



## **McLaren Independent Review of Gymnastics in Canada**

### **A Framework for Change: How to Achieve a Culture Shift for Gymnastics in Canada**

McLaren Global Sport Solutions Inc.

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## Chapter 1: Executive Summary

### *A Framework for Change: How to Achieve a Culture Shift for Gymnastics in Canada*

#### 1.1 Introduction

This Report provides a framework and methodology to address the tsunami of negative criticism and egregious allegations of abuse that have been leveled at the governance of gymnastics in Canada – referred to as the ‘Culture Review Framework’ (Chapter 3). These allegations are well documented and are discussed below as the impetus for this Report. The Report also provides a comprehensive review of Gymnastic Canada’s (‘GymCan’) Safe Sport and related policies.

Although this Report is authored by McLaren Global Sport Solutions (‘MGSS’) and its Independent Review Team (‘IRT’), the findings presented herein reflect the collective voice and impassioned pleas for change amongst more than 1,000 members of the gymnastics community in Canada who participated in the Independent Review (‘IR’). This includes highly descriptive, personal accounts from gymnasts, parents, coaches, judges, staff and the leaders of provincial and national governing bodies.

This Report provides GymCan and Provincial and Territorial Organisations (‘PTOs’) with the insights, findings and recommendations needed to begin the critical and necessary work of changing the culture of the sport. This Report is not a culture review; it identifies the systemic areas of concern that Gymnastics Canada, PTOs and those government agencies who fund gymnastics should focus on in order to truly drive change. The Culture Review Framework is a bespoke process that is unique from international culture reviews that have been undertaken thus far because the methodology

#### Report Highlights

- More than 1,000 voices representing the Gymnastics Community (‘GC’) in Canada provided feedback;
- The GC demands change and strongly supports a rigorous Independent Culture Review be undertaken;
- Most gymnasts in the sport report positive experiences, however, toxic examples of abuse and maltreatment persist at all levels; coaches, judges and staff have also reported maltreatment;
- Abuse & maltreatment of gymnasts appears most pronounced in Women’s Artistic Gymnastics and Women’s Rhythmic Gymnastics;
- The Gymnastics Culture Review should be led by an interdisciplinary team and take a Human Rights based approach – included as a key feature of the proposed Culture Review Framework;
- Every level of the sport and its stakeholders demands attention, from recreational to high-performance clubs to GymCan itself and how the sport is governed in Canada.

and recommendations are built upon the feedback of a broad cross-section of the gymnastics community in Canada.

The work to undertake a Gymnastics Culture Review will be challenging. But this work is long overdue to address the myriad of issues that continue to plague the sport in Canada. The investment of time and resources in the Culture Review Framework will ensure that the concerns, priorities and solutions expressed by the gymnastics community in this Report are finally acted upon.

### Report Caveats

MGSS and the IRT wish to bring two important caveats to the readers' attention.

#### 1) 'Facts' versus 'Opinions'

This Report is not an investigation report. It does not provide findings of fact. The plethora of comments and statements received from the gymnastics community (numbering in the thousands) were not individually corroborated or fact-checked by the IRT. That material reflects the views and opinions of the persons interviewed or surveyed. Some individual claims may give rise to further investigation or fact-checking if deemed necessary by any governing organisation identified in this Report. The IRT uses the material to develop several compelling themes regarding the views and assumptions of the community as is outlined in Chapter 2. The idiom 'Where there is smoke, there is fire' metaphorically describes this approach. Although individual accounts were not corroborated, the similarity and alignment of comments around specific consistent themes suggest that these issues are of significant concern to the Canadian gymnastics community and should be given further attention in the pending Gymnastics Culture Review Framework proposed in Chapter 3.

This approach is important and by design. The IRT is keenly aware of the gymnastics community's discontent about voices (athletes or others) not being heard. Consequently, individuals are quoted verbatim in the Report so as not to perpetuate the expressed discontent.

## 2) 'Eastern European' in Context

The term 'Eastern European' has been used in verbatim quotes provided by many individuals from the Canadian gymnastics community. It is referenced extensively in many international reviews, including the Whyte Review into British Gymnastics ('BG'). For example, in her report, Ms. Whyte states, "*I was informed that an orthodoxy prevailed in the sport in the 1980s and 1990s that Eastern European and Russian coaches knew best how to secure medals [...]*" and "*A significant number of coaches arrived in the UK after the collapse of the Soviet Union and the harsh and abrasive techniques and communication styles (at least by domestic standards), of some of them, became normal in the sport, particularly at the elite end.*"<sup>1</sup>

In the context of this Report and as it applies to gymnastics in Canada, the term Eastern European carries the same meaning as described by Ms. Whyte; it is meant to suggest the influence of negative coaching practices emerging from coaches from this geographic region; coaching practices according to many that have heavily influenced domestic coaches.

MGSS and its IRT recognise that this term may be objectionable to readers of Eastern European descent and others. The sport has surely been influenced (both positively and negatively) from coaches and coaching practices from all regions of the world in addition to former Soviet Union countries. The IRT has chosen instead to more broadly use the word 'international' in its Report. Any references to 'Eastern European' otherwise provided in this Report reflect verbatim quotes.

### Report Structure

Chapter 1 provides a high-level overview of the IRT's scope of work and findings. The full 277-page Report consists of five Chapters and three Appendices. Chapter 2 is an assimilation of key themes which reflect the collective voice of more than 1,000 individuals including those with in-depth experience in the Canadian gymnastics community. This includes 443 gymnasts representing every province in Canada and every level of competition within the sport, from grassroots recreational gymnasts to Olympians. You will hear their voices throughout this Report.

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<sup>1</sup> The Whyte Review, "*An independent investigation commissioned by Sport England and UK Sport following allegations of mistreatment within the sport of gymnastics,*" June 2022.

Chapter 3 sets forth the IRT's Independent Culture Review Framework and recommendations which build on the themes identified in Chapter 2 and on the extensive primary research conducted. Chapter 4 provides a technical analysis of GymCan's Safe Sport and related policies. Finally, Chapter 5 summarises several recent international gymnastics reviews.

The IRT is deeply grateful to every person who shared their uniquely personal experiences and insights in hopes of contributing to positive changes within the sport of gymnastics in Canada.

### Impetus for the Independent Review

On 30 June 2022, McLaren Global Sport Solutions ('MGSS') announced that it would lead an independent process to review GymCan's Safe Sport policies as well as develop a framework and recommendations to inform the implementation of a culture review for the sport of gymnastics in Canada.<sup>2</sup> MGSS's selection by the GymCan Board of Directors followed a public Request for Proposal ('RFP') process initiated by GymCan.

The impetus for the Independent Review ('IR') was based on myriad allegations of maltreatment within the Canadian gymnastics community including hundreds of Canadian gymnasts who "have signed an open letter calling for an independent investigation into an ongoing toxic culture and abusive practices at Gymnastics Canada."<sup>3</sup> That letter was addressed to Vicki Walker, Director General, Sport Canada, and included the following allegations:

*"As current and former elite Canadian gymnasts, we have been and continue to be subject to a toxic culture and abusive practices within Canadian gymnastics. We are and have been members of the Olympic Team, the National Team, and other competitive programs. For almost a decade, the fear of retribution has prevented us and scores of other athletes from speaking out. However, we can no longer sit in silence. We are coming forward with our experiences of abuse, neglect, and discrimination in hopes of forcing change. We ask*

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<sup>2</sup> McLaren Global Sport Solutions, "MCLAREN GLOBAL SPORT SOLUTIONS TO DEVELOP GYMNASTICS CANADA'S CULTURE REVIEW ROADMAP," 30 June 2022. Online: [MGSS GymCan PressRelease-June-30-22.pdf \(mclarenglobalsportsolutions.com\)](https://mclarenglobalsportsolutions.com/press-releases/mclaren-global-sport-solutions-to-develop-gymnastics-canadas-culture-review-roadmap/) [Last Accessed: 5 January 2023].

<sup>3</sup> The Canadian Press, "'My self-confidence is almost non-existent': Canadian gymnasts' letter on abuse spurs roundtable," 1 April 2022. Online: ['My self-confidence is almost non-existent': Canadian gymnasts' letter on abuse spurs roundtable | CBC Sports](https://www.cbc.ca/sports/2022/04/01/my-self-confidence-is-almost-non-existent-canadian-gymnasts-letter-on-abuse-spurs-roundtable/) [Last Accessed: 2 January 2023].

*Sport Canada to take action to ensure the next generation of Canadian gymnasts is not subject to the physical and psychological trauma that we have had to endure.”*

According to GymCan, “Gymnastics Canada was made aware yesterday (28 March 2022) of an ‘open letter’ circulated by Global Athlete expressing concerns regarding abuse and maltreatment in gymnastics. To date, Gymnastics Canada has not received the letter but is aware of it being circulated.”<sup>4</sup>

The open letter is a clarion call for action in a sport that many allege to be toxic in Canada, not unlike the findings of multiple international reviews conducted between 2017-2022 and reviewed by MGSS as part of its Terms of Reference. There has been no independent verification of the allegations made and no statistics are available as to the type of abuse, when it occurred, in which jurisdiction(s) and outcomes of any complaint proceedings that may have been initiated in respect to those who have signed-on in support of the letter.

Despite this lack of information, it is obvious that there are significant issues related to culture that are manifested in the maltreatment of athletes and others within the gymnastics community in Canada including coaches and staff in some contexts; this includes first-hand accounts from athletes and others who shared with our trauma-informed team deeply personal stories of maltreatment and abusive training environments, both historically and present day.

Following the publication of the open letter, a class action lawsuit was filed on 11 May 2022 in the Supreme Court of British Columbia which “identifies Gymnastics Canada, Gymnastics B.C., Alberta Gymnastics Federation, Gymnastics Saskatchewan Inc., Manitoba Gymnastics Association Inc., The Ontario Gymnastic Federation, and Fédération de Gymnastique du Québec as defendants.”<sup>5</sup> The statement of claim alleges that “The defendants caused or contributed to the abuse of gymnasts by creating a culture and an environment where the abuse could occur,

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<sup>4</sup> Gymnastics Canada, “Gymnastics Canada responds to letter circulated by ‘Global Athlete’,” 29 March 2022. Online: [News | Gymnastics Canada \(gymcan.org\)](#) [Last Accessed: 2 January 2023].

<sup>5</sup> Howie, Sacks & Henry LLP, “GYMNASTICS CANADA AND PROVINCIAL GYM ASSOCIATIONS CLASS ACTION COMMENCED IN CANADA,” 11 May 2022. Online: [GYMNASTICS CANADA AND PROVINCIAL GYM ASSOCIATIONS CLASS ACTION COMMENCED IN CANADA \(newswire.ca\)](#) [Last Accessed: 2 January 2023].

*and failing to take appropriate steps to protect the athletes in their care and control, many of whom were children when the abuse took place.”<sup>6</sup>*

The Representative Plaintiff is Amelia Cline, a former artistic gymnast who “*said the abuse led her to walk away from the sport at the age of 13.*”<sup>7</sup> The statement of claim alleges Ms. Cline and her teammates were subjected to various forms of abuse dating back to 2000. The statement of claim further alleges that “*Amelia’s experience of abuse is representative of what many gymnasts in Canada endure. Numerous gymnasts across Canada have brought forward complaints spanning decades that detail their experiences of sexual, physical and psychological abuse and institutional complicity that has enabled the culture of mistreatment of gymnastics athletes to persist.*”

During the writing of this Report, a documentary entitled “*Broken: The Toxic Culture of Canadian Gymnastics*” aired on the streaming network CRAVE and was promoted heavily on The Sports Network (‘TSN’) and the newsmagazine program W5 in Canada. “*The documentary unveils a litany of alleged and proven abuses in gymnastics and boundaries which are not only crossed but smashed. Some are sexual, others deal with physical endangerment, harassment, bullying, lack of respect, abuse of power and authority, body-shaming, and other emotional and psychological mistreatment.*”<sup>8</sup>

On 12 January 2022, MacLean’s Magazine published an article entitled “*The Harder They Fall*” which details the following: “*Dave and Elizabeth Brubaker became top Canadian gymnastics coaches by pushing young girls to their limit. Their former athletes say the tough training was a cover for abuse.*”<sup>9</sup> The article tells the difficult story of Abby Spadafora including disturbing accounts of abuse by the Brubakers.

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<sup>6</sup> Supreme Court of British Columbia, “*Notice of Civil Claim Between Amelia Cline (Plaintiff) and Gymnastics Canada et al. (Defendants)*,” 11 May 2022.

<sup>7</sup> CTV News Vancouver, “*Former B.C. gymnast the lead plaintiff in class-action lawsuit against Gymnastics Canada over alleged abuse,*” 12 May 2022. Online: [Gymnastics Canada class action: B.C. woman lead plaintiff | CTV News](https://www.ctvnews.ca/sports/former-b-c-gymnast-the-lead-plaintiff-in-class-action-lawsuit-against-gymnastics-canada-over-alleged-abuse-1.5400111) [Last Accessed: 16 January 2022].

<sup>8</sup> The Hamilton Spectator, “*Rick Westhead takes on abuse in sport in ‘Broken’ documentary,*” 12 November 2022.

<sup>9</sup> MacLean’s Magazine, “*The Harder They Fall,*” 12 January 2022.

The allegations against Gymnastics Canada and provincial governing bodies comes amidst a Safe Sport crisis and reckoning in Canadian amateur sport. Several other National Sport Organisations ('NSOs') in Canada have also been subjected to highly publicised claims of abuse including, but not limited to, Athletics Canada, Alpine Canada, Bobsleigh Canada, Boxing Canada, Canada Soccer, Hockey Canada, and Water Polo Canada. According to sport policy experts at the University of Toronto, *"In our view, the current crises stem from the failure of governments and sports bodies to create policies and programs, fund, and monitor and evaluate sports within the established frameworks of human rights."*<sup>10</sup>

On 12 June 2022 The Honourable Pascale St-Onge, Minister of Sport, announced several updates concerning Safe Sport following *"an initial emergency meeting with various leaders of the sport system"*<sup>11</sup> that was convened on 31 March 2022. Minister St-Onge *"noted that several observations clearly emerged from this period of consultation, including the need to improve organizations' accountability, the need to promote better governance practices within organizations, and the need to increase the representation and voice of athletes in our system."* MGSS is in lockstep with these observations as they pertain to gymnastics in Canada. Additional measures were announced in June 2022 to be led by Sport Canada including *"Responsibility, Accountability and Governance"* explained as follows:

*"Effective April 1, 2023, Sport Canada will make changes to contribution agreements with organizations that will meet the new eligibility requirements of the Sport Funding and Accountability Framework. The goal is to ensure that sport organizations receiving federal funding meet specific governance, accountability and safe sport standards. Over the next few months, Sport Canada will work to develop new requirements and standards to achieve this objective."*<sup>12</sup>

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<sup>10</sup> Kidd, Bruce; Kerr, Gretchen; and Donnelly, Peter, *"ENSURING FULL AND SAFE PARTICIPATION BY CANADIAN GIRLS AND WOMEN, FAIR ATHLETE REPRESENTATION, AND GOOD GOVERNANCE IN CANADIAN SPORT – A brief to The Standing Committee on the Status of Women and The Standing Committee on Canadian Heritage,"* 14 December 2022.

<sup>11</sup> Government of Canada, *"Government of Canada provides update and announces action on safe sport,"* 12 June 2022. Online: [Government of Canada provides update and announces action on safe sport - Canada.ca](https://www.canada.ca/en/government/canada-provides-update-and-announces-action-safe-sport.html) [Last Accessed: 4 January 2023].

<sup>12</sup> Ibid.

The creation of a Sport Canada Athlete Advisory Committee was also announced “to increase the representation of athletes in the sport system and to allow Sport Canada to obtain advice and guidance that reflect the realities of athletes in Canada.”<sup>13</sup>

During the writing of this Report, two Standing Committees in the Canadian House of Commons have held hearings about the pan-Canadian challenges facing amateur sport in Canada; these are the Standing Committee on the Status of Women and the Standing Committee on Canadian Heritage. It is hoped that this Independent Review published by MGSS will be helpful to these Standing Committees in furtherance of their important work.

### Primary Research

Extensive primary research involved more than 1,000 individuals within the Canadian gymnastics community. A total of 58 personal interviews were conducted with gymnasts (past and present), parents, coaches, judges, staff, and executive leadership of the national, provincial and territorial governing bodies for gymnastics. This included conversations with many gymnasts and others who openly and voluntarily shared their experiences of maltreatment and abuse. Sport policy experts were consulted as were the leaders of gymnastics reviews in the United Kingdom, New Zealand and the United States. Executives of Sport Canada, Own the Podium (‘OTP’), the Canadian Olympic Committee (‘COC’) and the Coaching Association of Canada (‘CAC’) consented to interviews.

Two surveys were developed and implemented. One was a survey of the executives of PTOs. The other was an open-access public survey of the gymnastics community in Canada. Together, a total of 974 individuals responded to these surveys (Appendix A and Appendix B). Many respondents indicated their appreciation for the opportunity to be heard and share their experiences.

The interviews and surveys included questions about the quality of an individual’s experience in the sport of gymnastics and sought feedback about how an eventual culture review of the sport

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<sup>13</sup> Government of Canada, “Government of Canada provides update and announces action on Safe Sport,” 12 June 2022. Online: [Government of Canada provides update and announces action on safe sport - Canada.ca](https://www.canada.ca/en/sport-canada/programs/safe-sport.html) [Last Accessed: 4 January 2023].

should be undertaken. Questions also were asked about the awareness and understanding of Safe Sport policies. The purpose of this research was to inform, rather than to unilaterally impose, a recommended process to implement a Gymnastics Culture Review in Canada. As such, the Culture Review Framework provided herein reflects several themes that emerged from consultation with the Canadian gymnastics community and other experts.

Although the survey and interview responses provide important insights into the culture of gymnastics in Canada generally, this Report is not — and was never intended to be — a standalone culture review. The feedback provided herein has been used to identify and inform strategic areas of focus and recommendations for a bespoke Gymnastics Culture Review to be undertaken at some point following the publication of this Report. This approach sets apart the forthcoming Gymnastics Culture Review from other international gymnastics reviews by first listening to the gymnastics community as well as learning from the methodological strengths and weaknesses of other reviews.

The survey responses and analytical data are extensive and can be used by whoever is appointed to lead a Gymnastics Culture Review to inform their work. This information provides an invaluable head start to conduct an exhaustive culture review that reflects the priorities and themes expressed by a broad cross-section of the Canadian gymnastics community.

Several key findings emerged from the research and are summarised as follows:

- Data provided by PTOs indicate approximately 266,077 registered gymnastics participants in Canada, suggesting a post-pandemic decline of as many as 45,980 participants or 17% of total participants over the past 3 years;
- Approximately 83% of participants are at the grassroots recreational level of the sport;
- Women's Artistic Gymnastics ('WAG') represents the largest cohort of the competitive disciplines (60% of all competitive gymnasts are WAG);
- More than 83% of gymnasts who were surveyed indicated their overall gymnastics experience as either *"Extremely Positive"* or *"Somewhat Positive"*;
- Amongst competitive disciplines, WAG is described as being the most negative and subject to abuse;
- Significant concerns are expressed about factors that can impact an athlete's mental or physical health including (in order of concern): 1) Body image, 2) High demand for results, 3) Authoritative coaching, 4) Parental influence/pressure, 5) Heavy training loads, 6)

- Pressure from a gymnastics organisation/staff and 7) Pressure to engage in early specialisation;
- Other factors of concern are noted, including lack of accountability, lack of Safe Sport education, poor communication, insufficient resources and a culture of fear.

The IRT heard from individuals who expressed grave concerns about the media narrative portraying the entirety of Canadian gymnastics as being “toxic.” The fact that more than 83% of gymnasts described their experience as positive validates these concerns and suggests that the vast majority of gymnasts are satisfied with their experience. However, this finding does not — and should not — excuse, diminish, or ‘sugar-coat’ the egregious maltreatment and abuse experienced by a minority of gymnasts in Canada. For example, the 7% of gymnasts who reported their overall gymnastics experience as either “Extremely Negative” or “Somewhat Negative” suggests that more than 18,625 gymnasts across Canada have had a negative experience<sup>14</sup>; this number of gymnasts arguably includes those who allege acts of maltreatment and abuse. The positive experiences of the majority of gymnasts does little to placate those who have had a negative, and potentially abusive, experience. These statistics also portend the continued maltreatment of gymnasts in Canada until the systemic issues identified in this Report are rectified. This also speaks to the urgent need for accountability within the system, which is one of the most consistent and troubling themes that emerged. To this end, the IRT has included specific recommendations concerning accountability as it relates to the outcomes of the Gymnastics Culture Review.

### Themes Related to Culture and a Culture Review Framework

Chapter 2 identifies the following 12 themes that emerged from the IRT’s primary research:

- 1) Club Level Analysis;
- 2) Sub-cultures by Competitive Discipline;
- 3) Governance, Jurisdiction and Accountability;
- 4) Gymnastics Canada Organisational Structure and Leadership;
- 5) Communication, Transparency and the Athletes’ Voice;
- 6) Performance Incentives – Win at all costs?;

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<sup>14</sup> Note: 7% of gymnasts who completed the survey and rated their experience as negative, multiplied by the total number of gymnasts in Canada suggests that more than 18,625 gymnasts have had a negative experience.

- 7) Reporting;
- 8) Coaching Practices and Impacts;
- 9) Judging Environment;
- 10) Parental Influences;
- 11) Safe Sport Education;
- 12) Safe Sport Policies.

These themes are reflected in the Culture Review Framework and recommendations provided in Chapter 3.

### Club Level Analysis

There is strong consensus that the Gymnastics Culture Review must focus on all levels of the sport, including attention to club-level factors. The notion of abuse being largely confined to high-performance competitive gymnastics is misleading and not generally supported by the Canadian gymnastics community. Maltreatment can and does occur at every level of the sport, thus the grassroots of the sport cannot be overlooked. A common refrain repeated from the gymnastics community as it pertains to the Culture Review Framework is: *“don’t forget about the ones (gymnasts) at the lower levels.”*

### Sub-Cultures by Competitive Discipline

The research confirms that there is no singular culture within the sport of gymnastics in Canada. Many agree with the sentiments of one gymnast who stated, *“Within gymnastics there are different silos, and major cultural differences between disciplines.”* It is incontrovertible that certain disciplines including WAG and Rhythmic Gymnastics ('RG') are, and have been, consistently beset by toxic environments for some athletes. This appears to be particularly true at the pinnacle of the sport where performance demands are most acute. A consistent theme that emerged is that WAG and RG continue to be plagued by negative cultures, including high-performance contexts and formative competitive pathways.

## Governance, Jurisdiction and Accountability

The governance of gymnastics, including issues related to jurisdiction and accountability, appears as a significant red flag throughout this Report as it relates to culture and Safe Sport. There is a chasm between GymCan and PTOs as it relates to jurisdiction which has resulted in the emergence of siloed PTO operating structures reflected in the following quote by a GymCan staff member: *“There is no direct oversight (of PTOs). Because PTOs feel like they oversee GymCan and not the other way around. Provinces feel like they control everything and feel that they have the power of oversight over GymCan.”* As a result, there is a lack of national oversight, coordination and support of grassroots gymnastics that is impacting a coordinated approach to Safe Sport. Many ‘accountability gaps’ are identified by the IRT including ineffective performance management of coaches and others in leadership positions within the sport. In effect, GymCan has been rendered impotent as it concerns their ability to enact and monitor consistent national standards for local clubs.

## Gymnastics Canada Organisational Structure and Leadership

The IRT received considerable negative feedback about GymCan’s organisational structure and leadership including one provincial gymnastics administrator who referred to GymCan’s structure as “*organisational disarray*” encompassing ineffective communications and staff turnover. There is a lack of capacity, transparency and support for staff within the current structure. Many individuals expressed concern about the impact of the dual roles of the GymCan CEO who also is the High-Performance Director, including some who have lost confidence and trust in the CEO. The organisation is described as being “*stretched thin*” and ineffective in its current form.

## Communication, Transparency and the Athletes’ Voice

Another consistent theme that emerged, particularly from athletes, is poor communication and a lack of transparency related to decisions that impact athletes. According to one athlete, “*there is no transparency in the hiring of coaches and poor consultation with athletes.*” Many athletes do not feel that their voice is heard which has been described as a negative part of the gymnastics culture in Canada. Issues involving communication and transparency between

gymnastics organisations and athletes is a function of multiple factors discussed in the Report including governance, leadership, values and an unhealthy power imbalance between coaches, administrators and the athletes they serve. The IRT provides a detailed example of the convoluted hiring process for the National WAG Head Coach that validates these concerns.

### Performance Incentives — Win at all costs?

The phrase ‘win at all costs’ has been used extensively in Canada and internationally to describe gymnastics culture. According to one gymnastics administrator, “*It sometimes feels like winning at any cost is acceptable.*” The IRT’s research confirms that many within the gymnastics community believe that such a philosophy is endemic to gymnastics at high-performance levels, without due consideration for an athlete’s physical and psychological well-being. Moreover, concerns about early specialisation, overtraining and high-pressure tactics to succeed are born at the nascent competitive pathways at the club level and can become more pronounced as athletes progress within the system. The win at all costs philosophy is a product of many factors including how athletes, coaches and programs are funded and supported within Canada’s high-performance system. These factors are explored in greater depth in Chapter 2 including recent changes to include more robust performance indicators associated with the health and well-being of athletes.

### Reporting

The gymnastics community is dissatisfied, confused and frustrated with current reporting mechanisms associated with maltreatment. This includes a lack of familiarity with the recently introduced Universal Code of Conduct to Prevent and Address Maltreatment in Sport (‘UCCMS’). Much of the confusion with reporting is a function of issues related to jurisdiction and policies that govern reporting at different levels. For example, there appears to be consensus with the statement that “*There is a bottleneck happening at the provincial and club level with reporting and complaints*”, as expressed by one administrator. The confusion and misunderstanding of reporting processes have caused many individuals to distrust both the process and those who are responsible for implementing the various reporting processes. Many individuals also agree

that “*There needs to be a clear black and white outline of processes to report depending on your level.*”

### Coaching Practices and Impacts

A thorough overview of coaching practices and impacts is provided in Chapter 2. This includes coaches who abuse their power to achieve performance outcomes through tactics that constitute maltreatment. Many individuals who were interviewed described the hiring of “*Eastern European coaches*” in Canada as a partial explanation for abusive coaching practices that have been left unchecked. The term Eastern European<sup>15</sup> coaches is meant to refer to a majority of coaches from the former Soviet Union who used abusive coaching practices in the pursuit of podium success. Tactics including body shaming, overtraining, training through injuries and autocratic leadership are examples of maltreatment characteristic of high-performance gymnastics coaches in the former Soviet Union. Other coaches abuse their power imbalance to prey on gymnasts for their sexual gratification, described as ‘sextortion’ by some sport ethicists.

The IRT also heard impassioned pleas from positive coaches who feel maligned, vilified and on the defensive. For example, many coaches believe “*the (Safe Sport) pendulum has swung too far the other way*,” and “*good coaches are being painted with the same brush as coaches who bring disrepute to the sport*.” The IRT spoke to and received survey responses from athletes who described their coaches as “*mentors*” and “*father figures*” who are supportive and encouraging in healthy ways. Coaches do not feel supported within the Canadian gymnastics system and are at risk of leaving the sport. The dichotomy of coaching styles prevalent across the sport is reflected in the following comment expressed by one gymnast: “*Most coaches are positive and willing to work, others just want to tear athletes down and provide no solutions or positive reinforcement.*”

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<sup>15</sup> Note: Refer to page 6 of the Report “*‘Eastern European’ in Context*” for a description of this phrase and its use in the Report.

## Judging Environment

The IRT sought input about the perceptions of culture within the judging ranks and the impact of judging on the athletes' experience. Judging culture appears to be discipline-specific, as it is for athletes. This includes a negative judging culture within WAG described by a judge as “competitive, *I might use the word toxic [...] and not competitive in a positive way.*” Moreover, judges across the Olympic gymnastics disciplines are subject to different governance and accountability requirements that demand attention.

## Parental Influences

The role and influence of parents on cultural dynamics and on their child's experience is an important theme that emerged. Most parents provide healthy forms of support for their children. However, the IRT heard accounts of parents who push their children beyond healthy limits, sometimes unwittingly siding with an abusive coach without comprehending that the actions of the coach constitute maltreatment. Some parents have been conditioned to believe that the coach is an infallible expert who knows what is best for the athlete to achieve success. The IRT heard about parents being blinded to the damage that negative coaching practices can cause through overtraining and other demands. The clouding of a parent's judgment can also occur “*when some parents realise that a child has a perceived talent for national and international competition they often support the child in different ways.*” Some parents, like their children, are victimized by the power imbalance used by unscrupulous coaches.

## Safe Sport Education

The need for more robust and coordinated education and training programs focused on Safe Sport emerged as an important theme. Only a minority of gymnasts were knowledgeable about the Safe Sport policies of governing organisations including clubs, PTOs and GymCan. Specific concerns raised by athletes, coaches and others include the content, frequency and method of delivery of Safe Sport training programs. Specific concerns were raised about Safe Sport training requirements for coaches, described as insufficient by most. This includes inadequate Safe Sport “*onboarding*” requirements for international coaches who come to Canada, as well as a lack of

mandated Safe Sport education requirements to maintain a coach's National Coaching Certification Program ('NCCP') credentials in good standing. Current online training programs for coaches was described by several individuals, including coaches themselves, as a "box-ticking exercise." Feedback also included the need to develop Safe Sport training that is specifically targeted to different gymnastics roles and contexts (e.g. coach, athlete, parent) as well as demographic characteristics (e.g. adults versus children). Clearly, a 'one size fits all' approach is neither desirable nor effective based on the IRT's research.

### Safe Sport Policies

Interviews with the gymnastics community suggest that the comprehension of Safe Sport policies is generally poor (especially reporting processes) although a majority of survey respondents indicated good knowledge of such policies. A GymCan Board member described the NSO's Safe Sport policies as "*sterile, cold, legal, and not implementable.*" Moreover, the interrelationship between local, PTO and GymCan policies is confusing and inaccessible to many, especially as this concerns reporting allegations of abuse.

### Culture Review Framework

Chapter 3 describes the Culture Review Framework. The contents of the Chapter rely heavily on the feedback received from the Canadian gymnastics community as well as an assessment of gymnastics culture reviews completed in other countries. The IRT wanted to understand from the community if a Gymnastics Culture Review was needed and, if so, what it should entail. Every single gymnastics administrator in Canada who provided input agreed that a Gymnastics Culture Review is necessary and urgent. This includes Board members and staff of Gymnastics Canada, and the Executive Directors/CEO of gymnastics governing bodies in every Canadian province. Moreover, almost 90% of survey respondents agreed that a culture review of gymnastics in Canada is important.

The Culture Review Framework includes a total of 46 recommendations, each with supporting rationale and a discussion of key methodological considerations. The Culture Review Framework begins with the IRT's recommendations as to who should lead this process — referred to as the

Culture Review Leadership Team ('CRLT'). This is envisioned as an independent, multi-disciplinary team with expertise in law, organisational behavior/change management, trauma-informed interviewing techniques and child protection. The CRLT also must include athlete representation.

Guiding principles and key operating components are provided. This includes taking a Human Rights Based Approach based on the United Nations Convention on the Rights of the Child. This was a hallmark approach of the Whyte Review ('WR'), an independent investigation commissioned by Sport England and UK Sport focused on British Gymnastics. The Culture Review Framework also calls for a 'safeguarding statement and protocol' to be developed by the CRLT to establish how victims of maltreatment and abuse who come forward will be supported. This includes the need for clearly established protocols to triage and refer/report allegations of abuse that may arise through the Gymnastics Culture Review.

The functional areas of inquiry for the Gymnastics Culture Review identified by the IRT are as follows:

- Governance and Leadership of Gymnastics in Canada;
- Jurisdiction, Reporting and Accountability;
- GymCan Organisational Structure and Leadership;
- Safe Sport Education and Training;
- Club Environments;
- Competitive and High-Performance Environments.

The experiences of gymnasts within club environments as well as within competitive and high-performance programs are of paramount importance. The Gymnastics Culture Review must also reflect the insights and experiences of other gymnastics stakeholders including coaches, judges, staff, executive leadership, parents and the government agencies who direct and support gymnastics programs across Canada. A summary of the 46 recommendations is provided later in this Chapter.

## 1.2 Independence of Review

The information relied upon as the basis of this Report has been independently requested, collected, collated and examined without bias or partiality. MGSS was contracted by GymCan to independently, and without any interference or dictates from the sport, undertake specific deliverables as provided in the Terms of Reference. MGSS and its IRT operated in complete independence from GymCan, and as a condition of its mandate, was granted the right to publish the final Report at its unfettered discretion.

## 1.3 Terms of Reference

The complete Terms of Reference are posted for full transparency on the MGSS website.<sup>16</sup> The two key deliverables included for MGSS to conduct a review of GymCan's Safe Sport policies and to develop a framework or 'roadmap' to set forth how a Gymnastics Culture Review should be conducted.

The Terms of Reference included that "*Gymnastics Canada agrees that MGSS shall publicly issue the final report for full transparency.*" It is specified that the Final Report be issued in January 2023, including the following elements:

- Methodology;
- Benchmarking survey results;
- Analysis and reporting of key themes related to how stakeholders envision a culture review of gymnastics unfolding;
- Key themes associated with international culture reviews in gymnastics;
- MGSS 'Roadmap' (Culture Review Framework): Recommendations to conduct a culture review of gymnastics in Canada;
- Gymnastics Canada Safe Sport policy review, analysis and recommendations.

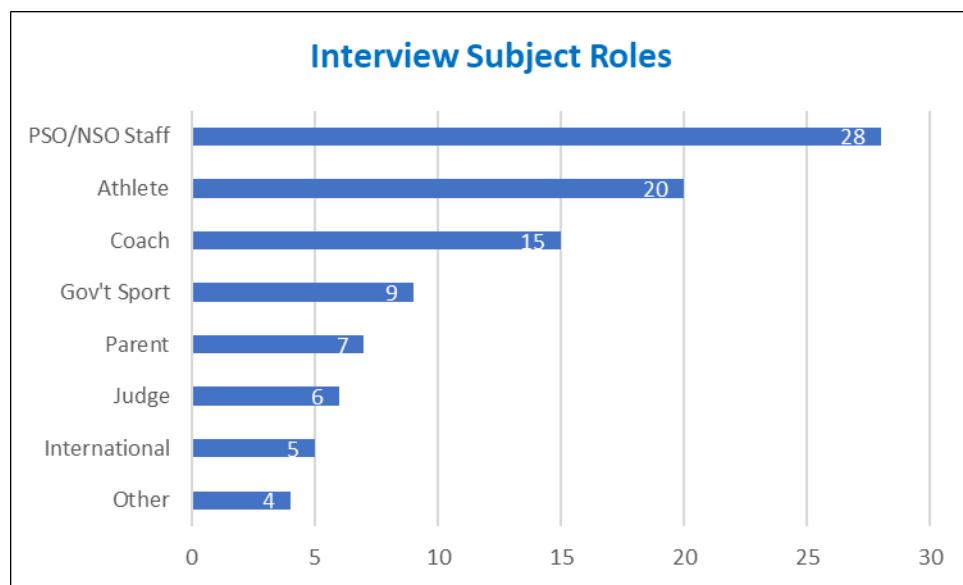
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<sup>16</sup> McLaren Global Sport Solutions, "Terms of Reference between Gymnastics Canada and McLaren Global Sport Solutions Inc.". Online: [TermsOfReference\\_MGSS\\_GymCan.pdf \(mclarenglobalsportsolutions.com\)](https://mclarenglobalsportsolutions.com/Downloads/TermsOfReference_MGSS_GymCan.pdf) [Last Accessed: 5 January 2023].

## 1.4 Methodology

### Interviews

The IRT conducted a total of 58 confidential interviews. Interview subjects were identified by the IRT's internal research. Some interview subjects self-identified through their completion of the public survey whereby they provided their contact information and consent to be contacted. Many interview subjects had a long history in the sport and multiple roles, as illustrated in the figure below:



The IRT contacted the Executive Directors of every PTO and invited their participation. A total of 14 executives of PTO's were interviewed, as well as additional PTO staff including club administrators. Executive leadership of GymCan included several members of the Board of Directors and the CEO. Multiple GymCan employees including high-performance directors, coaches and program staff were interviewed. A total of 20 current and former gymnasts participated including national team athletes among others representing a cross-section of gymnastics disciplines. These athletes provided important perspectives on their formative development in the sport as well as highly descriptive accounts of their personal experiences as national team athletes including their experiences with GymCan. Government sport agencies who were interviewed included representatives of Sport Canada, Own the Podium, the Canadian Olympic Committee and the Coaching Association of Canada. Interviews were conducted with

the leaders of three international gymnastics reviews, as well as a representative from the Fédération Internationale de Gymnastique ('FIG'). Other interviews included academics (Canadian sport policy, sport ethicists) and Safe Sport educators.

Semi-structured interview guides were prepared. Most interviews were conducted by two individuals, one male and one female, experienced in trauma-informed interviewing techniques. At the start of each interview, an overview of the Terms of Reference was provided and individuals were asked for their consent to record the confidential interview via Zoom. Every interview subject consented to the interview being recorded. Most interviews were approximately one hour in length with several interviews surpassing two hours. Several interview subjects consented to follow-up interviews and were helpful in fact-checking information discussed during the interview.

### Surveys

Two surveys were implemented: one was a survey of Executive Directors of PTOs; the other was a public survey open to any member of the gymnastics community in Canada. Both surveys were built on a sophisticated platform called 'Qualtrics Experience Management' which is trusted by leading global brands.

A total of 14 responses to the PTO survey were received representing a response rate of 88%. Survey respondents were asked to provide their name, job title and the name of their PTO. Every Canadian province is represented in the survey results. No responses to the PTO survey were received from territorial gymnastics organisations. A complete analysis of the PTO survey results is provided in Appendix A.

The public survey was open to anyone in the gymnastics community in Canada and received feedback from every province and from individuals with multiple roles across every discipline within the sport. The survey was pilot tested with four experienced gymnasts who are members of the Gymnastics Canada Athletes Commission. Feedback provided by these gymnasts was incorporated into the final version of the public survey. The final survey also passed internal 'quality checks' performed by the Qualtrics survey utility and received a quality score of 99%.

A total of 960 responses were received. Participants of minor age according to provincial definitions were flagged and were required to indicate the consent of a parent or guardian prior to being allowed to complete the survey. The survey was promoted through the support of PTO governing bodies across Canada, as well as through social media tools and word-of-mouth. Specialised tools within the Qualtrics survey utility prevented duplicate entries, a process referred to as 'ballot box stuffing.' The overall response rate is unknown because the addressable population who received an invitation to complete the survey is unknown.

The public survey included exploratory baseline questions about an individual's gymnastics experience in Canada, as well as targeted questions about what is important in conducting a culture review of the sport. Engagement with the survey was very strong including high response rates to optional open-ended questions with many lengthy answers provided. For example, the IRT received more than 30 pages of responses to one question that asked respondents to describe, in their own words, why they rated their experience as either positive or negative. These lengthy responses were assimilated into themes and are reported in Appendix B.

Although the public survey allowed anonymous responses and did not require respondents to provide their name or contact information, a total of 269 individuals voluntarily provided their name and email address further contributing to the survey's validity. All survey respondents were assured of confidentiality and were informed that the source data was not collected by, or shared with, GymCan or any PTO. All survey data was collected and analysed by MGSS and their research team. None of the identities of any of the survey respondents was shared beyond the MGSS research team.

Several questions about Safe Sport were highly instructive to the IRT in evaluating current levels of awareness of various policies and Safe Sport resources. Because the survey asked respondents to indicate their discipline(s) within the sport, the IRT was able to undertake cross-tabulation analysis to compare specific responses (e.g. level of satisfaction with gymnastics experience) by discipline. This helps to paint an exploratory picture of where some of the issues may be focused within the sport so that the Gymnastics Culture Review can more effectively address these issues.

## Document Analysis

Aside from the primary research conducted through interviews and surveys, secondary research was also conducted. That research included analysis of documents including copies of international gymnastics reviews, scholarly articles and reports and policy documents. GymCan was asked to provide copies of updated policy documents as reported in Chapter 4.

### 1.5 Gymnasts for Change Canada

Gymnasts for Change ('G4C') Canada describes itself as "*a grassroots movement, led by survivors and supporters, to eliminate abuse and maltreatment from the sport that we love.*"<sup>17</sup> Their mission indicates "*We care about making gymnastics a safe, healthy and abuse-free sport.*"<sup>18</sup>

G4C Canada has been active and vocal, particularly on social media, about the allegations of historical abuse within the gymnastics community in Canada. Bringing these issues to the attention of the public and government officials is important and necessary. On 4 October 2022, the IRT contacted their Canadian spokesperson Ms. Kim Shore, to invite her participation in an interview<sup>19</sup> (Appendix C) given G4C Canada's advocacy and athlete-centered mission.

