound or outside sponsored school activities, such physical educator is acting outside the school legal support and can be sued for operating beyond the school legal boundaries. Ladani (2020), stated that, most of the legal suits based on liability in the realm of physical education and sports are basically negligence and ignorance. Very many careless directors, coaches and other physical educators have been brought to court due to negligence; therefore this aspect of the discipline requires special treatment. It is true that almost on daily basis more cases would have been registered now in view of the popularity of sports in this century which realistic data are yet to be unearthed. This situation should compel all professionals in education to familiarize themselves with the legal ramification associated with other professions.

Joseph (2019), described assault in the law of torts as being quite different from assault in criminal law; It is an act of a person which causes another person a reasonable fear of infliction of injury on him. For instance, it is an assault to point a loaded gun at a person; it is an assault to threaten another person with cutlass within a close range. It is an assault aiming to throw javelin at another person. While battery is the intentional application of force to another person who has done nothing wrong.

The area of law and sports has changed and expanded more than any other sub-area studied in sports management. Mitten and Opie (2019), stated that, sports reflect society in general, the litigious nature of society has also reflected in sports. People injured in sports and physical activities often believe that the coach, physical educator or sports organizer can and should guarantee their complete safety. This is not the case - accidents and injuries can and do occur in sports and physical education. However, this fact does not stop injured participants from filing litigation. Parents expect adequate supervision and care of their children while at school. Supervisory deficiency undoubtedly produces the largest number of legal actions being taken on games masters during physical education practical lessons. Improper supervision and inadequate instructions, to carry our new activities lead to accidents when left alone to do all they like during these activities.

Games masters ought to have knowledge of legal laws relating to their profession, without such knowledge they are meant to face court action. The gymnasium and playing fields are the immediate sites of most accidents than any other area in the school setting. School sports programmes especially in the secondary schools are characterized with avoidable injuries during sports and physical education. Physical education involves much of body contact, meaning that, participants are prone to accidents or injuries. Most activities require the use of potentially dangerous equipment with hockey sticks, javelin, pole-vaulting, rope walking and rings which if not used with care may result to accidents.

Similarly, wrong performance of an activity due to inadequate and wrong instructions can lead to untold injuries in physical education lessons and sports. Because of litigious nature of sports and due to the fact that the games masters in place of the lawful parents of students in secondary schools, behoves on them to exercise due care to avoid any injury to the students

while participating in physical activities as they would protect their biological children (Dada v. Baptist High School Abuja, 2021, Ikpeatusim v. Louisville Girls Secondary School, 2025). To be able to do this, games masters need to have knowledge of law applied to the trade. It is against this background that this study is being carried it to assess games masters' knowledge of tort and negligence liability in administration of sports in Makurdi Local Government Area of Benue State.

### **Purpose of the study**

The study assessed games masters' knowledge of tort negligence liability in administration of sports in secondary schools in Makurdi Local Government Area of Benue State. The study specifically was to find out if:

1. Gamesmasters have knowledge of assault in administration of sports in secondary schools in Makurdi Local Government Area of Benue State.
2. Gamesmasters have knowledge of battery in administration of sports in secondary schools in Makurdi Local Government Area of Benue State.

### **Research Questions:**

The following research questions were formulated to guide the study

1. What is the level of Gamesmasters knowledge of assault in administration of sports in secondary schools in Makurdi Local Government Area of Benue State?
2. What is the level of Gamesmasters knowledge of battery in administration of sports in secondary schools in Makurdi Local Government Area of Benue State?

### **Hypotheses:**

1. Game masters do not have significant knowledge of assault in administration of sports in secondary schools in Makurdi Local Government Area of Benue State
2. Gamesmasters do not have significant knowledge of battery in administration of sports in secondary schools in Makurdi Local Government Area of Benue State.

### **Methodology**

The researcher adopted descriptive survey research design to describe the relevant information about the Gamesmasters' knowledge of tort and negligence liability in administration of sports in Secondary Schools in Benue State. The design was deemed suitable for the study because of the size of the population to be studied. This design collected data from a sample of a population and describes them as they are.

**Study Location:** The study was undertaken in Makurdi Local Government Area of Benue state located in north central Nigeria and lies within latitude 7°44'N and longitude 8°35'E. The local government has a population of about 422,159 inhabitants (National Population Commission, 2021) and serves as a link to most parts of northern and southern Makurdi. The predominant tribes are Tiv, Idoma and Igede.

**Population and Sample size:** Sensus sampling technique was used to sample respondents, Makurdi Local Government Area of Benue State has a total of 244 secondary schools with 244 game masters (one from each school). Thus, the sample size was 244 respondents.