Ms. Shore was provided with a link to the public survey and invited to complete it as well as share it with her network of supporters to ensure that they would directly be given the opportunity to contribute to the IRT's work and eventual Report. The IRT assumed she and some of her supporters would agree to do so as the G4C Canada mission states, "*G4C believes that every gymnast - past, present and future - deserves to be heard [...].*"<sup>20</sup>

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<sup>17</sup> Gymnasts for Change Canada, "*About G4C*," Online: [About Us — Gymnasts for Change Canada \(gymnasts4changecanada.com\)](https://gymnasts4changecanada.com) [Last Accessed: 6 January 2023].

<sup>18</sup> Ibid.

<sup>19</sup> McLaren Global Sport Solutions, "*Personal correspondence to Kim Shore*," 4 October 2022 [Appendix C].

<sup>20</sup> Gymnasts for Change Canada, "*About G4C*," Online: [About Us — Gymnasts for Change Canada \(gymnasts4changecanada.com\)](https://gymnasts4changecanada.com) [Last Accessed: 6 January 2023].

Ms. Shore did not consent to an interview. Rather, G4C Canada chose instead to make several disparaging and factually incorrect statements about MGSS's work as it was being undertaken; which are in the public record. MGSS chose not to provide any in-kind response to the spurious statements. Such a tact would have been an unproductive, negative exercise that would not serve the interests of gymnasts nor the aims of MGSS or this Report.

The IRT interviewed some individuals who provided comments about G4C Canada's leadership. These comments included displeasure with the organisation's negative pressure tactics. It is clear that G4C Canada in no way speaks for the gymnastics community in Canada at large.

## 1.6 Sport Culture in Context

The study of sport culture is largely drawn from academic literature and the study of 'workplace' organisational culture and social psychology more broadly. Organisational culture is a set of shared assumptions that guide what happens in organisations through the definition of appropriate behavior for various situations.<sup>21</sup> Business literature suggests that culture involves a mosaic of factors including an organisation's vision, values, norms, systems, symbols, language, assumptions, beliefs and habits.<sup>22</sup> This approach to organisational culture provides a helpful lens to examine culture within sport contexts generally. However, the complexity and variety of different contexts in sport such as grassroots participation (for fun) versus high-performance (to win) requires different approaches to examining culture. This is important as it relates to undertaking a Gymnastics Culture Review in Canada because so too does it require the implementation of different methodologies to examine culture in different environmental contexts. For example, methodologies to study culture in high-performance team environments should consider different factors compared to the study of culture within a recreational gymnastics club. However, international culture reviews of gymnastics to date have taken a rather generic 'one size fits all' approach to the study of gymnastics culture.

A report that was written by OTP and the Canadian Olympic and Paralympic Sport Institute Network ('COPSIN') following a National Think Tank in 2019 provides helpful research

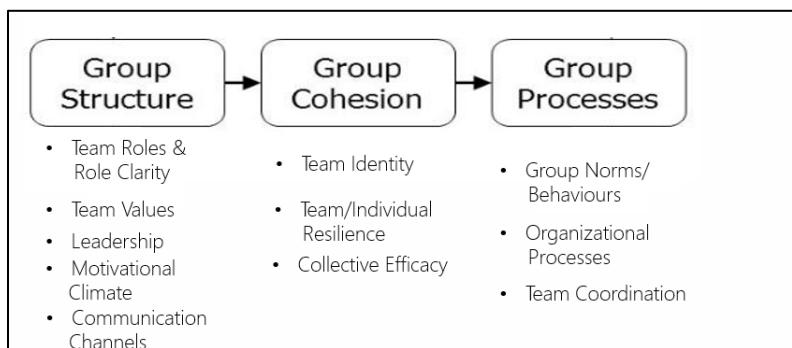
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<sup>21</sup> Ravasi and Schultz, "Responding to Organizational Identity Threats: Exploring the Role of Organizational Culture," *Academy of Management Journal*, 49 (3), 2006.

<sup>22</sup> Needle, "Business in Context: An Introduction to Business and Its Environment," 2004.

background to the study of culture in high-performance sport environments.<sup>23</sup> The OTP report examines various approaches to building “winning cultures” in high-performance sport environments. Citing a study by Vallee & Bloom (2016) involving university sport culture, the report states that “*Four key processes were determined critical to building a championship culture: i) enacting the vision, ii) athlete empowerment, iii) teaching life skills, and iv) lifelong learning and personal reflection.*”<sup>24</sup> The report also explores the role of team dynamics and group cohesion in high-performance sport environments, including work by Ohlert & Zepp (2016) that provided a framework “*to understand a high functioning team in a training or competition environment.*”<sup>25</sup> This framework is illustrated in the figure below:

### A Framework to Understand Team Performance (Ohlert & Zepp, 2016)



The National Think Tank Report also cites the work of Schein (2010) who “*defines a high-performance culture as a pattern of shared assumptions that a group or team learns as it solves its problems of external adaptation and internal integration, that has worked well enough to be valued and taught to new members as the correct way to perceive, think and feel towards those problems.*”<sup>26</sup> Schein’s work is an example of how “*Organizational and social psychology has played a crucial role in drawing parallels between organizational culture and sport culture.*”<sup>27</sup>

<sup>23</sup> Own the Podium and The Canadian Sport Institute Network, “*A Culture of Excellence in High Performance Sport, NATIONAL THINK TANK, Report & Recommendations Final Draft,*” April 2019.

<sup>24</sup> Ibid.

<sup>25</sup> Ibid.

<sup>26</sup> Ibid.

<sup>27</sup> Ibid.

The pioneering work of OTP and the COPSIN has resulted in the development of a unique methodology to examine culture within the high-performance programs of NSOs in Canada, called the Culture of Excellence Assessment and Audit Tool ('CAAT'). This specialised tool and its use within the Gymnastics Culture Review is described in Chapter 3.

## **1.7 Summary of Recommendations – Culture Review Framework**

The following recommendations together comprise the IRT's Culture Review Framework. In Chapter 3 each of the following recommendations is accompanied by supporting rationale and a discussion of methodological considerations.

*The IRT recommends that ...*

### [Culture Review Leadership Team Composition and Function](#)

- 1)** A single individual be appointed to lead an independent multi-disciplinary team referred to collectively as the Culture Review Leadership Team ('CRLT'). The appointed individual to serve as the independent Chair of the CRLT.
- 2)** The Board of Directors of Gymnastics Canada appoint a Canadian lawyer to Chair the CRLT and lead the Gymnastics Culture Review. The appointed individual must be independent of the sport of gymnastics in Canada with no actual or perceived conflicts of interest.
- 3)** The Chair of the CRLT consider the appointment of individuals with the following roles and expertise: 1) Child protection (x1), 2) Organisational behavior/change management (x1), 3) Trauma-informed Interview Associates (x3), 4) Coach and Judge representatives (x2) and 5) Gymnastics Athlete Representatives (x2). The Chair of the CRLT is to have discretion concerning the eventual final composition of the team.
- 4)** The Gymnastics Canada Athletes Commission nominate one male and one female member of the Commission to be included on the CRLT to provide athlete perspectives and technical expertise to the Chair.

## Communication of the Gymnastics Culture Review

- 5) A dedicated section on the Gymnastics Canada website be created to communicate information and progress about the Gymnastics Culture Review.
- 6) A coordinated announcement about the Gymnastics Culture Review be made by Gymnastics Canada in collaboration with its PTO members, including email notification to all participants through GymCan, PTOs and local clubs. The announcement also should include a call for participation, a link to the dedicated website and how to become involved with the Gymnastics Culture Review.

## Support and Processes for Victims of Maltreatment

- 7) It is imperative that protocols are established by the CRLT for the reporting of allegations of abuse that may arise through the consultation process.
- 8) A safeguarding statement and protocol be developed by the CRLT and posted on the dedicated website.
- 9) Resources to support victims of maltreatment be communicated to all participants in the Gymnastics Culture Review, including Abuse Free Sport and the Canadian Sport Helpline, among others.

## Stakeholder Consultation Methods

- 10) Consultation to incorporate a combination of methods including individual and group meetings, personal interviews, focus groups, surveys and written responses at the discretion of the Chair.
- 11) Interview techniques to follow a human rights-based and participatory approach to ensure all aspects of the Gymnastics Culture Review, from design to data collection, are focused on the principles of dignity, equality and respect. To this end, the IRT recommends the Gymnastics Culture Review be guided by the *United Nations Convention on the Rights of the Child* ('UNCRC').<sup>28</sup>
- 12) A representative sample of stakeholders be consulted amongst athletes and disciplines. Additionally, the CRLT is to consult with coaches, judges, parents, administrative staff, IST members and leadership of gymnastics governing bodies.

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<sup>28</sup> United Nations, "Convention on the Rights of the Child." Online: [Convention on the Rights of the Child | OHCHR](https://www.ohchr.org/EN/Issues/CRC/Pages/CRC.aspx) [Last Accessed: 24 November 2022].

**13)** Sport Canada, the COC and OTP be consulted to inform the Gymnastics Culture Review and its recommendations, particularly as they relate to how high-performance gymnastics programs are directed, supported and evaluated.

#### [Scope of the Gymnastics Culture Review – Levels of Gymnastics Participation](#)

**14)** The Gymnastics Culture Review must include an examination of all levels within the sport in Canada, from recreational participation (Gym for All) at the grassroots level through competitive provincial gymnastics to national and international levels of competition.

#### [Sub-cultures by Competitive Discipline](#)

**15)** The Gymnastics Culture Review examine and compare competitive sub-disciplines<sup>29</sup> in the sport, with specific attention paid to the Olympic disciplines including features of Women's Artistic Gymnastics and Rhythmic Gymnastics that make these disciplines more prone to negative cultures and abuse.

**16)** The Gymnastics Culture Review be focused on the welfare and experiences of athletes within the system irrespective of level or discipline.

**17)** The Gymnastics Culture Review must identify the systemic trends and drivers related to experiences of maltreatment and align recommendations to address these trends and drivers.

#### [Own The Podium “Culture of Excellence Assessment and Audit Tool” \(‘CAAT’\)](#)

**18)** The Gymnastics Culture Review implement the Culture of Excellence Assessment and Audit Tool (‘CAAT’) developed in partnership with OTP to assess culture within high-performance disciplines of gymnastics in Canada.

**19)** Sport Canada evaluate the opportunity to support the development of a companion tool to systematically assess and audit culture at the grassroots developmental level of the Canadian amateur sport community.

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<sup>29</sup> Note: Gym for All is not considered a competitive sub-discipline and will require a different approach to assessing culture.

## Local Gymnastics Clubs

- 20) The Gymnastics Culture Review include a systematic examination of local gymnastics clubs in Canada to assess culture.
- 21) The review of local clubs include a confidential web-based survey distributed to the management/leadership of every gymnastics club in Canada for distribution to their members and stakeholders.
- 22) The survey of clubs be augmented with personal visits to a selected number of clubs on behalf of the CRLT.

## Governance of Gymnastics in Canada

- 23) The relationship and alignment between national, provincial and local governance be examined as they relate to culture.
- 24) Gymnastics Canada's governance structure be measured and evaluated against the *Canadian Sport Governance Code* ('CSGC'). The CSGC can also be used to inform the exploratory review of governance best practices at the club and PTO levels.
- 25) The *Cromwell Report*<sup>30</sup> be reviewed by the CRLT and be used as a reference document to identify best practices and recommendations that may be applicable to the governance of gymnastics in Canada including the governance of Gymnastics Canada.
- 26) Performance management structures for coaches and other staff be reviewed at all levels.
- 27) The current Terms of Reference for Gymnastics Canada Athletes Commission be reviewed as it relates to gymnastics athlete representation within GymCan's governance structure, including expanded opportunities for athlete voices to be heard.

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<sup>30</sup> The Honourable Thomas Cromwell, C.C., "Final Report, Hockey Canada Governance Review," 31 October 2022. Online: [2022-hockey-canada-governance-review-final-report-e.pdf \(hockeycanada.ca\)](https://www.hockeycanada.ca/2022-hockey-canada-governance-review-final-report-e.pdf) [Last Accessed: 3 December 2022].

## Gymnastics Canada Organisational Structure and Leadership

**28)** Gymnastics Canada's organisational structure be reviewed including roles, leadership, reporting relationships and employee performance management structures.

**29)** A 360-degree review process be implemented for senior GymCan positions including the CEO and the lead staff member of each of the high-performance leadership teams.

## Jurisdiction, Safe Sport Reporting and Accountability

**30)** Processes related to jurisdiction, Safe Sport reporting and accountability be examined between local clubs, PTOs and Gymnastics Canada.

**31)** The CRLT identify the accountabilities and reporting relationships required by PTOs for member clubs operating within their jurisdictions.

**32)** The CRLT review and comment on the Sport Funding Accountability Framework as it relates to supporting and encouraging a positive culture within the sport of gymnastics.<sup>31</sup>

**33)** The CRLT review and comment on current program funding and evaluation requirements required by OTP for targeted high-performance sports as it relates to supporting and encouraging a positive culture.

**34)** The CRLT answer the question: Is there a 'win at all costs' approach within high-performance sub-disciplines of gymnastics in Canada? The answer to this question should include the role of funding agencies including Sport Canada, the COC and OTP.

**35)** A comprehensive review of complaint reporting processes be implemented. This must include an examination of the relationship between local, PTO and GymCan policies on reporting versus actual practice in the implementation of these policies.

**36)** An analysis of all complaints that have been reported at the local, PTO and GymCan levels over the past 5 years be implemented.

**37)** The impacts of GymCan's adoption of the UCCMS and agreement with the Office of the Sport Integrity Commissioner be reviewed, including how this affects reporting as it relates to individuals who are not identified by GymCan or OSIC as being under the jurisdiction of the OSIC national reporting mechanism.

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<sup>31</sup> Note: Effective April 1, 2023, Sport Canada will make changes to contribution agreements with organizations that will meet the new eligibility requirements of the Sport Funding and Accountability Framework.

**38)** The feasibility and advantages of developing a Club Accreditation Model ('CAM') for gymnastics in Canada be examined by the CRLT drawing upon the Club Licencing Model recently introduced by Canada Soccer for inspiration.

#### [Safe Sport Education](#)

**39)** The content, delivery and frequency of mandatory Safe Sport education and training be assessed including the Coaching Association of Canada's ('CAC') Safe Sport training and any programs that have been granted equivalency including Respect in Sport modules.

**40)** The CRLT review the effectiveness, alignment and delivery of Safe Sport education for gymnastics in Canada based on different gymnastics stakeholder roles — including athletes, coaches, parents, IST, judges and staff.

**41)** The CRLT review the effectiveness of the 'Values-Based Coaching Module' that was launched in 2020, including an analysis and profile of coaches who have completed the Module.

#### [Implementation of Gymnastics Culture Review Recommendations](#)

**42)** Recommendations provided by the CRLT must be measurable, actionable and should be prioritised with suggested implementation timelines.

**43)** Gymnastics Canada be responsible for implementing the recommendations published in the Gymnastics Culture Review.

**44)** A timeline of 10 months be considered to complete the review, which may vary according to the final Terms of Reference.

**45)** External oversight of GymCan's implementation of the Gymnastics Culture Review's recommendations is necessary to ensure accountability in the implementation of the recommendations.

**46)** Progress towards the achievement of milestones and recommendations be communicated on the dedicated website for the Gymnastics Culture Review (further to recommendation #5).

### **1.8 Safe Sport Policies**

Chapter 4 provides a detailed review of GymCan's Safe Sport policies and procedures. The IRT's Safe Sport policy review commenced in September 2022 and included an exhaustive review of

all Safe Sport and related policies in place at that time. The IRT was later informed that as of 17 December 2022, and in strict accordance with GymCan's requirements under its Agreement with the Sport Dispute Resolution Centre of Canada ('SDRCC'), GymCan has now updated some of its Safe Sport regulations to successfully meet its compliance requirements as a Signatory to the UCCMS and the Office of the Sport Integrity Commissioner ('OSIC'). The IRT's Safe Sport policy review suggestions should nonetheless be considered and actioned where applicable because many of the suggestions provided herein are independent of GymCan's regulatory requirements as an OSIC Signatory.

Each relevant regulatory document related to Safe Sport is summarised and examined, with the IRT then offering suggestions on how to improve the same, keeping in mind best practices, practical considerations, observations made by individuals interviewed, as well as other regulatory documents which are directly relevant to GymCan's regulatory framework, notably the Fédération Internationale de Gymnastique ('FIG') Safe Sport rules, as well as the UCCMS and OSIC, to which GymCan is now a Signatory.

The IRT notes that GymCan has had all of its policies drafted by qualified Legal Counsel in 2019 with the goal of improving its policies and procedures concerning Safe Sport in general. From a legal standpoint, GymCan's policies are well-drafted. There are no major gaps or major shortcomings and few contradictory provisions or conflicting core principles. Nonetheless, as with all regulatory documents, there is always room for improvement. In accordance with its Terms of Reference, the IRT has conducted an exhaustive review of all these documents and provides a variety of suggestions, general and specific, informed by best practice and UCCMS and OSIC considerations. These suggestions are to be prioritised and implemented either in short order or in due time keeping in mind other factors and legal implications further to the completion and outcomes of the Gymnastics Culture Review.

GymCan is encouraged to commit to and trust that the intended impact of a successful culture review and corollary Safe Sport policy review will result in a more positive sport experience for everyone involved in the gymnastics community in Canada.

## Chapter 2: Themes Arising from the Canadian Gymnastics Community

### 2.1 Introduction

Several important themes emerged from the Independent Review Team's ('IRT') primary research. The gymnastics community was consulted to inform these themes using the following methodologies:

- Survey of executives of provincial gymnastics organisations (Appendix A)
- Open access public survey of the Canadian gymnastics community (Appendix B)
- Personal interviews

In total, feedback was received from more than 1,000 individuals across all provinces including athletes (past and present), coaches, judges, parents, staff, executives of gymnastics governing bodies and government agencies responsible for national sport in Canada. Each theme presented in this Chapter includes an introductory quote from a gymnastics community member who was interviewed. The themes identified are generally consistent across the surveys and interviews and several themes are further supported by the findings of international gymnastics reviews (Chapter 5). Feedback from the Canadian gymnastics community that underpins these themes is reflected in the IRT's recommended 'Culture Review Framework' for gymnastics in Canada (Chapter 3) and 'Safe Sport Policy Review' recommendations (Chapter 4).

The following themes are identified as they relate to culture generally as well as to inform the IRT's recommendations concerning a Culture Review Framework for gymnastics in Canada. The themes related to culture are exploratory and do not constitute a culture review per se; rather, they assist in identifying strategic areas of focus and methodologies for the Gymnastics Culture Review.

## 2.2 Themes Related to Culture and a Culture Review Framework

### 1) Club Level Analysis

***“So much Safe Sport needs to be done at the club level and this is not really the purview of GymCan or even some PTOs. They (clubs) don’t have the administration, or the time or money for this.”***

The need to consult with gymnasts and other stakeholders within club environments emerged as an important theme related to developing a Culture Review Framework. For example, a Gymnastics Canada ('GymCan') Board member suggested the need to *“rally the clubs into the culture review”* and *“there needs to be more intense dialogue with the top clubs where practices seem questionable.”* A strong consensus from the gymnastics community is that a culture review must include consultation and analysis at every level of the sport, from grassroots recreational participation — referred to as Gym for All ('GFA') — to high-performance international levels of competition.

The IRT spoke to individuals who had both positive and negative experiences within their club environment including many who agree that *“entry-level gymnastics clubs are great.”* Much attention has been focused on maltreatment within competitive and high-performance disciplines because *“competition is the problem and where the issues start breeding.”* Competitive clubs with a mission to produce at the international level have *“a different environment with a different culture.”* Historically, this included the recruitment of *“a big wave of foreigners”* from international countries *“who brought their own sport culture to Canada which produced well and rapidly,”* according to a gymnastics administrator. This approach *“became the methodology to be used; it was a dictatorial approach and it became the norm.”*

However, the IRT has also found that the notion of abuse being largely confined to high-performance gymnastics is misleading and not generally supported by the Canadian gymnastics community. The IRT heard many accounts of maltreatment and abuse at entry levels of gymnastics, with children in nascent competitive streams being at particular risk. According to a provincial gymnastics administrator *“there is a sense in the sport that everything is about high-*

*performance and that all the issues come at the top level of the sport. The facts don't support that.*" A common refrain that was repeated from the gymnastics community as it pertains to the Culture Review Framework is: "*don't forget about the ones (gymnasts) at the lower levels.*"

There are a variety of operating models for gymnastics clubs in Canada including for-profit and not-for-profit clubs that offer different types of programming including recreation-only, competitive, as well as mixed programming. Moreover, some gymnastics clubs are discipline specific. A majority of clubs are women-only with a much smaller proportion of co-ed clubs. Oversight of clubs also varies according to different provincial and territorial mandates that may be in place concerning Safe Sport and how to report allegations of abuse.

The IRT learned that as many as five to ten percent of local recreation-only clubs are independent and not members of any provincial or national gymnastics governing body. The reasons provided include not receiving commensurate value/membership benefits in exchange for the membership fees that are mandated and considered exorbitant by some. The key leverage that provinces have over clubs to become a member is access to insurance benefits, as well as the ability for competitive gymnasts to compete at provincial or national competitions. However, there are alternative options for recreation-only clubs to source insurance independently; moreover, providing recreational gymnasts with access to provincial or national competitions is irrelevant to their operations.

The absence of any common standards or processes for independent clubs<sup>32</sup> should worry provincial and national leaders. One of the reasons to be concerned is that important stakeholders involved with independent clubs are left without a voice concerning the provincial and national governance of the sport and policies are not standardized in every club across the country. Provincial and Territorial Organisations ('PTOs') and GymCan should explore how to better serve the needs of these independent clubs so that they are incentivized to become a part of the sanctioned gymnastics community in Canada. An example of this could be to offer a lower cost membership option for recreational only clubs similar to the model that USA Gymnastics currently offers.

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<sup>32</sup> Note: Independent clubs refers to gymnastics clubs that are not sanctioned by, or otherwise affiliated with, provincial or national governing bodies.

Operating models can impact culture in different ways depending on the membership composition, governance and values of local clubs. For example, the IRT was told about negative aspects of culture associated with competitive gymnastics that can sometimes “spill over” to recreational gymnasts at the same club. This can happen when recreational gymnasts and coaches are influenced to adopt the negative behaviors of competitive coaches within the same club. This can become a vicious circle; for example, *“the cycle of an abused athlete who becomes a coach and perpetuates the problem.”* Examples of this occurring at grassroots levels of the sport include former competitive gymnasts coaching recreational gymnasts with tactics more suited to a competitive athlete. This can create unsafe training environments and illustrates how negative cultures can be perpetuated within an organisation.

According to feedback, clubs that offer recreational gymnastics exclusively may promote a healthier environment and culture than clubs that offer a mix of recreational and competitive programming. Thus, the Gymnastics Culture Review should examine different club operating models to validate the extent to which the club model and governance affects culture. Furthermore, it would be helpful for the Culture Review Leadership Team (‘CRLT’) to provide clubs with operational guidance based on the CRLT’s findings and best practices.

## 2) Sub-cultures by Competitive Discipline

**“Within gymnastics there are different silos, and major cultural differences between disciplines.”**

Extensive feedback was received about the sub-cultures inherent to gymnastics. These are prevalent in all countries; it is not a finding unique to Canada and is a common feature of international gymnastics reviews (Chapter 5). The IRT’s research confirms that there is no singular culture within the sport of gymnastics in Canada. It is thus factually incorrect to paint the entire sport of gymnastics in Canada as “toxic”. It is also incontrovertible that certain disciplines including Women’s Artistic Gymnastics (‘WAG’) and Rhythmic Gymnastics (‘RG’) are, and have been, consistently beset by toxic environments for some athletes. This appears to be particularly true at the pinnacle of the sport where performance demands are most acute. A consistent theme that emerged is that both WAG and RG continue to be plagued by negative

cultures, especially at the high-performance level. For example, one gymnastics administrator acknowledged that “*Rhythmic is the most toxic in terms of overtraining, overstretching of athletes and more reflective of soviet era coaching tactics.*” It was suggested that although “*Rhythmic has come a long way,*” there are still issues including “*yelling is still there, disrespect of other coaches, and coaches are not respecting IST support.*” These issues persist among others because “*systematic coaching evaluations are missing*” — discussed in Section 3) ‘Governance: Jurisdiction and Accountability’.

Several examples were provided of this negative culture in WAG and RG trickling down to the club level among athletes entering the competitive pathway in these two disciplines. Negative behaviors and norms can become a vicious circle in some contexts. For example, the IRT heard accounts of younger coaches who emulate the negative coaching tactics of older coaches because such tactics are believed to be the only way to produce successful performance outcomes. WAG was referred to as being “*more cutthroat*” than other disciplines including “*ego-driven coaches.*” In contrast, Men’s Artistic Gymnastics (‘MAG’) was referred to as “*easy going, no egos. Judges, coaches, athletes know what their roles are. Issues are presented calmly and dealt with calmly.*” It is critical for the Gymnastics Culture Review to answer the question: Why are some disciplines characterised by negative cultures more so than others? What are the structural and behavioral antecedents that allow negative cultures to persist and be perpetuated, and how can these negative inputs to culture be mitigated or eradicated?

The competitive pathways for WAG and RG start at a very young age; girls and women in the sport also peak at a very young age compared to MAG. There are many other features that differentiate MAG and WAG, including much higher levels of participation and competitiveness within WAG. One career coach who coached both WAG and MAG disciplines suggested that “*90 percent of the complications are in WAG and Rhythmic.*” The coach further said that “*the culture of men’s gymnastics didn’t have trouble in the 1990’s and doesn’t have trouble today; I think the boys are treated really well, especially as it relates to psychological trauma and mental abuse,*” which is more common in WAG and RG. A current gymnastics administrator agreed that there are clear delineations in culture based on specific disciplines and the WAG culture is influenced by pervasive abusive coaching tactics from international countries. The administrator claimed that persistent issues in WAG are based on the (flawed) belief held by some that “*if you want to*

*produce athletes of national calibre level you need to use that dictatorial way of coaching (emblematic of WAG).” Furthermore, many in the gymnastics community believe that “the competitiveness within WAG and RG extends to competitiveness amongst judges and coaches” and this has a negative impact on culture and the experiences of gymnasts.*

Other disciplines including MAG and Trampoline and Tumbling were described more positively. For example, Trampoline and Tumbling was described as a “*supportive community, everyone works together strongly and collectively.*” Trampoline and Tumbling is considered a discipline that “*does not have a lot of historical baggage,*” especially when compared with WAG and RG. For example, “*there are very different cultures across disciplines.*” Trampoline and Tumbling also was described as “*mostly positive, great relationships with long-term coaches and athletes.*”

Other features associated with WAG and RG that make these disciplines more prone to maltreatment include early specialisation and the power imbalance between coaches and young athletes, influence and expectations of parents, reluctance of athletes to report abuse, funding pressures and historical (international) coaching practices that still persist. These are further addressed in Theme 8) ‘Coaching Practices and Impacts.’ Poor accountability and oversight also are important factors that create the conditions for maltreatment to persist; however, these are features that can be found across the gymnastics’ ecosystem, rather than a feature that is exclusive to WAG or RG. Lack of accountability is a foundational theme related to culture that is explored further in this Chapter.

### 3) Governance, Jurisdiction and Accountability

***“Provincial organisations are not being held accountable for overseeing their clubs’ respect of all rules and consistency in standards.”***

The governance of gymnastics is a reflection of Canada’s federated system whereby there are overlapping jurisdictions between the federal and provincial governments as it concerns who is responsible for amateur sport. Typically, Sport Canada has primary jurisdiction over national sport contexts and provinces have primary jurisdiction over provincial sport contexts. For example, government entities including Sport Canada, the Canadian Olympic Committee (‘COC’)

and Own the Podium ('OTP') have mandates that are focused on national and international pathways rather than grassroots participation. Although GymCan is the National Sport Organisation ('NSO') that represents the collective of the sport, it has very little practical or policy influence over grassroots gymnastics. This appears to be the prevailing philosophy of the GymCan Board including one Board member who stated that "*GymCan's mission is to manage high-performance needs.*" In fact, the GymCan mission is provided as follows:

***"GymCan Mission: Build the foundation. Create champions. Inspire the nation"***<sup>33</sup>

The inconsistency between the Board member's understanding of GymCan's mission and the published mission of the organisation is unsettling and lends credence to where many believe the NSO is focused in practice — on high-performance. But is this focus entirely intentional, or a product of efforts by some PTOs to keep GymCan out of their business as it is alleged by some respondents? GymCan's ability to "*Build the foundation*" — including strategic attention to culture and Safe Sport — requires specific attention to the governance and jurisdictional issues described herein including greater alignment and cooperation between local, provincial and national governing bodies.

The relationship between federal and provincial jurisdictions as it concerns amateur sport is nuanced and has resulted in varying levels of cooperation between PTOs and NSOs across different sports in Canada. Some NSOs have been more successful than others in developing vertically integrated governance structures whereby NSOs enjoy some level of jurisdiction over provincial participants depending on the governing agreements between an NSO and its member PTOs. This suggests that despite Canada's federated structure, "*if there is a will there is a way*" to develop more vertically integrated approaches to sport governance. However, as it pertains to gymnastics in Canada, there is a chasm between GymCan and PTOs as it relates to jurisdiction; this has resulted in the emergence of siloed PTO operating structures with no effective national oversight provided by GymCan — and GymCan cannot and must not be entirely faulted for this. This is illustrated in the following comment made by a GymCan staff member: "*There is no direct oversight (of PTOs). Because PTOs feel like they oversee GymCan and not the other way around.*

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<sup>33</sup> Gymnastics Canada, "Mission," Online: [Mission | Gymnastics Canada \(gymcan.org\)](https://www.gymcan.org/mission) [Last Accessed: 15 December 2022].

*Provinces feel like they control everything and feel that they have the power of oversight over GymCan.*" Another leader in the gymnastics community echoed this, stating that "*the balance of power is skewed in favour of the provinces.*"

According to a GymCan Board member, the governance of gymnastics in Canada "*is based on a system which does not fit because of how big gymnastics has become.*" Furthermore, the Board member suggests "*the model (of governance) does not work anymore*" and there is a need to establish with much greater clarity what is expected at the national level and the provincial level. It is unclear what steps the GymCan Board has taken to rectify this model of governance.

The governance of gymnastics in Canada is complex and fractured. There is inconsistency in how the sport is governed across Canada's ten provinces and three territories. Consider, for example, that there are 15 different PTO governing bodies for the sport, described by one individual as "*too many cooks in the kitchen.*" A total of five provinces (Saskatchewan, Ontario, Quebec, Newfoundland and Labrador and PEI) have PTOs that govern all disciplines of gymnastics within the province, whereas the remaining five provinces (British Columbia, Alberta, Manitoba, Nova Scotia and New Brunswick) employ a hybrid model. The hybrid model includes one governing body for all disciplines of gymnastics with the exception of Rhythmic Gymnastics; in these provinces, there exists a separate governing body for Rhythmic Gymnastics. This creates an added layer of complexity, both within the hybrid provinces as well as reporting lines to GymCan. The impact of this structure on the culture of each of these organisations and the athlete experience is unclear and would benefit from additional examination through the Gymnastics Culture Review. It is important to note that this structure evolved historically from two distinct national governing bodies that were eventually combined into a singular national governing body that is now GymCan.

GymCan's lack of influence over PTO members and local clubs is a significant concern that requires attention. Clubs are members of their PTO and are accountable to their PTO. As a result of this governance structure, there is a lack of national oversight, coordination and support of grassroots gymnastics. One gymnastics PTO administrator commented that their PTO is "*finding huge amounts of variance at the local level to deal with issues that come up.*"

According to sport policy and governance experts at the University of Toronto, “*Clearly, Canadian sport also faces a major crisis in sports governance.*”<sup>34</sup> The University of Toronto experts led by Bruce Kidd, O.C., made the following pan-Canadian recommendations:

*“If there is to be a national inquiry, it would be more productive to investigate: (i) the woeful lack of transparency and accountability in Canadian sports governance; (ii) the lack of adequate athlete representation; (iii) the disconnect between the activities at the national level and those at the provincial/territorial and municipal levels; [...].”*

These comments are an indictment of the pan-Canadian system of amateur sport governance and accurately depict the current state of governance of gymnastics in Canada.

According to a gymnastics club owner, one important issue associated with this decentralised approach is reporting and “*there needs to be a clear black and white outline of processes of how to report (abuse) depending on your level.*” However, attempts by GymCan to develop streamlined and standardised national Safe Sport initiatives have been met with resistance. For example, a gymnastics administrator commented that there has been “*a lot of push-back from provinces (about Safe Sport) – a lot of push-back around great plans that (GymCan staff) had prepared on how to do cross country education and tours around Safe Sport.*”

The current governing relationship between GymCan and its PTO members as it relates to jurisdiction, reporting and accountability has been cited by many individuals as a significant impediment to how Safe Sport is managed within the gymnastics’ ecosystem. For example, a current GymCan Board member commented that “*there is definitely work to be done, provinces are too independent and not accountable enough.*” In a recent article, GymCan CEO Ian Moss suggested that “*we defer a lot of the oversight through to the provincial members, and not the other way around.*”<sup>35</sup> He went on to add, “*we can’t mandate all the way down to a club.*” This is an accurate description of the siloed nature of gymnastics governance in Canada. GymCan is

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<sup>34</sup> Kidd, Bruce; Kerr, Gretchen; and Donnelly, Peter, “*ENSURING FULL AND SAFE PARTICIPATION BY CANADIAN GIRLS AND WOMEN, FAIR ATHLETE REPRESENTATION, AND GOOD GOVERNANCE IN CANADIAN SPORT – A brief to The Standing Committee on the Status of Women and The Standing Committee on Canadian Heritage,*” 14 December 2022.

<sup>35</sup> The Toronto Star, “*The current system has failed athletes’: How Canadian gymnastics turned dreams of Olympic gold into nightmares,*” Online: [Canadian gymnastics turned dreams of Olympic gold into nightmares | The Star](https://www.thestar.com/sports/gymnastics/2022/12/10/the-current-system-has-failed-athletes-how-canadian-gymnastics-turned-dreams-of-olympic-gold-into-nightmares/) [Last Accessed: 10 December 2022].

excluded from any direct oversight of clubs and it is unclear what systems are put in place to ensure that PTOs are effectively monitoring club requirements. For example, how do PTOs ensure the effective oversight of clubs? And who are PTOs accountable to in order to ensure that clubs are being held to specific standards including Safe Sport policies and procedures, among others? What consistent national standards exist concerning the oversight and compliance of local clubs?

The answer to these questions represents a critical area of inquiry for the Gymnastics Culture Review. Consider that almost 92% of respondents to the PTO executive survey agreed that local gymnasts at the club level who are not associated with a national team program have little interaction with GymCan. The IRT heard from individuals who suggested that clubs are “*none of GymCan’s business*” and are the responsibility of PTO governance exclusively. This viewpoint is supported by anecdotal accounts of GymCan being told not to communicate directly with local clubs and to vet any communications through PTOs. For example, a GymCan staff member commented that, “*what is problematic is GymCan is not allowed to speak to anyone in the province, clubs without reaching out to the CEO (of the PTO).*” Furthermore, the GymCan Board has no connection with PTO Boards and this connection has been resisted by the CEOs of provincial and territorial organisations. This situation implies a lack of trust, cooperation and an ineffective model of governance and compliance related to the oversight of gymnastics clubs, including Safe Sport. GymCan has been rendered impotent as it concerns their ability to enact and monitor consistent national standards for local clubs.

The IRT considers the lack of integrated national standards and leadership to be the Achilles Heel of Canada’s gymnastics’ ecosystem. Recommendations are provided in Chapter 3 to address these current limitations in order to provide more integrated and effective oversight of gymnastics, particularly as it relates to requirements within the club environment where the vast majority of gymnastics participation occurs.

The disjointed governance structure described herein has a concomitant impact on accountability within the system, including managing the compliance of clubs, staff, administrators, coaches and other stakeholders. Maltreatment and abuse persists because of insufficient performance management structures, among other antecedents. The IRT has

identified gaps in the performance management of coaches and other staff at every level of gymnastics in Canada. For example, a common sentiment is that “*performance reviews (of coaches) need to be wider, including communication, interpersonal relationships, conflict resolution [...].*” The IRT learned about performance management processes that were non-existent in some cases and others that lacked a systematic approach to gathering input from important stakeholders within the gymnastics community — especially gymnasts themselves. The inability of governing bodies — including GymCan, PTOs and clubs — to ensure compliance with policies and to hold coaches and others accountable for negative behaviours is a common theme and a major reason why negative cultures continue to persist in some disciplines. According to a current GymCan Board member, “*coaches have a responsibility and accountability to be professionals which is much more than producing results on the podium.*”

The gymnastics community have called for “*better hiring, screening, training and performance reviews*” at every level within the gymnastics hierarchy; and this applies to more than just coaches. GymCan staff, for example, reported a lack of systematic performance reviews and inconsistent requirements related to staff accountability. For example, it was suggested that “*it is not a current priority that everyone working with GymCan must sign the current Code of Ethics. There is no oversight of this and no way to know if everyone working at GymCan has signed it.*” Deficiencies in these areas are cited as fuelling negative cultures generally and why perpetrators of maltreatment “*fall through the cracks.*” However, the IRT also learned that many clubs, PTOs and GymCan are limited in their capacity to oversee these functions effectively. A more integrated approach that requires consistent standards and support in these critical areas must be contemplated as part of the Gymnastics Culture Review.

#### 4) Gymnastics Canada Organisational Structure and Leadership

*"The CEO cannot orchestrate a group of competent people (because) there is too much to do and too big of an operation. It is because of a lack of structure and the fact that the CEO is acting as the High-Performance Director. This is not sustainable from a human perspective or from a productivity and efficiency perspective."*

A persistent theme includes criticism leveled at GymCan's current leadership and organisational structure including a GymCan staff member who referred to GymCan's structure as "organisational disarray" encompassing ineffective communications, staff turnover and "there is not much positivity." Another individual who is familiar with the operation of the Board suggested that "everyone feels like there is a disconnect. Everyone in the community gets along really well, but we feel that anything that is brought forward to GymCan is not managed well." These sentiments were directed at "the CEO, but mostly the high-performance director for each discipline." Another individual who commented on RG explained that "a high-performance coordinator came in to help but knows nothing about Rhythmic and there is so much to do and not enough people to get it done." The previous structure included a Chief Operating Officer, Chief Executive Officer and a High-Performance Director ('HPD') where "the HPD oversaw all the disciplines and helped current discipline specific high-performance directors. Now they are left to take care of everything themselves."

The opening quotation to this section is all the more perplexing because it was made by a current GymCan Board member. The sentiment itself illustrates a recurring theme that the CEO and Board are ineffective and unable to bring about structural change to address myriad issues identified in this Report. A second Board member commented that "even if the Board is the top of the food chain they have little control or power to make change." A GymCan Board member also commented that "below the CEO there are many positions that are not filled and there are positions that do not have the competencies that they (GymCan) require." These statements are cause for concern and highlight a critical area of inquiry for the Gymnastics Culture Review.

The criticism of GymCan is informed by multiple perspectives including staff members employed by GymCan, athletes, coaches, judges as well as Board members who were interviewed. Criticism of this structure includes the following:

- Lack of capacity within the current structure;
- Lack of transparency within the current structure;
- Ineffective leadership because of the dual structure of the CEO & High-Performance Director;
- Lack of support for staff in upholding policies including the Code of Conduct;
- Insufficient performance management of employees and leaders;
- Vacant positions due to workload and lack of support;
- Inconsistent processes related to reporting;
- Lack of consistency in job titles across high-performance leadership teams.

According to a coach employed by GymCan, “*because of the scale of the country GymCan does not have the structure, personnel or funding to oversee the whole country.*” GymCan has been described as an organisation that is “*stretched thin*” and unable to service the needs of many within the gymnastics community, including athletes as well as staff employed by GymCan. This has resulted in intense criticism of GymCan and its leadership.

The COVID-19 pandemic has had a negative impact on GymCan’s capacity to service the gymnastics community, including a 41% decline in full-time staff employed by the NSO, from 22 full-time staff pre-pandemic to 13 full-time staff currently. This may explain some of the recent criticism. The decline in registered gymnastics participants across Canada due to the pandemic has resulted in a commensurate decline in registration fees to PTOs and to GymCan.<sup>36</sup> Moreover, spiralling legal costs associated with managing Safe Sport complaints has taken a significant financial toll on GymCan and further eroded its capacity. According to GymCan, when Covid hit revenues went from \$2.5M to \$1M “*overnight*” which pushed the NSO to near bankruptcy and necessitated the furlough of some staff. Although GymCan is described to be “*in much better shape now*” and cash flow has stabilised, the organisation is still down approximately \$750,000 since pre-Covid. Of the \$8 per gymnastics registrant that is paid to GymCan, approximately \$5 is allocated to national team budgets with the remaining \$3 for everything else including Safe Sport

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<sup>36</sup> Note: Gymnastics Canada receives \$8 per registered participant which flows through the PTO registration process to Gymnastics Canada. Gymnastics Canada is not provided with the names of provincial registrants.

and coach/judge development, among other needs. GymCan made a request to PTOs for an extra \$1 per member to be allocated for Safe Sport costs, but the request “*was flatly refused.*” According to GymCan, there has been no new government funding and a reduction in government funding to NSOs for Safe Sport.

The issues related to organisational structure have contributed to a negative culture within GymCan – described as “*administrative toxicity*” by a staff member. For example, the IRT learned that “*the relationship between coaches, GymCan and judges is strained on many levels,*” and “*there is a lack of respect for sure in communications and the way they deal with each other.*” Staff members commented on a culture of unwarranted blame, finger-pointing and unprofessional communications directed at GymCan office staff from others in the gymnastics community. These accounts include the public airing of negative grievances and staff who reported receiving inappropriate (bullying) communications from gymnastics stakeholders outside of GymCan because they work for the national office and “*have a target on their back.*” Furthermore, staff do not trust the leadership of GymCan to support them in holding people accountable for such behavior even if there are existing policy mechanisms that are in place for such a purpose. One of the reasons cited for this lack of support is the ineffective organisational structure and the lack of capacity within the organisation. Staff suggested that some positions are vacant because of this negative culture and “*staff that are left behind are tired and overworked.*” Another individual expressed concern for the organisation related to attracting and retaining staff including, “*we’ve lost a lot of good staff. It shows that leadership and communication is not good because we keep losing people.*”

Multiple individuals including staff and athletes expressed concerns and frustration about communication from GymCan as well as a lack of transparency and consultation in decision-making. One recent example includes the lack of transparency in the hiring process for the new WAG National Team Head Coach, as described later in this Chapter.

Consistent feedback suggests the CEO is overwhelmed because of his dual roles as CEO and HPD. The CEO’s attention has been further divided by the plethora of Safe Sport complaints that have been leveled at GymCan. There is consensus that the CEO would be more effective in his role with a singular focus on the CEO role. One of the reasons that the position evolved this way

is a function of limited resources to hire two separate positions, thus illustrating the resource challenges and lack of capacity within the current structure. However, others who are quite familiar with the operation of GymCan believe that “*we need new leadership at Gymnastics Canada*”; that “*the current leadership has lost the confidence and trust of many individuals in the gymnastics community*” and that “*it will be difficult to rebuild trust with the current leadership.*” Many have questioned the competency of GymCan leadership including the CEO which is reflected in the following statement: “*I have serious concerns about GymCan’s leadership. I have little to no confidence in the current leadership [...].*” However, other comments about the CEO reflect empathy and support including, “*Ian Moss is spread too thin, I don’t think he is intentionally ignoring issues or doing things in bad faith, he just does not have time. I have a lot of respect for what he knows and what he does.*”

The concerns about GymCan’s leadership extend to the relationship between the Board and the CEO. Some individuals assert that the Board is constrained in making decisions and relies too heavily on the unilateral perspective of the CEO and that “*the CEO has too much influence*” rather than seeking broader perspectives to inform decisions, especially from athletes. This requires further examination through the Gymnastics Culture Review.

Other important areas of inquiry related to GymCan’s organisational structure include how the high-performance disciplines (Rhythmic, Women’s Artistic, Men’s Artistic, and Trampoline and Tumbling) are structured and supported. Some have described these disciplines as “*operating in silos*” with a lack of direction from high-performance leadership. Moreover, the titles and roles for the high-performance leadership teams on the organisational chart are inconsistent and confusing to many. It would be helpful for GymCan to provide more clarity about the roles and responsibilities for the leads of each discipline, including a comparative review of formal job descriptions for each leadership job description. The IRT makes several recommendations to further assess GymCan’s organisational structure in Chapter 3.

## 5) Communication, Transparency and the Athletes' Voice

*"The importance of the athlete voice at the policy and decision-making level in any national sport organisation is critical."*<sup>37</sup> – CEO, Gymnastics Canada

A consistent theme that emerged, particularly from athletes, involves poor communication and transparency related to decisions that impact athletes. For example, *"there is no transparency in the hiring of coaches and poor consultation with athletes."* Many athletes do not feel that their voice is heard which has been described as a negative part of the gymnastics culture in Canada – and something that must change. This includes feedback from individuals at the club level through to multiple national team athletes who described specific examples to illustrate this theme. For example, a gymnastics administrator was told that he *"heard firsthand from a former athlete who wanted to be on the Board of Directors (of GymCan) and was just ghosted and not given feedback."*

Issues involving communication and transparency between gymnastics organisations and athletes is a function of multiple factors including governance, leadership, values and an unhealthy power imbalance that has been described throughout this Report. A power imbalance exists at both an interpersonal level (i.e. coach & athlete) and at an organisational level where governing bodies and those at the helm yield both power and influence over decisions within their jurisdictions. One gymnast described being treated *"like machines rather than human beings."* Issues related to the organisational structure and capacity of GymCan have been cited as to why communication from the leadership of GymCan has been problematic, including examples of poor or non-existent follow-up from time to time to specific questions or concerns raised by members of the gymnastics community.

Although the importance of the athletes' voice has been articulated publicly by GymCan leadership as illustrated in the opening quotation, 'actions speak louder than words.' Many national team athletes feel left out of important decisions that directly impact their experience, including a recent example involving the selection of the Women's Artistic Gymnastics National

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<sup>37</sup> Gymnastics Canada, News, "Cory Paterson elected as the new National Team Athlete Representative to the Gymnastics Canada Board of Directors," Online: [News | Gymnastics Canada \(gymcan.org\)](https://news.gymcan.org/cory-paterson-elected-as-the-new-national-team-athlete-representative-to-the-gymnastics-canada-board-of-directors/) [Last Accessed: 23 November 2022].

Team Head Coach. This example is described in detail below as it illustrates the frustrations that have been expressed by several high-performance gymnasts in Canada.

In June, 2019 GymCan announced the resignation of Alex Bard, National Team Head Coach for Women's Artistic Gymnastics for “personal reasons.”<sup>38</sup> However, this quickly drew intense criticism within the gymnastics community. It was suggested that Bard was forced out. According to one media account, “Gymnastics Canada said Bard resigned for personal reasons, but media reports soon pointed out he was pushed out — a fact that other staff members have since confirmed. Those include CEO Ian Moss, who said Bard failed to improve on repeated inappropriate behaviour.”<sup>39</sup> The alleged inappropriate behavior includes “[...] complaints that Bard had been seen touching a teenage gymnast on her bottom.”<sup>40</sup> Subsequently, it was reported that “since his fallout with Gymnastics Canada, Bard has been helping to coach in various gyms in Canada as recently as this past summer, according to sources.”<sup>41</sup> This further illustrates the concerns that many people have about the oversight, accountability and transparency of GymCan; as a result, “they (Gymnastics Canada) keep repeating the past by recycling coaches who have had complaints against them,”<sup>42</sup> according to a former athlete.

Following the departure of Bard, GymCan announced the following: “For the short term, the WAG national team technical and management needs will continue to be supported by Amanda Tambakopoulos, Jean-François Mathieu, Lorie Henderson, and David Kikuchi.”<sup>43</sup> Almost 3.5 years has passed since this announcement and a permanent WAG National Team Head Coach remains to be employed as of 20 December 2022. The IRT spoke to multiple WAG National Team athletes and others who expressed grave concerns about this hiring process.

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<sup>38</sup> Gymnastics Canada, “Resignation of Alex Bard – National Team Coach (WAG),” Online: [https://www.gymcan.org/news/details/2019\\_WAG\\_BARD-RESIGN\\_June2019](https://www.gymcan.org/news/details/2019_WAG_BARD-RESIGN_June2019) [Last Accessed: 13 December 2022].

<sup>39</sup> CBC News, “Gymnastics Canada CEO promoted prominent coach despite complaints,” Online: [Gymnastics Canada CEO promoted prominent coach despite complaints | CBC News](https://www.cbc.ca/news/politics/gymnastics-canada-ceo-promoted-prominent-coach-despite-complaints-1.5115000) [Last Accessed: 13 December 2022].

<sup>40</sup> TSN, “Gymnastics Canada publicly lauded coach who was fired after multiple complaints,” Online: [Gymnastics Canada publicly lauded coach who was fired after multiple complaints - TSN.ca](https://www.tsn.ca/gymnastics-canada-publicly-lauded-coach-who-was-fired-after-multiple-complaints-1.5115000) [Last Accessed: 13 December 2022].

<sup>41</sup> CBC News, “Gymnastics Canada CEO promoted prominent coach despite complaints,” Online: [Gymnastics Canada CEO promoted prominent coach despite complaints | CBC News](https://www.cbc.ca/news/politics/gymnastics-canada-ceo-promoted-prominent-coach-despite-complaints-1.5115000) [Last Accessed: 13 December 2022].

<sup>42</sup> Ibid.

<sup>43</sup> Gymnastics Canada, “Resignation of Alex Bard – National Team Coach (WAG),” Online: [https://www.gymcan.org/news/details/2019\\_WAG\\_BARD-RESIGN\\_June2019](https://www.gymcan.org/news/details/2019_WAG_BARD-RESIGN_June2019) [Last Accessed: 13 December 2022].

In “late 2019/early 2020” a hiring process was commenced, led by a committee of five individuals including an athlete representative and GymCan’s OTP consultant. Two candidates were short-listed for the position. However, the hiring process was abandoned after one of the two remaining candidates removed themselves from consideration. The remaining candidate was told that a second hiring process had to be initiated “according to policy” because he was the only person left. The remaining candidate was skeptical of the reason provided or the necessity of undertaking a second hiring process. During this time, the Covid pandemic caused the postponement of the 2020 Summer Olympics. A second hiring process was initiated several months following the rescheduled 2020 Summer Olympic Games that took place between June and August, 2021. This was described as “a constantly evolving process” plagued by poor communication and alleged conflicts of interest involving certain members of the hiring committee who had professional relationships with candidates in both the first and second interview processes according to individuals familiar with the process. According to information in the IRT’s possession, these conflicts of interest were not declared or identified as cause for recusal of these committee members. After the first unsuccessful search, one member of the hiring committee resigned from their position out of frustration with the process.

In July 2022, GymCan leadership was approached by a WAG National Team athlete seeking information about the second hiring process for the WAG National Team Head Coach, among other issues that were brought forward at the time. The WAG athlete raised a number of legitimate concerns including the fact that the WAG program was without a permanent head coach and a program manager; moreover, the Director of Safe Sport position remained vacant. Athletes on the team felt unsupported at a critical time leading up to the 2022 Gymnastics World Championships (from 29 October to 6 November). In response to these concerns, several individuals told the IRT that they were advised by the CEO to contact the previous Director of Safe Sport who had resigned her position the previous year but was still available to respond to athlete concerns. The IRT was informed that the previous Director of Safe Sport was “absolutely not” available for such follow-up work suggested by the CEO, but this has not been independently verified by the IRT. This raised significant concerns amongst members of the WAG National Team including one individual who stated the following: “*That is terrible for him (CEO) to be saying and for him to not know what the situation is.*”

Despite what was described as a positive conversation in July 2022, the WAG athlete received no response from GymCan leadership about the various concerns that she had raised. The WAG athlete subsequently followed up in “August/September” with two athlete representatives on the GymCan Athletes Commission to reiterate the prior concerns raised with GymCan and to share the fact that GymCan had provided no response or updates. A WAG gymnast commented that “*if you have a concern, you want to feel like you have been heard.*” However, despite the initial conversation with the GymCan CEO in July and the follow-up conversation with the GymCan Athletes Commission representatives in September, GymCan failed to respond to the WAG athlete as well as others who had made inquiries to GymCan about the repeated delays in the hiring process and the lack of transparency regarding the same. In September 2022 at the WAG National Team training camp/trials in Montreal, WAG coaches met with the GymCan CEO and were told that he had a preferred candidate for the Head Coach position but the name of the candidate could not be announced at the time. In response to this news, the CEO was asked if the coaches and athletes would have a chance to give feedback on this preferred candidate before it is finalised. There was no similar meeting between the CEO and the WAG National Team athletes. According to a WAG athlete who attended the training camp, “*that did not happen.*”

The continued silence of GymCan to respond to the WAG athlete’s concerns prompted two WAG athletes to co-sign a letter dated 21 September 2022 that was addressed to the Board of Directors of GymCan outlining their concerns. These concerns included reference to the flawed guidance provided by the CEO for athletes to contact the previous Director of Safe Sport if they had concerns about maltreatment. As of 13 December 2022, the WAG gymnasts who authored the letter had yet to receive a formal response from the GymCan Board of Directors.

The IRT learned that in October 2022, less than one month before the start of the World Artistic Gymnastic Championships, GymCan held a Zoom call with the WAG National Team including athletes and personal coaches. The purpose of the Zoom call was to announce “*internally to the National Team*” the selection of a tandem of individuals to lead the WAG program including a National Team Head Coach and a second individual in a supporting role to the Head Coach. It was made clear on the call that this was “*unofficial*” and the two individuals had not been formally hired. To this point, athletes and others still had not been provided with the opportunity to provide feedback which had been promised repeatedly by the CEO to no avail.

“Within seconds” following the Zoom call, several members of the WAG National Team became aware of Safe Sport allegations in the public domain associated with the preferred candidate; however, these unproven allegations were not addressed by the CEO at the time of the internal announcement on the Zoom call. The CEO also received emails following the Zoom call asking yet again about the process for feedback concerning the National Team Head Coach selection that had been promised. There was no response to the emails.

Following the October 2022 Zoom announcement of the preferred WAG Head Coach candidate, members of the WAG National Team learned that GymCan planned to have the preferred candidate attend the World Artistic Gymnastics Championships *“just as an observer”* according to an individual privy to the conversation. The team was taken aback by this, including a group of coaches who *“asked that he not be there.”* The team was concerned about this being a distraction. Despite the protestations, the decision was made to send the preferred candidate and the team was reassured by the CEO that he would stay apart from the team to minimise distractions. Just days prior to departure, the mother of one of the gymnasts on the team passed away and an alternate was selected to replace the affected athlete. This was described as something *“that really rocked our team”* and as a result, a second appeal was made to the CEO to not have the preferred candidate attend, but the request was denied.

Despite assurances that the preferred candidate would stay apart from the team, the IRT learned that the preferred candidate *“was slowly trying to integrate himself with the team.”* He attended team training sessions *“sitting by himself watching”* which was uncomfortable to the team and exactly the distraction the team wanted to avoid. *“This was not the expectation and not what should have happened”* according to a team member. The preferred candidate was provided with accreditation that said *“program manager (or similar)”* according to a team delegate, despite the fact that the preferred candidate was not employed in any official capacity by GymCan. Moreover, team members were uncomfortable due to Safe Sport concerns about the preferred candidate that the team had discovered following the internal announcement made by GymCan.

On 17 November 2022, the WAG National Team coaches and athletes received an email update from GymCan explaining the delay in hiring the preferred candidate and the second supporting

position. GymCan had previously had their Sport Canada funding frozen and this was cited as a reason for the delayed hiring. However, several members of the WAG National team remain skeptical of this reason and are disillusioned with the process. *“In the crossfire of all of this are the athletes. They should not be put in this position...None of these decisions are in the best interests of athletes.”*

This example of the hiring process for the WAG National Team Head Coach was described by a WAG team member as *“a big slap in the face of all athletes in Canada. I don’t know the information behind it (that led to the decision) but it is disrespectful to athletes; it does not prioritise their safety or comfort of athletes.”* A GymCan Board member suggested that, in general terms, *“there are issues and content that cannot be communicated for several reasons, legal or others.”* It is clear that this could have been managed more effectively by GymCan including balancing confidentiality requirements in the hiring process with more effective communication with athletes who had been proactive in wanting to learn and contribute feedback to the hiring process. GymCan and its CEO did not follow through on the repeated promise made to athletes and coaches to consider their feedback.

Furthermore, the IRT was told that other athletes on the WAG team expressed frustration with the hiring process, stating *“what is the point of saying anything, it will not change their (GymCan’s) mindset.”* This is akin to throwing in the towel and is directly counter to the statement that, *“the importance of the athlete voice at the policy and decision-making level in any national sport organisation is critical.”* Clearly, the athlete who made the former statement does not feel heard. Another current athlete asked *“how can we ensure that athletes’ voices are valued and positioned as a partner in the sport system? Athletes want to feel valued and invited in a way that is consistent across the whole organisation, including feedback mechanisms.”* These dynamics are important to examine and resolve as part of the Gymnastics Culture Review to ensure that specific governance structures and processes are enacted to facilitate meaningful opportunities for athletes to be heard.

On 22 January 2023, shortly before the publication of this Report, the IRT was informed by GymCan officials that an exhaustive report commissioned by GymCan to investigate the public allegations against the unofficial candidate was completed. The Chair of GymCan provided

Professor Richard McLaren, CEO of MGSS with a copy of this confidential document dated 17 January 2023 for his eyes only. From Professor McLaren's review of the document he is able to say that two separate and independent United States-based commissions dismissed the allegations as not probable. Professor McLaren concludes that what is found on social media is inaccurate and not proven. The Chair of GymCan accurately summarised the report when he said it *"found no evidence of any wrongdoing."* GymCan advised coaches of the findings at GymCan's 2023 'Elite Canada'<sup>44</sup> competition. However, it is unclear how athletes were informed of the findings, including those who had expressed concerns previously about the allegations.

## 6) Performance Incentives – Win at all costs?

**"It sometimes feels like winning at any cost is acceptable."**

The gymnastics administrator who made the above comment asked, *"how much is too much, and how hard is too hard?"* Many within the Canadian gymnastics community believe that a win at all costs philosophy is endemic to gymnastics at high-performance levels, without due consideration for an athlete's physical and psychological well-being. Moreover, concerns about early specialisation, overtraining and high-pressure tactics to succeed are born at the early competitive pathways at the club level as described herein. This lends support to the thesis that winning at all costs is a feature of gymnastics culture within certain disciplines in Canada. Furthermore, multiple international gymnastics reviews reached the conclusion that a win at all costs approach is a problematic component of their culture.

Many gymnasts have described their experience as win at all costs, where they have pushed through injuries and psychological abuse in their pursuit of success in the sport. For some, this was somewhat self imposed, describing themselves as highly competitive perfectionists. Former athletes indicated that they thought this approach was *"normal"* and *"necessary"* at the time; however, in hindsight, they recognise that such practices were abusive. The degree to which a win at all costs approach is currently endemic to gymnastics in Canada – and why – requires systematic analysis by discipline as part of the Gymnastics Culture Review.

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<sup>44</sup>Note: The Elite Canada Men's and Women's Artistic Gymnastics event is a national-level competitive opportunity for developing high-performance athletes. It was held from January 18-22, 2023 in Saskatoon, Saskatchewan.

In order to assess the degree to which a win at all costs approach may be present, it is necessary to examine the national structures (i.e. Sport Canada, Own the Podium, Canadian Olympic Committee) and criteria used to evaluate and fund gymnastics disciplines at the high-performance level. This should include a review of how coaches are incentivised and evaluated as many believe that “*the only measure of coaches is if the athletes are successful.*” Leading academics suggest that there has been an unhealthy focus on winning in Canadian high-performance sport, which is illustrated in the following excerpt from a brief that was recently submitted to The Standing Committee on the Status of Women and The Standing Committee of Canadian Heritage.

*“[...] we need to recognize that the high-performance mantra of Canadian sport during the last four decades and the associated financial incentives to achieve medals placed upon sports bodies, coaches and athletes by Sport Canada, Own the Podium, and their provincial/territorial counterparts have created cultural enablers for maltreatment.”<sup>45</sup>*

The IRT received many comments from individuals who believe that historical drivers within the system in pursuit of podium success have neglected athlete welfare as a by-product. For example, a GymCan Board member made the following comment:

*“The system creates perverse effects because everyone is trying to attain criteria and results to get funding – athletes, coaches, and clubs alike. As a result, (athlete) support mechanisms are perverse themselves rather than being supportive at the higher levels. Everyone wants recognition, results, and financial support but it is a vicious circle. In order to get more positive results and improve culture, the methodology should be modified.”*

This is a tacit admission that a win at all costs philosophy exists within certain gymnastics structures and disciplines. The “*methodology (that) should be modified*” refers to how athletes, coaches, and programs are incentivised, rewarded and evaluated. The “*modification*” that is necessary according to sport ethicists, academics and the gymnastics community at large is to provide a more holistic evaluation of what constitutes success, including assessments of athlete welfare at every level of the sport. At high-performance levels, funding decisions should consider

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<sup>45</sup> Kidd, Bruce; Kerr, Gretchen; and Donnelly, Peter, “*ENSURING FULL AND SAFE PARTICIPATION BY CANADIAN GIRLS AND WOMEN, FAIR ATHLETE REPRESENTATION, AND GOOD GOVERNANCE IN CANADIAN SPORT – A brief to The Standing Committee on the Status of Women and The Standing Committee on Canadian Heritage,*” 14 December 2022.

both the performance thresholds for funding as well as criteria that measure athlete support structures together with measures of the psychological and physical health of athletes. Compliance with these requirements should be tied to funding decisions. This process is already underway including new requirements that have been introduced by Own the Podium as well as a novel culture review process for high-performance sports that incorporates measures related to both 'performance' and 'person' dimensions (See Chapter 3).

Conversely, as discussed in Section 8 below there are also examples of highly competitive and successful athletes in Canada who have thrived in the high-performance environment thanks to open and honest communications with their coach emblematic of a partnership. Even if they have been pushed and have pushed themselves to achieve greatness, they have always felt empowered to use their voice. These athletes serve as examples of how determination, hard work, resilience and grit can be positive drivers of success when athletes are treated as human beings and have a positive, balanced and healthy relationship with their coaches.

## 7) Reporting

*"There needs to be a clear black and white outline of processes to report depending on your level."*

The gymnastics community is dissatisfied, confused and frustrated with current reporting mechanisms related to maltreatment. This also includes a lack of familiarity with the recently introduced Universal Code of Conduct to Prevent and Address Maltreatment in Sport ('UCCMS'), Abuse Free Sport, and the Office of the Sport Integrity Commissioner ('OSIC'). According to sport policy and governance researchers at the University of Toronto, the lack of familiarity with the UCCMS and related mechanisms is a pan-Canadian sport issue, which is reflected in the following statement:

*"The UCCMS is not widely understood. In many cases its very existence and purpose is still entirely unknown by professionals in the sport world. Nor does it spell out the desirable leadership and coaching practices that would reduce the incidence of maltreatment. A*

*broad program of communication, education, and training at all levels of Canadian sport is urgently needed to make it effective.”<sup>46</sup>*

Policies related to reporting are addressed in Chapter 4, including the implications of Gymnastic Canada’s recent signing of an agreement with the OSIC as it concerns reporting maltreatment.

Much of the confusion with reporting is a function of issues related to jurisdiction and policies that govern reporting at different levels. There also have been many calls to improve communication as it relates to reporting. Confusion about reporting is particularly evident at the grassroots level of gymnastics where there is less familiarity with such policies and the respective roles of clubs, PTOs and GymCan in the process. The reluctance of some PTOs to foster communication between GymCan and the grassroots gymnastics community has been identified by several individuals as a constraint to developing a more holistic understanding of the reporting process across all levels of the gymnastics community.

Confusion and misunderstanding of reporting processes have caused many individuals to distrust the process, including some who have alleged cover-ups at worst and dissatisfaction with the timing and resolution of complaints at best. Many agree with the statement that “*there is a bottleneck happening at the provincial and club level with reporting and complaints.*” The IRT heard accounts of some PTOs escalating complaints to GymCan because they lack the capacity and resources to manage the process locally or provincially. These concerns have informed several recommendations about reporting in the IRT’s Culture Review Framework provided in Chapter 3.

In its present form, the OSIC’s scope of application is limited. For example, “*Recognising that OSIC is accessible only to national level athletes – a very small percentage of sport participants across the country – immediate steps should be taken to develop complaint processes for*

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<sup>46</sup> Kidd, Bruce; Kerr, Gretchen; and Donnelly, Peter, “*ENSURING FULL AND SAFE PARTICIPATION BY CANADIAN GIRLS AND WOMEN, FAIR ATHLETE REPRESENTATION, AND GOOD GOVERNANCE IN CANADIAN SPORT – A brief to The Standing Committee on the Status of Women and The Standing Committee on Canadian Heritage,*” 14 December 2022.

*provincial and community level sport participants [...].*<sup>47</sup> This is an accurate description of the limited number of individuals in the Canadian gymnastics community who are subject to the OSIC.

## 8) Coaching Practices and Impacts

***“Most coaches are positive and willing to work, others just want to tear athletes down and provide no solutions or positive reinforcement.”***

Although the majority of coaches are considered to be positive and supportive, there still exists gymnastics coaches who abuse their power. Of those “bad apples”, some abuse their power to achieve performance outcomes through negative tactics, including maltreatment; whereas others abuse their power imbalance by becoming sexual predators who take advantage of the vulnerabilities of athletes and the system to perpetrate sexual harassment and abuse. The actions of both categories of coaches are left unchecked for several reasons. As explained previously, poor or non-existent accountability mechanisms including performance reviews have created the conditions for abuse to persist. Insufficient education also has been cited by many individuals as contributing to lower reports of maltreatment, particularly among gymnasts and their parents.

The IRT received feedback from a total of 406 coaches via the public survey and 15 coaches who were interviewed by the IRT. This includes coaches at every level of the sport in Canada including recreation-only coaches, personal coaches of high-performance athletes and national team coaches with extensive experience and insights. Arguably, abusive coaches likely did not fill out the survey. Feedback about coaching practices and experiences was sought and received from all gymnastics stakeholder groups in addition to the coaches themselves. This includes perspectives from hundreds of current and former athletes, PTO executives, GymCan staff and Board members, and parents, among others.

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<sup>47</sup> Kidd, Bruce; Kerr, Gretchen; and Donnelly, Peter, “*ENSURING FULL AND SAFE PARTICIPATION BY CANADIAN GIRLS AND WOMEN, FAIR ATHLETE REPRESENTATION, AND GOOD GOVERNANCE IN CANADIAN SPORT – A brief to The Standing Committee on the Status of Women and The Standing Committee on Canadian Heritage*,” 14 December 2022.

A gymnastics coach has significant influence on the experience of athletes under their supervision at every level of participation in the sport. The relationship between an athlete and their coach(es) is evidently the most important determinant of whether their experience is positive or negative. This is especially true given the individual nature of the sport and the one-on-one interaction between coaches and athletes which becomes more pronounced as athletes progress through the high-performance pathway. According to one national team athlete, *“I have a healthy relationship with my coach. My coach is deeply concerned and cares about my well-being... (including) autonomy, my life outside the gym, and positive values. We are pushed hard and motivated. I am honest with myself and with my coach as to what motivates me.”* This is an example of how a supportive, athlete-centred approach should work.

Still, while the majority of coaches in the system may be good, bad ones still exist. According to a gymnastics administrator, *“there are toxic coaches — they may not be at the national level. They may be provincial. It just becomes far more visible at the international level.”* There are undoubtedly coaches who are in violation of Gymnastic Canada’s policies including the *National Safe Sport Policy*, the *Code of Conduct and Ethics Policy*, and the *Abuse, Maltreatment, and Discrimination Policy* who are still coaching gymnastics today. The vast majority of issues, concerns and complaints related to abuse and maltreatment in gymnastics involve inappropriate coaching practices. This has been demonstrated internationally through exhaustive reviews and many believe that Canada is no different. It is essential for the Gymnastics Culture Review to determine how and why such maltreatment continues to persist in order to develop strategies to mitigate, if not eliminate altogether, these harmful practices.

Although the majority of athlete abuse and maltreatment is perpetrated by coaches, the IRT also heard accounts of staff members and fellow coaches who allege that they were bullied or abused by a coach. One particular account involved an international coach who would routinely kiss gymnasts and coaches as a normal course of business, including feigning a kiss on the cheek and instead kissing a fellow coach on the lips. This was explained as a product of the coach’s international coaching philosophy and style; this behavior also exemplifies the ineffective onboarding of international coaches and resistance to education about Safe Sport.

Although most abuse and maltreatment within gymnastics is inflicted by coaches, this represents a minority of coaches in the sport. The tsunami of negative international attention on gymnastics including hundreds of allegations of maltreatment in Canada has led many good coaches to feel maligned, vilified, and on the defensive. For example, many coaches believe “*the (Safe Sport) pendulum has swung too far the other way*,” and that “*good coaches are being painted with the same brush as coaches who bring disrepute to the sport*.” The IRT heard this repeatedly. For example, one coach commented that “*coaches are panicking, in fear, (and) if you are accused (of maltreatment), you are done*.” One coach commented that he and many other coaches feel that “*GymCan would cut off a coach’s head to save their body. Any type of complaint would result in a coach being fired; and, for coaches, it’s a life living in fear*.” This is clearly not a healthy culture and coaches, too, need to be supported. Some great coaches are leaving the sport because of this persistent negative fear-driven environment.

A recurring theme is that coaches do not feel supported through the different levels of governance when an allegation is made. Concerns about procedural fairness and natural justice for coaches were raised. Coaches also expressed concern about issues with disgruntled parents who “*have it out for a coach*.” For example, one coach commented that “*coaches are always scared of disgruntled parents and the lack of understanding of what abuse is [...] it creates big problems*.”

The comment about the lack of understanding of what constitutes abuse is a salient point and is related to the importance of context according to many coaches and coach educators. For example, several coaches raised issues about spotting gymnasts where a coach may either inadvertently spot an athlete incorrectly or be forced into a position to touch an athlete’s private areas to avoid a serious injury. This is a very important and nuanced point and is not intended to be an escape hatch or excuse for abusive touching. Two coaches who were interviewed by the IRT, including a clinician who teaches appropriate spotting behavior internationally, explained how this should be addressed with an athlete (and others, including parents) to distinguish it from behavior that is abusive and predatory. Responsible coaches should discuss the possibility of this happening with athletes and parents before it takes place, including the specific context(s) in which it has the potential to occur. Moreover, the coach should immediately acknowledge and address any spotting activity that involves touching a private area of a gymnast. This

acknowledgment should immediately explain the context in which it occurred (e.g. to reduce potential injury) and should be focused on the feelings and welfare of the gymnast. This approach can and should be differentiated from predatory spotting behaviors that are repeated and not acknowledged. More robust education and training is necessary to help athletes and parents identify the specific contexts and circumstances that constitute maltreatment.

Most gymnasts reported positive experiences overall in the sport, including many who recounted healthy relationships with coaches. However, amongst those gymnasts who indicated a negative experience, the most common indicator related to this experience involved negative coaching practices. As noted previously, the prevalence of these negative coaching behaviors appears to be discipline-specific, with more extreme examples of maltreatment reported in WAG and RG. Many anecdotes about negative coaching practices that forge a negative culture were shared. The most common negative coaching themes are summarised below:

#### Abuse of a coach's power imbalance over an athlete/Manipulation of parents

Often the starting point for maltreatment is a coach who abuses his or her power imbalance to achieve specific performance outcomes. More than 88% of survey respondents expressed concern about authoritative coaching practices (Appendix B), including 24% who are “extremely concerned” and 26% who are “very concerned.” The potential for abuse of power is greater with young gymnasts who begin their gymnastics pathway as children. The IRT was told about coaches who “brainwash” or “groom” young athletes and their parents into believing that their negative tactics are the accepted pathway to achieve success. Athletes and their parents are groomed by abusive coaches, including examples where some parents reinforce a negative coaching style that is not in the best interests of their child; some parents are convinced by the coach that negative techniques are necessary and well-established. In such instances, when both the coach and an athlete’s parents unwittingly reinforce the same negative behaviors, the gymnast is left with nowhere to turn.

A former national level gymnast suggested that “women’s coaches in WAG and RG need total control” and the culture is “fear-based.” For example, “coaches shun their athletes and get mad at them. Coaches are disappointed in them, not for them.” This further illustrates systemic cultural issues in these disciplines. The power imbalance in WAG and RG is further exacerbated

by a confluence of factors including the young age of entry into the sport where children are unlikely to question a coach. Other factors that contribute to the acceptance of such tactics include parental influences and ineffective oversight and performance management of coaches. However, this assessment of WAG and RG is contrasted with MAG where the same national level gymnast explained that “*on the men’s side (MAG) there is more trust, more independence, and more communication with athletes.*”

The IRT further notes as a reality that perpetuates many of the above issues is that in many cases, an athlete spends more time with their coach than their own parents.

### International influences on coaching

**“*Eastern European<sup>48</sup> model of brainwashing and winning at all costs attitudes are still prevalent throughout the sport.*”**

The success of Eastern European gymnastics programs including WAG and RG led to the recruitment of international coaches by western countries including Canada; and with these coaches came a repetition of the negative coaching practices as the guiding philosophy to achieve success. International coaching practices — largely arising from the former Soviet Union — that spilled over to Canada, particularly in WAG and RG, included “*coaches controlling athletes and their training and athletes did not have a voice at all,*” according to a current coach. Athletes were described as “*a commodity and are used to try to get the best results they (coaches) can get and it would enhance their own status in the coaching community.*” Many who were interviewed believe that the *“model of high reward still exists in Canada, Great Britain, United States, for Women’s Artistic Gymnastics and Rhythmic Gymnastics.”*

The IRT was told by a GymCan Board member that “*many coaches think they won’t have the same results if they have to adapt their coaching styles and interventions while maintaining a safe and healthy coaching environment.*” This is a troubling and repeated observation. For example, the IRT heard about some coaches who “*would roll their eyes (in contempt) about*

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<sup>48</sup> Note: Refer to page 6 of the Report “*‘Eastern European’ in Context*” for a description of this term and its use in the Report.

completing Safe Sport education requirements.” Others referred to mandatory Safe Sport education as “a box ticking exercise.” This exemplifies why systematic performance evaluation of coaches is crucial. This process must be designed to ensure compliance with policies and expected standards of behavior so that coaches are held accountable. This will result in more effective processes to weed out toxic coaches at every level of the sport.

#### Extreme focus on negative reinforcement versus positive reinforcement in training

In some disciplines there is an unhealthy focus on negative reinforcement because of the scoring systems in place by the Fédération Internationale de Gymnastique (‘FIG’). This includes “*certain mandatory requirements and levels of difficulty that a routine needs.*” This results in a “*perception to be excellent is so high that someone is always finding fault* (and deducting points) as opposed to rewarding gymnasts and being positive. So you start at ten and they deduct points as opposed to starting low and adding points.” Essentially, this is akin to a glass half-empty (i.e. what is wrong with the routine?) versus a glass half-full (i.e. what has been accomplished?). This was described by a former coach as “*placing too much emphasis on negative (descriptive) approaches to coaching rather than on positive (prescriptive) approaches to coaching.*” Another coach commented that there is “*so much criticizing and picking apart and aiming for perfection rather than rewarding.*” These comments are most typical in WAG and RG.

Some suggest that a constant focus on what a gymnast is doing wrong can be damaging to an athlete’s mental health, and this approach “*is conceptually wrong.*” This is contrasted with other disciplines including Trampoline and Tumbling where prescriptive approaches to coaching are more commonplace and where the scoring system rewards gymnasts on more objective measures of achievement.

#### Overtraining and competing through injury

Over 70% of survey respondents expressed concern about the impact of overtraining (Appendix B). Comments about overtraining include an excessive amount of training hours especially at young ages as well as examples of gymnasts being forced to overtrain and compete through an injury. However, several athletes explained that it was their personal choice to compete through

an injury, rather than being forced to do so by a coach. This is a product of the “brainwashing” discussed previously whereby the culture in some disciplines has been to push through injuries. Many athletes have been conditioned to accept this as a requirement to be successful. The IRT heard from former athletes who, with the benefit of hindsight, considered such a culture abusive including several athletes who continue to struggle with physical and mental health issues as a result.

In Canada’s high-performance system, particularly for nationally funded Olympic disciplines, athletes have the benefit of an Integrated Support Team (‘IST’) comprised of sport science and medical professionals. Why then are some high-performance gymnasts forced to overtrain or compete through an injury in cases where there is professional oversight of athletes by IST staff? According to a gymnastics administrator and National Coaching Certification Program (‘NCCP’) clinician, in Canada powerful coaches are able to put pressure on IST personnel in some circumstances. The administrator drew a contrast between Canada and the National Collegiate Athletic Association (‘NCAA’), where it was explained that, *“in women’s college gymnastics in the NCAA, the trainer is the boss. If you are the head coach of UCLA, and the trainer says no-go, then athletes don’t compete. That’s the end of the discussion.”*

A current gymnasts club administrator with deep experience in the sport provided further credence to the power dynamic between some coaches and IST personnel. For example, *“female coaches have such control over their athletes, that the physio cannot even talk to them without the coach being present. Crazy control.”* The extent of influence that IST professionals have on decisions related to an athlete’s ability to compete as well as the role that athletes themselves play in the process requires more analysis by discipline. For example, the IRT heard accounts of athletes concealing an injury because of the win at all costs approach that is suggested to be part of the culture. The authority and practice of IST professionals in the decision-making process as it relates to an athlete’s physical and psychological fitness to train and compete requires further analysis through the Gymnastics Culture Review.

### Pressure to engage in early specialisation

More than 58% of survey respondents (Appendix B) expressed concern about pressure to engage in early specialisation. These concerns are most acute in WAG and RG. Several athletes explained that they switched at a young age from WAG or RG to another discipline because of the intense requirements to specialise in these disciplines. Other factors related to switching out of WAG and RG disciplines include excessive training demands, high expectation for results, and a greater opportunity to “*enjoy the sport*” in other disciplines.

### Body image criticism

Another negative impact of authoritative coaching practices includes an unhealthy focus on body image, which is most prevalent in WAG and RG. For example, “*there is so much pressure on Rhythmic athletes for certain body types and training is too long, athletes also are not eating well.*” This was the most troubling issue expressed by the gymnastics community including more than 92% of survey respondents who expressed concern about such practices. According to a former gymnast and current administrator, “*there is huge pressure to be a certain body type, especially in WAG and RG.*”

### Summary

The IRT received extensive feedback about why the maltreatment of gymnasts by abusive coaches continues to persist within the Canadian gymnastics community — despite overwhelming media, public, and political attention being paid to these issues. A summary of the most commonly cited factors by the gymnastics community includes the following:

- Ineffective or non-existent performance management of coaches;
- Insufficient education of coaches concerning Safe Sport;
- Insufficient education of athletes and parents concerning Safe Sport;
- Grooming of young gymnasts and parents who are led to believe coaches are infallible and should not be questioned;
- Ineffective ‘onboarding’ of international coaches, particularly regarding Safe Sport expectations and coaching norms;

- Resistance to education about Safe Sport amongst some coaches and disciplines, with a specific emphasis on international coaches in Women’s Artistic Gymnastics and Rhythmic Gymnastics who are “*going through the motions and not buying into the Safe Sport concepts*”;
- New coaches modeling inappropriate behaviors of established coaches who are not in compliance with expected standards of behavior;
- Ineffective screening mechanisms for problem coaches;
- Insufficient resolution of some complaints that allow problem coaches to continue coaching through a decision that allows a coach to resign their position rather than be terminated;
- Reluctance of athletes and others to report allegations of maltreatment — either for fear of reprisal, or lack of knowledge about reporting processes;
- Persistent issues concerning the power imbalance between coaches and athletes that are left unchecked and underreported.

Each of these factors represents an ‘input’ that facilitates the ‘output’ of abusive behavior in certain environments and contexts. For example, some local clubs may not experience any of these factors whereas others may see multiple factors present. As such, each of these factors should be carefully reviewed through the Gymnastics Culture Review to determine the extent to which they are present at different levels of participation as well as within different gymnastics disciplines and locations in Canada.

## 9) Judging Environment

***“Judges at the top of the food chain can be controlling and are often power driven.”***

The IRT sought input about the perceptions of culture within the judging ranks and the impact of judging on the athlete experience. Judging culture appears to be discipline-specific, akin to the observations made in Theme 2) ‘Sub-cultures by Competitive Discipline’. Moreover, judges across the Olympic gymnastics disciplines are subject to different governance and accountability structures within the Canadian system. The impact of these structures on the culture within each of the disciplines requires additional attention through the Gymnastics Culture Review.

Judging culture in WAG and RG appears to be fraught with issues. One Canadian WAG judge suggested that judging within the discipline is “*competitive, I might use the word toxic [...] and not competitive in a positive way.*” This particular judge, and others, suggested that in the past

judges worked together more collaboratively, but there are now pockets of individualism and unhealthy competition amongst judges competing for limited international assignments. This negative culture also can impact coaches and athletes.

According to feedback from Canadian WAG judges, the way that the WAG judging system is structured and managed in Canada is flawed and is a negative factor related to the culture of WAG. The WAG judging structure in Canada is described as a pyramid with very limited opportunities at the pinnacle of the sport to become a Brevet Judge and be selected for the Olympic Games. In this structure *“judges become fixated on the top goal”* and instead of supporting each other, *“they tend to claw at each other”* as they try to ascend to what is described as an unrealistic goal for the majority of judges in the sport. This is described as a *“fixation on the Olympic Games that can become problematic and reality gets distorted”* according to one Canadian international judge. This is further exacerbated by the process of judge selection for high-profile international assignments.