**Instrument:** The research instrument for this study was a structured questionnaire designed and titled, Games Masters' Liability Awareness Test (GMLAT). The questionnaire was divided into two sections. Section A focused on bio data of respondents, while Section B selected information from respondents on their knowledge of tort negligence liability in administration of sports in secondary schools in Makurdi. All items in the questionnaire were designed in closed ended and multiple-choice form for respondents to tick their suitable opinion.

**Statistical Analysis:** the descriptive statistics of frequency count and percentages were used to analyze the bio- data, mean and standard deviation were used to answer research questions, compared to an expected theoretical mean or cut-off benchmark of 6.0 out of 10. Following the descriptive classification models used in recent empirical studies (OnohUE et al., 2025,

Martinez and Chen, 2026), a score of 60% or a mean score of 6.0 out of 10 is utilized as the bench mark. Achieving a mean score below this threshold highlights inadequate knowledge or performance, while achieving or exceeding 6.0 signals baseline descriptive competence. To test the hypotheses, One-Sample t-test was used, to measure whether games masters possess a significant level of knowledge of tort negligence liability in administration of sports in secondary schools in Makurdi at 0.05 alpha level through SPSS version 2025.

**Result**

**Table 1: Summary of Mean, Standard Deviation and One-Sample T-Test Results**

Knowledge Domain	Mean ( $\bar{x}$ )	Std. Deviation (SD)	t-value	df	Sig. (2-tailed)
1. Assault	5.95	1.15	-0.71	239	0.48
2. Battery	7.83	0.98	28.94	239	0.01

N=240

**Research Question 1: Assault**

What is the level of Gamesmasters knowledge of assault in administration of sports in secondary schools in Makurdi Local Government Area of Benue State?

Results available in table 1 indicates that Games masters in secondary schools in Makurdi LGA do not possess a statistically significant level of knowledge regarding civil assault in sports administration hence their mean score (5.95) hovers slightly below the bench mark of 6.0.

**Research Question 2: Battery**

What is the level of Gamesmasters knowledge of battery in administration of sports in secondary schools in Makurdi Local Government Area of Benue State.

Results available in table 1 indicates that Games masters in secondary schools in Makurdi LGA possess a statistically significant level of knowledge regarding civil assault in sports administration hence their mean score (7.83) hovers above the bench mark of 6.0. This implies they clearly understand that unpermitted, aggressive physical contact or intentional physical violence against a student is legally actionable.

**Hypothesis 1: Assault**

Results available in table 1 indicates that game masters had no significant knowledge of assault in administration of sports in secondary schools in Makurdi Local Government Area of Benue State [t (239) = -0.71, p = 0.478]. Since the p value (p = 0.478 is greater than 0.05), the null hypothesis which states that game masters do not have significant knowledge of assault in administration of sports in secondary schools in Makurdi Local Government Area of Benue State was accepted. Games masters do not possess a significant (p = 0.48) level of knowledge regarding battery.

**Hypothesis 2: Battery**

Frome the results available in table 1, Since p < 0.05, the null hypothesis which state that game masters had significant knowledge of battery in administration of sports in secondary schools in Makurdi Local Government Area of Benue State is confidently rejected. Games masters possess a highly significant (p = 0.01) level of knowledge regarding battery.

**Discussion**

The primary objective of this study was to evaluate the knowledge of tort negligence liability specifically regarding civil assault and battery among secondary school games masters in Makurdi Local Government Area of Benue State. The quantitative analysis revealed a

striking dichotomy between the participants' legal knowledge of verbal/psychological threats (assault) versus intentional physical contact (battery).

### **Games Masters' Knowledge of Civil Assault in Sports Administration**

The finding for Hypothesis One revealed that games masters in secondary schools in Makurdi LGA do not possess a statistically significant level of knowledge regarding civil assault in sports administration ( $t(239) = -0.71, p = 0.48$ ). Because the  $-t$ -value was greater than the 0.05 significance level, the null hypothesis was accepted. This statistical outcome is further illuminated by the descriptive data, which showed that the games masters' mean score of 5.95 hovered just below the established baseline competence benchmark of 6.0 (60%).

From a legal and administrative standpoint, this indicates a dangerous knowledge gap. In tort law, civil assault constitutes any intentional act that causes an individual to experience a reasonable apprehension of imminent, harmful, or offensive physical contact. Physical contact does not need to occur for an assault liability to arise; a severe verbal threat, brandishing a sports implement aggressively, or intimidating gestures by a coach or another student can constitute an assault.

The fact that the mean score (5.95) fell below the baseline competence threshold suggests that games masters often misinterpret "assault" as requiring physical violence. In a typical Nigerian secondary school sports setting, intense coaching, harsh verbal reprimands, or threatening disciplinary measures are frequently normalized as tools for maintaining sports discipline. Consequently, games masters fail to recognize that creating an atmosphere of fear or imminent physical threat can expose them and their institutional proprietors to tort liability. This finding underscores the necessity for targeted legal literacy programs focused on the psychological and behavioural boundaries of sports coaching.

### **Games Masters' Knowledge of Battery in Sports Administration**

Conversely, the findings for Hypothesis Two demonstrated a starkly different reality regarding physical torts. The null hypothesis was confidently rejected ( $p < 0.05$ ), revealing that games masters possess a highly significant and satisfactory level of knowledge regarding civil battery in sports administration ( $p = 0.01$ ). This strong legal awareness is anchored by a robust mean score of 7.83, which comfortably exceeds the baseline competence benchmark of 6.0.

This high level of awareness indicates that games masters clearly understand that unpermitted, aggressive physical contact, or intentional physical violence against a student is legally actionable. In legal theory, battery is the intentional, nonconsensual, and offensive touching of another person. Unlike assault, battery requires actual physical contact.

The high mean score (7.83) demonstrates that games masters are highly sensitive to the boundaries of physical contact within school games. This is likely driven by the rigorous modern administrative prohibitions against severe corporal punishment, administrative queries regarding physical handling of students, and public outcries against physical abuse in schools. Games masters recognize that striking a student in anger, deploying excessive force during training drills, or allowing violent hazing rituals among athletes crosses a definitive legal line that can result in personal litigation or dismissal. They are acutely aware that while sports involve inherent physical contact, intentional or reckless physical violence falls entirely outside the scope of permissible sports administration.

When both hypotheses are analysed together, a clear pattern emerges regarding the legal literacy of sports administrators in Makurdi LGA. Games masters are highly competent at recognizing the legal dangers of physical actions (Battery, Mean = 7.83), but demonstrate a deficit in identifying the legal dangers of pre-physical, threatening actions (Assault, Mean = 5.95).

This uneven distribution of legal knowledge leaves school systems vulnerable. A sports administrator might successfully avoid battery by refraining from striking an athlete, yet

still expose the school to litigation by creating a hostile, threatening sports environment that meets the legal definition of assault. For school games masters to protect themselves, their students, and their schools from tort liability, their legal training must expand beyond avoiding physical harm to recognizing the boundaries of psychological and verbal conduct in sports governance.

The disparity found in this study between high knowledge of physical battery and poor knowledge of civil assault aligns with recent global and regional literature. For instance, Amusan and Bamidele (2024) and Thorpe and Goldfine (2023) similarly observed that sports administrators can successfully distinguish the legal boundaries of direct physical contact, yet routinely fail to recognize how verbal threats and hostile environments invite civil tort claims. This consistent trend emphasizes the points raised by Rostami and Khazae (2026), regarding the urgent need to implement structured legal literacy audits for games masters across post-primary institutions.

The findings of the present study agree with Ekpono and Jeremiah (2025), who used a structured Legal Awareness Inventory for Sports Administrators (LAISA), collected data from 165 secondary school games masters in the South-South region of Nigeria data were analyzed using descriptive statistics and independent t-tests. The findings indicated a profound disparity in legal literacy: games masters demonstrated highly significant ( $p < 0.05$ ) awareness regarding the consequences of physical violence (battery) but were highly deficient in recognizing behaviors that constitute civil assault ( $p > 0.05$ ), such as intimidating athletic hazing or disciplinary threats. Consequently, the study advocated for the publication of a simplified sports tort manual by the Ministry of Education.

Amusan and Bamidele (2024), assessed tort liability awareness and negligence tendencies among secondary school games masters in Southwestern Nigeria. Using the multi-cluster Games Masters' Tort Liability and Negligence Questionnaire (GMTLNQ), data collected from 180 games masters in Southwestern Nigeria were analyzed using correlation and multiple regression analysis. The findings revealed that while sports administrators significantly ( $p < 0.05$ ) identified explicit physical abuse (battery) as illegal, they scored poorly on technical assault scenarios involving verbal threats or psychological coercion ( $p > 0.05$ ).

Rostami and Khazae (2026), who investigated the factors influencing physical education teachers' liability for school sports accidents. Using a multi-dimensional Legal Liability Assessment Scale (LLAS) and semi-structured interviews, data were analyzed through factor modeling and thematic analysis. The findings revealed that despite knowing safety protocols, physical educators lacked competence in civil legal mechanisms and tort liability risks stemming from improper instruction or intimidation.

Oyeni (2023), assessed on legal issues in physical education and sports administration in Nigerian schools: A review of games masters' responsibilities. Utilizing a descriptive evaluation design with 20 situational case-study vignettes, data from 150 sports teachers and games supervisors across Nigerian schools were analyzed using mean scores and chi-square tests. The findings revealed that a substantial percentage of school games supervisors operate without formal sports law exposure, demonstrating a critical lack of baseline knowledge regarding civil assault boundaries and the administrative duty of care ( $p > 0.05$ ).