The IRT learned that in 2016 the FIG shifted the way that they select judges. The shift involved the FIG nominating and selecting judges by name rather than by the previous selection process that involved a more convoluted set of criteria and the involvement of national federations in assigning certain categories of judges. In the old system, for example, the FIG would give a judging assignment to GymCan which would be responsible to appoint judges based on the FIG criteria. The change in 2016 is described as *“better for the sport because it involves the objective evaluation of judges and nominations based on a score that is limited to one judge per country.”*

An issue that has persisted in Canada since these changes were implemented is that the FIG can appoint judges who are not the highest ranking judges as determined by Canadian ranking protocols leading to frustration and confusion amongst the Canadian WAG judges. *“The selection process (for WAG judges) is a competitive mess,”* according to one current judge who also added that *“Canada has not shifted”* to be aligned with the FIG judge selection process. A review of the impacts of these inconsistencies on Canadian judges is warranted.

Additional concerns raised about WAG judges (by fellow current WAG judges) include a lack of developmental pathways for judges who can progress to the ‘P1’ level. The reason why this is a

concern is that at the end of a designated appointment cycle through an intentional “system of mobility” judges who have had an opportunity at the pinnacle of the sport must move aside. This rule is well-intentioned to provide access to these assignments to other judges and to encourage development of judges within the sport. However, in Canada, this was expressed as a concern by some in the WAG judging ranks because “we lose deep knowledge and experience.” The Gymnastics Culture Review may wish to examine if and how these P1 Canadian judges are encouraged to impart their knowledge and institutional memory of the sport to emerging judges in the development pipeline.

Other shortcomings in the governance of WAG judging involve a committee called the Judge Development Working Group (‘JDWG’), described as self-governing and comprised of judges with no direct line of accountability to GymCan. The JDWG was described by GymCan as “they are supposed to be an advisory group to the program manager and historically they have always done their own thing.” Furthermore, “when the program manager tried to impose authority, there is pushback.” The IRT was told that each discipline has their version of the JDWG that is set up the same way except for WAG, and “in most disciplines the principles and processes are followed pragmatically.”

Several issues with the JDWG were raised including conflicts of interest (particularly as it concerns judge assignments), lack of transparency in how decisions are made and “rules written based on the flavour of the day and adjusting rules in a short-sighted way.” Furthermore, the IRT was told that in some cases panel assignments “are not written out.” Judging assignments and opportunities within the WAG discipline are based on a process of assigning points related to various criteria and priorities related to the assignment. This has implications for various types of assignments including national team training camps. For example. ‘P1’ and ‘P2’ judges are invited to national team training camps, including financial support to attend. However, only occasionally are ‘P3’ judges invited, and at their own expense. Given the conflicts of interest described in the governance of WAG judges, the practice of judges themselves assigning the points through the JDWG is an understandable source of concern amongst several current judges. The JDWG was described as creating a lot of friction including “bias and personal interest claims against them.”

The attention paid to Safe Sport within the structure of the JDWG requires further review. For example, comments provided to the IRT about the JDWG's involvement in Safe Sport include "no involvement" to "discussions about it in late 2017/2018." As it pertains to Safe Sport, the role of the JDWG was described as "more reactive" with limited mandatory education requirements that "simply put, are not tracked (like 'The Locker' for coaches)." One judge told the IRT that she was required to take the Respect in Sport course which was completed in 2018 and she has not taken it since. It appears that judges who are interested in Safe Sport must access these resources on a self-directed basis. Despite these shortcomings, one judge described the JDWG's involvement with Safe Sport as "*I think this is an opportunity, yes.*" Another judge said that Safe Sport is more top-of-mind generally, "*talked about a lot in judges' meetings,*" and "*Safe Sport is important for athletes, (it) empowers athletes.*" References were made to the vacant Director of Safe Sport position which was described as an important role. The scope of the JDWG warrants attention through Gymnastics Culture Review given feedback that "*it has grown too big, has too much power, and it is not overseen sufficiently.*" Furthermore, the impacts related to the JDWG structure on the culture within WAG in Canada should be examined further.

Judging concerns in WAG and RG are the result of several factors including the highly critical, deductive and subjective nature of how gymnasts are evaluated. This observation is consistent with findings from several international gymnastics reviews and is a function of the rules of the FIG. Many individuals including athletes, coaches and judges themselves posit that the manner in which athletes are judged can have a negative impact on their experiences. Athletes are constantly reminded of their shortcomings and imperfections, particularly in Artistic Gymnastics, rather than a more positive and objective approach; for example, judging in Trampoline and Tumbling was described as more objective and less stressful on athletes. One current judge commented that "*I would love to know how athletes perceive us.*" The answer to this question is an appropriate area of inquiry for the Gymnastics Culture Review.

Multiple stakeholders described some judges in WAG and RG as elitist and characterised by a sense of power and entitlement. These judges are described by one gymnastics stakeholder as "*smart*" and "*renowned at the international level*" but also being "*at the top of the food chain, power-driven, and controlling.*" According to one current judge, "*a lot of people (judges) have their identity wrapped up in the sport [...] this brings passion, but also challenges.*" The IRT

learned that some of these challenges include an environment of fear amongst athletes and resentment amongst coaches. Another judge commented that historically “judges are often perceived as the enemy, everyone hates the judges,” but added that “what has changed in the last couple of years is culture is shifting a bit now (and) a newer generation of coaches are more approachable and interested in what judges have to say.” Although some suggest the culture is shifting more positively within the judging ranks, several important issues have been identified as not being conducive to a healthy, respectful and positive culture within WAG and RG. The extent and impact of these observations on the athlete experience requires further attention.

Interview feedback was not entirely negative about judging culture in Canadian gymnastics. For example, one judge commented that “*I have seen shifts and changes. I have seen an evolution from a system that was fairly closed, to more transparency.*” According to some, there has been an evolution in the culture of judging, including “*opinions are solicited more broadly.*” However, the same judge who has witnessed this shift further suggested “*that change has been met with resistance from ‘the old guard.’ These are people who had the ear and confidence of the former regime and program manager present in the late 1990s through 2014 timeframe.*” The culture in this previous system was described as “toxic”, “adversarial” and characterised by “bad blood.” To this point, one judge commented that “*I think the athletes act more gracefully and as a team than the adults around them.*” Therefore, despite this apparent progress, there is evidence that suggests an ongoing cultural chasm between progressive judges in WAG and those who are resistant to change.

A program that has been credited with improving the relationships between judges and high-performance athletes was implemented in 2018 that involves pairing WAG judges and gymnasts. The purpose of this program is to have judges observe and assist gymnasts with how routines are constructed. In theory, this is a good idea as it helps athletes better understand the technical expectations and judging requirements for their sport and this may reduce feelings of stress amongst the paired athletes.

The judge/athlete pairing system raises questions about reporting allegations of maltreatment in the event a judge witnesses such treatment. Although the program is focused on technical input, one judge explained that because of the close, one-on-one nature of this pairing program,

a judge has the opportunity to observe athletes who may be experiencing issues with their mental or physical health. For example, a judge spoke about a specific athlete who she described as “*being damaged, in a dark place* (who was observed) *curled up in a corner.*” The judge told the IRT that she brought this to the attention of the coach and additional supports were provided to the athlete through GymCan.

The response provided by this judge about the athlete curled up in a corner in distress indicates that judges are aware of their duty to report such behavior. However, the explanation of how the judge reported the alleged maltreatment is not fully aligned with GymCan’s *Complaints and Discipline Policy and Procedures*. This raises important questions about how judges are educated to respond to acute mental health situations that they observe within the judge/athlete pairing program. It would be helpful to further examine the impact of this program on athletes

#### 10) Parental Influences

**“Parents without knowing it are one of the most important players in the culture review.”**

The role and influence of parents on cultural dynamics and, in particular, on their child’s experience is an important area of inquiry for the Gymnastics Culture Review as evidenced by the above quotation. This feedback was most commonly received from athletes, coaches and parents themselves.

Most parents provide healthy forms of support for their children in gymnastics. However, the IRT heard accounts of parents that push their children beyond healthy limits, sometimes unwittingly siding with an abusive coach without comprehending that the actions of the coach constitute maltreatment. More than 68% of survey respondents are concerned about the impact of parental pressure on the mental or physical health of gymnasts and consider parents an important aspect of culture that should be considered as part of the Gymnastics Culture Review. For example, one gymnast commented that “*My negative experiences were all pressure situations created by my parents.*”

It has been suggested that some parents fall victim to delusions of success and are culpable as it relates to tolerating abusive coaches. For example, “*when children are in the hands of coaches who have produced great athletes, they (parents) cover-up or stay silent and encourage the child not to speak out about what’s wrong because of the promise of success.*”

Some parents have been conditioned to believe that the coach is the expert and knows what is best for the athlete to achieve success. This is typical in many sports. For example, “*the sport context makes parents lose their minds under the guise that it is good for athletes.*” The IRT heard about parents being blinded to the damage that negative coaching practices is causing through overtraining and other requirements. The clouding of a parent’s judgement can also occur “*when some parents realise that a child has a perceived talent for national and international competition they often support the child in different ways.*” This is an important dynamic that requires further attention through the Gymnastics Culture Review, including more effective education for parents about what constitutes maltreatment.

The IRT learned that there is a power imbalance between some coaches and parents including parents who are told not to question a coach, while others suggest they have been bullied by a coach. The Gymnastics Culture Review would benefit from a more holistic understanding of parental influences on culture and the dynamic between parent-coach-child. This includes the need to examine parental education about Safe Sport as well as a parent’s role, obligations and rights within the club environment. For example, do parents have the opportunity to provide anonymous feedback to their club about a coach? Some parents told the IRT that they are reticent to provide negative feedback about a coach for fear of it negatively impacting opportunities for their child. Also, how do clubs deal with complaints that a coach or another individual in a club environment may have with a parent? These are questions that can be used to inform the Gymnastics Culture Review.

Issues were also raised about conflicts of interest involving “*some parents who get involved as volunteers on (local) Boards and who try to influence decisions about their child.*” This is explored further in Section 3) ‘Governance, Jurisdiction and Accountability’.

## 11) Safe Sport Education

***“Safe Sport education is a Pan-Canadian responsibility. Education and advocacy requires collaboration between everybody but PTOs and GymCan are not coordinated.”***

The need for further development of Safe Sport education and training emerged as an important theme amongst the gymnastics community. Only a minority of gymnasts interviewed by the IRT were knowledgeable about Safe Sport policies of governing organisations including clubs, PTOs and GymCan. Most gymnasts could not recall if or when they might have received information about Safe Sport policies, illustrating the need for more effective methods of conveying and tracking this information.

Specific concerns raised include the content, frequency, and method of delivery. For example, *“there is no renewal of Safe Sport (qualifications) and they (coaches) only have to check the box once.”* The most common feedback includes the need to improve in the following areas:

- Safe Sport Education and training that is targeted for specific audiences;
- Safe Sport Education and training that is delivered via multiple formats;
- Greater frequency of Safe Sport education and training;
- Development of standalone Safe Sport training modules within the NCCP program;
- Development of consistent national standards for Safe Sport education and training.

Safe Sport education can be more effective if it caters to an individual's role and demographic characteristics. For example, education for participants who are minors requires a different approach than does education for an adult athlete. Similarly, the development of a bespoke Safe Sport education program for parents of grassroots gymnasts could alleviate a lot of problems and misunderstandings with parents. *“Parents need to be educated about what to look for in a positive gym, and what to avoid at others”* illustrates how Safe Sport education can be made more practical and interactive for parents.

A ‘one size fits all approach’ is not desirable and several individuals pointed out the CAC’s Safe Sport education as illustrative of this. The Respect Group offers various ‘Respect in Sport’ modules that have been developed for specific audiences including ‘Respect in Sport for Activity Leaders’ and ‘Respect in Sport for Referees and Officials’ among others. However, these

modules are not focused exclusively on Safe Sport. The Respect Group is developing new training and education programs including components that “*actualise the training*” through professional facilitators and in-person group discussion sessions. This reflects significant feedback about the need to augment web-based education with follow-up training that encourages an interactive dialogue. Another nascent approach that holds promise includes OTP’s Culture of Excellence Assessment and Audit Tool (‘CAAT’) described in Chapter 3. As part of this program, OTP is training professional facilitators to assist NSOs in the implementation of this new assessment tool.

Relying exclusively on web-based Safe Sport training, while efficient, is not the most effective pedagogy. For example, “*there needs to be access to more Safe Sport training through in-person delivery, not just online.*” The IRT learned that some progressive clubs offer in-person parent training sessions that incorporate information about Safe Sport. For example, a parent commented positively about a parent orientation program offered by the Calgary Gymnastics Club. There are also calls for greater frequency of Safe Sport education including, at minimum, “*yearly refreshers*” versus “*one and done*”. This is especially important for individuals in positions of leadership and authority, including coaches.

Extensive feedback was provided about Safe Sport training for coaches including “*our NCCP system is lacking the proper education and resources in those (Safe Sport) areas*” and “*lack of evolving coach education.*” Feedback also was received that coaches need more training on mental health basics that better equip them to “*understand the impact their decisions have on their athletes.*”

NCCP clinicians and course developers who were interviewed are critical of the lack of Safe Sport training offered within the NCCP program and suggest the need for more robust Safe Sport training and education to be offered. The NCCP does not offer a dedicated module on Safe Sport for coaches; rather, some Safe Sport education is embedded in other NCCP modules, including in planning modules (as they relate to different stages of development and maturation) as well as in the ‘Making Ethical Decisions’ course. Currently, there is no requirement for coaches to be re-certified upon completion of their NCCP qualifications; however, coaches must accumulate a specified number of professional development points in self-directed areas of study to maintain

their certification in good standing. One suggestion made to the IRT is to mandate the completion of Safe Sport education modules towards the professional development points requirement.

The onboarding of international coaches as it pertains to Safe Sport is a weakness of the current system. The IRT heard examples of international coaches who were not required to complete any Safe Sport education prior to coaching in Canada because some form of equivalency was granted. For example, *“proper onboarding is basically non-existent when accepting coaches from other jurisdictions, including Safe Sport, nutrition, etcetera.”* All international coaches should be required to complete standardised Safe Sport training geared to the Canadian gymnastics environment, irrespective of previous training in other jurisdictions. This training also should include a comprehensive overview of Canadian Safe Sport policies to educate international coaches about their obligations and accountabilities within local, provincial and national contexts in Canada.

As of 1 April 2020, all Sport Canada-funded organisations are mandated to have training in Safe Sport available to everyone under their immediate authority including *“Decision-makers”*, *“Those with direct athlete contact”* and *“Those with no direct athlete contact.”*<sup>49</sup> According to the CAC, Decision-makers include the following roles:

- Senior staff;
- High-performance directors;
- Case managers;
- Adjudicators;
- Investigators;
- Operational board members.

The CAC identifies those with direct athlete contact to include:

- National team athletes;
- Parents of junior athletes;
- Coaches;
- High-performance staff;
- National Training Centre staff;

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<sup>49</sup> Coaching Association of Canada, “Safe Sport Training,” [Participants Training | Safesport \(coach.ca\)](https://www.safesport.ca/participants-training) [Last accessed: 30 November 2022].

- Nationally appointed coach developers;
- Integrated support team personnel (mental, strength and conditioning, nutrition, physiotherapy, massage, etc.);
- Contractors;
- Officials.

The CAC identifies those with no direct athlete contact to include:

- Organising committee members;
- Administration/finance staff;
- Governance committee members;
- Judicial boards;
- Governance board members;
- Event volunteers;
- Office staff.

These mandatory requirements are limited to individuals who are under an NSO's "*immediate authority*" which requires a more descriptive explanation of how this is determined. This leaves the vast majority of decisions regarding compulsory Safe Sport education to PTOs and local clubs. As such, it is important to identify how to align best practices more effectively for Safe Sport education across the entire gymnastics' ecosystem. The siloed nature of jurisdiction as alluded to earlier is an impediment to achieving more effective alignment as it concerns Safe Sport education and training.

In 2018, GymCan made "*a commitment to incorporating and activating the True Sport Principles within their coach education program.*"<sup>50</sup> This included the launch of an online learning course for coaches on 23 September 2020 which is intended to promote the True Sport Principles illustrated as follows:<sup>51</sup>

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<sup>50</sup> Gymnastics Canada and True Sport, "A True Sport Journey: Gymnastics Canada's new Values-Based Coaching Module," Online: [Gymnastics Canada's New Values-Based Coaching Module | Blog | SIRC](#) [Last Accessed: 14 December 2022].

<sup>51</sup> Gymnastics Canada and True Sport, "A True Sport Journey: Gymnastics Canada's new Values-Based Coaching Module," Online: [Gymnastics Canada's New Values-Based Coaching Module | Blog | SIRC](#) [Last Accessed: 14 December 2022].

## GOOD SPORT



It is important that the True Sport Principles are ebbing and flowing, in balance and proportion with one another, in order to create the positive sport experience we seek.

## WINNING AT ALL COSTS

VS.



When too much emphasis is placed on the "Go For It" principle, the other True Sport Principles become under-represented and the good sport experience is compromised.

## A Slide from the Values-Based Coaching Module

The Values-Based Coaching Module is described as follows:

*"The Values-Based Coaching Module introduces gymnastics coaches to the values and principles of True Sport, expands their understanding of the connections between values-based sport and GymCan's Safe Sport Framework and long-term development model, and provides practical exercises to help coaches implement key learnings in real-life situations. Throughout the module, coaches are provided with True Sport information, activities, ideas and tools to help them deliver values-based programming. This course also highlights how coaching through a True Sport lens will help ensure a positive and enriching gymnastics experience for all. Gymnastics coaches who complete the course will develop the skills and confidence necessary to create the fair, safe, inclusive environment participants need in"*

*order to experience all the benefits of good sport. They will also receive three Professional Development Points towards maintenance of their NCCP certification.”<sup>52</sup>*

*To inform the development of this Module, “a survey of members and stakeholders was launched to gauge how the organisation’s values aligned with the True Sport Principles, and determine the viability of developing a strategy to incorporate more True Sport training for coaches, athletes and key leaders at the national level. Stakeholders were extremely engaged by the survey and results were positive and powerful [including the following]:*

- *79% of respondents felt that GymCan’s values align with the True Sport Principles.*
- *100% felt adding the True Sport Principles to the National Coaching Certification Program (NCCP) courses is an effective strategy to provide coaches with the education and training they require in order to provide athletes with a quality sport experience.”<sup>53</sup>*

*Feedback included “a clear desire to incorporate the True Sport Principles in every facet of GymCan’s work,” which is reflected in the following comments:*

*“I think it’s an excellent idea (adding the True Sport Principles into the NCCP). It would help ensure gymnastics coaches from across Canada are promoting the same values. It’s a good way to help shift the culture of gymnasts in Canada to something more positive and inclusive. True Sport values are applicable to all levels of gymnastics from recreation levels to high-performance.”*

*“Adding the True Sport Principles to the NCCP courses is one component of ensuring coaches provide athletes with a quality sport experience. Class planning and coaching with these principles in mind will allow for a positive experience for participants.”<sup>54</sup>*

Coaches who complete the Module earn three professional development points towards maintenance of their NCCP certification. Although this is a step in the right direction and appears to be welcomed by coaches and members who were surveyed by GymCan, the impact of this Module is limited to coaches who voluntarily decide to complete it. It would be prudent for the

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<sup>52</sup> Gymnastics Canada and True Sport, “A True Sport Journey: Gymnastics Canada’s new Values-Based Coaching Module,” Online: [Gymnastics Canada’s New Values-Based Coaching Module | Blog | SIRC](#) [Last Accessed: 14 December 2022].

<sup>53</sup> Ibid.

<sup>54</sup> Gymnastics Canada and True Sport, “A True Sport Journey: Gymnastics Canada’s new Values-Based Coaching Module,” Online: [Gymnastics Canada’s New Values-Based Coaching Module | Blog | SIRC](#) [Last Accessed: 14 December 2022].

Gymnastics Culture Review to examine how effectively this Module has been implemented amongst coaches as well as opportunities to expand its use.

## 12) Safe Sport Policies

***“The rules are so complex and legal that people aren’t getting to the point quickly.”***

A comprehensive review of GymCan’s Safe Sport policies is provided in Chapter 4. An overriding theme is that GymCan’s Safe Sport policies are poorly understood and poorly communicated. According to one Board member, *“I disagreed with how the policies were being acted upon. I felt the Safe Sport policies were sterile, cold, legal, and not implementable.”* Numerous comments were made about people being unfamiliar with Safe Sport policies locally, provincially and nationally – especially amongst athletes. Concerns were raised about how difficult it is to locate Safe Sport policies and resources on the GymCan website. Moreover, the interrelationship between local, PTO and GymCan policies is confusing to many, especially as these policies concern reporting allegations of abuse. This is another example of how the siloed jurisdiction in Canada is negatively impacting culture.

### 3.1 Introduction

The Independent Review Team ('IRT') was tasked with developing a framework and recommendations as to how a culture review of gymnastics in Canada should be undertaken. Ultimately, how a culture review is to be fully implemented will be the decision of GymCan's Board of Directors, in consultation with their Provincial and Territorial Organisation ('PTO') counterparts and Sport Canada. To be clear, the recommendations provided herein are not narrowly focused on the national governing body, but rather on all facets of how gymnastics is delivered in Canada. No singular body, organisation, or individual is wholly responsible for the culture of the sport. This is a fact that has emerged through the consultation process.

Culture is both a function of the 'top-down' leadership and governance of GymCan, as well as the 'bottom-up' inputs from the hundreds of gymnastics clubs that are the lifeblood of the sport and where culture is first learned among nascent coaches, athletes and others. For a culture review to be effective, it is essential that clubs, PTOs and GymCan work collaboratively and in good faith to bring meaningful and actionable change.

Examining the culture, or rather sub-cultures, of gymnastics in Canada requires an in-depth review of the interrelationships between the organisations responsible for delivering the sport including clubs, PTOs, GymCan and national funding partners. The IRT has identified many complex foundational issues related to governance and jurisdiction that are impacting the culture of the sport. Specific attention in the IRT's recommendations is focused on governance and jurisdiction. Moreover, culture within the sport of gymnastics may be impacted by the policies and requirements of national organisations including Sport Canada, Own the Podium ('OTP'), the Canadian Olympic Committee ('COC'), as well as the nascent Office of the Sport Integrity Commissioner ('OSIC') and Abuse Free Sport Canada.

The IRT has drawn on extensive primary and secondary research to inform its recommendations. This includes consultation with multiple stakeholders at every level of the sport of gymnastics in Canada, from grassroots recreational participation to high-performance international competition. PTOs provided important feedback through both personal interviews and survey

responses. Input was received from leaders representing Sport Canada, the COC, the Coaches Association of Canada ('CAC') and OTP. The IRT also has drawn upon a critical analysis of several international gymnastics reviews and investigations to identify approaches to a culture review that would benefit gymnastics in Canada. The result is a bespoke framework and recommendations focused on specific areas of concern identified by the IRT as requiring further analysis.

A total of 46 recommendations are provided to GymCan and the Canadian gymnastics community to inform the development and implementation of a culture review process. These recommendations should be evaluated and considered by multiple stakeholders prior to implementing the Gymnastics Culture Review, especially considering the rapid pace of emerging Safe Sport requirements both nationally and provincially. This should include feedback and guidance from Sport Canada in consultation with other entities responsible for oversight of NSOs and high-performance programs including the COC and OTP. It also would be prudent for the OSIC to review these recommendations to ensure alignment with other environmental scans that may be required of NSOs that have signed an agreement with the OSIC. These national sport governing entities have unique expertise and insights in developing and implementing complex evaluation structures for NSOs and can play an important role in helping to inform the Gymnastics Culture Review and its component parts. GymCan cannot, and should not, do this alone.

Because the Safe Sport regulatory environment is changing rapidly in Canada (including requirements imposed by the Minister of Sport, Sport Canada, OTP and the OSIC), the Culture Review Leadership Team must be provided with the flexibility to adapt and respond to changes that might impact the implementation of certain recommendations provided in this Report. Like any roadmap, one occasionally has to take a detour and consider other factors that will impact arrival at the final destination. Other factors that may affect the implementation of the recommendations provided herein include resources, capacity and support for the Gymnastics Culture Review. To be effective, everyone involved in the governance of gymnastics in Canada must be committed to the process including Sport Canada, GymCan, PTOs and local clubs.

The IRT's consultation was exploratory in nature and has advanced an understanding of the complexity and nuances involving culture. This has enabled the IRT to make specific actionable recommendations designed to address the underlying issues — for example, jurisdiction, accountability and performance management have all been identified as being problematic.

A culture review of gymnastics is late in being undertaken in Canada compared to other countries. However, the Canadian gymnastics community can benefit from what has been learned in other international jurisdictions in addition to important perspectives from stakeholders provided in this Report. This can result in a bespoke culture review process that addresses the needs of the Canadian gymnastics community as expressed through the recommendations provided in this Report.

A culture review of gymnastics in Canada is not intended to be focused on the investigation of historical allegations of maltreatment. This is aligned with how other international gymnastics reviews were conducted. However, the culture review framework should not, and does not, preclude the need to investigate any allegations of abuse that may emerge through the culture review consultation process. To this end, specific recommendations are made as to how such allegations can be addressed along with how individuals who have experienced abuse can be supported.

### 3.2 Guiding Principles of a Culture Review of Gymnastics in Canada

These guiding principles emerged through the IRT's consultation process including feedback from more than 1,000 individuals in the Canadian gymnastics community. The IRT recommends the following principles to guide the implementation of a culture review of gymnastics in Canada.

- 1) **Independence** – the culture review should be led by an individual or organisation who is independent from the sport of gymnastics in Canada with no actual or perceived conflicts of interest associated with the sport of gymnastics.
- 2) **Transparency** – the culture review must be transparent in terms of the scope of work being undertaken, findings and reporting the progress of recommendations. Communication of the

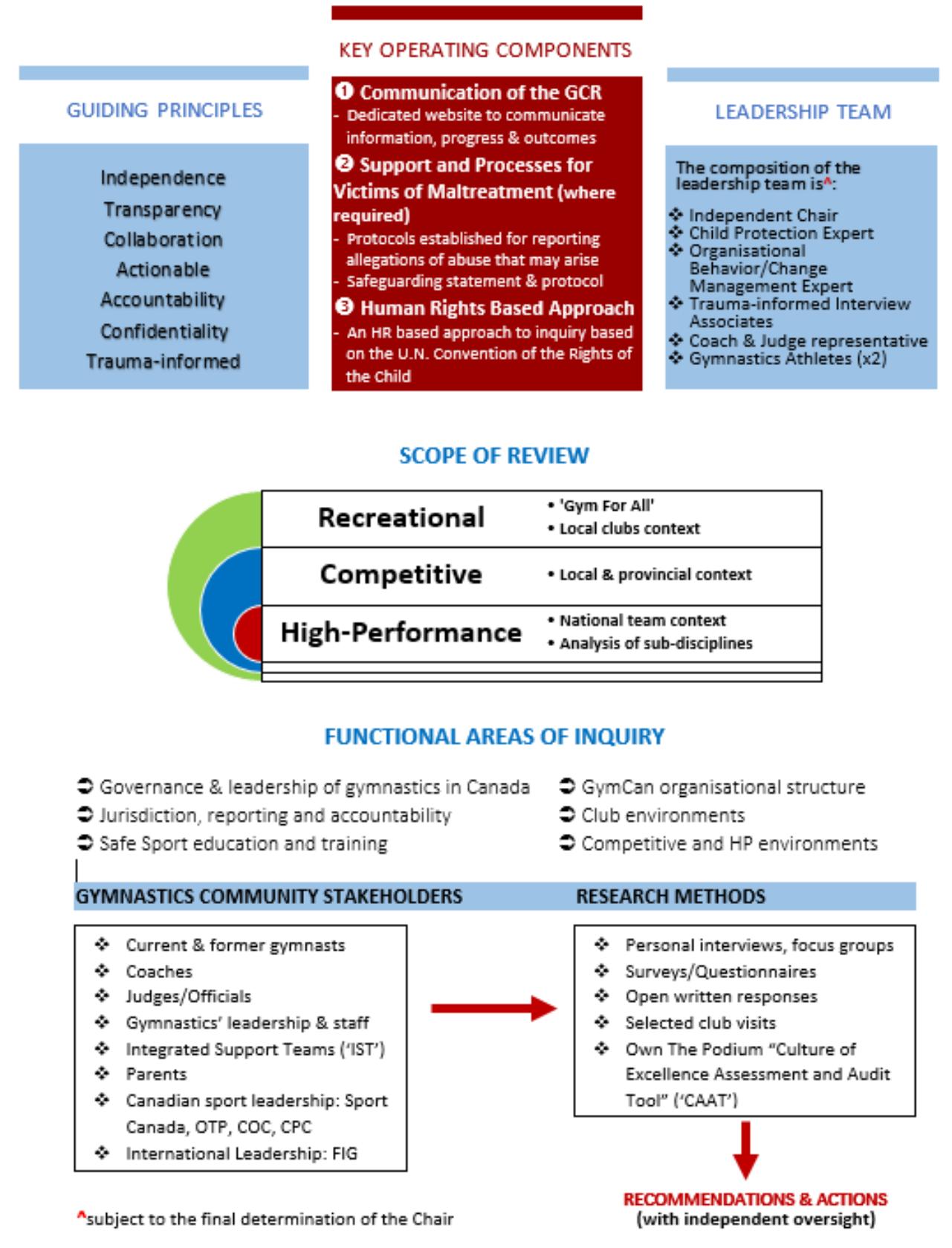
Gymnastics Culture Review process should be undertaken so as to keep the community informed of key milestones and progress.

- 3) **Collaboration** – to be effective, organisational stakeholders including clubs, PTOs and GymCan must be collaborative in their support of the culture review. It is essential that clubs, PTOs and GymCan fully commit to the Gymnastics Culture Review process in good faith. Furthermore, national sport organisations including Sport Canada, Own the Podium, the OSIC and Abuse Free Sport Canada should be actively engaged. The approach of the Gymnastics Culture Review must be both collaborative and inclusive in inviting and considering different experiences and perspectives across the sport of gymnastics. This collaboration must be deliberate in engaging the athlete voice in the process.
- 4) **Actionable** – the culture review must include recommendations that are actionable and not simply aspirational.
- 5) **Accountability** – stakeholders in the gymnastics community, including GymCan as well as PTOs, must be accountable to ensure that the recommendations are implemented.
- 6) **Confidentiality** – anyone who provides feedback to the culture review should be provided with assurances of confidentiality, if desired, which must be observed.
- 7) **Trauma-informed** – although the culture review is not an investigation, it is expected that the consultation process may trigger memories of abuse and maltreatment. As such, some of the interviewers must be trained in trauma-informed interviewing techniques. Furthermore, processes must be in place to refer individuals to appropriate reporting and support mechanisms for anyone who may have experienced maltreatment.

### 3.3 Culture Review Framework – Recommendations

Each recommendation provided in this Chapter includes supporting rationale and draws upon feedback from the gymnastics community in Canada including the themes identified in Chapter 2. Furthermore, the recommendations are informed by international culture reviews that are summarised in Chapter 5. A brief discussion of methodological considerations is provided. The following schematic provides an overview of the Gymnastics Culture Review Framework.

## GYMNASICS CULTURE REVIEW FRAMEWORK



A total of 46 recommendations are made in thirteen categories.

***The IRT recommends that ...***

### **3.3.1 Culture Review Leadership Team Composition and Function**

- 1)** A single individual be appointed to lead an independent multi-disciplinary team referred to collectively as the Culture Review Leadership Team ('CRLT'). The appointed individual to serve as the independent Chair of the CRLT.
- 2)** The Board of Directors of Gymnastics Canada appoint a Canadian lawyer to Chair the CRLT and lead the Gymnastics Culture Review. The appointed individual must be independent of the sport of gymnastics in Canada with no actual or perceived conflicts of interest.
- 3)** The Chair of the CRLT consider the appointment of individuals with the following roles and expertise: 1) Child protection (x1), 2) Organisational behavior/change management (x1), 3) Trauma-informed Interview Associates (x3), 4) Coach and Judge representatives (x2) and 5) Gymnastics Athlete Representatives (x2). The Chair of the CRLT is to have discretion concerning the eventual final composition of the team.
- 4)** The Gymnastics Canada Athletes Commission nominate one male and one female member of the Commission to be included on the CRLT to provide athlete perspectives and technical expertise to the Chair.

Supporting Rationale
<ul style="list-style-type: none"><li>■ The lead reviewer for the U.K. Gymnastics Review was appointed by U.K. Sport and Sport England. The lead reviewer for the New Zealand Review was appointed by Gymnastics New Zealand together with Sport New Zealand. A collaborative approach to appointing the Chair of the CRLT will create more trust in the process and support for the appointment should GymCan wish to seek the support of Sport Canada in this regard.</li></ul>
<ul style="list-style-type: none"><li>■ Additional capacity and expertise is necessary to address the complexity of the issues identified in this Report. As well, the IRT's recommendation to incorporate multiple research methods (interviews, surveys, club visits) for the Gymnastics Culture Review requires a larger team to complete the review in a timely fashion. The USA Review, for example, included a lead reviewer and a partnership with an agency that acted as a "force multiplier" that enabled club visits to be included in the review.</li></ul>
<ul style="list-style-type: none"><li>■ International gymnastics reviews including the U.K. and New Zealand were constrained by small review teams which the IRT noted as a limitation. These two reviews included a lead reviewer and two assistants.</li></ul>

- Leaders of international reviews in the U.K. and New Zealand strongly advised to include individuals on the review team who have a strong understanding of sport structures. Given the highly technical nature of gymnastics across multiple disciplines, including representatives from the GymCan Athletes Commission is prudent.
- *“The importance of the athlete voice at the policy and decision-making level in any national sport organisation is critical”*<sup>55</sup>
- Feedback from surveys and interviews supports a multi-disciplinary approach to conducting the Gymnastics Culture Review and gives people more trust in the process. The importance of athlete involvement in the process is reflected in the following feedback: *“Not only should athletes take place in the review, they should help lead it.”*

### Methodological Considerations

The IRT envisions the CRLT to be comprised of approximately ten individuals, including the Chair. It was common across international reviews that a single individual was appointed to lead the review who then built out his or her team. In some instances, the appointment of the lead reviewer was made by the national gymnastics federation as was the case with USA Gymnastics. Other approaches included the appointment of the lead reviewer by a higher national sport authority as was the case in the U.K. where the lead reviewer was appointed by U.K. Sport and Sport England. A third model included a joint appointment by the national federation responsible for gymnastics and the national sport authority. For example, David Howman was appointed to lead the New Zealand Gymnastics Review by Gymnastics New Zealand and Sport New Zealand. The IRT recommends that the lead reviewer be appointed by a resolution of the Gymnastics Canada Board of Directors. The GymCan Board may wish to consider involving Sport Canada in this process as an oversight function to the selection. This is important to engender trust in the process, especially amongst some individuals who have expressed a lack of confidence in GymCan.

The child protection and organisational behavior roles are intended to support and advise the Chair in these two critical areas. This will ensure best practices are considered and reflected in the recommendations. These two roles are not anticipated to have any responsibilities related to interviewing; however, the Chair is responsible to create Terms of Reference for these and all

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<sup>55</sup> Gymnastics Canada, News, *“Cory Paterson elected as the new National Team Athlete Representative to the Gymnastics Canada Board of Directors,”* Online: [News | Gymnastics Canada \(gymcan.org\)](https://news.gymcan.org/cory-paterson-elected-as-the-new-national-team-athlete-representative-to-the-gymnastics-canada-board-of-directors/) [Last Accessed: 23 November 2022].

other roles on the CRLT. The Chair is intended to be the lead interviewer who is to be supported by two to four individuals who are experienced in trauma-informed interviewing techniques.

The GymCan Athletes Commission provides an advisory role to the GymCan Board of Directors. The Athletes Commission is comprised of five individuals, each of whom is appointed as an athlete representative for one of five disciplines. The Chair of the CRLT should consult with the Chair of the Athletes Commission as it concerns the role and appointment of two representatives, one male and one female, to serve on the CRLT. The final composition of the CRLT shall be at the sole discretion of the Chair.

### **3.3.2 Communication of the Gymnastics Culture Review**

5) A dedicated section on the Gymnastics Canada website be created to communicate information and progress about the Gymnastics Culture Review.

6) A coordinated announcement about the Gymnastics Culture Review be made by Gymnastics Canada in collaboration with its PTO members, including email notification to all participants through GymCan, PTOs and local clubs. The announcement also should include a call for participation, a link to the dedicated website and how to become involved with the Gymnastics Culture Review.

Supporting Rationale
■ Survey responses and interview feedback strongly suggest the need for full transparency concerning all facets of the Gymnastics Culture Review.
■ A best practice of the USA Gymnastics Review included a dedicated section of the USA Gymnastics website for the review. The U.K. Gymnastics Review created a website to keep the public informed about progress including Frequently Asked Questions ('FAQs'), explanations of confidentiality, privacy policy, various policy documents, among other information.
■ Coordinated messaging will ensure high awareness and a greater likelihood of full participation in the Gymnastics Culture Review across the Canadian gymnastics community.

### Methodological Considerations

The dedicated section on the GymCan website should include comprehensive information about the Gymnastics Culture Review including who is leading it, Terms of Reference, Frequently Asked Questions and how to become involved. Progress updates should be posted. Furthermore, the

final report should be posted on the website including a summary of key recommendations and progress towards achievement of the recommendations. This was a hallmark of the USA Gymnastics Review and will ensure full transparency. Effective and ongoing communication of the Gymnastics Culture Review is essential to ensure trust, participation and accountability. GymCan, PTOs and clubs are encouraged to actively communicate the Gymnastics Culture Review to its stakeholders through a variety of techniques; for example, generating landing pages on PTO and club websites to promote the Gymnastics Culture Review.

### **3.3.3 Support and Processes for Victims of Maltreatment**

- 7) It is imperative that protocols are established by the CRLT for the reporting of allegations of abuse that may arise through the consultation process.
- 8) A safeguarding statement and protocol be developed by the CRLT and posted on the dedicated website.
- 9) Resources to support victims of maltreatment be communicated to all participants in the Gymnastics Culture Review, including Abuse Free Sport and the Canadian Sport Helpline, among others.

Supporting Rationale
<ul style="list-style-type: none"><li>■ Feedback from the public survey indicates a need to support victims who choose to participate in the Gymnastics Culture Review.</li><li>■ The New Zealand Gymnastics Review developed specific protocols to triage any reports of maltreatment that were raised through the consultation process.</li><li>■ The Whyte Review (U.K.) included processes for the reviewer to refer information to statutory authorities, as well as a requirement to have a safeguarding statement and protocol developed and posted on the review website. A total of 70 referrals were made to statutory authorities.</li></ul>

### **Methodological Considerations**

Although the Gymnastics Culture Review is not a formal investigation of claims of maltreatment, the Chair and interviewers will hear accounts of maltreatment and abuse. As such, specific protocols must be developed concerning how to triage these accounts based on myriad factors including the nature of the maltreatment and age of the alleged victim, the jurisdiction of where the abuse may have occurred and the interest of the alleged victim in making a report. The Chair

may wish to consider developing internal decision-making documents to assist team members in triaging safeguarding issues.<sup>56</sup>

When it is deemed necessary to escalate an allegation of abuse, all such decisions should flow through the Chair who shall determine the appropriate reporting mechanism for the allegation(s). The Chair will not be involved in any investigation; rather, upon determining that a complaint must be escalated, the Chair will ensure that it is referred to the appropriate reporting authority(ies). Any allegation that is of a criminal nature or raises immediate safeguarding concerns should be reported by the Chair.

Safe Sport resources, tools and clearly defined reporting procedures should be communicated on the Gymnastics Culture Review website further to Recommendation #5. All PTOs and clubs are encouraged to link to the Gymnastics Culture Review website and/or provide a landing page. This will ensure consistency in messaging and processes.

### 3.3.4 Stakeholder Consultation Methods

**10)** Consultation to incorporate a combination of methods including individual and group meetings, personal interviews, focus groups, surveys and written responses at the discretion of the Chair.

**11)** Interview techniques to follow a human rights-based and participatory approach to ensure all aspects of the Gymnastics Culture Review, from design to data collection, are focused on the principles of dignity, equality and respect. To this end, the IRT recommends the Gymnastics Culture Review be guided by the *United Nations Convention on the Rights of the Child* ('UNCRC').<sup>57</sup>

**12)** A representative sample of stakeholders be consulted amongst athletes and disciplines. Additionally, the CRLT is to consult with coaches, judges, parents, administrative staff, IST members and leadership of gymnastics governing bodies.

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<sup>56</sup> Note: This was a feature of the Whyte Review.

<sup>57</sup> United Nations, "*Convention on the Rights of the Child*," Online: [Convention on the Rights of the Child | OHCHR](https://www.ohchr.org/EN/Issues/Countries/Pages/ConventionontheRightsoftheChild.aspx) [Last Accessed: 24 November 2022].

13) Sport Canada, the COC and OTP be consulted to inform the Gymnastics Culture Review and its recommendations, particularly as they relate to how high-performance gymnastics programs are directed, supported and evaluated.

Supporting Rationale
■ A combination of qualitative (interviews) and quantitative (surveys) research methods provides full context and support for recommendations. A variety of different consultation methods will facilitate greater participation in the Gymnastics Culture Review.
■ The Swiss Gymnastics Review used a combination of personal interviews, questionnaires and written surveys. The Dutch review relied on interviews and written submissions. The Whyte Review included personal interviews, meetings and written responses.
■ The Gymnastics Australia Review used a human rights-based and participatory approach and was guided by the U.N. Convention on the Rights of the Child ('UNCRC').
■ The UNCRC is a human rights treaty created by the United Nations that provides a full list of rights for all children up to the age of 18. The Government of Canada signed the Convention in 1991. <sup>58</sup>
■ Policy experts at the University of Toronto suggest that " <i>In our view, the current crises stem from the failure by governments and sports bodies to create policies and programs, fund, and monitor and evaluate sports within the established frameworks of human rights.</i> " <sup>59</sup>
■ Stakeholders consulted by the IRT believe it is vital to understand how the interrelationship between Sport Canada, the COC, OTP and Gymnastics Canada affects culture. This includes sport funding accountability frameworks, support structures and other criteria used to evaluate high-performance programs in Canada. Policy experts at the University of Toronto suggest " <i>Sport Canada has failed to enforce compliance with its various policy requirements [...].</i> " <sup>60</sup>

### Methodological Considerations

Personal interviews, meetings and direct observation are the most effective methods to assess context, credibility and develop a more textured understanding of culture and experience. However, these techniques are time-consuming and do not offer an opportunity for wide participation in the Gymnastics Culture Review. Given more than 266,000 registered gymnastics

<sup>58</sup>United Nations, "*The United Nations Convention on the Rights of the Child: An Overview for Children and Teenagers,*" Online: [The United Nations Convention on the Rights of the Child: An Overview for Children and Teenagers - Canada.ca](http://The%20United%20Nations%20Convention%20on%20the%20Rights%20of%20the%20Child%20-%20An%20Overview%20for%20Children%20and%20Teenagers%20-Canada.ca) [Last Accessed: 29 November 2022].

<sup>59</sup>Kidd, Bruce; Kerr, Gretchen; and Donnelly, Peter, "*ENSURING FULL AND SAFE PARTICIPATION BY CANADIAN GIRLS AND WOMEN, FAIR ATHLETE REPRESENTATION, AND GOOD GOVERNANCE IN CANADIAN SPORT – A brief to The Standing Committee on the Status of Women and The Standing Committee on Canadian Heritage,*" 14 December 2022.

<sup>60</sup>Ibid.

participants in Canada<sup>61</sup>, notwithstanding coaches, parents, judges and others involved in supporting the sport, the Gymnastics Culture Review cannot rely solely on interviews and meetings.

The Chair should consider the combined use of personal interviews and survey methods to ensure broad access to the Gymnastics Culture Review. Focus groups should also be considered; however, some international gymnastics reviews that had intended to include focus groups did not do so because of the reluctance of participants for reasons including privacy and confidentiality.

A human rights-based approach is critical to ensure that the voices and experiences of children and young people is recognised and elevated. To this end, the United Nations Convention on the Rights of the Child, adopted by Canada in 1991, is a foundational document that can assist the Chair to inform the Gymnastics Culture Review and its recommendations.

It is important for the CRLT to develop interview guides and surveys that are informed by the themes that emerged from the gymnastics community in Chapter 2 as well as the survey results provided in Appendix A and Appendix B. This should include, but not be limited to, an analysis of the extent and impact of the following factors on gymnastics culture and the athlete experience:

- Authoritative coaching – including persistent issues related to power imbalances;
- Body image factors including body shaming;
- High demand for results and a “win at all costs” approach;
- Overtraining;
- Pressure to engage in early specialisation;
- Parental influence/pressure.

Additionally, the CRLT’s methodology should be informed by issues and recommendations identified in this Chapter and Report including the following:

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<sup>61</sup> Note: This figure is derived from the IRT’s 2022 survey of PTOs, including responses from 14 PTOs. This does not include participation from Yukon Gymnastics and Rhythmic Gymnastics Nova Scotia.

- Governance of Gymnastics in Canada (3.3.9);
- Gymnastics Canada Organisational Structure and Leadership (3.3.10);
- Jurisdiction, Reporting and Accountability (3.3.11);
- Safe Sport Education (3.3.12);
- Policy Considerations (Chapter 4).

### 3.3.5 Scope of the Gymnastics Culture Review — Levels of Gymnastics Participation

14) The Gymnastics Culture Review must include an examination of all levels within the sport in Canada, from recreational participation (Gym for All) at the grassroots level through competitive provincial gymnastics to national and international levels of competition.

Supporting Rationale
■ A large majority of the gymnastics community in Canada (79%) believe that a Gymnastics Culture Review should examine all levels of the sport. For example, <i>“The review needs to happen at the top but also at the individual recreational club level.”</i>
■ The leaders of PTOs who were surveyed support a Gymnastics Culture Review that examines all levels of gymnastics in Canada.
■ Strong consensus from interviews that all levels of gymnastics must be examined.
■ Aligned with best practices of gymnastics reviews conducted internationally.
■ Recreational gymnastics participation represents approximately 83% of all participants in the sport in Canada (n=222,000).

### Methodological Considerations

Athlete performance requirements at the high-performance level are unique from recreational gymnastics as is the cultural milieu. As such, a culture review of the competitive and high-performance levels of the sport requires a different approach than does a culture review of recreational gymnastics. The training environment for a nationally ranked competitive athlete includes several factors that are not present at the recreational level. For example, factors related to the quality of the experience and developing a culture of excellence for a high-performance athlete might include sport science/sport medicine, athlete pathways and performance plans, and leadership within the sport in support of performance excellence. In addition, the influence of national organisations such as the COC and OTP on the culture of high-performance gymnastics should be examined. However, a different methodological approach is

required to examine the culture and athlete experiences among recreational gymnasts. Thus, the Gymnastics Culture Review is not a ‘one size fits all’ approach. Subsequent recommendations in this Chapter address different considerations for implementing a culture review at the recreational level versus competitive and high-performance levels.

### 3.3.6 Sub-cultures by Competitive Discipline

- 15) The Gymnastics Culture Review examine and compare competitive sub-disciplines<sup>62</sup> in the sport, with specific attention paid to the Olympic disciplines including features of Women’s Artistic Gymnastics and Rhythmic Gymnastics that make these disciplines more prone to negative cultures and abuse.
- 16) The Gymnastics Culture Review be focused on the welfare and experiences of athletes within the system irrespective of level or discipline.
- 17) The Gymnastics Culture Review must identify the systemic trends and drivers related to experiences of maltreatment and align recommendations to address these trends and drivers.

Supporting Rationale
<ul style="list-style-type: none"><li>■ A large majority of the gymnastics community in Canada (93%) believe that sub-disciplines have unique cultures that result in different experiences for athletes, coaches and other stakeholders.</li><li>■ Leaders of PTOs strongly agree that sub-cultures exist within the sport.</li><li>■ Numerous examples and anecdotes of different cultures by sub-discipline were provided by interview subjects (Appendix B). For example, <i>“There are some disciplines that require more of a culture review than others. Even though they must work together, there is still lots of difference in the overall culture of each one of them.”</i></li><li>■ The IRT’s research illustrates that negative cultures and abuse are more common in Women’s Artistic Gymnastics (‘WAG’) and Rhythmic Gymnastics (‘RG’) among the competitive disciplines. For example, <i>“I cannot emphasise enough that although maltreatment and abuse can and does occasionally occur in other disciplines, the absolutely vast majority occur in Women’s Artistic and Rhythmic gymnastics.”</i></li><li>■ International reviews have established the presence of sub-cultures within gymnastics, including myriad examples of toxic cultures in Women’s Artistic Gymnastics and Rhythmic Gymnastics.</li><li>■ International gymnastics reviews were largely focused on athlete welfare and the experiences of athletes, especially the U.K. and Australia.</li></ul>

<sup>62</sup> Gym For All is not considered a competitive sub-discipline and will require a different approach to assessing culture which is addressed later in the Chapter.

■ The Australia Gymnastics Review included focused attention on systemic trends and drivers for misconduct, bullying, abuse, sexual harassment and the measures put in place to prevent and respond to these experiences.

### Methodological Considerations

It is important that the CRLT build on the exploratory research and findings of this Report, as well as international gymnastics reviews which together demonstrate the presence of different cultures and athlete experiences by discipline. The CRLT should advance our understanding of ‘why’ these different cultures exist. What are the systemic drivers of negative experiences in Canada? What are the unique structural and environmental factors that contribute to both positive and negative cultures by discipline? Several insights into these questions can be drawn from the IRT’s primary research contained herein.

Systemic drivers of concern related to an athlete’s physical and mental health expressed by the gymnastics community in Canada include the following:

- Body image factors (n=687; 92.34% of survey respondents concerned);
- High demand for results (n=668; 90.28% concerned);
- Authoritative coaching (n=661; 88.86% concerned);
- Parental influence/pressure (n=648; 87.45% concerned);
- Heavy training loads (n=642; 86.51% concerned);
- Pressure from a gymnastics organisation/staff (n=590; 79.82% concerned);
- Pressure to engage in early specialisation (n=575; 77.5% concerned);
- Lack of accountability (identified as a theme through open-ended responses);
- Insufficient education (identified as a theme through open-ended responses).

This exploratory research by the IRT can be used to inform the Gymnastics Culture Review. It is critical for the CRLT to examine why these drivers persist across various levels and disciplines within the Canadian gymnastics’ ecosystem and what recommendations can be made to mitigate their negative impact on the experiences of athletes. These structural recommendations for change must be carefully considered by the CRLT, both in terms of the substance of the recommendations and the feasibility of implementation.

The IRT has identified WAG and RG as having more negative cultures than other disciplines; therefore, these disciplines require special focus as part of the Gymnastics Culture Review. However, this is not meant to imply that other disciplines are immune to maltreatment and negative issues related to culture. In fact, such issues have been shared with the IRT, but their prevalence appears to be much lower than WAG and RG. Therefore, it is still important to examine the differences between these disciplines – building on positive features of culture in some disciplines and identifying negative inputs to culture that are more common in other disciplines.

Athletes represent the largest stakeholder within the gymnastics community who are at the greatest risk of abuse, including minors. As such, the primary focus of the Gymnastics Culture Review must be focused on their welfare and experiences. This is aligned with the focus of all other international gymnastics reviews. However, this is not to suggest that the experiences of other stakeholder groups not be considered. For example, coaches and GymCan staff members have experienced anxiety, stress and maltreatment in the workplace. The systemic drivers for these experiences also requires further examination.

### 3.3.7 Own The Podium “Culture of Excellence Assessment and Audit Tool” (‘CAAT’)

**18)** The Gymnastics Culture Review implement the Culture of Excellence Assessment and Audit Tool developed in partnership with OTP to assess culture within high-performance disciplines of gymnastics in Canada.

**19)** Sport Canada evaluate the opportunity to support the development of a companion tool to systematically assess and audit culture at the grassroots developmental level of the Canadian amateur sport community.

Supporting Rationale
<ul style="list-style-type: none"><li>■ The CAAT was developed through a rigorous process of consultation and testing over several years including OTP, the CPC and the Sport Institute Network, among other experts in high-performance sport and organisational behavior.</li><li>■ The CAAT was developed to focus specifically on high-performance sport for Canadian national team programs. It has been designed to measure culture according to two dimensions: Person dimensions and Performance dimensions. The ‘Person’ dimension will help, in part, to answer the following question posed by one survey respondent: <i>“How does Sport Canada, COC, and OTP evaluate the ‘human’ experience as a condition of funding?”</i></li></ul>

- The CAAT is an evidence-based turnkey tool that can assist to inform our understanding of high-performance cultures in gymnastics, including the ability to compare results between disciplines within a sport, as well as between different NSOs.
- The CAAT includes access to 'Culture and Wellness Facilitators' which "*is a new expert-based role in Canadian high-performance sport in response to NSO focus on developing or enhancing their culture of excellence.*"<sup>63</sup>
- All NSOs in Canada are encouraged to adopt the CAAT as a common, systematic evaluation tool that will allow a comparison of cultures between NSOs. It can also be used to track longitudinal data on person and performance dimensions of culture over time in order to assess if progress is being made.
- There is no comparable systematic tool to assess and compare culture in recreational and lower competitive contexts. Therefore, the development of a 'companion process' to the CAAT is an aspirational goal to support a more systematic and aligned process to understand the impacts more fully on culture in grassroots developmental contexts across all amateur sports in Canada.

### Background Information

A National Think-Tank was held on 15 February 2019 to examine a culture of excellence in high-performance sport. The resulting report "*provides recommendations for a national response to deliberate and appropriate support to NSOs to achieve a culture that places excellence at the core of everything that is done in the pursuit of podium success.*"<sup>64</sup> The Think-Tank objectives were to:

- 1. Provide a general understanding of culture in high-performance sport as a potential performance gap.*
- 2. Provide a framework for culture of excellence, contrasting high performance organisational culture versus team performance culture.*
- 3. Review team performance culture modules and consider implementation factors for the Canadian high-performance system.*
- 4. Consider team performance culture from the perspective of a quadrennial objective.*
- 5. Identify key roles of sport partners in delivering and sustaining a culture of excellence."*

The Think-Tank included representatives from the COC, CPC, OTP and experts representing Canadian universities, NSOs and the Canadian Olympic and Paralympic Sport Institute Network ('COPSIN').

<sup>63</sup> Own the Podium, "Culture & Wellness Facilitator Training National Call," (unpublished, undated).

<sup>64</sup> Own the Podium and The Sport Institute Network, "A Culture of Excellence in High-Performance Sport, National Think-Tank Report & Recommendations, Final Draft," April 2019.

The CAAT is an outcome of the Think-Tank and was built upon a rigorous testing and consultation process. The CAAT was initially piloted in July 2021 with four NSOs (two para sports and two able-bodied sports). Phase 2 of the pilot included an automated version of the CAAT implemented with seven different non-targeted sports; this achieved content validity and construct validity measures. Workshops and participant de-briefing sessions were also held. It is important to note that the CAAT is not intended to measure culture outside of the Canadian high-performance context as described herein. Four groups of participants have been identified to complete the CAAT including athletes, coaches, sport science/IST and staff.

The CAAT features a series of questions that measure two key dimensions: 1) Person Dimensions and 2) Performance Dimensions. The factors associated with each dimension are summarised below.

#### Person Dimensions

- 1. Mental health and well-being
- 2. Physical Health and well-being
- 3. Psychological safety
- 4. Physical safety and Safe Sport
- 5. Self-determination

#### Performance Dimensions

- 1. Leadership
- 2. Coaching
- 3. Daily training environment
- 4. Sport science and sport medicine
- 5. Pathways and profiles
- 6. Athletes and international results

Each factor includes a series of questions with a 0-10 grading matrix. Additionally, each question has a qualitative option for open-ended responses for each question. Once the online process is completed, the scores for each factor and dimension are plotted on a graph and can be compared to identify each specific input to the culture being measured. The figure below<sup>65</sup> illustrates a matrix of different potential cultures, including a culture of harassment, apathy, care, quality, or excellence.

The CAAT was launched on 28 October 2022 to the NSO community in Canada. This included an invitation to watch the [CAAT Introduction Video](#). Additionally, a CAAT Process Map and FAQs

<sup>65</sup> Personal interview, 29 November 2022. Figure excerpted and subsequently adapted from Sport Information Resource Centre, *“Building a culture of excellence in high performance sport,”* 19 July 2021.

infographic was provided to NSOs which outlines a step-by-step process regarding the use of the CAAT.



### Methodological Considerations

The CAAT represents a significant advancement in measuring culture in Canadian high-performance sport environments. There are many individuals in the Canadian gymnastics community who have expressed concern about a win at all costs approach to high-performance sport, suggesting that athlete welfare has not been prioritised resulting in concomitant negative impacts on their experience. In addition to measuring 'performance' dimensions, the CAAT enables researchers to directly measure the impact of 'person' dimensions on culture which represents an important tool for NSOs. Because the CAAT is an automated tool that can be completed online, the entire process can be completed in approximately seven days according to developers of the CAAT.

The CAAT represents a foundational tool to better understand the discreet inputs to culture in Canadian high-performance NSO environments. The efficiency of this tool is an advantage to the Gymnastics Culture Review given all of the up-front research, testing and validation that has been completed.

The IRT recommends implementing the CAAT according to sub-disciplines within gymnastics. This will allow the CRLT to compare and analyse the cultures between the different national team disciplines within GymCan. An innovative component of the CAAT process is the training of a new expert-based role called ‘Culture and Wellness Facilitator’ whose purpose is to support NSOs “to develop comprehensive wellness plans and assist in identifying and procuring resources.”<sup>66</sup>

While the CAAT represents an innovative tool to measure culture, it should not be the sole methodology relied upon to assess culture within high-performance disciplines in gymnastics. For example, the CAAT is intended for current athletes and other stakeholders — limited to coaches, sport science/IST and staff. The IRT has identified other important stakeholders in the high-performance environment who must be consulted. There should also be opportunities for former athletes to participate in the Gymnastics Culture Review which the CAAT does not provide for in its process. Furthermore, the CAAT does not rely on personal interviews which is an important feature of the Gymnastics Culture Review.

This IRT has identified additional targeted areas of inquiry for the Gymnastics Culture Review that must augment the CAAT including gymnastics governance structures, GymCan organisational structure, accountability mechanisms, education and reporting. Thus, the CAAT is but one tool in the Gymnastics Culture Review toolbox.

Because the CAAT has been developed for a very narrow segment of the gymnastics community in Canada it is not an appropriate tool to measure culture amongst recreational participants or provincial-level competitive gymnastics. As such, the Gymnastics Culture Review must use traditional methods of inquiry as described herein to assess culture in these environments. The IRT recommends that Sport Canada evaluate the opportunity to ‘reverse engineer’ the CAAT tool so that it might be adapted to measure culture in recreational and other competitive contexts in the future. The developers of the CAAT advised the IRT that such a process is possible, but it would require funding that is not available through the mandates of OTP or the COC given their high-performance focus. Thus, leadership from Sport Canada is necessary to assess and drive this opportunity forward. A common tool to assess culture in local grassroots sport contexts that

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<sup>66</sup> Own the Podium, “Culture & Wellness Facilitator Training National Call,” (unpublished, undated).

can be implemented quickly and efficiently would be a game changer and offer significant advantages to the amateur sport community in Canada.

In the meantime, the CRLT can draw inferences from the CAAT to inform certain aspects of the review of culture within local contexts; for example, the person dimensions have relevance at the grassroots level of the sport. Thus, although the CAAT cannot be deployed in local or provincial environments, the factors that have been identified as person dimensions should be explored in the context of local, non high-performance participation in the sport.

### 3.3.8 Local Gymnastics Clubs

**20)** The Gymnastics Culture Review include a systematic examination of local gymnastics clubs in Canada to assess culture.

**21)** The review of local clubs include a confidential web-based survey distributed to the management/leadership of every gymnastics club in Canada for distribution to their members and stakeholders.

**22)** The survey of clubs be augmented with personal visits to a selected number of clubs on behalf of the CRLT.

Supporting Rationale
<ul style="list-style-type: none"><li>■ Gymnastics clubs include approximately 84% of gymnastics participants in Canada and employ the vast majority of gymnastics coaches in Canada. <i>“Since the majority of gymnasts in Canada are recreational (as opposed to competitive), more emphasis ... needs to demonstrate the importance of Gymnastics for All.”</i></li><li>■ Issues of maltreatment have been reported involving club-level gymnastics. For example, <i>“The primary place to be aware of an abusive culture is at the club level.”</i></li><li>■ There is considerable variability in how clubs operate across Canada including not-for-profit clubs, for-profit clubs, recreational-only clubs, and mixed discipline clubs (e.g. recreational and competitive). The impacts of these different operating models and structures on culture merits examination as part of the Gymnastics Culture Review.</li><li>■ The factors that impact culture at the club level may be different than the factors that impact culture at the high-performance level.</li><li>■ There has not been a systematic examination of culture within club environments in Canada.</li><li>■ A clubs visit strategy was an important component of the USA Gymnastics Review.</li></ul>

## Methodological Considerations

Local gymnastics clubs represent the lifeblood of the sport with more than 222,000 participants and as many as 700 clubs<sup>67</sup> across Canada. However, there has not been a systematic examination of features in the club environment that impact culture and the athlete experience. The IRT recommends the CRLT implement a survey that is widely distributed via gymnastics clubs to their members and stakeholders. This will provide important quantitative benchmarking data about culture to inform the CRLT's recommendations.

The survey should be augmented through a clubs visit strategy. The club visits should include different sizes and types of clubs as determined by the CRLT.<sup>68</sup> Given the extensive number of clubs in Canada, it is not feasible to expand club visits beyond a small catchment. Implementation of the clubs' survey will provide the opportunity for the systematic examination of features between clubs according to type, size and geography. For the USA Gymnastics Review, the ability to personally observe clubs and speak to stakeholders contributed to a stronger and more nuanced understanding of the cultural milieu within different club environments.

Further to Recommendation #16, the CRLT should be focused on the welfare and experiences of athletes within the club environment; and further to Recommendation #17, the CRLT must identify the systemic trends and drivers related to experiences of maltreatment amongst athletes in the club environment and align recommendations to address these trends and drivers. A comparison between the systemic drivers of maltreatment in the club environment can and should be compared against the drivers of maltreatment within other levels and disciplines of the sport.

The IRT also learned about independent gymnastics clubs that are not affiliated with, or sanctioned by any form of provincial or national gymnastics governing body. The owner of one of

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<sup>67</sup> Note: GymCan has published statistics indicating there are 700 gymnastics clubs in Canada. The IRT received feedback from 14/16 PTOs indicating a total of 536 gymnastics clubs. This excludes data from Yukon Gymnastics and Rhythmic Gymnastics Nova Scotia and does not consider independent (i.e. unsanctioned) clubs.

<sup>68</sup> Note: The CRLT can draw inspiration from the club visits strategy outlined in the USA Gymnastics Review. This included a total of 25 strategically selected visits.

these independent clubs told the IRT that there was no “*value proposition*” for the club to become affiliated with a governing organisation so the decision was made to proceed without any form of sanctioning. It is prudent for the CRLT to speak to some independent club owners to better inform how a bridge to sanctioning of these clubs might be accomplished. Having independent clubs operating without any oversight is problematic.

### 3.3.9 Governance of Gymnastics in Canada

23) The relationship and alignment between national, provincial and local governance be examined as they relate to culture.

24) Gymnastics Canada’s governance structure be measured and evaluated against the *Canadian Sport Governance Code* (‘CSGC’). The CSGC can also be used to inform the exploratory review of governance best practices at the club and PTO levels.

25) The *Cromwell Report*<sup>69</sup> be reviewed by the CRLT and be used as a reference document to identify best practices and recommendations that may be applicable to the governance of gymnastics in Canada including the governance of Gymnastics Canada.

26) Performance management structures for coaches and other staff be reviewed at all levels.

27) The current Terms of Reference for Gymnastics Canada Athletes Commission be reviewed as it relates to gymnastics athlete representation within GymCan’s governance structure, including expanded opportunities for athlete voices to be heard.

Supporting Rationale
<p>■ Many individuals expressed concerns about the lack of alignment and effectiveness between local, provincial and national governance and the impact on accountability, culture and Safe Sport. For example, “<i>While GymCan &amp; national team coaches are the easiest to probe at because they are outward facing, the truth is the federation actually has little to no impact on how day-to-day gym operations run. Clubs are insured by their provincial orgs and their provincial orgs play a larger role in their standards and culture.</i>” Also, “<i>Gymnastic Canada’s Safe Sport Framework is an excellent starting point. Unfortunately, PTO’s have not bought into it.</i>”</p>

<sup>69</sup> The Honourable Thomas Cromwell, C.C., “*Final Report, Hockey Canada Governance Review*,” 31 October 2022. Online: [2022-hockey-canada-governance-review-final-report-e.pdf \(hockeycanada.ca\)](https://www.hockeycanada.ca/2022-hockey-canada-governance-review-final-report-e.pdf) [Last Accessed: 3 December 2022].

- Individuals consulted for this Review expressed concerns about governance, including at the local club level where dysfunctional Board environments with apparent conflicts of interest are stoking a negative culture in some clubs (Appendix B).
- Feedback from interviews included concerns about the effectiveness of the current governing Board structure at GymCan, and the inability of the current Board to implement meaningful changes. It is hypothesised that some of the limitations of the GymCan Board are related to jurisdictional limitations across the gymnastics' ecosystem.
- The *Cromwell Report* provides “*a comprehensive review of Hockey Canada’s governance structure, systems, personnel and processes, and offers important recommendations to help improve the organisation and meet industry best practices.*”<sup>70</sup> The CRLT can draw insights from these recommendations and industry best practices that may be applicable to the governance of gymnastics in Canada.
- The *Canadian Sports Governance Code* (the ‘Code’) “*is applicable to all National Sports Organisations representing Sports on the Olympic Program (‘NSOs’). All other National Sports Organisations are encouraged to adopt the best practices which are set out in the Code.*”<sup>71</sup>
- According to Article 6 of the Code, “*it is fundamental for athletes to have meaningful representation in the governance structure of the NSO and for athlete voices to be heard.*” The IRT interviewed every member of the GymCan Athletes Commission who expressed some uncertainty about their role within the overall governance structure of GymCan.
- The IRT has identified significant gaps in how the performance of employees is evaluated, including coaches at the club level in particular where many performance review processes are flawed or non-existent in some cases.
- Many gymnasts have expressed to the IRT that their voice is not heard and there are limited opportunities to express their opinions and provide feedback.

### Methodological Considerations

The most difficult consideration to implementing these recommendations is how to efficiently assess the governance of local clubs given myriad different clubs and operating models spread across the expansive Canadian geography. This can be accomplished in part by incorporating questions about governance within the clubs’ survey further to Recommendation #21. This can provide important baseline information about these governance processes which can be further

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<sup>70</sup> Hockey Canada, “*Governance Review: HOCKEY CANADA RELEASES FINAL INDEPENDENT GOVERNANCE REVIEW FROM FORMER SUPREME COURT JUSTICE THOMAS CROMWELL*,” 4 November 2022. Online: [Hockey Canada releases Final Independent Governance Review from Former Supreme Court Justice Thomas Cromwell](https://www.hockeycanada.ca/governance-review-hockey-canada-releases-final-independent-governance-review-from-former-supreme-court-justice-thomas-cromwell/) [Last Accessed: 3 December 2022].

<sup>71</sup> The Canadian Sports Governance Code, 21 April 2021.

expanded upon through personal interviews and club visits as provided in Recommendation #22.

Specific functional areas of governance that should be prioritised in the Gymnastics Culture Review include the following:

- Board of Directors' membership structure, requirements and roles;
- Alignment of norms and values associated with the governance models;
- Participation and empowerment of members of governing organisations;
- Transparency and responsiveness within the governance structures;
- Processes to ensure accountability and performance.

The performance management structures for coaches and other staff should be reviewed at all levels including the following:

- Frequency of performance review process(es);
- Documentation of performance review process(es);
- Reporting structures of coaches (particularly at the club level);
- Opportunities for stakeholders to provide feedback (e.g. asking gymnasts to provide confidential feedback about coaches or other gymnastics staff);
- PTO oversight of performance management requirements at the club level;
- GymCan oversight of performance management requirements at the national level.

GymCan is one of many NSOs whose governance practices are being scrutinised. For example, the *Cromwell Report* is a 213-page independent review of the governance of Hockey Canada that was published on 31 October 2022. Insights and best practices into how a national sport is regulated in Canada can be drawn from the *Cromwell Report* including specific legal and policy frameworks for NSOs. For example, the *Cromwell Report* identifies the following such frameworks applicable to NSOs in Canada:

- The Canadian Sport Policy;
- The Sport Funding and Accountability Framework;
- Sport Canada Governance Report Card;
- Contribution agreement;
- The Canadian Sport Governance Code;
- The Universal Code of Conduct to Prevent and Address Maltreatment in Sport;

- Office of the Sport Integrity Commissioner;
- Own the Podium.

The role of these frameworks in the governance of gymnastics in Canada should be evaluated by the CRLT, as well as the governance best practices identified in the *Cromwell Report*. The *Cromwell Report* also includes a summary of the Governance of Not-For-Profit Corporations and a Framework for Good Governance including relationships and accountabilities that can inform the CRLT's review of governance structures in gymnastics.

### 3.3.10 Gymnastics Canada Organisational Structure and Leadership

**28)** Gymnastics Canada's organisational structure be reviewed including roles, leadership, reporting relationships and employee performance management structures.

**29)** A 360-degree review process be implemented for senior GymCan positions including the CEO and the lead staff member of each of the high-performance leadership teams.

Supporting Rationale
■ Interview feedback, including from current GymCan staff, paint a picture of an NSO whose organisational structure is inefficient, understaffed and not supporting the needs of staff.
■ Many individuals have described the dual roles of CEO and High-Performance Director as ineffective and having a negative impact on the CEO's ability to serve the needs of staff, members and the broader gymnastics community. This, in turn, has led to frustration and in some cases a lack of trust in the leadership of the CEO.
■ A 360-degree review process is a well-accepted employee performance tool that includes peer and direct report feedback to paint a more complete picture of employee performance. This will help senior GymCan leaders identify their strengths and weaknesses and work on improving their skill set.

### Methodological Considerations

The IRT recommends a meeting between the CRLT and the GymCan Board of Directors to review the issues identified in this Report related to the current organisational structure and to discuss strategies to improve the environment for office staff as well the relationship between GymCan and all other stakeholders within the gymnastics community in Canada. These discussions can be used to inform recommendations. It also is vital for the CRLT to interview current staff of GymCan to provide context to the exploratory issues identified in this Report.

Given comments and concerns expressed by some about the leadership of Gymnastics Canada, the implementation of a 360-degree review process is recommended for senior positions including the CEO and the lead staff member of each of the high-performance leadership teams. This will provide greater clarity for leaders about their strengths, weaknesses and opportunities to improve the NSO's organisational culture through these leadership positions. An additionally important observation made by IRT is that performance reviews for staff in the GymCan office are inconsistent, ineffective and not systematically undertaken according to several staff members interviewed for this Report. So too should this be an area of focus for the CRLT including recommendations to render the performance review process more robust. An ineffective performance review process is associated with a lack of accountability and can lead to frustration and poor satisfaction within an organisation.

### **3.3.11 Jurisdiction, Reporting and Accountability**

Many complex issues related to jurisdiction, reporting and accountability have been identified by the gymnastics community as being problematic. As such, the IRT has identified the following recommendations for the Gymnastics Culture Review. As it relates to jurisdiction, there appears to be a lot of confusion about 'who does what?'; therefore, the Gymnastics Culture Review must explore how issues related to jurisdiction, reporting and accountability are impacting culture and how they can be remedied.

- 30) Processes related to jurisdiction, reporting and accountability be examined between local clubs, PTOs and Gymnastics Canada.**
- 31) The CRLT identify the accountabilities and reporting relationships required by PTOs for member clubs operating within their jurisdictions.**
- 32) The CRLT review and comment on the Sport Funding Accountability Framework as it relates to supporting and encouraging a positive culture within the sport of gymnastics.**
- 33) The CRLT review and comment on current program funding and evaluation requirements required by OTP for targeted high-performance sports as it relates to supporting and encouraging a positive culture.**

34) The CRLT answer the question: Is there a ‘win at all costs’ approach within high-performance sub-disciplines of gymnastics in Canada? The answer to this question should include the role of funding agencies including Sport Canada, the COC and OTP.

35) A comprehensive review of complaint reporting processes be implemented. This must include an examination of the relationship between local, PTO and GymCan policies on reporting versus actual practice in the implementation of these policies.

36) An analysis of all complaints that have been reported at the local, PTO and GymCan levels over the past 5 years be implemented.

37) The impacts of GymCan’s adoption of the UCCMS and agreement with the Office of the Sport Integrity Commissioner be reviewed, including how this affects reporting as it relates to individuals who are not identified by GymCan or OSIC as being under the jurisdiction of the OSIC national reporting mechanism.

38) The feasibility and advantages of developing a Club Accreditation Model (‘CAM’) for gymnastics in Canada be examined by the CRLT drawing upon the Club Licencing Model recently introduced by Canada Soccer for inspiration.

Supporting Rationale
<ul style="list-style-type: none"><li>■ Many gaps and inconsistencies were shared with the IRT about how local clubs are held accountable by PTOs including concerns about what national mechanisms are in place to ensure the consistent application and enforcement of local standards. For example, <i>“Culture change needs to be directed through strong policy expectations and policing of norms in local and grassroot club governance and operations.”</i> The policing of such norms and compliance with policies can be achieved through a Club Accreditation Model.</li><li>■ The relationship between PTOs and GymCan as it concerns the accountability of local clubs is unclear. GymCan has no jurisdiction as it concerns the oversight of clubs and was described as having no oversight, authority, or influence over the local club environment. For example, <i>“The National body takes a lot of flak, but has very few mechanisms to oversee individual relationships unless complaints come up through the system.”</i></li><li>■ Confusion and frustration about jurisdiction create the conditions for some people to <i>“fall between the cracks”</i> which is further exacerbated by ineffective compliance requirements. This is especially important as it relates to GymCan’s ability to influence PTOs as it concerns the accreditation of clubs. A Club Accreditation Model can ensure more consistency in standards related to the oversight and performance management of coaches, particularly as the local club level which has been identified as a significant gap within the Canadian gymnastics’ ecosystem. For example, <i>“There has been a complete lack of professional oversight of coaches ...”</i> and <i>“Oversight should be welcomed, standards set for code of conduct by coaches and staff.”</i></li></ul>

- The suggestion that OTP encourages a ‘win at all costs’ culture for high-performance disciplines requires the systematic examination of funding criteria for targeted sports, including any current or planned requirements related to athlete health and well-being to be eligible for funding.
- Given that more than 84% of gymnastics participation in Canada is at the recreational club level, it is critical to examine structures that provide consistent national standards and support mechanisms for club accreditation which PTOs are responsible for monitoring and enforcing. Clubs are accountable to PTOs who, in turn, should be accountable to GymCan to ensure that local club accreditation standards are upheld. For example, *“There is no system of support for clubs producing high level gymnasts. There is no feeling of being a part of Canadian gymnastics. No transparency or accountability for anything.”*
- There is a lack of trust and frustration with complaint reporting processes amongst many in the gymnastics community. For example, according to the public survey, the majority of respondents who filed a complaint indicated that it was not well-handled (n=98; 73.13%) compared with less than a third of respondents who were satisfied with the complaint process (n=36; 26.87%) (Appendix B). These processes are poorly understood and are implemented inconsistently across Canada, including accounts of reporting processes either not being followed or applied inconsistently. For example, *“I think it's vital that the Canadian gymnastics community knows the exact process for reporting abusive behaviour. Currently, I think the process is vague and many do not know what to do if they witness abuse.” “A staggering amount goes unreported.” “Expressing concerns to the PSO has been a horrible experience.”*
- An audit of complaint reporting cases filed in all jurisdictions in the past five years provides an opportunity to review such procedures against the current policy lens for reporting as it exists at the local, provincial and national level. For example, *“Someone needs to review the complaints and concerns ... and compare them to the action that was taken.” “There needs to be better sharing of statistics about complaints so they be addressed more strategically.”*
- Gymnastics reviews in the USA, U.K. and Australia all included some form of audit of reports filed alleging maltreatment.
- There was strong consensus from the IRT’s interview process that the concept of a Club Accreditation Model for gymnastics offers many advantages and should be examined as part of a Gymnastics Culture Review to raise standards, consistency and more effective compliance measures that may be absent under the current system.
- Canada Soccer’s Club Licencing Program is a best practice that was recently implemented to support clubs and to address gaps in jurisdiction, consistency in standards (particularly re. Safe Sport) and compliance.
- The implications of GymCan signing an agreement with the OSIC requires further examination as to how this will impact existing reporting mechanisms, including who is subject to the OSIC national reporting requirements and who is not.

### Methodological Considerations

It is critical for the CRLT to examine the oversight and compliance functions of PTOs as it concerns member clubs. Additional perspectives about the oversight function of PTOs can be

sought through the implementation of the clubs' survey. Structures related to accountability and compliance should be compared between PTO jurisdictions, identifying best practices, common practices and gaps. For example, the CRLT should include a review of PTO oversight of clubs in myriad areas of accountability including coach vetting and performance management, reporting of complaints, and education requirements, among other areas of governance that clubs must have in place as a condition of their membership.

Recommendations #35 and #36 to analyse the reporting of complaints should be grounded according to the local, PTO and GymCan policies in place at the time the various reports were filed. The analysis should examine the process by which each complaint was reported, as well as how the complaint was managed and the final outcome of the complaint. Any exceptions to the procedures set forth in the policies for reporting at the local, PTO and national levels should be noted by the CRLT.

Gymnastics Canada can look to other NSOs who have faced similar issues regarding the application of consistent standards and accountability frameworks at the club level including Canada Soccer. In response to these issues, Canada Soccer developed a Club Licencing Program ('CLP') to guide member organisations throughout Canada toward best principles for organisational development both on and off the field. The CLP sets standards and provides support for different levels of classifications within the club soccer system, starting with a National Youth Club Licence. Within the CLP, the "soccer club" is defined as being any organization that is a member of Canada Soccer either directly or affiliated through membership with a Member Association that registers players and coaches and delivers soccer programming. Member Associations meeting the criteria of each classification within the CLP are recognised accordingly by Canada Soccer. The Canada Soccer CLP is vertically aligned (from FIFA through the Member Associations) and integrates best principles from several sources to create a standard that is high quality and consistent across clubs within each classification.

Strengths of the Canada Soccer CLP that gymnastics could benefit from include the following:

## **Strengths of the Canada Soccer Club Licensing Program**

- Detailed criteria for compliance incorporating a range of best practices and principles. This assists new and existing members to understand their responsibilities in upholding a club to its highest potential, while also ensuring all prospective clubs have the same resources and requirements for the provision of quality sport nationwide.
- Detailed Safe Sport requirements.
- The National Youth Club Licence requires that clubs adhere to the Canada Soccer Code of Conduct and Ethics (demonstrating integration with policies at large), that they have a Code of Conduct to protect children, guidelines for appropriate/inappropriate conduct between adults/children, a policy outlining reporting obligations regarding inappropriate conduct and a policy outlining reporting obligations regarding suspicions of child abuse reported to law enforcement. Local clubs being required to produce their own policies allows them to amend and input unique provisions catered to their communities while also ensuring they meet national requirements.
- The corresponding Licensing Support Manual outlines examples of supporting documentation that will meet the obligations for every criterion in the policy, making it clear and achievable for applicants.
- The requirements for Member Association Licences (1 and 2) are also vast and cover the need for coaches and team personnel to have completed proper Background Screening, including a Criminal Record Check (CRC) with Vulnerable Sector Check (VSC) or Enhanced Police Information Check (EPIC) within the last 3 years. Further, the Member Association Licences require clubs to have Rule of Two Guidelines and the completion by coaches and team personnel of Respect in Sport Activity Leader Training. These detailed requirements demonstrate active implementation of safety measures and ensure that clubs have resources in place when incidents arise that may be better suited to a local administration.

The requirement for local clubs to produce their own policies allows them to amend and input unique provisions catered to their communities while also ensuring they meet national requirements. The CLP is a foundational component of Canada Soccer's Safe Sport strategy; implementing a similar accreditation program may offer corresponding benefits to the gymnastics community in Canada.

The IRT recommends that the GymCan consult with Canada Soccer to fully understand the rationale and process for the development and implementation of the CLP, including the roles and responsibilities of the NSO, PTOs and local clubs. This should include a review of mandatory

requirements related to Safe Sport that are reflected in the CLP. The IRT envisions that under such a model designed for gymnastics, local clubs will continue under the jurisdiction of PTOs; however, PTOs should be required to verify with GymCan compliance with the club accreditation requirements.

The advantages of implementing a CAM for gymnastics should be explored through a dialogue between GymCan, PTOs and clubs including levels of accountability and oversight related to the implementation of such a model. Furthermore, it would be beneficial for the CRLT to examine how local club standards can be strengthened and made more consistent through such an accreditation model. A CAM can be viewed as a mechanism to provide greater clarity, consistency and support for clubs to achieve more consistent national standards. To this end, the CAM should include processes to assist clubs in becoming compliant with any new standards that may be imposed.

Recommendations #33 and #34 are provided because of many comments that have been made about a supposed ‘win at all costs’ approach at the high-performance level, including specific criticisms leveled at Canada’s OTP program. Recently, OTP has developed and/or launched several initiatives aimed at measuring and improving culture including the Culture of Excellence Assessment and Audit Tool described in Chapter 3.3.7. OTP has also recently developed an ‘Integrated Wellness Plan’ requirement that targeted sports will be mandated to include in their high-performance plan effective 1 April 2023. According to OTP, “*The Integrated Wellness Plan provides a starting point for building participant wellness in an organisation. A National Sport Organization that supports psychological well-being and safety thrives in its day-to-day work and creates a safe place for the pursuit of excellence.*”<sup>72</sup>

OTP has other features and requirements in their funding process related to Safe Sport that would benefit from further review. For example, to inform their funding decisions, OTP evaluators undertake an “*assessment of the environment*” through direct observation of high-performance training environments. This assessment might include features related to Safe Sport; however, this requires further evaluation by the CRLT.