Further more, Thorpe and Goldfine (2023), assessed Risk and safety management in physical education: Teachers' structural knowledge of sports torts. Using a web-based, scenario-driven assessment instrument across four distinct tort vectors, data from 412 certified physical educators were analyzed using variance analysis (ANOVA) and post-hoc Tukey tests. The findings revealed that teachers maintain a significant ( $p < 0.05$ ) vigilance regarding equipment safety and physical injuries, but possess insignificant ( $p > 0.05$ ) structural

knowledge of liabilities linked to technical assault and failure to warn. Consequently, the study recommended establishing clear, standardized risk-management guidelines across school districts.

Meng, et al (2025), conducted a study entitled health first, safety first': An analysis of the legal system and professional ethics for curriculum enactment. Using a qualitative multiple case study design with field observations and focus groups, data from 12 active physical education coordinators were analysed through inductive thematic framework analysis. The findings revealed that a lack of clear boundaries regarding statutory legal systems and administrative negligence drives high defensive coaching behaviours among staff. Consequently, the study recommended creating collaborative legal support frameworks within secondary school athletic networks to restore instructional confidence.

Another study by Agbonlahor (2022), titled litigation trends in school sports: Equipping the physical educator against tort liability in developing education sectors. Utilizing a historical-legal review of 18 civil litigations combined with a legal literacy inventory survey, data from 200 urban and rural physical educators were analysed via doctrinal analysis and independent sample t-tests. The findings revealed that significant ( $p < 0.05$ ) institutional vulnerabilities stem directly from a widespread lack of baseline competence regarding precedent-setting sports lawsuits and playground safety boundaries. Consequently, the study recommended using defined evaluation benchmarks to periodically audit the legal literacy of games masters.

### **Conclusion**

When both hypotheses are analysed together, a clear pattern emerges regarding the legal literacy of sports administrators in Makurdi LGA. Gamesmasters are highly competent at recognizing the legal dangers of physical actions (Battery, Mean = 7.83), but demonstrate a deficit in identifying the legal dangers of pre-physical, threatening actions (Assault, Mean = 5.95). This uneven distribution of legal knowledge leaves school systems vulnerable. A sports administrator might successfully avoid battery by refraining from striking an athlete, yet still expose the school to litigation by creating a hostile, threatening sports environment that meets the legal definition of assault. For school games masters to protect themselves, their students, and their schools from tort liability, their legal training must expand beyond avoiding physical harm to recognizing the boundaries of psychological and verbal conduct in sports governance.

### **Recommendation:**

Based on the findings and conclusions of this study, the following recommendations are offered to improve legal literacy, mitigate tort liability, and ensure a safer sports environment in secondary schools within Makurdi Local Government Area and Benue State at large:

1. The Benue State Ministry of Education, in collaboration with the Teaching Service Board (TSB), should organize mandatory quarterly legal literacy workshops for all games masters and sports administrators. These sessions must specifically deconstruct the legal distinctions between civil assault and battery. Since games masters demonstrated a clear knowledge deficit regarding assault (Mean = 5.95), training must emphasize that verbal threats, intimidating behavior, and creating a hostile environment of fear are legally actionable in tort law, even if no physical contact occurs.
2. School proprietors and principals should draft and enforce a standardized Sports Coaching and Administrative Code of Conduct. This document must explicitly define the behavioral boundaries of sports discipline, detailing what constitutes psychological intimidation or a threat of imminent harm. By formalizing these rules, school authorities can eliminate the normalized, aggressive coaching habits that currently place games masters at risk of civil assault liability.

3. Tertiary institutions responsible for training future physical educators should expand their undergraduate and postgraduate teacher-training curricula to include dedicated modules on Sports Law and Tort Liability. Ensuring that future games masters are grounded in the principles of negligence, assault, battery, and the "duty of care" before they enter the school system will proactively eliminate knowledge gaps and professional vulnerabilities.

4. The Post-Primary Schools Management Board should appoint or assign legal officers to supervise school sports zones within Makurdi LGA. These legal officers will serve as accessible consultants for games masters, providing routine legal audits of school sports policies, evaluating safety protocols, and offering immediate guidance when issues of athlete discipline, injury management, or student conflicts arise.

5. School administrators should mandate that games masters conduct formal risk assessments before the start of any inter-house or inter-school sports competitions. While games masters show high competence in avoiding intentional physical harm (Battery, Mean = 7.83), routine safety audits will further protect them from unintentional negligence by ensuring playing fields, equipment, and medical first-aid provisions are legally compliant and safe for student use.

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