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<sup>72</sup> Own the Podium, “*Integrated Wellness Plan – Draft PowerPoint Presentation,*” June 2022.

To be considered for funding, targeted sports must submit a high-performance plan to OTP for evaluation. This plan must address several criteria; for example, quality high-performance coaches, daily training environment, IST support, podium pathways, governance, Safe Sport and wellness. The Gymnastics Culture Review will benefit from a review of these requirements as it relates to supporting and encouraging a positive culture within gymnastics disciplines supported by OTP. The CRLT may also consider exploring how non-targeted sports might benefit from access to these resources.

### 3.3.12 Safe Sport Education

**39)** The content, delivery and frequency of mandatory Safe Sport education and training be assessed including the Coaching Association of Canada's ('CAC') Safe Sport training and any programs that have been granted equivalency including Respect in Sport modules.

**40)** The CRLT review the effectiveness, alignment and delivery of Safe Sport education for gymnastics in Canada based on different gymnastics stakeholder roles — including athletes, coaches, parents, IST, judges and staff.

**41)** The CRLT review the effectiveness of the 'Values-Based Coaching Module' that was launched in 2020, including an analysis and profile of coaches who have completed the Module.

Supporting Rationale
<p>■ The IRT's research identified concerns about Safe Sport education amongst the gymnastics community, including the need for more targeted education based on an individual's role and demographic characteristics. For example, education for participants of minor age requires a different approach than does education for an adult athlete. Feedback is provided in Chapter 2 suggesting the need to examine the content, frequency and method of delivering Safe Sport education. This is supported by comments provided in Chapter 2 related to Safe Sport education including, <i>"our NCCP system is lacking the proper education and resources in those (Safe Sport) areas"</i>; <i>"Need access to more Safe Sport training through in-person delivery, not just on-line"</i>; and the need for <i>"parental training/education"</i> and <i>"yearly refreshers."</i></p>
<p>■ Sport Canada's mandate for Safe Sport training is limited to funded NSOs and applies only to <i>"everyone under their immediate authority."</i> Provincial mandates and local club initiatives that involve Safe Sport requires greater clarity in terms of the alignment and effectiveness of this training across Canada.</p>

## Methodological Considerations

It is important for the CRLT to review the content and delivery of Safe Sport education as well as how this education is aligned with different stages of the Long Term Athlete Development Model for gymnastics. For example, is the current Safe Sport education and training pedagogy being delivered suitable and targeted for the intended audiences? Is the current training adapted or delivered to reflect these different roles and perspectives? For example, what elements of Safe Sport training would be most advantageous for children and youth gymnasts versus adult participants?; how can Safe Sport training be more effective for parents?

### **3.3.13 Implementation of Gymnastics Culture Review Recommendations**

**42)** Recommendations provided by the CRLT must be measurable, actionable and should be prioritised with suggested implementation timelines.

**43)** Gymnastics Canada be responsible for implementing the recommendations published in the Gymnastics Culture Review.

**44)** A timeline of 10 months be considered to complete the review, which may vary according to the final Terms of Reference.

**45)** External oversight of GymCan's implementation of the Gymnastics Culture Review's recommendations is necessary to ensure accountability in the implementation of the recommendations.

**46)** Progress towards the achievement of milestones and recommendations be communicated on the dedicated website for the Gymnastics Culture Review (further to recommendation #5).

Supporting Rationale
■ The U.K. Gymnastics Review was deliberate in ensuring that recommendations were realistic and actionable versus <i>“wide overarching recommendations.”</i>
■ Several international gymnastics reviews included recommendations that lacked clarity on next steps to be taken.
■ Selected international gymnastics reviews including the USA and New Zealand included mechanisms to ensure oversight of the published recommendations.

- The time to complete international reviews ranged from 6 months to 22 months. The IRT's suggested timeline of approximately 10 months is based on the complexity of the recommendations provided herein as well as the composition of the Culture Review Leadership Team.

### Methodological Considerations

The U.K. Gymnastics Review (Whyte Report) focused on providing recommendations that were realistic and clear. Furthermore, the U.K. Review was deliberate in not making recommendations that would require the engagement of international bodies like the FIG in order to focus on more immediate national priorities. The IRT considers it a priority for the CRLT to focus on myriad domestic issues identified in this Report. However, the CRLT should be provided with the flexibility to consider recommendations that reference FIG rules and standards as they may impact gymnastics culture in Canada.

The success of the Gymnastics Culture Review rests on the implementation of the recommendations provided by the Culture Review Leadership Team. As such, it is critical to ensure effective oversight of the CRLT's recommendations. The USA Gymnastics Review and the New Zealand Gymnastics Review provide two different oversight mechanisms that the CRLT may wish to consider.

Upon completion of the USA Gymnastics Review, the lead reviewer Deborah Daniels provided follow-up audits concerning the implementation of the recommendations provided in her report. These audits were completed at specific intervals and published on the USA Gymnastics website for full transparency. The New Zealand Gymnastics Review ('NZR') took a different tack to overseeing the implementation of the recommendations. Following the review, *"Gymnastics New Zealand created a 'Statement of Commitment' to publicly commit to implementing the recommendations made in the Report, and to reinforce its living commitment to change across all levels and aspects of the sport. Gymnastics New Zealand also issued a public apology and set up an Independent Complaints Service."*<sup>73</sup>

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<sup>73</sup> Gymnastics New Zealand, *"Shaping the Future of Gymnastics in Aotearoa,"* July 2022.

Several important procedural steps and levels of oversight were implemented following the completion of the NZR. Expressions of interest were sought for participation in an independent nine-member Steering Committee which was tasked to “*propose changes to implement the Independent Review recommendations.*” A public and administrative lawyer was appointed by the Gymnastics New Zealand Board to Chair the Gymnastics New Zealand Steering Committee. The Gymnastics New Zealand Steering Committee was announced in December 2021, whose mandate is described as follows:

*“The Steering Committee is responsible for engaging and collaborating with many people and groups, including survivors, former and current athletes, clubs, coaches, volunteers, relevant experts, as well as representative bodies – both past and present – to ensure an inclusive and equitable process is undertaken, as it advises and proposes changes to the Board, to implement recommendations from the Independent Review. The Steering Committee will make proposals to the Board of Gymnastics New Zealand on changes in the areas of leadership and culture, policies, procedures, and regulations [...].”*

The extent of the oversight mechanism to be recommended by the CRLT will depend on several factors that must be considered including capacity, timing and cost.

## Chapter 4: Safe Sport Policies and Procedures

### 4.1 Executive Summary

#### 4.1.1 Introduction

Chapter 4 provides a detailed review of GymCan's Safe Sport policies and procedures. The IRT's Safe Sport policy review commenced in September 2022 and included an exhaustive review of all Safe Sport and related policies in place at that time. The IRT was later informed that as of 17 December 2022, and in strict accordance with GymCan's requirements under its Agreement with the Sport Dispute Resolution Centre of Canada ('SDRCC'), GymCan has now updated some of its Safe Sport regulations to successfully meet its compliance requirements as a Signatory to the UCCMS and the Office of the Sport Integrity Commissioner ('OSIC'). The IRT's Safe Sport policy review suggestions should nonetheless be considered and actioned where applicable because many of the suggestions provided herein are independent of GymCan's regulatory requirements as an OSIC Signatory.

The Report below first examines each relevant GymCan regulatory document related to Safe Sport and offers commentary, suggestions and general or specific comments on the same. The IRT then offers insight into any gaps between GymCan's policies and some Fédération Internationale de Gymnastique ('FIG') Safe Sport rules as well as the UCCMS. Finally, the IRT briefly discusses certain topics to be considered going forward in GymCan's modification, implementation, dissemination and oversight of its Safe Sport policies.

The IRT provides the following analysis concerning its review of GymCan's current Safe Sport policies and procedures and other pertinent and related regulatory documents relative to best practices and legal requirements concerning Safe Sport. The analysis includes, but is not limited to, the following GymCan Safe Sport policies:

- National Safe Sport Policy;
- Abuse, Maltreatment and Discrimination Policy;
- Code of Ethics and Conduct;
- Complaints and Discipline Policy and Procedures;

- Diversity, Equity and Inclusion Policy;
- Screening Policy;
- Bylaws.

Incorporated into the analysis are some suggestions on possible amendments to these policies as well as considerations with regard to their implementation and administration.

At the outset, the IRT notes that GymCan had all of its policies drafted by qualified Legal Counsel in 2019 with the goal of improving its policies and procedures concerning Safe Sport in general. From a legal standpoint, GymCan's policies are well-drafted. There are no major gaps or major shortcomings and few contradictory provisions or conflicting core principles. Nonetheless, as with all regulatory documents, there is always room for improvement. Accordingly, in accordance with its Terms of Reference, the IRT provides a variety of suggestions, general and specific, informed by best practice.

The IRT acknowledges that GymCan is concurrently undertaking a policy amendment process in order to meet requirements set forth by the Office of the Sport Integrity Commissioner ('OSIC'). These amendments are outside the scope of the IRT's policy review but are briefly discussed below in the OSIC and Sport Dispute Resolution Centre of Canada ('SDRCC') Regulatory Requirements section at 4.2.10.

#### 4.1.2 Terms of Reference

The Terms of Reference for this stage of the work include the following:

- A comprehensive review of current national Safe Sport policies and procedures utilised by GymCan, including, but not limited to, bylaws, rules and regulations, reporting procedures, case management procedures, codes of conduct, employment agreements and educational requirements.
- Provision of suggestions/recommendations to strengthen Safe Sport policies and procedures informed by best practices and PTO survey feedback.

#### 4.1.3 Jurisdiction

As discussed in Chapter 2, jurisdictional issues, as well as their ramifications on standardisation, reporting and accountability are reflected in governance and policy at the local, PTO and NSO levels. Many complex issues related to jurisdiction, reporting and accountability have been identified by the pan-Canadian gymnastics community as being problematic. Policies, processes related to jurisdiction, reporting and accountability must be examined collaboratively at least between PTOs and Gymnastics Canada (and ideally also local clubs) in order to provide a more standardised, harmonised and streamlined approach to all policies, reporting mechanisms and the accountability that arises from the same.

As identified in Chapter 2, there is currently a lack of clarity on lines of responsibility and accountability between jurisdictions. As a result of these jurisdictional issues, the basic question that arises for all stakeholders in various situations, especially those related to Safe Sport, is: *Who does what?*

Other questions arise out of this fundamental query. They include for example:

- Who is responsible for what?
- Who decides who is responsible for what?
- What are the lines of accountability and responsibility?
- How are individuals supposed to know which entity to deal with and report to?
- Why do reporting, investigations and disciplinary processes vary so much?
- Who are PTOs accountable to in order to ensure that their clubs are being held to specific standards, including Safe Sport policies and procedures, among others?
- What consistent national standards exist concerning the oversight and compliance of GymCan, PTOs and their member local clubs?
- Is it possible to establish oversight for a clear map of jurisdictional responsibility?

There is clearly a lack of understanding with regard to responsibility and accountability between GymCan and the PTOs. There is also a significant gap in the lack of uniform policies, standards and oversight processes for gymnastics participation and experiences in Canada. Thus, the jurisdiction issue is discussed throughout this Report as being a major gap that the eventual Culture Review Leadership Team ('CRLT') will need to address.

#### 4.1.4 Assessment of IRT's Safe Sport Policy Suggestions

Some, if not most, of the IRT's suggestions, both specific and general, will need to be carefully thought out by GymCan based on jurisdictional limitations and an honest assessment of whether current procedures are effectively (1) applicable and (2) being followed. Finally, GymCan will need to carefully assess if the IRT's suggestions might work in practice and not just in theory given GymCan's current (or future) operational and jurisdictional framework. This is truly the hallmark of effective Safe Sport policies; that they not only read well, but can be easily understood and successfully implemented.

## 4.2 Review Of GymCan Safe Sport Policies And Other Relevant Regulations

### 4.2.1 National Safe Sport Policy

#### Summary

The *National SafeSport Policy* provides a framework to create the optimal Safe Sport environment within Gymnastics Canada. The policy includes an organisational commitment and general Safe Sport principles upon which specific policy is to be developed. The *National Safe Sport Policy* also directs the reader to numerous other GymCan policies to be read in conjunction, including the *Code of Ethics and Conduct Policy* and the *Abuse, Maltreatment and Discrimination Policy*.

#### Specific comments

All the policies listed do not have the accurate titles. Order has been changed so that it is more logical, intuitive and consistent with other GymCan policy documents. A few documents that are referred to (related to the United Nations) were also deleted as they are not relevant to Canada, and thus superfluous.

Corrections must be made as follows with all struck through words deleted and redlined additions inserted as below:

Gymnastics Canada's National Safe Sport Policy is an overarching organisational policy that should be read in conjunction with the following policies and best practices:<sup>74</sup>

- Code of Ethics;
- ~~Abuse, Harassment and Bullying Policy~~ Abuse, Maltreatment and Discrimination Policy;
- ~~Complaint Reporting~~ Complaints and Discipline Policy and Procedures;
- Screening Policy;
- Travel Policy;
- Safety, Medical and Concussion Policy;
- Dispute Resolution Policy;
- ~~Inclusion Policy~~ Diversity, Equity and Inclusion Policy;
- Anti-Doping Policy;
- ~~United Nations Convention on the Rights of the Child~~
- ~~Universal Declaration of Human Rights~~
- Best Practices: Rule of Two;
- Best Practices for Social Media and Written Communications.

### Suggestions

- Comments made above are self explanatory.
- Keep all policy document titles consistent.
- Lack of consistency leads to confusion.
- Suggest adding a section to this document and all policies that binds all individuals to whom all this and all other Safe Sport policies apply:

E.g.:

*“As with all other GymCan Safe Sport Policies that it overarches, all persons and members listed below, by virtue of membership, participation, accreditation, employment or any other association or involvement with GymCan anticipated by these policies their scope agree to bind by GymCan’s National Safe Sport Policy and its related policies and procedures.”*

- If it is reviewed annually (as stated in the review cycle box), the 2019 version should not be replacing the 2014 version.
- This National Safe Sport Policy is akin to a landing page on a website that provides an overview and access to a variety of other documents. Consider a flow chart as to how all policies interplay.
- Online version should have hyperlinks to each policy.

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<sup>74</sup> Note: Strikethrough comments are intentionally provided by the IRT.

- Under the heading ‘Safe Sport Principles’ the phrase “*All participants of Gymnastics Canada will*” is included. The word “*participant*” will need to match the UCCMS definition or be redefined.
- Principle 1 prioritises the “*well-being*” of each participant. The term “*well-being*” is ambiguous and could give rise to multiple meanings. It would be prudent to enumerate different types of well-being followed by a general term to ensure that all types are captured. For example, an improved construction could read something like “*Prioritise the current and future well-being, including mental, physical, social, emotional, and other kinds of well-being of each participant above all else.*”
- Principle 2 could give rise to issues. What would happen if the best interests of one participant do not align with the best interests of another?
- Generally, the methods identified through which the Safe Sport principles will be cultivated and upheld are strong. However, with respect to numbers 1 and 8, the policies should include timelines for the review, evaluation, and update of Safe Sport policies rather than stating that this will be done “*periodically*.”
- Does “*Gymnastics Canada’s members*” under the heading “*Policy Application*” refer to gymnasts? This could be clarified. Further, it is unclear if former “*members*” are required to adhere to the National Safe Sport Policy.
- The Policy itself is rather short and merely lists broad general principles that Gymnastics Canada and its “*members*” should adhere to. It does not create a list of tangible policies which create protocol or procedure. Consideration might be given as to whether this is effectively a policy. If so, consider if it could be the appropriate place to discuss GymCan’s implementation of more operative, mechanical policies or if they are best placed elsewhere. If not, then perhaps it should be defined otherwise.

#### 4.2.2 Abuse, Maltreatment and Discrimination Policy

##### Summary

The Gymnastics Canada *Abuse, Maltreatment and Discrimination Policy* aims to create a safe, healthy and inclusive sporting environment free of abuse, maltreatment and discrimination. The policy, to be read in conjunction with the *Code of Ethics and Conduct Policy*, outlines offenses and unacceptable conduct that may be subject to review, investigation, disciplinary action, law enforcement involvement and/or legal action. These behaviors include physical abuse, emotional abuse, sexual abuse, neglect, harassment, bullying, hazing and discrimination.

## Suggestions

- To be read in conjunction with the *Code of Ethics and Conduct Policy*.
- If online – it should be hyperlinked so the reader can access the Code of Ethics without hassle.
- To simplify the reporting process, the online version should have the *Complaints and Discipline Policy and Procedures* hyperlinked.
- Reprisal section is good. Consider adding one sentence about unfounded or malicious complaints not being tolerated.

### 4.2.3 Code of Ethics and Conduct Policy

#### Summary

The Gymnastics Canada “*Code of Ethics*” sets out the minimum expectations for acceptable behavior for all individuals within the scope of this Policy. This includes, but is not limited to, employees and other service providers, members of the Board of Directors, athletes, coaches, judges, parents, guardians, spectators and generally every other member of the Gymnastics Canada community.

The Gymnastics Canada *Code of Conduct* for athletes, coaches, team personnel, judges, Gymnastics Canada Board of Directors and member associations have similarly been developed to both guide and define expectations for conduct by individuals in those positions in addition to the expected conduct in compliance with the *Code of Ethics*.

It is a comprehensive set of policies pertaining to Safe Sport and GymCan values. The latest version of the Code is dated 2019. The Code’s purpose is to ensure a safe and positive environment by making individuals aware that there is an expectation, at all times, of appropriate behaviour consistent with GymCan’s core values. The Code is not intended to specifically outline every instance of misconduct. Misconduct that is not in line with GymCan values or purpose of the Code of Ethics may still constitute a breach of the Code and be subject to sanctions even though not specifically included in the Code. The Code focuses on conduct of actions on and off the field of play. Breaches of the Code are governed by the

GymCan Disciplinary Code, which deals with breaches of misconduct of many kinds across GymCan jurisdiction.

### Specific Comments

The following are the IRT'S specific comments and suggestions on each subsection of the *Code of Ethics*.

Section	Recommendations
1. Organisational Committee	<ul style="list-style-type: none"> <li>Consider adding a line to reflect GymCan commitment to respect, implement and uphold all the principles of the UCCMS, the OSIC etc.</li> </ul>
2. Policy Description	<ul style="list-style-type: none"> <li>Code of Ethics applies uniformly to all. <ul style="list-style-type: none"> <li>Codes of Conduct although separate apply to each distinct group (athletes, coaches, team personnel, Officials, GymCan BOD and Member associations) outlining different responsibilities and “expectations for conduct” for each group.</li> </ul> </li> </ul>
3. Application	<ul style="list-style-type: none"> <li>Good that it matches the application of the <i>Abuse, Harassment and Discrimination Policy</i>.</li> </ul>
4. Code of Ethics	<p><b><u>4.1 My Commitment to the Gymnastics Canada Community</u></b></p> <ul style="list-style-type: none"> <li>Should be prefaced by something – it is unclear if this is to be a personal manifesto, rules that all participants are automatically bound by virtue of participation etc. <ul style="list-style-type: none"> <li>“The following outlines non-exhaustive commitments and responsibilities that all individuals to whom the Code of Ethics and Conduct applies agree to be bound by, by virtue of participation in GymCan activities.”</li> </ul> </li> </ul>
5. Code of Conduct	<p><b><u>5.1 Code of Conduct</u></b></p> <ul style="list-style-type: none"> <li><b><u>5.1.1 Athletes Rights</u></b> <ul style="list-style-type: none"> <li>What about adding the words “fun” or “enjoyable” to this list? Is that not at its core what sport is meant to be regardless of the level?</li> <li>Hyperlink all other GymCan policies referred to and relied upon.</li> <li>Consider referring to the UCCMS.</li> </ul> </li> <li><b><u>5.1.2 Athlete Code of Conduct</u></b> <ul style="list-style-type: none"> <li>Ibid. See 5.1.1 comments.</li> </ul> </li> <li><b><u>5.1.2(f)</u></b> requires athletes to “follow instructions from coaches, responsible adults, and other persons of authority at events and when travelling, for their own safety and protection and that of others”. What if a coach or responsible adult instructs an athlete to do something contrary to the <i>Code of Ethics</i> or <i>Code of Conduct</i>?</li> </ul> <p><b><u>5.2 Coaches Code of Conduct</u></b></p> <ul style="list-style-type: none"> <li>Hyperlink the NCCP Code of Ethics is referring or relying on it.</li> <li>Hyperlink all other GymCan policies referred to and relied upon.</li> <li>Consider referring to the UCCMS.</li> </ul>

	<p><b>5.2(j)</b>, and should include reference to communication through social media.</p> <p><b>5.3 Team Personnel Code of Conduct</b></p> <ul style="list-style-type: none"> <li>• Hyperlink the NCCP Code of Ethics is referring or relying on it.</li> <li>• Hyperlink all other GymCan policies referred to and relied upon.</li> <li>• Consider referring to the UCCMS.</li> </ul> <p><b>5.3(f)</b>, should include reference to communication through social media.</p> <p><b>Sub-section 5.4</b></p> <ul style="list-style-type: none"> <li>• Hyperlink all other GymCan policies referred to and relied upon.</li> <li>• Consider referring to the UCCMS.</li> </ul> <p><b>5.4(b) and (d)</b> speaks to a commitment to impartiality and the appearance of impartiality. It might be worthwhile to enumerate some things which might conflict with judicial impartiality or give the appearance of doing so.</p> <p><b>Sub-section 5.5</b></p> <ul style="list-style-type: none"> <li>• Hyperlink all other GymCan policies referred to and relied upon.</li> <li>• Consider referring to the UCCMS.</li> </ul> <p><b>Sub-section 5.6</b></p> <ul style="list-style-type: none"> <li>• Hyperlink all other GymCan policies referred to and relied upon.</li> <li>• Consider referring to the UCCMS.</li> <li>• As discussed elsewhere in the Report, consider creating and implementing a licencing or accreditation program to ensure that minimal requirement notably with regards to Safe Sport are mandatory for all Member Associations to have an active and compliant membership to GymCan.</li> </ul>
7. Confirmation of Compliance with Code of Ethics and Conduct	<ul style="list-style-type: none"> <li>• How are you policing or enforcing the “<i>expectation to confirm on an annual basis the understanding of and intention to comply with the Code of Ethics and Conduct Policy?</i>”</li> <li>• Here, you are first suggesting a “<i>Registered Participant Declaration</i>” with signature required. <ul style="list-style-type: none"> <li>○ How many of these forms have you received?</li> <li>○ This is, in fact and practice, impossible to do for all the individuals listed at 3 and to whom you state the <i>Code of Ethics</i> applies.</li> <li>○ How do you effectively BIND everyone to whom the policy applies?</li> </ul> <p>Suggestions:</p> <ul style="list-style-type: none"> <li>○ Add to Athlete agreements and all contracts (staff, coach etc.), as discussed in considerations.</li> <li>○ A mandatory form to be filled out yearly online?</li> <li>○ Adding a line to all document regarding membership dues, coaching or officials, accreditation, any new board members. (difficult and administrative burden to oversee).</li> <li>○ A general “<i>all participants by virtue of membership or other</i>” agree to be bound.</li> </ul> <li>• You are also suggesting the existence of a Parent or Guardian Declaration. Again, does this really exist and how are you effectively overseeing this on a yearly basis?</li> <li>• Same comments as above apply. Need to reconsider.</li> </li></ul>

#### 4.2.4 Complaints And Disciplinary Policy And Procedures

##### Summary

The Gymnastics Canada *Complaints and Disciplinary Policy and Procedures* lays out the process for investigating and resolving reported violations of the Gymnastics Canada *Code of Ethics and Conduct Policy*, as well as the procedures for remedying such violations. The policy also sets forth the support offered by Gymnastics Canada.

In particular, the policy outlines the procedures for reporting and handling minor and major infractions, the responsibility for the costs of filing and dealing with complaints, illegal activity/criminal charges and offences, the discipline committee and procedures, and the appeal committee and procedures.

##### 4.2.4.1 General comments on key themes in the Complaints and Disciplinary Policy and Procedures

There are some key positions or themes missing from this GymCan policy. While we appreciate that some of these are difficult to implement due to lack of human and financial resources, the IRT offers the suggestions below as best practices to work towards, whilst keeping in mind the current limitations GymCan faces from a financial, administrative and human resource perspective.

##### Director Safe Sport and Supporting Safe Sport Team, Safe Sport Coordinator, Lead Safeguarding Officer, Team of volunteer Safe Sport Officers

In addition to the Director of Safe Sport, GymCan may wish to establish a group of people with relevant knowledge, skills and experience who are neutral and unbiased. This group is responsible for collaborating/advising/liaising with the person/Safeguarding Officer in the assessment of the incident and determining the jurisdiction, referral route and approach.

- It is important and strongly recommended for GymCan to identify at least one person (Safeguarding Officer), who is not the CEO, with the overall responsibility for responding

to concerns. The responsible person (or Safeguarding Officer) needs to have the appropriate experience and training in harassment and abuse.

- While this in the past was the Director of Safe Sport — this in fact should not be the responsibility of the Director of Safe Sport, whose focus should be education and awareness and dissemination of information contained in policies and education materials. The Director of Safe Sport should however collaborate with the Safeguarding Officer and various volunteers who would take on these roles (in and out of competition — like for example at training camps or competitions).
- Unless and until GymCan creates an established safeguarding team, the responsible person/Lead Safeguarding Officer should ideally be as independent as possible from the Executive. An independent contractor ideally.
- If this is not achievable, they must be impartial and empowered to act in accordance with the Policy to fulfil their duties.
- The safeguarding team, comprised of the Lead Safeguarding Officer and its volunteers of Safe Sport Officers would ideally establish consistent processes: e.g. reporting forms and reporting mechanism, decision/disciplinary action forms, communication processes (notably for minor infractions) etc. and consistent record keeping. The provinces could then ideally mirror all these processes so that all Safe Sport mechanisms, processes and actions are consistent throughout Canada.
- Safe Sport Officers could also be team staff that attend national and regional competitions. But if so, they must be required to attend a training session which includes code of conduct, addressing and reporting infractions, etc.
- Safe Sport Officers should be screened like any volunteer or employee of GymCan, have Respect in Sport training (required by all GymCan athletes, coaches and employees), have a gymnastics background of some sort with knowledge of rules and regulations as well as the *Code of Conduct*; currently (or at least 2019). A GymCan employee or contractor in charge of events de facto acted in this capacity, handling small issues and reporting larger ones to GymCan staff.
- Ideally, the Safe Sport Officer has the authority to handle minor infractions quickly, consistently and efficiently and in a confidential manner in accordance with the established process. This standardised and consistent process should ideally be applied throughout all provinces and at the national level.
- If the Lead Safeguarding Officer is in attendance he/she may also take the place of a Safe Sport Officer as the person of authority to deal with the infraction.
- Major infractions as discussed below would flow through the designated GymCan complaint process.
- A standard incident report form would help Safe Sport Officers report incidents and their resolution across the country (and PTOs and clubs could use the same forms).

## Whistleblowing policy

- It is imperative for Athletes and others to have access to an independent, non-sport related trustworthy source to whom they may wish to report any wrongdoing.
- GymCan currently does not have an actual standalone Whistleblowing Policy. Recommendation is for such a Policy to be developed and able to be read in conjunction with the *Complaints and Disciplinary Policy*.
- Whistleblowing guidelines encourage individuals to raise concerns of abuse and poor practice. They provide reassurance that the individual will be protected and supported by the organisation. The inclusion of such guidelines is important to support individuals with legitimate concerns who may be fearful of reprisals.
- There must be an acknowledgement that GymCan recognises that some individuals may be fearful of the consequences of making a complaint under these procedures, particularly where the perpetrator is in a position of authority. In these circumstances, where possible, the identity of the Whistleblower will remain confidential.
- The Whistleblower Policy could either be a standalone document, or be included in this Complaints, Discipline and Procedures Policy.

## Handling of Minor Infractions

Elsewhere in this Report, licencing/accreditation is proposed to address the issue of harmonisation and to allow provinces and GymCan to arrive at a standardised way of dealing with complaints, whether related to major or minor infractions, so that everyone is treated uniformly and has the confidence that the system will effectively treat them as such.

- Considering these minor infractions will continue to fall under GymCan's purview when the OSIC comes into effect, GymCan needs to consider how to produce a process that is fair, not cumbersome and perhaps not GymCan led, so that every individual is sure that their complaint for a minor infraction has been dealt with appropriately.
- Once a decision on the infraction is made and any discipline imposed – this outcome should be recorded in a file and also in a registry – a risk registry of sorts, shared with others and other jurisdictions (if possible legally/confidential) etc.
- A suggestion is to distinguish between in-competition and out-of-competition minor infractions:
  - Re: "*in-competition infractions*," suggestion is to broaden the language to "*in-competition or in national training camps*" (which, like the competition, include travel time to and from the camp, training time, hotel/residence time).

- Consider including training camps of any kind, provincial, regional or national, under in competition infractions so that those can be dealt with in a standardised, documented manner.
- For “*out-of-competition infractions*” — addressing these situations could be included as part of any developed club licencing/accreditation requirements, as well as under PTO policies that are mandated to follow the eventual NSO policy.
- While dealing with minor infractions presupposes an informal nature of procedures for dealing with same, this does not prevent an appropriate person having authority from taking immediate informal or corrective action.
- The person in authority in club situations is often the best placed to make a decision on the spot; so long as they document the complaint, outcome, sanctions if any, and provide these to the provincial and/or national Safe Sport Officer.
- As referred to above, consider naming someone as a Safe Sport Officer (perhaps voted on by the Board after they review all reference and screening material?) who could work in both competition and camp settings, ideally one or more trained in each province so that the ‘resident’ Safe Sport or Safeguarding Officer can attend locally held national camps and competitions.
- Gymnastics at all levels needs to identify a person in authority, who has presumably been screened as a coach or manager or volunteer and can take action to ensure the safety of an individual. That action needs to be documented following a standard form, allow for the respondent to hear the nature of the infraction and provide information to the on-the-spot decision maker.
- In all cases there needs to be some level of consistency in how complaints are handled from national competitions down to provincial training camps to regular club training sessions; highlighting duty to report (see 5.11 in UCCMS) to all parents, athletes, coaches, administrators, etc. is key; log all complaints in a confidential database so that multiple minor infractions, for example, can be escalated to a major infraction process. (This of course could be achieved with a functional club licencing program).
- GymCan’s policy defines major infractions as including “*repeated minor infractions*”, but there is no practical process in place to log these Canada-wide (This depends of course on much required cooperation with GymCan and its PTOs). Without the creation of some type of registry, how will the Safe Sport Officer at National Championships or training camps who receives a complaint about a coach’s conduct (minor infraction) know that this is complaint number 5, for example?
- All minor and major infractions should be recorded and reported to GymCan or a confidential Safe Sport database so that a confidential database of minor infractions (athletes and coaches) can be developed (See below as regards to confidentiality issues and recording).

- E.g. *Minor infractions that result in discipline will be recorded and maintained by GymCan. Repeat minor infractions may result in further such incidents being considered a major infraction.*
- A documented and consistent way of imposing, recording and confidentially reporting disciplinary actions is critical.

Documentation and Retention of Records:

- Consider making all forms bilingual and consistent for use nationally and provincially. The recommendation is for greater transparency in this regard and the inclusion of some provisions in relevant policies to reflect the same.
- It is important to ensure GymCan maintains appropriate records irrespective of the decision as they may be important if additional concerns are reported in the future. Also note that the retention of records is subject to applicable data protection law.
- Every single action taken by GymCan under any of the National Safe Sport policies must be documented clearly, accurately, confidentially and safely, to avoid the negative impacts of complaints that are not established.
- Where these need to be relayed to a Safe Sport Committee, or the Board, they need to be recorded and kept in minutes.
- Any information relating to complaints of non-accidental violence should be stored securely. This will involve developing a Data Protection and Data Retention Policy.
- Any information about poor practice or complaints about harassment and abuse that may indicate that a participant in a position of trust is unsuitable to work or volunteer in the sport will be retained for as long as the participant remains active in the sport or for ten years, whichever is longer, even if it were not possible at the time that the information was first reported to instigate any formal proceeding. This will involve developing a Data Protection and Data Retention Policy.
- Any records relating to complaints or disciplinary action taken by GymCan or its members thereafter should be retained in accordance with the retention periods set out in the GymCan Code of Discipline/Complaints and Disciplinary Procedure, entered into a risk registry and documented in a secure database. This will involve developing a Data Protection and Data Retention Policy.

➤ **IRT Note:** Whomever embarks on the Gymnastics Culture Review will want to take a detailed look into GymCan's records. GymCan should spend some energy collecting and collating all the records kept in the course of implementing its various disciplinary mechanisms (as it relates to all submissions of concern, decisions taken and discipline imposed). Ensuring greater transparency and accountability in all Safe Sport matters is necessary to regain the trust of some former athletes and all current stakeholders.

## Investigation Process

- While the Policy speaks of Case Managers conducting investigations, there is no information provided, even basic, on the investigation and what one might entail.
- Investigation template process documents could be created to ensure that GymCan and Provinces follow consistent processes and in all regulatory documents, and on the website, a general overview of basic tenants and stages of Safe Sport investigations could be provided.
- An option is to add, even if broad, a general outline of what might occur in the course of an investigation.
- Although some other NSOs have taken the approach that outlining their investigative processes and measures should be included in their policies, the IRT's recommendation is that greater details not be provided with regards to investigations which should be tailored to each individual case. Avoiding step-by-step outlines of investigative processes is preferable because failure to fulfill one of these steps could provide procedural defenses for respondents.
- See below for some examples of best practices.

## General Handling of Major Infractions

The IRT also notes that some of the individuals interviewed commented that various relevant complaint policy documents were not available on the GymCan website and that upon request were not promptly forwarded by GymCan to the requesting individual. A section below on the website addresses the accessibility of policies but it goes without saying that if ever an individual requests assistance from GymCan on the location of a specific policy (or their inability to locate any policy for that matter), especially the Complaints and Disciplinary Policy, an answer should be immediate and collaborative. Such an approach can only encourage individuals to come forward, whilst the reverse will only end up creating more distrust in the system.

#### 4.2.4.2 Specific Comments and Suggestions on the Complaints and Discipline Policy and Procedures

Section	Recommendations
1. Introduction	No recommendations.
2. Linking Code of Ethics and Conduct to Complaints and Discipline	<ul style="list-style-type: none"> <li>Compliance with the Gymnastics Canada <i>Code of Ethics and Conduct Policy</i> and the <i>Abuse, Maltreatment, and Discipline Policy</i> is expected of all individuals within the Policy scope as set out under Section 3 below. <ul style="list-style-type: none"> <li>Abuse, Maltreatment and Discrimination Policy does not exist.</li> <li>A correction and amendment is necessary. <ul style="list-style-type: none"> <li>e.g. As with all other policies under the overarch of the National Safe Sport GymCan, Compliance with the Gymnastics Canada <i>Code of Ethics and Conduct Policy</i> and the <i>Abuse, Maltreatment and Discrimination Discipline Policy</i> is expected of all individuals within the Policy scope as set out under Section 3 below.</li> </ul> </li> </ul> </li> </ul>
3. Scope of Policy	<p><b><u>3.1 Policy Application</u></b></p> <ul style="list-style-type: none"> <li>The scope of the policy includes (a) “<i>All full-time and part-time employees (permanent, temporary, or fixed-term) of Gymnastics Canada...</i>” (g) “<i>Volunteers at events hosted by Gymnastics Canada</i>” [emphasis added], and (h) “<i>Volunteers appointed by Gymnastics Canada to accompany teams to events, training camps, competitions, or other activities.</i>” The inclusion of the language “<i>at events hosted by Gymnastics Canada</i>” is too specific and likely would not capture volunteers who assist in gyms on a day-to-day basis. There is no reason that volunteers should not be held to the standards of conduct laid out in this Policy, especially given the prevalence of volunteers within the gymnastics community.</li> </ul> <p><b><u>3.2 The Multi-Jurisdictional Structure of Gymnastics Canada</u></b></p> <ul style="list-style-type: none"> <li>Clarify at the outset the possible issue of jurisdiction and that a complaint filed with GymCan may ultimately be remitted to the Member Association or that GymCan may seize itself of the matter if the Member Association fails to do so – if that is the intention.</li> <li>May want to clarify that if GymCan seizes a Member Association matter due to the member’s inaction, GymCan may recoup some of the costs.</li> <li>“<i>Where there is a question of jurisdiction, the Gymnastics Canada CEO shall determine which jurisdiction shall address the alleged misconduct. The CEO may seek legal counsel prior to making this determination.</i>”</li> <li>If this determination is not subject to appeal or cannot be challenged, we suggest that it is clearly stated here.</li> <li>E.g. add a sentence along these lines after making this determination. “<i>Any such determination shall be final and binding or shall not be subject to challenges.</i>”</li> </ul>
4. Definitions	<ul style="list-style-type: none"> <li>As explained below in the UCCMS section, check all definitions.</li> <li>Suggest adding other definitions as identified below to clarify important roles: <ul style="list-style-type: none"> <li>4.1. Use of the term “<i>Registered Participants</i>” may cause confusion with the UCCMS term “<i>participants</i>” consider changing word to “<i>registered members</i>” or other.</li> <li>4.4 The Case Manager “<i>should be</i>” - must not be a “<i>member</i>”.</li> <li>Language inadequate.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>o What is a member – not defined anywhere.</li> <li>o Suggested amendment: <i>“In addition to not being a member of Gymnastics Canada, the Case Manager must be independent, disinterested and impartial and shall sign a Declaration of Independence and Impartiality attesting to their lack of conflict of interest prior to being assigned any complaint.”</i></li> <li>o On this particular point, the IRT suggests that GymCan not always use the same Case Manager – to avoid even an appearance of lack of independence and impartiality.</li> <li>o Case Managers should be totally independent of GymCan and its PTOs and GymCan Staff.</li> </ul>
5. Reporting of Complaints	<p>Note: may need to reconsider the use of the word “individual” vs “participant” throughout.</p> <ul style="list-style-type: none"> <li>• Under part 5. Reporting Complaints to Gymnastics Canada, reporting is limited to participants, former participants and their guardians. This needs to be changed to members with an associated broad definition.</li> <li>• At the beginning of part 5, the policy states that it is a violation of the policy for an adult <u>not</u> to report an infraction of the policy, but this obligation is not carried through, as reporting is limited to participants in paragraph 3.</li> <li>• Recommend keeping a log and tracking systems of all major and minor infraction complaints, investigations and confirmed infractions.</li> <li>• Recommend keeping a risk registry based on the tracking system for major and minor infractions.</li> <li>• Consider expanding the duty to report below: <i>“Persons holding a position of trust or authority in a Gymnastics Canada program or activity, or those persons who are in an administrative position, have a responsibility to report infractions that they have witnessed or of which they have been made aware.”</i></li> <li>• Section could be revised to make the appropriate path for reporting allegations or suspicions of misconduct clearer. In its current form, one must report the written infraction to Gymnastics Canada by using a complaint form. What is a written infraction? It's unclear what this means.</li> <li>• Good that you also provide the opportunity to make a complaint verbally to the Director of Safe Sport or CEO but nowhere is confidential hotline reporting offered.</li> <li>• Consider expanding below the ways in which complaints may be made or explaining that one may first report by various available means but that ultimately, in order to formalise the process, the complaint must be in writing; and that it could be anonymous or confidential. <i>“Complaints must be made in writing, dated, and signed by the Complainant or, in the case of minors, an individual acting on behalf of the minor registered”</i>.</li> <li>• <i>“All infractions must be reported through Gymnastics Canada using the Complaint Form”.</i> <ul style="list-style-type: none"> <li>• The new OSIC may resolve the issue of individuals who may have wanted to report but not wanted to report to GymCan (for fear of reprisal, lack of trust or other). Many people simply do not want to go through the NSO or its staff to file complaints it may want to be anonymous or confidential.</li> </ul> </li> </ul>
6. Reporting of Minor Infractions	<p>Various General Suggestions are already provided above,</p> <p><b><u>6.1 Procedures to Resolve Minor Infractions</u></b></p> <ul style="list-style-type: none"> <li>• Assuming that GymCan continues to receive reports for minor infractions after the OSIC starts, per 6.1:</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>6.1.1 Minor Infraction Outside of Competition</b> <ul style="list-style-type: none"> <li>◦ Procedures for out of competition infractions are “<i>at the discretion of the person responsible for the program or activity</i>”- this is unclear. Who would this one person be in practice?</li> </ul> </li> <li>• <b>6.1.2 Minor Infractions during a Competition Time-Period</b> <ul style="list-style-type: none"> <li>◦ Dealt with the “<i>designated person of authority</i>.”</li> <li>◦ Clarification may be required here briefly and or by reference to the relevant process or document (hyperlinked).</li> <li>◦ E.g. Who holds the disciplinary meeting? Who is the designated person of authority and how are they chosen? Are they independent? What is their role? They appear to conduct investigations if necessary, are they also the ones who impose disciplinary measures? They also have to write written report with corrective actions etc. If so, what training or qualifications does this person have? Perhaps this person of authority is wearing too many hats and these tasks should be delegated?</li> <li>◦ Given the severity of the possible disciplinary measures at 6.2, all these elements should be clarified and the role of the “<i>person of authority</i>” better defined and free of conflicts of interest.</li> <li>◦ It may be that this “minor infraction process” needs to be simplified considering the above questions and concerns.</li> <li>◦ It is likely never actually followed. It should probably be done by an external person and not someone within GymCan depending on what it is.</li> </ul> </li> </ul>
7. Reporting and Handling of Major Infractions	<p>Although some of these will arguably be dealt with by the OSIC going forward, the IRT provides the following suggestions for all complaints of major infractions that will be handled by GymCan in accordance with its own policies:</p> <p><b>General Recommendations</b></p> <ul style="list-style-type: none"> <li>• Hyperlink relevant rules and regulations referred to.</li> <li>• Consider having definitions somewhere in the document that define important terms: e.g. “<i>Person of authority</i>”, “<i>Responsible adult</i>”, “<i>designated recipient</i>”, “<i>external case manager</i>”, “<i>External qualified expert</i>”.</li> <li>• How you deal with complaints that are brought to the Gymnastics Ethics Foundation in these policies. Do you consider the interplay between policies, jurisdiction or other?</li> <li>• Is there a time limit for filing or reporting complaints? If so it should be expressly stated.</li> <li>• Ensure that the processes outlined in the Policy are strictly adhered to and that no case falls between the cracks. <ul style="list-style-type: none"> <li>➤ See Section 3.1 for Recommendation of Audit of past GymCan reviews of received major complaints.</li> </ul> </li> <li>• Must ensure complete confidentiality of the process.</li> </ul> <p><b>7.2 Reviewing Complaints of Major Infractions</b></p> <ul style="list-style-type: none"> <li>• Complaint forms should perhaps not be received or reviewed by “<i>a designated recipient</i>” at Gym Can but by an independent, third person with no affiliation to GymCan.</li> <li>• How do you define designated recipient? Is this person independent, impartial, have they signed confidentiality forms?</li> </ul> <p><b>7.3 &amp; 7.4 Provisional Suspension</b></p>

	<ul style="list-style-type: none"> <li>CEO should not be responsible for imposing provisional suspensions.</li> </ul> <p><b>7.5 Case Manager Investigation and Report</b></p> <ul style="list-style-type: none"> <li>What is an “<i>external case manager</i>” as opposed to a “<i>case manager</i>” as defined at 4.4? Suggest defining and distinguishing both.</li> <li>Are they independent, impartial, etc.?</li> <li>On this particular point, as above, the IRT suggests that GymCan not always use the same Case Manager – to avoid even an appearance of lack of independence and impartiality.</li> <li>Case Managers should be totally independent of GymCan and its PTOs and GymCan Staff.</li> <li>Should also be defined and distinguished from an “<i>external qualified expert</i>” (at 7.8).</li> <li>CEO should really have no role in the process (re: ss. “j.”) until the Case Manager report, investigation etc. is finalised and the decision/recommendations are made.</li> <li>The IRT has been informed that some individuals who lodged complaints were later identified in other complaint reports by the Case Manager, thus breaching confidentiality, and also creating an issue of possible reprisal. Reports must always be confidential, and if names are used which are not relevant or may affect confidentiality and privacy rights or result in reprisal, they must be redacted. Needless to say, breaching confidentiality parameters does not encourage individuals to come forward and only amplifies distrust in the reporting system.</li> <li>The IRT has been informed of some Case Manager reports being issued that did not address many elements of the complaint and thus left the complainant feeling as though their complaint had not been adequately addressed if not dismissed without being fully assessed. <ul style="list-style-type: none"> <li>All Case Manager Reports must adequately address each matter raised in each individual complaint.</li> <li>Complainants must be satisfied that they have been heard; that their complaint has been effectively treated and not ignored or dismissed matter-of-factly.</li> <li>Not doing so amplifies distrust of the process.</li> </ul> </li> <li>Any eventual Report must be fully reasoned and address all matters raised in the major infraction complaint and must be promptly communicated to the complainant as soon as it is drafted. <ul style="list-style-type: none"> <li>There should be a deadline for the Case Manager to complete the report for all parties to have certainty in the process and its finality.</li> </ul> </li> </ul>
8. Responsibility for the Costs of Filing and Dealing with Complaints	Ok. But consider providing that the Disciplinary Chair may award a contribution of costs to the prevailing party.
9. Discipline and Appeal Panel (8-11)	<ul style="list-style-type: none"> <li>Generally acceptable and well drafted with conflict of interest, explanations of roles and responsibilities etc.</li> <li>11.4.1 “<i>15 days after the appeal is received</i>” 15 business days? Regular days? Should be clear to avoid confusion. Perhaps include deadline/days in the definition section if you create one, e.g. DAYS: shall be regular calendar days including holidays and weekends.</li> </ul>
15. Training and Policy Review	<ul style="list-style-type: none"> <li>Does GymCan truly provide such information and training sessions to its staff? If so how?</li> </ul>

	<ul style="list-style-type: none"> <li>• Although this provision states that they are, the Policy and related policies are not reviewed annually. Either commit to this or leave out if you do not want to be breaching your own policies.</li> <li>• In the course of its interviews, the IRT has been informed of gaps and deficiencies that were identified as a result of a complaint and ensuing investigation that were not considered and did not result “in an amendment to any section of the policy” and likely should have.</li> <li>• Suggestion: ensure that anything stated in the regulations is actually implemented.</li> </ul>
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#### 4.2.5 Diversity, Equity and Inclusion Policy

##### Summary

The Gymnastics Canada *Diversity, Equity and Inclusion Policy* ('DEI') aims to promote a safe, healthy and inclusive sport environment that is free from abuse, discrimination, harassment, violence and other harms. It outlines GymCan's guiding principles to foster a diverse, equitable and inclusive environment, as well as the appropriate actions for all participating individuals and organizations. The DEI is guided by GymCan's organisational values and the fundamental rights of every individual. Through this DEI, GymCan recognises the inherent worth and dignity of all individuals and purports to provide equitable programming and opportunities to all members. The DEI acknowledges the unique intersection of characteristics among GymCan's members and promotes the idea that each individual's identity should be recognised, valued and respected.

In particular, the DEI discusses the following areas of diversity, equity and inclusion: age, national or ethnic origin, Indigenous identity, race and colour of skin, religion, sex, sexual orientation, gender identity or expression, abilities, socioeconomic background and language. It covers accessibility and inclusivity for a large variety of underrepresented groups, demonstrating a wide commitment to increasing participation in GymCan.

## Specific Comments and Suggestions

Section	Suggestions
1. Organizational Commitment	<ul style="list-style-type: none"> <li>“<i>All Participants have the right...</i>” What participants? In GymCan only? GymCan and its provincial members? Anyone who participates in organised gymnastics? The scope needs to be better defined.</li> <li>Reference to “<i>Safe Sport policies</i>” should be defined as all the policies or simply be exact and refer specifically to the (GymCan) National Safe Sport Policy.</li> <li>In Article 1, 3<sup>rd</sup> paragraph second line “<i>please be mindful</i>”. This is a policy. No need to include “<i>please</i>”. The Policy is mandatory as are the principles and responsibilities inherent to it.</li> <li>Later in the same paragraph it reads “<i>this Policy outlines the guiding principles</i>”. This implies that the Policy should be read more like guidelines. If it’s a Policy, use stronger terms. If it’s meant to be a guideline, then make it a guideline and not a policy.</li> <li>In the ‘Please note’ section. <ul style="list-style-type: none"> <li>Again no “<i>please</i>” – it is a Policy.</li> <li>If you are to clarify jurisdiction going up (FIG) the suggestion is that you also clarify it going down (PTOs) e.g. “<i>... for activities outside of Gymnastics Canada’s jurisdiction (i.e. FIG activities, PTO activities etc.), the policies, rules and regulations determined by the appropriate and relevant governing body will take precedent</i>”.</li> </ul> </li> </ul>
2. Areas of Diversity, Equity and Inclusion	<p><b>General Comments</b></p> <ul style="list-style-type: none"> <li>Is this section only for GymCan, (national team members) or also meant to include all PTO’s? It seems that it is for “<i>all participants</i>”. Why “<i>participants</i>” and the scope of the Policy should be better defined in Article 1.</li> </ul> <p><b>2.8 Gender Identity or Expression</b></p> <ul style="list-style-type: none"> <li>Does this mean that you allow for transgender athletes to compete at the domestic and international stage [subject to Pan American Gymnastics Union ('PAGU') and FIG regs]? e.g. the way this reads, a transgender athlete could compete at national level? Needs clarifications if not.</li> </ul> <p><b>2.9 Abilities</b></p> <ul style="list-style-type: none"> <li>Specifies provincial/territorial associations for the first time in the whole document! Why just here?</li> </ul> <p><b>2.11 Language</b></p> <ul style="list-style-type: none"> <li>Do you consider the National Safe Sport Policy a “<i>key operating</i>” document? (See comments above).</li> <li>All relevant “<i>key operating</i>” documents should be available in French.</li> </ul>

#### 4.2.6 Screening Policy

##### Summary

The *Screening Policy* concerns background screening procedures for positions at GymCan. The latest version of the policy is dated 2019. The *Screening Policy*'s purpose is to ensure a safe, positive and healthy environment for all individuals at GymCan. The *Screening Policy* focuses on documentation and background check requirements for positions based on assessment of risk level and procedures for monitoring, reassigning, dismissing or expelling individuals once in a position at GymCan. It has numerous strengths:

- It applies to individuals who are in positions of power, trust and authority at GymCan and who work closely with athletes and vulnerable persons.
- While Member Associations and Clubs have their own policies they must at minimum be in compliance with GymCan's *Screening Policy*.
- Can lead to refusal to hire an individual into a position if they have been charged with or convicted of a “*relevant offence*” as defined in Section 3.6 of the *Screening Policy* (including but not limited to sexual offences, sexual offences against a minor or vulnerable person, criminal offence involving accessing, making or distributing pornography).
- Risk level of position is reviewed annually or when the individual resigns (whichever is earlier).

##### Suggestions

- Amend the definition of “*minor persons*” and “*vulnerable persons*” to be consistent with the UCCMS.
- Consider reviewing risk level of low-risk (and maybe medium-risk) positions where there has been a finding of a major offense committed by an individual in a low- (or medium-risk) position.
- High risk and medium risk positions must complete a *Respect in Sport for Activity Leaders* eLearning Module. Completion of the eLearning Module about Safe Sport/child welfare should be a complementary requirement if content not already contained in the *Respect in Sport* Module.
- *All positions should complete Respect in Sport at minimum.*

- Clarify what “contact” means in the high-risk position definition. For medium-risk positions the definition clarifies that contact is “*indirect, limited or ‘in a group only’ contact*” and for low-risk positions the definition clarifies that contact is “*little or no contact*.” But, for high-risk the definition just states that the position involves “*contact with athletes...*” It would help to provide more clarity on the level of contact (as was done for the medium and low-risk positions). If it is meant to refer to any form of contact it could say “*any form of contact with athletes ...*”
- Included in the list of examples of high-risk positions is “*other positions determined by Gymnastics Canada, when necessary.*” This is missing from the list of medium-risk and low-risk positions.
- For high-risk positions individuals who have resided outside of Canada for at least five years must obtain a Vulnerable Sector Check (or equivalent) from these other countries. This is missing for medium-risk positions.
- A medium-risk position is defined as an individual who “... *makes decisions about programs or selection only in the context of the sport or competition rules.*” However, included in the list of medium-risk positions is “*Gymnastics Canada staff members without...program or selection input.*” For clarity, should amend to something like:
- “ *... without...program or selection input in contexts other than sport or competition rules*”.
- Provide more clarity on how supervisors will monitor those in medium and high-risk positions once hired/screened/trained.

#### 4.2.7 The Bylaws

##### Summary

The GymCan Bylaws (the ‘Bylaws’) outline the classes and conditions of membership within GymCan and the process by which members can be terminated and expelled. The Bylaws also outline the composition of the Board and its respective authority over the affairs of GymCan. Critically, there is nothing in the Bylaws that related to Safe Sport or to the Board requirements, role and responsibilities with regard to Safe Sport or the Board’s adherence to any of GymCan’s Safe Sport Policies. The latest version of the Bylaws is dated 2013.

## General Comments and Suggestions

- Nothing directly related to Safe Sport in the Policy.
- The procedure for provisionally suspending individuals pending allegations of major offences is contained in the Complaints and Disciplinary policy, but maybe should be referenced in the sections of the Bylaws about suspending/disciplining/removing Directors and Members.
- No reference to Directors' obligation to comply with Code of Ethics, Safe Sport, Maltreatment Policy etc.

### 4.2.8 FIG Safe Sport Regulations

The IRT read and compared FIG's Safe Sport regulations to identify any major gaps or inconsistencies in GymCan's policies. Specifically, the following FIG policies were reviewed:

- Code of Ethics, 2022;
- Code of Conduct, 2022;
- Code of Discipline, 2021;
- Framework for Safeguarding during Events, 2019;
- Policy and Procedures for Safeguarding and Protecting Participants in Gymnastics, 2018.

For the most part, the GymCan policies generally reflect the content of FIG policies. However, because of the differing jurisdiction and spheres of application (international vs national), the policies differ in content, even if addressing some universal principles.

Specifically, with regard to the *Code of Ethics and Conduct*, there are some inconsistencies that GymCan may wish to consider when amending its policies. They are as follows:

#### Enforcement

- FIG Code of Ethics has a section titled 'Enforcement' which specifies how any infringement of the Code of Ethics will be dealt with. It provides that:
  - Any infringement of the Code of Ethics will be dealt with by the Disciplinary Authority of the Gymnastics Ethics Foundation.

- FIG officials or federations are to inform the Director of the Gymnastics Ethics Foundation of any breach or reasonable suspicion of an infringement.
- It specifies that the Director of the Gymnastics Ethics Foundation shall open the proceedings with the Disciplinary Commission.
- GymCan Code of Ethics and Conduct does not specify how to deal with any infringement, allegation or suspicion of a violation. It only specifies that athletes, coaches, team personnel and officials, GymCan Directors and Committee Members, and Member Associations must report any violation to GymCan.

### Missing Elements

The following provisions that are in the FIG's Code of Conduct are absent from GymCan's Code of Ethics. GymCan may wish to consider importing some, if not all of these, into its own Code of Ethics.

- *Athlete Specific Principles missing from GymCan Code of Ethics Article 5.1.2 (Athlete's Code of Conduct):*
  - Follow a training plan that is compatible with education and private life and designed in consultation with coaches and, if minors, with parents or legal guardians, to reach mutually agreed upon goals.
  - Accept the decisions of officials or judges during events, and raise potential complaints, differences of opinion or conflicts through the appropriate channels.
  - Provide accurate personal information to the appropriate authorities.
- *Coach Specific Principles missing from GymCan Code of Ethics Article 5.2 (Coaches Code of Conduct):*
  - Maintain professional relationships with athletes, athletes' parents/legal guardians, technical and medical staff and officials.
  - Ensure each athlete follows a well-planned program of training suitable to their age and ability level, and designed to support them to reach mutually agreed upon goals compatible with education, development stage in life and sport, and private life of the athlete.
  - Maintain vigilance that the training process continues to respect and consider each athlete's specific physiological abilities and psychological characteristics, and that the current and long-term physical and mental health, safety and welfare of each athlete remains the priority over any goal or result.
  - Keep current with the latest sports science knowledge.

- Never overrule medical and paramedical experts, and to respect medical advice regarding athletes suffering from any illness or injury, mental health conditions, or in prescribed treatment, in a recovery protocol or who are returning to training.
- Provide feedback in an honest, positive manner and ensure a factual and constructive approach that allows athletes to express their own views without fear of repercussions.

Note: Although under 'Athlete rights', provision 'I' specifies that athletes have a right to report misconduct without fear of reprisal, this is not specific to coaches' conduct.

- Listen actively to concerns voiced by athletes and follow up with appropriate action to resolve issues.

Note: GymCan's policy does include a provision stating that coaches must "communicate consistently and openly with all members of the community, especially athletes", however, there is no specific reference to listening to concerns and following up with appropriate action.

- Ensure that any physical contact with an athlete is appropriate to the situation and necessary for the athlete's skill development and/or safety.
- Respect the rules of competition and never compromise athletes by advocating measures that conflict with any competition rules.

- *Judge- and Official-Specific Principles missing from GymCan Code of Ethics Article 5.4 (Judges Code of Conduct):*

- Work in a spirit of cooperation and respect with other officials and event organisers.
- Provide input and feedback in a constructive and positive manner, when requested, at the appropriate time and place.
- Always uphold as first priority the physical, psychological and mental well-being and integrity of the athlete.

- *Principles missing from GymCan Code of Ethics Article 5.5 (GymCan BOD and Committee Member Code of Conduct Member Association Code of Conduct) and GymCan Code of Ethics Article 5.6 (Member Association's Code of Conduct):*

(GymCan National Federations 'NFs' could be changed to PTOs.)

- Ensure that their NF (PTOs) organisation acts in compliance with all applicable laws, rules and regulations and respects all decisions rendered by the FIG authorities and bodies.
- Ensure their NF (PTOs) maintains a culture of trust and empowerment, makes decisions in the best interests of the athletes, and clearly rejects win-at-all-costs strategies at the expense of athletes' well-being.

- Ensure a clearly defined boundary is maintained between the sport's training process and the goals of external stakeholders.
- Clearly articulate and define recourse to a resolution with a neutral third party, mediator or arbitration body in case of conflict, assuring equal treatment between all parties.

#### 4.2.9 Universal Code of Conduct to Prevent and Address Maltreatment in Sport ('UCCMS')

The Universal Code of Conduct to Prevent and Address Maltreatment in Sport ('UCCMS') was first published in January 2020 following extensive consultation with the Canadian sport community who together expressed overwhelming support to proceed with a pan-Canadian code of conduct with harmonised definitions and sanctions. The UCCMS has since been updated to version 5.6. The UCCMS is a set of harmonised rules to advance a respectful sport culture that delivers Safe Sport mechanisms to all. Its Key Principles are that it seeks to be harmonised, comprehensive, fair, trauma-informed, evidence driven, independently administered, proportionate and expertly informed.

The UCCMS version 5.6. addresses maltreatment broadly and comprehensively, covering all types of conduct that inflict physical or psychological harm by a person against another person, within the sport community. That harm can be caused in a number of ways including through psychological, physical or racial maltreatment.

As GymCan is a Signatory to the UCCMS and has signed on to the OSIC, the IRT also provides suggestions on how to better incorporate the most recent version of the UCCMS into GymCan's Safe Sport policies. GymCan is advised to follow a strict adherence to the UCCMS and corresponding use of proper UCCMS terms throughout all policies for consistency. These terms should also be defined when utilised in each policy.

In reviewing the UCCMS alongside current GymCan Policies, the IRT identified various gaps or inconsistencies in terminology and etymology in Safe Sport regulations. The following section provides a summary of these discrepancies and below the explanation text offers a side-by-side comparison of the definitions of key GymCan and UCCMS precepts - with the conspicuously missing terms and passages highlighted in red.

## UCCMS Definitions vs. GymCan Policy Definitions

### GymCan – Abuse, Maltreatment and Discrimination Policy

#### Gaps or Inconsistencies in the GymCan Definition of Discrimination

- While the list of grounds of discrimination is not all encompassing it could be amended to include Indigeneity and language.
- The policy does not state that some behaviours, policies/practices benefitting members of marginalised groups is not considered discrimination.
- The policy does not state that discrimination does not include behaviours and policies connected to legitimate sport objectives.

➤ **IRT Note:** It is noted that the GymCan Diversity Equity and Inclusion Policy contains an acknowledgment that while GymCan will not deny individuals access to programming based on national or ethnic origin some technical rules and procedures may limit certain individuals from participating in activities and this would not be considered discrimination. Therefore there is some acknowledgement of this concept but it would be worthwhile to have it in the definition of discrimination itself.

GymCan - Discrimination	UCCMS – Discrimination
<p>Discrimination is unfair or improper behaviour, whether intentional or not, that results in differential treatment of one or more individuals and that is related to one or more of any grounds of discrimination prohibited by human rights legislation, including but not limited to:</p> <ul style="list-style-type: none"><li>• race or perceived race.</li><li>• ancestry, citizenship, nationality or national origin, place of origin, colour, ethnic or linguistic background or origin, including aboriginal origin.</li><li>• religion, or creed, or religious belief, association or activity.</li><li>• political belief, association, convictions, or activity.</li><li>• age.</li><li>• sex, including sex-determined characteristics such as pregnancy, the possibility of pregnancy, and circumstances related to pregnancy.</li><li>• sexual orientation.</li><li>• gender identity and gender expression.</li><li>• marital status (including single status), family status, civil status, family association.</li></ul>	<p>Behaviour, policies, and/or practices that contribute to differential, inequitable, adverse or otherwise inappropriate treatment of or impact on an individual or class of individuals based on one or more prohibited grounds, which include race, national or ethnic origin, colour, <b>Indigeneity</b>, religion, age, sex, sexual orientation, gender identity or expression, pregnancy, marital status, family status, <b>language</b>, genetic characteristics or disability, and analogous grounds. <b>Behaviour, policies, and/or practices specifically benefitting members of marginalised groups shall not be considered Discrimination. Discrimination does not include behaviour, policies and/or practices rationally connected to legitimate sport objectives</b> with the honest and good faith belief that they are reasonably necessary to accomplish the relevant objectives, provided that accommodation of the needs of an individual or a class of individuals affected would impose undue hardship on the <i>Participant</i> and/or <i>Adopting Organisation</i> that would have to accommodate those needs, considering health, safety, cost, and legitimate sport objectives.</p>

<ul style="list-style-type: none"> <li>• social condition or disadvantage.</li> <li>• physical or mental disability, or related characteristics or circumstances, including reliance on a service animal, a wheelchair, or any other remedial appliance or device, as well as disfigurement and any irrational fear of contracting an illness or disease.</li> <li>• criminal charges or criminal record.</li> <li>• source of income or receipt of public assistance.</li> <li>• actual or presumed association with another individual or class of individuals having any of the aforementioned prohibited grounds of discrimination.</li> </ul> <p>An individual does not have to intend to discriminate for the behaviour to be discrimination. It is enough if the individual knew or ought reasonably to have known that their behaviour would be inappropriate or unwelcome.</p> <p>A discriminatory practice is to deny access to goods, services, facilities, or accommodation customarily available to the general public or to differentiate adversely in relation to any individual, on a prohibited ground of discrimination.</p> <p>Examples of conduct that may be considered discrimination include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• stereotyping (assuming that an individual has certain traits, qualities, or beliefs).</li> <li>• racial, ethnic, or religious jokes, slurs, nicknames, or mimicry.</li> <li>• practical jokes that cause awkwardness or embarrassment.</li> <li>• persisting with comments or jokes after becoming aware that the behaviour is unwelcome.</li> <li>• offering or withholding favours or employment benefits such as promotions, favourable evaluations, favourable assigned duties or shifts, conditioned on or related to a characteristic protected under any prohibited ground of discrimination.</li> </ul>	<p><b>5.8.1</b> Discrimination can include overt or subtle forms of harm that uniquely define the adverse or inequitable experiences of marginalised persons.</p> <p><b>5.8.2</b> The following are examples of Discrimination if they are based on one or more of the grounds of Discrimination within the definition:</p> <ol style="list-style-type: none"> <li>a) Denying someone access to services, benefits, or opportunities;</li> <li>b) Treating a person unfairly;</li> <li>c) Communicating hate messages or unwelcome remarks or jokes;</li> <li>d) The perpetuation of misogynistic, racist, ableist, homophobic, or transphobic attitudes and stereotypes.</li> </ol> <p><b>5.8.3</b> Discrimination does not require an intention to cause harm.</p>
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## Gaps or Inconsistencies in the GymCan Definition of Neglect

- The policy does not state that neglect should be evaluated with consideration to the particular Participant's needs and requirements.
- Forms of UCCMS neglect not included in the GymCan definition:

- not allowing an athlete adequate recovery time.
- disregarding and/or not considering a person's physical or intellectual disability.
- not considering the welfare of the athlete when prescribing dieting or other weight control methods [this is maybe partly addressed by: denying adequate hydration, nutrition].
- disregarding the use of performance-enhancing drugs by an athlete.
- failure to ensure safety of equipment or environment.
- allowing an athlete to disregard sport's rules, regulations and standards.
- The policy does not acknowledge that these behaviours are viewed objectively rather than being based on intent.

GymCan - Neglect	UCCMS – Neglect
<p>Neglect refers to acts of omission in care and/or general deprivation of attention. Neglect occurs when an individual fails to protect and nurture the health and welfare of others in their care, including but not limited to denying adequate hydration, nutrition, or medical attention, abandonment of an athlete following a poor training or competitive result, inadequate supervision, chronic rejection, prohibiting social relations within or outside sport, ignoring an injury, or failure to intervene when made aware of misconduct.</p>	<p>Any pattern or a single serious incident of lack of reasonable care, inattention to a Participant's needs, nurturing or well-being, or omissions in care. See section 5.4.</p> <p><b>Section 5.4:</b></p> <p><b>5.4.1</b> Neglect refers to the omission of adequate care and attention and is evaluated with consideration given to the Participant's needs and requirements. Examples of Neglect include without limitation: <b>not allowing an athlete adequate recovery time</b> and/or treatment for a sport injury; <b>disregarding and/or not considering a person's physical or intellectual disability</b>; not ensuring appropriate supervision of an athlete during travel, training or competition; <b>not considering the welfare of the athlete when prescribing dieting or other weight control methods</b> (e.g., weigh-ins, caliper tests); <b>disregarding the use of performance-enhancing drugs by an athlete</b>; failure to ensure safety of equipment or environment; allowing an athlete to disregard sport's rules, regulations, and standards.</p> <p><b>5.4.2</b> Neglect is determined by the behaviour viewed objectively, not whether harm is intended or results from the behaviour.</p>

## Gaps or Inconsistencies in the GymCan Definition of Physical Maltreatment

- GymCan's policy uses the term "physical abuse" vs. UCCMS uses the term "physical maltreatment".
- The policy only acknowledges harm to physical well-being whereas the UCCMS definition also acknowledges harm to psychological well-being.
- Forms of UCCMS physical maltreatment not included in the GymCan definition:
  - isolating a person in a confined space;

- forcing a person to assume a painful stance or position for no athletic purpose;
- denying adequate hydration ... or sleep;
- denying access to a toilet;
- providing alcohol to a Participant who is under the legal drinking age;
- providing illegal drugs or non-prescribed medications to a Participant;
- encouraging an athlete to perform a potentially dangerous skill for which the Participant knows or ought to know that the athlete is not developmentally ready.
- The policy does not acknowledge that these behaviours are viewed objectively rather than being based on intent.

GymCan – Physical Abuse	UCCMS – Physical Maltreatment
<p>Physical abuse refers to the exercise of physical force by a person, or contact or non-contact behaviour that has the potential to cause physical harm or inflict physical injury to someone. These behaviours may be overtly forceful (e.g. hitting, punching, shaking, pushing) and/or subtle (e.g. squeezing, restraining, pinching, or displaying threatening gestures). Physical abuse may occur as a result of inappropriate or excessive physical measures of punishment, including but not limited to, denying access to nutritional needs, conditioning to the point of vomiting, deliberately disregarding medical advice, and/or forcing a premature return to training or competition following a serious injury or concussion, overstretching, and excessive repetition of skill to the point of injury. A statement or behaviour that can reasonably be interpreted as a threat to exercise physical force against someone is also considered physical abuse.</p>	<p>Any pattern or a single serious incident of deliberate conduct, including contact behaviours and non-contact behaviours as outlined in Section 5.3, that has the potential to be harmful to a person's physical <b>or psychological well-being</b>. See Section 5.3.</p> <p><b>Section 5.3:</b></p> <p><b>5.3.1</b> Physical Maltreatment includes contact or non-contact infliction of physical harm.</p> <p>a) Contact behaviours: without limitation, deliberately punching, kicking, beating, biting, striking, strangling or slapping another; deliberately hitting another with objects; providing a massage or other purported therapeutic or medical interventions with no specific training or expertise.</p> <p>b) Non-contact behaviours: without limitation, isolating a person in a confined space; <b>forcing a person to assume a painful stance or position for no athletic purpose</b> (e.g. requiring an athlete to kneel on a hard surface); the use of exercise for the purposes of punishment; <b>withholding, recommending against, or denying adequate hydration, nutrition, medical attention or sleep; denying access to a toilet; providing alcohol to a Participant who is under the legal drinking age; providing illegal drugs or non-prescribed medications to a Participant</b>; encouraging or permitting an athlete under their authority to return to play following any injury, including after a concussion, when they knew or ought to have known that the return is premature, or without the clearance of a medical professional where reasonably required; <b>encouraging an athlete to perform a potentially dangerous skill for which the Participant knows or ought to know that the athlete is not developmentally ready</b>.</p>

	<b>5.3.2 Physical Maltreatment is determined by the behaviour viewed objectively, not whether harm is intended or results from the behaviour.</b>
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## Gaps or Inconsistencies in the GymCan Definition of Emotional Abuse/Psychological Maltreatment

- GymCan's definitions uses the term "*emotional abuse*" vs. UCCMS uses the term "*psychological maltreatment*."
- The UCCMS subdivides psychological maltreatment into 4 categories vs. GymCan divides it into only 2 categories.
  - UCCMS categories: verbal conduct, non-assaultive physical conduct, conduct that causes denial of attention or support, and a person in authority's pattern of deliberate non-contact behaviours that have the potential to cause harm.
  - GymCan categories: verbal and non-verbal.
- Forms of UCCMS psychological maltreatment not included in the GymCan definition:
  - Under verbal conduct:
    - verbally assaulting or attacking someone in online forms.
    - unwarranted personal criticisms.
    - implied or expressed body shaming; derogatory comments related to one's identity (e.g. race, gender identity or expression, ethnicity, Indigeneity, disability).
    - the use of rumours or false statements about someone to diminish that person's reputation; using confidential sport and non-sport information inappropriately.
  - Non-assaultive conduct:
    - body-shaming, such as, without limitation, repeated and unnecessary weigh-ins, setting unreasonable weigh-in goals, inappropriately taking food away from athletes, prescribing inappropriately restrictive diets, inappropriately focusing on the physical appearance of a person's body, unnecessary or inappropriate emphasis on biometric data.
  - Denial of support:
    - arbitrarily or unreasonably denying feedback, training opportunities.
- The policy does not acknowledge that these behaviours are viewed objectively rather than being based on intent.

GymCan – Emotional Abuse	UCCMS – Psychological Maltreatment
<p>Emotional abuse refers to a pattern of deliberate non-contact behaviours that have the potential to cause harm. These behaviours may be verbal (e.g. shouting, belittling, humiliating, intimidating, name-calling, degrading) or non-verbal (e.g. denial of attention and support, hitting or throwing objects in frustration, social isolation, stalking). Emotional abuse is often at the foundation of all other forms of maltreatment. Although such behaviour is usually persistent, pervasive, or patterned in nature, a single incidence of such behaviour that causes high intensity emotional trauma and therefore has a lasting harmful effect on a person may also qualify as emotional abuse.</p>	<p>Any pattern or a single serious incident of deliberate conduct that has the potential to be harmful to a person's psychological well-being. See Section 5.2.</p> <p><b>Section 5.2:</b></p> <p><b>5.2.1</b> Psychological Maltreatment includes, without limitation, verbal conduct, non-assaultive physical conduct, conduct that denies attention or support, and/or a person in authority's pattern of deliberate non-contact behaviours that have the potential to cause harm.</p> <p>a) Verbal Conduct: without limitation, verbally assaulting or attacking someone, <b>including in online forms; unwarranted personal criticisms; implied or expressed body shaming; derogatory comments related to one's identity</b> (e.g. race, gender identity or expression, ethnicity, Indigeneity, disability); comments that are demeaning, humiliating, belittling, intimidating, insulting or threatening; <b>the use of rumours or false statements about someone to diminish that person's reputation; using confidential sport and non-sport information inappropriately.</b></p> <p>b) Non-assaultive physical conduct: physical behaviour, or the encouragement of physical behaviour, that has the potential to be harmful or instil fear, including, without limitation:</p> <ul style="list-style-type: none"> <li>i. <b>body-shaming, such as, without limitation, repeated and unnecessary weigh-ins, setting unreasonable weigh-in goals, inappropriately taking food away from athletes, prescribing inappropriately restrictive diets, inappropriately focusing on the physical appearance of a person's body, unnecessary or inappropriate emphasis on biometric data; and</b></li> <li>ii. <b>forms of physically aggressive behaviours such as, without limitation, throwing objects at or in the presence of others without striking another; damaging another's personal belongings; hitting, striking or punching objects in the presence of others.</b></li> </ul> <p>c) Conduct that causes denial of attention or support: without limitation, forms of lack of support or isolation such as ignoring psychological needs or socially isolating a person repeatedly or for an extended period of time; abandonment of an athlete as punishment for poor performance; <b>arbitrarily or unreasonably denying feedback, training opportunities, support or attention for extended periods of time and/or asking others to do the same.</b></p>

	<p>d) A person in authority's pattern of deliberate non-contact behaviours that has the objective potential to be harmful.</p> <p><b>5.2.2</b> Psychological Maltreatment is determined by the behaviour viewed objectively, not whether harm is intended or results from the behaviour.</p>
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## Gaps or Inconsistencies in the GymCan Definition of Sexual Abuse/Sexual Maltreatment

- GymCan's definition uses the term "sexual abuse" vs. UCCMS uses the term "sexual maltreatment."
- UCCMS forms of sexual maltreatment not included in the GymCan definition:
  - potential to harm someone's sexual integrity.
  - luring and agreement or arrangement to commit a sexual offence.
  - behaviour that is unwelcome and that would be objectively perceived to be unwelcome.
  - any act targeting a person's sexuality, gender identity or expression.
  - stalking or harassment in person or by electronic means where the stalking or harassment is of a sexual nature.
    - HOWEVER there is a separate definition for harassment in the GymCan policy.
    - Unwelcome remarks based on gender which are not of a sexual nature but which are demeaning, such as derogatory gender-based jokes or comments.
- Does not state that sexual abuse can take place through various means of communication including online, social media etc.
- There is no section about sexual maltreatment of a minor.

### General Comments

- GymCan's definition of sexual abuse refers to the idea of consent/lack thereof but it does not actually define it. There is a definition for consent contained in the UCCMS:
  - *The communicated voluntary agreement to engage in the activity in question, by a person who has the legal capacity to consent. Consent regarding sexual activity is assessed in accordance with the laws of Canada, including the Criminal Code.*
- GymCan's definition makes no explicit reference to grooming, though this would appear to be a form of sexual maltreatment – though it could also be made into its own separate definition. The definition in the UCCMS is:

- Deliberate conduct by a Participant comprised of one or several acts that, viewed objectively, either make it easier to engage in Sexual Maltreatment or reduce the chance that Sexual Maltreatment will be Reported.
- GymCan's definition does refer to power dynamics in the context of sexual abuse but does not explicitly use the term "power imbalance" or define it. There is definition for power imbalance in the UCCMS:
  - A Power Imbalance is presumed to exist where a Participant has authority or control over another person, is in a position to confer, grant or deny a benefit or advancement to the person, or is responsible for the physical or psychological well-being of the person. Whether an actual Power Imbalance exists will be determined based on the totality of the circumstances, including the subjective view of the subordinate Participant.

GymCan – Sexual Abuse	UCCMS – Sexual Maltreatment
<p>Sexual abuse refers to any sexual interaction with a person(s) of any age that is perpetrated against the victim's will, without consent, or in an aggressive, exploitative, coercive, manipulative, or threatening manner. Sexually abusive behaviours can be contact (e.g. inappropriate touching, intercourse, reward for sexual favours) or non-contact (e.g. indecent exposure, sexually oriented comments or jokes, voyeurism, intimidating sexual remarks, advances, suggestions or requests, sexually intrusive questions, displaying or sharing of obscene or pornographic images or materials).</p> <p>Note that sexual abuse includes making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the individual and knows or ought reasonably to know that the solicitation or advance is unwelcome. A reprisal, or a threat, or implied threat of reprisal, for rejecting a sexual solicitation or advance is also prohibited.</p>	<p>Any pattern or a single incident, whether physical or psychological in nature, that is committed, threatened, or attempted, and that has the <b>potential to be harmful to a person's sexual integrity</b>. See Section 5.5.</p> <p><b>Section 5.5:</b></p> <p><b>5.5.1</b> Sexual Maltreatment includes, but is not limited to,</p> <p>a) any non-consensual touching of a sexual nature <b>and/or the Criminal Code offence of sexual assault</b>.</p> <p>b) forcing or coercing a person into sexual acts.</p> <p>c) <b>participating in or performing acts on a person that violate their sexual integrity</b>.</p> <p>d) Criminal Code offences that do not involve actual physical contact or that can occur through electronic means such as indecent exposure, voyeurism, non-consensual distribution of sexual/intimate images, <b>luring and agreement or arrangement to commit a sexual offence</b>.</p> <p>e) Sexual harassment, which is defined as any series of or serious comment(s) or conduct of a sexual nature <b>that is unwelcome and that would be objectively perceived to be unwelcome</b>, and which broadly includes jokes, remarks or gestures of a sexual or degrading nature, or distributing, displaying or promoting images or other material of a sexual or degrading nature, <b>or any act targeting a person's sexuality, gender identity or expression</b>. It can also include stalking or harassment in-person or by electronic means where the stalking or harassment is <b>of a sexual nature</b>.</p>

	<p><b>5.5.2</b> Sexual Maltreatment can take place through any form or means of communication (e.g. online, social media, verbal, written, visual, hazing, or through a third party).</p> <p><b>5.5.3</b> Sexual Maltreatment of a Minor is any Sexual Maltreatment against a Minor. It includes the items described in 5.5.1 above and also includes, but is not limited to, the Criminal Code offences that are specific to individuals who are not adults or to individuals under a particular age, such as sexual exploitation, sexual interference, and any offence related to exploitation of a Minor through prostitution. Sexual Maltreatment of a Minor is not limited to acts that involve physical contact but can include acts that can occur in-person or via electronic means such as, but not limited to, invitation to sexual touching, making sexually explicit material available to a Minor, and acts that occur only online such as luring or agreement or arrangement to commit a sexual offence against a Minor. It also includes any offence related to child pornography as that term is defined in the law in Canada. For the sake of clarity, it shall not constitute a violation in and of itself for a Minor Participant to create, possess, make available or distribute images of themselves.</p> <p><b>5.5.4</b> A Participant is presumed to know that a person is a Minor.</p> <p><b>5.5.5</b> It is prohibited for a Participant to create, possess, make available or distribute images that sexualize or contain nudity of another person in the absence of consent.</p> <p><b>5.5.6</b> Where there is a Power Imbalance, sexual acts or communications (electronic or otherwise) between any Participant and another Participant are prohibited.</p> <p><b>5.5.7</b> Examples of Sexual Maltreatment include, without limitation:</p> <ul style="list-style-type: none"> <li>a) Reprisal or a threat of reprisal for the rejection of a sexual solicitation or advance, where the reprisal is made or threatened by a Participant who has more power in the context of a relationship that involves a Power Imbalance, or if the person to whom the solicitation or advance is made is a Minor.</li> <li>b) Pressuring a person to engage in sexual activity, including by making repeated advances that are known or ought to be known to be unwelcome.</li> </ul>
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	<p>c) Questions asked of a person about their sexual preferences, sexual history, sexual organs or sexual experiences, particularly when such questions are asked by a Participant who has more power in the context of a relationship that involves a Power Imbalance, or asked of a Minor or Vulnerable Participant.</p> <p>d) <b>Sexual attention when the person giving the attention reasonably knows or ought to know that the attention is unwanted or unwelcome or where the object of the attention is a Minor.</b> Sexual attention includes but is not limited to comments about a person's appearance, body or clothing that could be objectively perceived by another person as being sexual in nature, practical jokes based on sex, intimidating sexual remarks, propositions, invitations or familiarity.</p> <p>e) <b>Unwelcome remarks based on gender which are not of a sexual nature but which are demeaning such as derogatory gender-based jokes or comments.</b></p>
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## GymCan Complaints and Discipline Policy

### Preliminary comment

There is no definition for “*disclosure*” in the Complaints and Disciplinary policy.

- The definition for disclosure in UCCMS is:
  - *“The sharing of information by a person regarding an incident or a pattern of Maltreatment experienced by that person, including a breach of reasonable boundaries. Disclosure does not constitute a formal Report.”*
- Given the importance of disclosure in the course of reporting and complaints, GymCan may wish to add this definition in the Policy.

### Gaps or Inconsistencies in GymCan’s Citing of the Criminal Code

The definition is consistent – only difference is “*as amended*.”

GymCan	UCCMS
Criminal Code, R.S.C., 1985, c. C-46.	The Criminal Code of Canada (Criminal Code, R.S.C. 1985, c. C-46, <i>as amended</i> ).

## Gaps or Inconsistencies in the GymCan Definition of a Minor

The GymCan definition depends on the province whereas the UCCMS definition is under 19 years old.

GymCan	UCCMS
A “minor registered participant” refers to a registered participant under the age of majority in the selected province or territory.	For the purpose of the UCCMS, an individual who is <b>under the age of 19 years old</b> . It is at all times the responsibility of the adult Participant to know the age of a Minor.

## Gaps or Inconsistencies in the GymCan Definition of Participants

They are defined completely differently, which may have a significant impact with the applicability and interplay of GymCan Policies and the UCCMS/OSIC. The IRT does note that this definition is likely to have been amended in accordance with GymCan’s Signatory’s regulatory responsibilities.

GymCan	UCCMS
Each Member Association registers individual athletes, coaches, judges, volunteers, and other classes of members from within the applicable provincial or territorial association with Gymnastics Canada on an annual basis. These individuals are referred to as “ <i>registered participants</i> .”	<b>Any individual who is subject to the UCCMS. Participants could include, without limitation, athletes, coaches, officials, volunteers, administrators, directors, employees, trainers, parents/guardians, etc., according to the policies of the Adopting Organisation.</b>

## Gaps or Inconsistencies in the GymCan Definition of Reporting

The UCCMS definition allows for third parties to report prohibited behaviours. The GymCan policy does not, except in the case of a minor.

GymCan	UCCMS
There is no formal definition for report(ing) in the policy. However of note:  Complaints must be made by the Complainant or, particularly in the case of minors, an individual acting on behalf of the minor registered participant.	The provision of information by a Participant or by any person to an independent authority designated by the Adopting Organisation to receive Reports regarding Prohibited Behaviour. Reporting may occur through either: (i) the person who experienced the Prohibited Behaviour, <b>or (ii) someone who witnessed the Prohibited Behaviour or otherwise knows or reasonably believes that Prohibited Behaviour or a risk of Prohibited Behaviour exists.</b>

## Gaps or Inconsistencies in the GymCan Definition Of Legal Duty to Report

GymCan's statement about when allegations must be reported to law enforcement does not specifically refer to persons under the age of protection. It is more general.

GymCan	UCCMS – Legal Duty to Report
<p>There is no definition for legal duty to report, but the policy does discuss when such a duty exists:</p> <p>If Gymnastics Canada receives a complaint that involves allegations that may be of an illegal nature, such allegations will immediately be reported to the appropriate law enforcement and/or child welfare authorities. In that event, Gymnastics Canada will cooperate fully with, and take direction from, the authority with which jurisdiction over the allegations resides.</p>	<p>The legal obligation to report potential abuse of a <b>person under the age of protection</b> in their province or territory of residence, in accordance with applicable provincial and territorial legislation.</p>

## GymCan Screening Policy

### Gaps or Inconsistencies in the GymCan Definition of Minor

The GymCan definition depends on the province whereas the UCCMS definition is under 19 years old.

GymCan	UCCMS
<p>For the purposes of this Policy, a “<i>minor</i>” means a person under the age of majority according to the laws of the province or territory in which they reside. The age varies across Canada.</p>	<p>For the purpose of the UCCMS, an individual who is <b>under the age of 19 years old</b>. It is at all times the responsibility of the adult Participant to know the age of a Minor.</p>

### Gaps or Inconsistencies in the GymCan Definition of Vulnerable Person

- The GymCan definition is silent on a number of specific examples of traits that would make an individual vulnerable under the UCCMS definition.
- The GymCan definition does not explicitly state anything about individuals who cannot provide informed consent.

GymCan – Vulnerable Person	UCCMS – Vulnerable Participant
<p>A person who, because of his or her age, a disability, or other circumstances, whether temporary or permanent:</p> <p>a) is in a position of dependency on others; or</p>	<p>Persons at increased risk of Maltreatment and/or coercion, <b>often due to age, gender, race, poverty, Indigeneity, sexual orientation, gender identity or expression, disability, psychosocial or cognitive ability,</b></p>

<p>b) is otherwise at a greater risk than the general population of being harmed by a person in a position of trust or authority towards them.</p>	<p>and their intersections. Vulnerable Participants include persons who are not able to provide informed Consent.</p>
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## National Safe Sport Policy

No terms are defined in the National Safe Sport Policy.

However, it does make reference to the following terms used or defined in the UCCMS:

- “Discrimination”
  - *“Participants in Gymnastics Canada programs and activities, including athletes, coaches, judges, sport administrators, parents/guardians, volunteers, and others should be able to engage in a positive sport environment free of abuse, discrimination, and potential harm.”*
- “Reporting”
  - *“Implementation of best practice safeguards, support for prompt identification and reporting of misconduct, as well as confidential, procedurally fair, and timely processes for investigating and resolving allegations of misconduct.”*
- “Participants”
  - *“Participants in Gymnastics Canada programs and activities, including athletes, coaches, judges, sport administrators, parents/guardians, volunteers, and others should be able to engage in a positive sport environment free of abuse, discrimination, and potential harm.”*

## Code of Ethics

No terms are defined in the Code of Ethics.

However, it does make reference to the following terms also used or referred to in the UCCMS:

- “Boundaries” [UCCMS defines “boundary transgressions”]
  - *“I will establish and maintain clear, appropriate, and consistent boundaries with all participants, especially children and youth, that reflect Gymnastics Canada’s policies and best practice guidelines.”*
- “Discrimination”
  - *“I will support and foster an inclusive sport environment for all participants regardless of race or perceived race, ancestry, citizenship, nationality or national*

*origin, place of origin, ethnic or linguistic background or origin, colour, religion, political belief, age, sex, sexual orientation, gender identity or expression, marital status, family status, social condition or disadvantage, physical or mental disability, genetic characteristics, body type, athletic level or ability, or any other prohibited ground of discrimination in accordance with applicable human rights legislation.”*

- “Minors”
  - *“If a minor, I will refrain from consuming (vaping, smoking, eating, or ingesting by any other means) alcohol, tobacco, cannabis, or any illegal substance at all times.”*
  - *“I will not, under any circumstances, behave in a sexual manner, or engage in a sexual or intimate relationship with any athlete or minor coach, official, or volunteer for whom I am responsible through a club, member association, or national team setting, or with any minor whatsoever.”*
  - *“I will refrain from one-on-one personal communication with minor athletes through emails, texts, letters, or phone calls and always include parents, legal guardians, or other responsible adults in these communications.”*
- “Neglect”
  - *“I will refrain from engaging in exploitative, intimidating, discriminatory, abusive, neglectful, or corrupt relations of any kind, in-person or through the means of written communication, including but not limited to e-mail, text messaging, and social media, and will not use my power, authority, or trust to encourage or coerce others to engage in or view inappropriate, unethical or illegal activities.”*
- “Power”
  - *“I will refrain from engaging in exploitative, intimidating, discriminatory, abusive, neglectful, or corrupt relations of any kind, in-person or through the means of written communication, including but not limited to e-mail, text messaging, and social media, and will not use my power, authority, or trust to encourage or coerce others to engage in or view inappropriate, unethical or illegal activities.”*
- “Sexual”
  - *“I will not, under any circumstances, behave in a sexual manner, or engage in a sexual or intimate relationship with any athlete or minor coach, official, or volunteer for whom I am responsible through a club, Member Association, or national team setting, or with any minor whatsoever. This includes but is not limited to the use of sexual jokes, language, and/or names, the display of sexually explicit materials, sexual solicitations or advances, participation in sexual touching and/or exploitation, and the use of, reference to, distribution of obscene or pornographic images or language, or participation in any kind of sexual activity.”*

## Suggestions

- Gym Can is advised to carefully consider the above noted gaps and to strictly adhere to the UCCMS and corresponding use of proper UCCMS terms throughout all policies. These terms could also be defined when utilised in each policy for greater clarity. This will promote consistency, standardisation and harmonisation of terms and policies throughout Canada.
- As jurisdiction and access to complaint mechanisms have been identified as key themes of relevance to any eventual Gymnastics Culture Review, the IRT notes that it is vital for Abuse Free Sport, the OSIC and GymCan to clearly delineate who has – or does not have - access to the various reporting processes; moreover, the interoperability of these processes must be unambiguous to those who wish to report a concern.

### [\*\*4.2.10 Office of the Sport Integrity Commissioner \('OSIC'\) and Sport Dispute Resolution Center of Canada \('SDRCC'\) Regulatory Requirements\*\*](#)

#### GymCan responsibilities as a Signatory to the OSIC under its agreement with SDRCC

The IRT is informed that under its Agreement with the SDRCC, GymCan's obligations and responsibilities are as follows:

- Adopting the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (the 'UCCMS') and ensuring that all other internal policies and procedures are consistent with the UCCMS.
- Obtaining the consent of persons affiliated with the Program Signatory ('UCCMS Participants') so that all UCCMS Participants become subject to the UCCMS and its administration and enforcement processes.
- Referring all applicable UCCMS-related matters concerning UCCMS Participants to the OSIC so that they may be administered by the OSIC and addressed in accordance with the OSIC complaint management process.
- Sharing information regarding existing sanctions imposed by the Program Signatory or any other organisation to the OSIC.
- Providing periodic UCCMS-compliant training opportunities and tracking the completion of these training activities.
- Full cooperation in good faith with the OSIC and its designated representatives as part of any process related to the administration and enforcement of the UCCMS.

- Ensuring that any sanctions or measures which are imposed by the Director of Sanctions and Outcomes ('DSO'), Safeguarding Tribunal or the Appeal Panel, are implemented, respected and adhered to.
- Reporting back to the OSIC on any requirement or recommendation imposed or formulated by the DSO or the OSIC.
- The following are some specific policy amendments that are expected of all Signatories in signing on to the OSIC and using the services of the SDRCC.

#### Specific Signatory agreement wording

In addition to many definitions that are provided above that GymCan may wish to ensure better reflect the UCCMS definitions within its own policies, the IRT is also informed of specific wording that will need to be included in GymCan's policies and that GymCan is successfully in the process of undertaking these amendments within the expected dates of compliance.

These include the following regulatory requirements:

- Adopting the UCCMS on a standalone basis and ensuring that all of its organisational policies and procedures are interpreted and applied in a manner consistent with the UCCMS.
- Ensuring that all processes required for the administration and enforcement of the UCCMS, including but not limited to complaint management, reporting, investigation and adjudication of matters under UCCMS, are directed to the OSIC (or the DSO, as applicable) and to be addressed in accordance with the policies and procedures of the OSIC (or the DSO, as applicable).
- Obtaining each UCCMS Participant's consent (including of legal guardian(s) in the case of minors) for being subject to the UCCMS, its administration and enforcement processes as contemplated, and for the collection, use and disclosure of personal information, in each case.
- Sharing with the OSIC all applicable sanctions GymCan imposes against UCCMS Participants, as defined in the Agreement and in accordance with the information sharing process for the Registry to be indicated from time to time by the OSIC.
- Providing periodic UCCMS-compliant training opportunities to all UCCMS Participants and tracking completion.
- Fully cooperating with the OSIC and its designated representatives for any reasonable periodic, special and other compliance audit in accordance with the relevant auditing procedures to be communicated from time to time by the OSIC, including, without limitation, by giving timely access to all relevant information, books, and other records maintained by GymCan in relation to the UCCMS.

- Fully cooperating with the OSIC and its designated representatives or assigned investigators as part of any sport environment assessment initiated by the OSIC in accordance with its mandate related to the administration and enforcement of the UCCMS and in accordance with published OSIC guidelines regarding sport environment assessments. Such cooperation shall include, without limitation, giving timely access to all relevant information and to the designated individuals and environment(s) of GymCan.
- Subject to applicable laws, providing the contact information of an authorized representative of GymCan who can objectively and under strict confidentiality (without having to consult or disclose to any other person) provide to OSIC and to members of the Investigation Unit (as applicable) all relevant information requested to perform the services outlined in its Agreement with the SDRCC. Such requested information may include, without limitation: membership status, age, contact information (including parents in the case of minors), accessibility requirements and language of preference between French and English for UCCMS Participants and other individuals concerned who have consented to the disclosure of their information to GymCan/SDRCC, information on environment(s) in which concerned individuals interact, including nature and frequency of interactions, etc.
- Subject to applicable laws, fully cooperating in good faith and encouraging its staff and constituents to fully cooperate in good faith, as part of all applicable procedures related to the administration and enforcement of the UCCMS, including, without limitation, by providing to the OSIC, in a timely manner, all relevant information requested for purposes of the administration and enforcement of the UCCMS, including but not limited to documents, records, materials, videos, and/or electronic messages.
- Ensuring that any sanctions or other measures imposed by the DSO, the Safeguarding Tribunal or the Appeal Panel, including Provisional Measures and any final outcomes, are implemented and respected within the limits of GymCan's jurisdiction.
- Reporting back to the OSIC, in the manner and timing indicated, on any requirement or recommendations formulated by the DSO or the OSIC in accordance with its mandate related to the administration and enforcement of the UCCMS regarding GymCan's policies and practices.
- Providing a clear pathway for the OSIC to redirect inadmissible complaints to a proper independent mechanism to address them. Inadmissible complaints will be redirected in accordance with published OSIC policies, procedures and guidelines.

## General Comments

The IRT was informed of some of the modifications that were brought to GymCan policies in order to meet OSIC requirements after the completion of its policy review. These modifications do not have an incidence on the suggestions provided throughout this Report as the OSIC and SDRCC regulations apply strictly to matters related to the UCCMS, the OSIC and the SDRCC. All the IRT's suggestions relate to GymCan's policies and Safe Sport processes. GymCan should carefully assess how many complaints will realistically fall under the jurisdiction of the OSIC and ensure going forward that all others are properly dealt with in accordance with its (amended) policies.

Considering that GymCan's obligations under its Agreement with the SDRCC is to ensure that any sanctions or other measures imposed by the DSO, the Safeguarding Tribunal or the Appeal Panel, including Provisional Measures and any final outcomes, are implemented and respected within the limits of GymCan's jurisdiction, clarity with regards to jurisdiction will be even more important for GymCan throughout its (amended) policies.

GymCan has engaged itself and agreed to use the services of the SDRCC, including without limitation, the OSIC's complaint management process and other dispute resolution services. The intended effect of GymCan's agreement with the SDRCC is that any UCCMS-related incident or complaint is reported to and administered by the OSIC — a functionally independent entity equipped to investigate allegations of wrongdoing.

## Suggestions

GymCan should reassess its treatment, processing, oversight and recording of all complaints further to the Gymnastics Culture Review and the practical applications of signing on to OSIC.

- Serious thought will need to be given on how to process infractions that fall outside OSIC jurisdiction, how to oversee and take over if necessary, club or provincial or territorial level complaints that are not being treated promptly or properly by member PTOs (perhaps at the PTO's cost).
- GymCan's objective should be to ensure that any complaint received at any level is expeditiously treated in accordance with consistent processes, and then properly

actioned, documented and recorded, with no complaint falling through the proverbial cracks.

- As mentioned many times throughout this Report, clarifications to GymCan's various jurisdictional issues is imperative to provide much needed clarity to all victims and or individuals who wish to report maltreatment of any kind.
- GymCan will of course need to fully commit to respecting and implementing all its obligations and responsibilities as provided in its Agreement with the SDRCC as an OSIC Signatory.

### 4.3 Other Considerations

In addition to the Exhaustive Policy Review provided above, the IRT offers additional considerations as related to the following:

- Jurisdiction – some inconsistencies identified in GymCan's policies that underline the issue discussed above at 1.5 and in Chapter 3;
- Best Practices examples from other NSOs;
- Bolstering Safe Sport and Code of Ethics requirements in all Agreements;
- Encouraging stakeholders' awareness, knowledge and implementation of Safe Sport policies as well as increasing their accessibility;
- Ensuring all Safe Sport initiatives are collaborative and positive.

Clearer references to all Safe Sport policies and roles, responsibilities and accountabilities in relation to all the topics discussed below and throughout this Report can only bolster GymCan's educational program. The promotion of positive awareness campaigns and the accessibility of Safe Sport materials are simple actionable measures that are in the best interests of GymCan, all PTOs and clubs and all gymnastics stakeholders in Canada.

#### 4.3.1 Inconsistencies in Determining Jurisdiction

This is a common theme that has been raised throughout this Report and that has far reaching consequences and repercussions.

In addition to the inconsistent and disjointed way Safe Sport is approached and implemented throughout Canadian gymnastics, current GymCan policies do not expressly or consistently address the issue of jurisdiction, which as explained earlier in this Report, is at the source of much of the confusion of accountabilities related to Safe Sport reporting and discipline (and current negative media attention in the sport).

Other than national level athletes, participants are not currently bound to GymCan policies. As a result, GymCan currently has no way of policing or overseeing that its policies and procedures are being applied at the provincial level or that provincial level policies are appropriate, reasonable and consistent with best practices.

The following are concrete examples of some inconsistencies excerpted from GymCan policies.

### **Ex. 1 Complaints and Discipline Policy and Procedures**

#### *“3.2 The Multi-Jurisdictional Structure of Gymnastics in Canada*

*Gymnastics Canada works within a multi-jurisdictional sport structure with member provincial and territorial associations having their own Conduct and Discipline policies. Many gymnastics clubs belonging to the provincial and territorial member associations have also developed their own codes of conduct and expectations for participants, members, coaches, parents, and volunteers, among others. Gymnastics Canada encourages member associations and clubs to manage allegations of misconduct and complaints occurring in the programs and activities in their jurisdiction. However, Gymnastics Canada must be informed of any serious complaints received by a member association or club in order to maintain appropriate records and offer assistance, support, and/or escalate the complaint, if needed. Where there is a question of jurisdiction, the Gymnastics Canada CEO shall determine which jurisdiction shall address the alleged misconduct. The CEO may seek legal counsel prior to making this determination.”*

#### **➤ IRT Notes:**

- Here the CEO decides who has jurisdiction. Conflicts with below where it is the Case Manager who decides jurisdiction.
- Further, what is GymCan “encouraging” anyone to do? Language needs to be clarified to better reflect jurisdictional issues.

## **Ex. 2 Complaints and Discipline Policy and Procedures**

### *“7.10.2 Case Manager Recommendations*

*Once the investigation is completed, the Case Manager will determine whether the acts complained of are substantiated. The Case Manager’s Report will make one of four recommendations:*

- 1. the complaint should be dismissed as it is unsubstantiated, trivial or vexatious; or*
- 2. the complaint does not fall within the jurisdiction of this Policy, and it should be referred to the appropriate body having jurisdiction, e.g. the member association or local club; or*
- 3. the complaint should be dealt with as a Minor Infraction and referred to the appropriate person of authority as per section 5 of this Policy; or*
- 4. the complaint should be referred to a Discipline Committee as per section 10 of this Policy for Gymnastics Canada to take appropriate disciplinary and corrective action.*

*Where a concern, incident, or complaint is not substantiated, there will be no repercussions against the Complainant as long as the complaint was made in good faith. “*

➤ **IRT Note:** Here the Case Manager decides who has jurisdiction (not the CEO).

## **Ex. 3 Diversity, Equity and Inclusion Policy**

### *“Scope*

*Please note: This policy applies to all activities that fall within the jurisdiction of Gymnastics Canada, which operates within a multi-jurisdictional sport structure. For activities outside of the jurisdiction of Gymnastics Canada (i.e. FIG activities), the policies, rules, and regulations determined by the international governing body will take precedent. “*

➤ **IRT Note:** While it excludes FIG activities, this fails to address provincial jurisdiction – are PTOs and their clubs also supposed to be captured by the DEI policy?

### *“2.9 Abilities*

*2.9.1 GymCan strives to create a sporting environment that is open to all developmental, intellectual, and physical abilities. GymCan and its provincial/territorial associations will act as a resource for programming by:*

- i. Encouraging participation in the Gymnastics for All discipline for all functional ability levels;
- ii. Encouraging competitive disciplines to integrate athletes of all abilities whenever possible and appropriate; and
- iii. Encouraging collaboration and consultation with paraspot organisations and Special Olympics.

2.9.2 *The above subsections shall only be limited in the event that one could reasonably assume that such accommodations would place too high a burden on the organisation, or that it could pose a safety risk to the member directly, or those with whom the organisation is also responsible. Please refer to your provincial/territorial human rights laws for a full overview of your responsibilities and rights related to the duty to accommodate.”*

- **IRT Note:** This implies that GymCan and its PTOs work together and collaboratively which, in practice, it appears they do not.

#### **Ex. 4 Screening Policy**

##### **“2. Scope of Policy**

...

*Although Member Associations and Clubs may have similar policies and procedures in place, their policies must, at a minimum, comply with the following standards set out by Gymnastics Canada.”*

- **IRT Note:** This implies that GymCan imposes some standards on PTOs which, in practice, it appears they currently do not.

##### Suggestions on all above

As discussed many times throughout this Report, the IRT suggests that a baseline of consistent principles, expectations, and best practices be applied throughout GymCan’s Safe Sport policies to the extent possible.

GymCan should have an important degree/power of oversight and enforcement. PTOs should relinquish some of their tightly held power and choose to become accountable to GymCan (as

described above) in all Safe Sport matters – this would be for the greater good of all involved in gymnastics in Canada.

Additionally, an extra layer of accountability needs to be created between clubs and PTOs by creating an accreditation/club licencing program as recommended in Chapter 3 that can be overseen by GymCan (and funded jointly by GymCan and PTOs) to ensure that all gymnastics stakeholders are operating from consistent principles, policies, processes and standards.

### 4.3.2 Best Practices

As mentioned throughout this Report, everyone involved in gymnastics would benefit from having all complaint and reporting mechanisms be streamlined and consistent throughout provinces and nationally, ideally through a CAM. The IRT has provided some policy specific suggestions above for GymCan to consider implementing, according to how they best deem appropriate within GymCan and in other provincial jurisdictions.

To assist GymCan in its eventual policy revision exercise, the IRT has considered complaint and reporting policies of other selected NSOs and extrapolated some strong elements from the same that might be considered by GymCan for implementation within its own processes.

For ease of reference, the IRT has provided excerpts of best practice examples to assist GymCan in drafting amendments to some identified shortcomings of its current policies including the successful and accurate implementation of policies, reporting, handling of minor infractions and investigations.

#### 4.3.2.1 Best Practice Example – Ringette Canada

##### Application/Scope of Policy

- 4. This Policy applies to matters that may arise during Ringette Canada's business, activities, and events including, but not limited to, competitions, practices, tryouts, training camps, travel associated with Ringette Canada's activities, and any meetings.

- 5. This Policy also applies to Participants' conduct outside of Ringette Canada's business, activities, and events when such conduct adversely affects relationships within Ringette Canada (and its work and sport environment), is detrimental to the image and reputation of Ringette Canada, or upon the acceptance of Ringette Canada. Applicability will be determined by Ringette Canada at its sole discretion.
- 8. This Policy does not prevent immediate discipline or sanction from being applied as reasonably required. Further discipline may be applied according to this Policy. Any infractions or complaints occurring within competition will be dealt with by the procedures specific to the competition, if applicable. In such situations, disciplinary sanctions will be for the duration of the competition, training, activity or event only.

### **Individual Who Receives Complaints**

- 18. Complaints or incident reports should be made in writing and the person making the report may contact Ringette Canada's Independent Case Manager for direction.
- 19. Ringette Canada's Independent Case Manager will determine the jurisdiction under which the report will be addressed and notify Complainant and PTSO, if applicable. If the report should be handled by a PTSO, the applicable PTSO will appoint its own Independent Case Manager to assume the responsibilities listed herein.

### **Procedure for Dealing with Minor Complaints**

- 21.d. (i) Process #1 – The Complaint alleges the following incidents:
  1. Disrespectful, abusive, racist, or sexist comments or behaviour.
  2. Disrespectful conduct.
  3. Minor incidents of violence (e.g. tripping, pushing, elbowing).
  4. Conduct contrary to the values of Ringette Canada, a PTSO, or a Local Association.
  5. Non-compliance with Ringette Canada's policies, procedures, rules, or regulations.
  6. Minor violations of the *Code of Conduct and Ethics*.

### **Who Makes the Disciplinary Decision?**

- 23. Following the determination that the complaint or incident should be handled under Process #1, the Independent Case Manager will appoint a Discipline Chair who

will review the submissions related to the complaint or incident and determine one or more of the following sanctions:

1. Verbal or written reprimand.
2. Verbal or written apology.
3. Service or other contribution to Ringette Canada, a PTSO, and/or a Local Association.
4. Removal of certain privileges.
5. Suspension from certain teams, events, and/or activities.
6. Suspension from all the activities of Ringette Canada, a PTSO, or a Local Association for a designated period.
7. Any other sanction considered appropriate for the offense.

- 24. The Discipline Chair will inform the Parties of the decision, which will take effect immediately.
- 25. Records of all sanctions will be maintained by Ringette Canada and PTSOs. PTSO's will disclose all decisions to Ringette Canada, which may disclose such records at its discretion.

#### [4.3.2.2 Best Practice Example – Athletics Canada](#)

##### **Application/Scope of the Policy**

3. The Commissioner's Office has jurisdiction over complaints that contain allegations of any violations of the AC Code, in the following situations:
  - a. Incidents that occur during Athletics Canada's business, activities, or events including, but not limited to, competitions, practices, tryouts, training camps, travel associated with Athletics Canada's activities, Athletics Canada's office environment, and any meetings.
  - b. Instances where Athletics Canada is required to take jurisdiction due to requirements imposed by government, Sport Canada or other governing body as amended from time to time.
  - c. Incidents or complaints involving an allegation of maltreatment that occur during any Club or Member business, activities, or events including, but not limited to, competitions, practices, tryouts, training camps, travel associated with a Club or

Branch's activities, a Club or Branch's office environment, and any meetings, except in circumstances where at the time the complaint is filed with the Commissioner:

- the claimant has registered the same or similar complaint with the relevant Club or Member.
- the Club or Member has a Policy and Procedure that governs the subject matter of the complaint.

### **Individual Who Receives Complaints**

8. The Commissioner's Office is empowered to receive complaints within its defined scope as defined in Section 5.0 and to resolve such complaints.

...

5. Upon receiving the complaint, the Commissioner's Office may determine that the complaint is frivolous or vexatious, outside of the jurisdiction of the Commissioner's Office, or that the description of the incident is insufficient. Such complaints will be dismissed unless the Commissioner's Office permits the complaint to be resubmitted with more complete or accurate information.

6. The Respondent may, at any time in a Commissioner's complaint process, communicate to the Commissioner that they accept responsibility for the alleged breach of the Code. The Commissioner may then determine if the breach was minor or major and provide a sanction as described in the AC Code.

7. After the Commissioner has confirmed jurisdiction the Commissioner may, by communicating with each of the parties (the Appellant and the Respondent), determine if it is possible to reach a resolution to the dispute by mediation or by means of private negotiation between the parties and/or their legal representative, if any...

10. If mediation fails, is not possible, or is not deemed appropriate by the Commissioner, the Commissioner's Office will determine if the alleged violation is a minor infraction or a major infraction.

### **Investigation**

9. The Commissioner's Office will determine if the complaint needs to be investigated and, if so, will appoint an independent investigator to investigate the complaint and prepare an Investigator's Report; Investigators must be selected from the previously approved pool of qualified investigators vetted by Athletics Canada. Federal and/or

Provincial/Territorial legislation related to Workplace Harassment may apply to the investigation if the maltreatment was directed toward a worker in a Workplace. The Commissioner's Office should review workplace safety legislation and/or consult independent experts to determine whether legislation applies to the complaint.

When appointed, the Investigator will have terms of reference as determined by the Commissioner's Office.

### **Minor Infractions**

11. Minor infractions are defined as:

- a) Disrespectful, abusive, racist, or sexist comments or behaviour that do not represent a sustained pattern of conduct;
- b) Conduct contrary to the values of Athletics Canada;
- c) Neglecting attendance at Athletics Canada events and activities for which attendance is expected or required;
- d) Non-compliance with Athletics Canada's policies, procedures, rules, or regulations which non-compliance does not represent a sustained pattern; or
- e) Minor violations of Athletics Canada's Code, at the discretion of the Commissioner's Office.

### **Who Makes Disciplinary Decisions for Minor Infractions?**

12. If the alleged violation is determined to be a minor infraction, the Commissioner's Office will refer the complaint to be handled by an appropriate person who has authority over both the situation and the individual(s) involved. The person in authority can be, but is not restricted to, staff, event group leaders, team managers, officials, coaches, judges, organisers or Athletics Canada decision-makers. The person in authority must report any sanction or discipline (if applied) back to the Commissioner's Office for retention or distribution as necessary.

#### 4.3.2.3 Best Practice Example – Canoe Kayak Canada

##### Reporting a Complaint

11. All complaints must be reported by an Individual (or Individuals) to one of Canoe Kayak Canada's identified independent Case Managers.

##### Case Manager Responsibilities

12. Upon receipt of a complaint from an Individual (or Individuals), the Case Manager shall determine whether the complaint should be handled by the relevant Club, Provincial/Territorial Organisation (or, where applicable, Division) or by Canoe Kayak Canada.

...

15. The Case Manager shall direct a complaint to be managed by the Discipline Chair of a Club, Provincial/Territorial Organisation (or, where applicable, Division) or Canoe Kayak Canada (as applicable pursuant to Sections 13 and 14 above) if the Complainant alleges that any of the following incidents have occurred:

- i. Disrespectful, abusive, racist, or sexist comments, conduct or behaviour;
- ii. Minor incidents of physical violence;
- iii. Conduct contrary to the values of the Member;
- iv. Non-compliance with the Member's policies, procedures, rules, or regulations;
- v. Minor violations of the *Code of Conduct and Ethics*, *Social Media Policy*, *Athlete Protection Policy* or *Event Discipline Policy*.

16. The Case Manager shall direct a complaint to be managed by the relevant Provincial/Territorial Organization (or, where applicable, Division) or Canoe Kayak Canada (as applicable pursuant to Sections 13 and 14 above) if the Complainant alleges that any of the following incidents have occurred:

- i. Repeated minor incidents.
- ii. Any incident of hazing;
- iii. Behaviour that constitutes harassment, sexual harassment, or sexual misconduct;
- iv. Major incidents of physical violence (e.g. fighting, attacking);

- v. Pranks, jokes, or other activities that endanger the safety of others;
- vi. Conduct that intentionally interferes with a competition or with any Athlete's preparation for a competition;
- vii. Conduct that intentionally damages the Member's image, credibility, or reputation;
- viii. Consistent disregard for the Member's bylaws, policies, rules, and regulations;
- ix. Major or repeated violations of the Code of Conduct and Ethics, Social Media Policy, Athlete Protection Policy or Event Discipline Policy;
- x. Intentionally damaging the Member's property or improperly handling the organisation's monies;
- xi. Abusive use of alcohol, any use or possession of alcohol by minors, or use or possession of illicit drugs and narcotics;
- xii. A conviction for any Criminal Code offense;
- xiii. Any possession, use, trafficking or administration of Prohibited Substances or Prohibited Methods as indicated on the version of the World Anti-Doping Agency's Prohibited List currently in force.

17. In exceptional circumstances, the Case Manager may direct a complaint to be managed by Canoe Kayak Canada if the Club or Provincial/Territorial Organisation (or, where applicable, Division) is otherwise unable to manage the complaint for valid and justifiable reasons, such as a conflict of interest or due to a lack of capacity.

#### **Complaint Handled by Discipline Chair**

21. Following the Case Manager's determination that the complaint or incident shall be managed by a Discipline Chair pursuant to Section 15 above, the Club, Provincial/Territorial Organisation (or, where applicable, Division) or Canoe Kayak Canada (as applicable) will appoint a Discipline Chair. The Discipline Chair appointed to handle a complaint or incident must be unbiased and not in a conflict-of-interest situation.

#### **Complaint Handled by Case Manager**

32. If the Canoe Kayak Canada Case Manager determines that the complaint or incident should be handled by the relevant Provincial/Territorial Organisation (or, where applicable, Division), that Provincial/Territorial Organisation (or Division, if applicable) shall appoint its own Case Manager to fulfil the responsibilities listed

below. In such instance, any reference to Case Manager below shall be understood as a reference to the Provincial/Territorial Organisation's Case Manager (or, if applicable, the Division's Case Manager).

33. Following the Case Manager's determination that the complaint or incident should be handled by the relevant Provincial/Territorial Organisation (or Division, if applicable) or Canoe Kayak Canada (as applicable) pursuant to Section 16 above, the Case Manager will have the responsibility to:

- a) Determine whether the complaint is frivolous and/or within the jurisdiction of this Policy;
- b) Propose the use of the Dispute Resolution Policy (if considered appropriate in the circumstances);
- c) Appoint the Discipline Panel, if necessary;
- d) Coordinate all administrative aspects and set timelines;
- e) Provide administrative assistance and logistical support to the Discipline Panel as required;
- f) Provide any other service or support that may be necessary to ensure a fair and timely proceeding.

## Procedures

34. If the Case Manager determines the complaint is:

- a) Frivolous or outside the jurisdiction of this Policy, the complaint will be dismissed immediately.
- b) Not frivolous and within the jurisdiction of this Policy, the Case Manager will notify the Parties that the complaint is accepted and of the applicable next steps.

35. The Case Manager's decision to accept or dismiss the complaint may not be appealed.

36. The Case Manager will establish and adhere to timelines that ensure procedural fairness and that the matter is heard in a timely fashion.

#### 4.3.2.4 Best Practice Example – USA Gymnastics

##### USA Gymnastics SAFE SPORT FAQ March 2022

- **IRT Note:** A similar Q & A section must be added to the Safe Sport page on the GymCan website.

##### **What Happens After I Make A Report To USA Gymnastics?**

Once a report is received, USA Gymnastics will review to determine if the allegations or circumstances:

1. Mandate reporting to law enforcement or child protective services;
2. Mandate reporting to the Center;
3. Are governed by the Code, the Policy, or the U.S. Center for SafeSport Minor Athlete Abuse Prevention Policies;
4. Require imposition of restrictive measures.

##### **When USA Gymnastics Receives a Report**

USA Gymnastics Safe Sport uses a 5-Tier System to assess each report to identify those reports that need immediate attention, allocate investigative resources, and determine an appropriate resolution. It is important to review Safe Sport Intake Process and Safe Sport Investigation & Resolution Procedures for information related to reports.

##### USA Gymnastics Response and Resolution Procedures

#### **VII. Report and Submission Intake**

...

##### **B. Intake**

1. USA Gymnastics will review all Reports to determine if allegations or circumstances:
  - a. Mandate reporting to law enforcement or child protective services;
  - b. Mandate reporting to the Center;
  - c. Are governed by the Code, the Policy, or the U.S. Center for SafeSport Minor Athlete Abuse Prevention Policies (“the MAAPP”); or
  - d. Require imposition of Restrictive Measures.
2. USA Gymnastics determines Jurisdiction and notifies the Claimant or Reporting Party.

3. Matters involving more than one Claimant, or more than one Respondent may, in the discretion of USA Gymnastics, be consolidated into a single matter.

### **XIII. Investigation**

The investigation process consists of:

- A. A Notice of Allegations which summarises the alleged Misconduct is provided to Respondent before the Respondent is contacted by an investigator.
- B. Following the notice to Respondent, a Notice of USA Gymnastics Safe Sport Report is provided to the club in which Respondent is employed or was employed at the time of alleged Misconduct.
- C. A USA Gymnastics investigator will contact Claimant, the Reporting Party, identified Witnesses, and Respondent to request statements or interviews.
- D. If any party to a matter declines to participate, USA Gymnastics may, in its discretion, choose not to proceed or may respond to the Report in limited and general ways.
- E. Any party may consult with an advisor or an attorney. A party or Witness involved in the matter, or an employee of, board member of, or legal counsel for, USA Gymnastics cannot serve as an advisor. Only a Claimant or Respondent may be accompanied by their respective advisor throughout the Process. While the advisor may provide support and advice throughout the Process, they may not speak on behalf of the Claimant or Respondent, or otherwise participate in the Process except as provided herein. Only an attorney may speak on behalf of a Claimant or Respondent client.
- F. All information gathered, including investigator's notes, are confidential and privileged work product of USA Gymnastics. Disclosure of information necessary to facilitate USA Gymnastics Restrictive Measure or Resolution Panel Hearing process is not a subject matter waiver of any privilege.
- G. Following the investigation, USA Gymnastics will determine, in its discretion, whether the matter is appropriate for resolution by dismissal, administrative closure, resolution agreement, or by a USA Gymnastics Resolution Panel.

### 4.3.3 Agreements/Contracts

A valuable tool to educate athletes, judges, coaches and staff players and promote a common understanding of responsibilities and accountabilities are Athlete Agreements, Coach and Judge Agreements and staffing contracts, all of which should include Safe Sport principles and binding provisions to all Safe Sport policies, including the Code of Ethics etc.

The IRT thus recommends that GymCan develop standardised Athlete, Coach and Judge Agreements and staffing contracts in general that contain a list of roles and responsibilities with regard to Safe Sport and ethical behavior and refer to specific GymCan policies throughout where relevant.

#### 4.3.3.1 Athlete Agreements

According to AthletesCAN, “*Athlete Agreements ('AA') adopted systematically in Canada, govern the daily relationships and mutual obligations between athletes and their National Sport Organisations ('NSOs').*”<sup>75</sup> The benefits of an Athlete Agreement include clarity on the roles, responsibilities, and accountabilities between national team athletes and their NSO.

In 2015 an Athlete Agreement Working Group was struck led by AthletesCAN including leaders representing the SDRCC, CPC, COC, OTP and Sport Canada. The Working Group published their findings in a document entitled “*The Future of Athlete Agreements in Canada*” which “*aims to begin a national conversation on changes that could help both National Sport Organisations and athletes better use AAs to manage their interdependent relationships. It aspires to improve sport performances in Canadian sport, through a targeted and measured modification of existing practices.*”<sup>76</sup>

In addition AthletesCAN published an Athlete Agreement Template following consultation with athletes, NSO leaders together with marketing and legal experts. According to this document, “*The Athlete Agreement that follows is meant to act as a template for both athletes and NSOs*

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<sup>75</sup> AthletesCAN, “*The Future of Athlete Agreements in Canada*,” 24 November 2015. Online: [the future of athlete agreements in canada \(athletescan.ca\)](http://the future of athlete agreements in canada (athletescan.ca)) [Last Accessed: 12 December 2022].

<sup>76</sup> Ibid.

to come to a mutually beneficial, reciprocal agreement to foster the performance relationship.”<sup>77</sup>

### Suggestions

- GymCan more effectively develop its standardised Athlete Agreement to include additional information on Safe Sport, ethics, etc.
- The IRT suggests that GymCan consult the following publications developed by AthletesCAN in developing its Athlete Agreement:
  - The Future of Athlete Agreements in Canada: [the future of athlete agreements in canada \(athletescan.ca\)](http://the future of athlete agreements in canada (athletescan.ca))
  - Athlete Agreement Template (Annotated):  
[athlete agreement annotated template - final eng 2.pdf \(athletescan.ca\)](http://athlete agreement annotated template - final eng 2.pdf (athletescan.ca))

#### [4.3.3.2 Coaches' and Judges' Contracts](#)

Individuals spoken to indicated that in communications and dealings between staff, coaches, judges etc. there is a lack of respect of the Code of Ethics, if people are even knowledgeable on its contents.

In the same way as Athlete Agreements such Coach and Judge Agreements will act as a template for both athletes and NSOs to come to a mutually beneficial, reciprocal agreement to foster the performance relationship and underline the importance of respecting Safe Sport principles, policies etc.

### Suggestions

- GymCan could include consistently in all its Coaches and Judges Agreements a section on roles and responsibilities with regard to Safe Sport and ethical behaviour.
- This is notably important when coaches from foreign countries are onboarded.

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<sup>77</sup> AthletesCAN, “Athlete Agreement Template – Annotated,” 24 November 2015. Online: [athlete agreement annotated template - final eng 2.pdf \(athletescan.ca\)](http://athlete agreement annotated template - final eng 2.pdf (athletescan.ca)) [Last Accessed: 12 December 2022].

#### 4.3.3.3 Staff Contracts

Staff indicated that in communications and dealings between staff, coaches, judges etc. there is a lack respect of the Code of Ethics and basic Safe Sport principles.

Including Safe Sport principles in all staff contracts will act as a template for both GymCan and its staff (including the Executive and Board) to come to a mutually beneficial, reciprocal agreement to foster the performance relationship, and ensure that the working environment is positive and governed by the Code of Ethics and all Safe Sport regulations.

##### Suggestion

- GymCan could include consistently in all its staff contracts, a section on roles and responsibilities with regard to Safe Sport and ethical behaviour.

#### 4.3.4 Director of Safe Sport

An individual has recently been hired to fill this role that was left vacant since the resignation of the previous Director of Safe Sport.

The growing complexity and impacts of Safe Sport should be reflected in more attention to how this function is structured within the organisation. As a result of GymCan neither having a Director of Safe Sport nor a Safe Sport Coordinator for many years, the task has either been loosely delegated to other staff, all of whom are already overstretched and have a significant portfolio of core responsibilities in addition to Safe Sport, or not been actioned at all. In order to ensure that its Safe Sport policies are being properly implemented, that education on Safe Sport is properly disseminated to all stakeholders, and that oversight of GymCan's Safe Sport program rests in the hands of a designated and qualified individual, it is imperative that GymCan hire an individual to fulfill a dedicated position for Safe Sport as its own functional area of responsibility within GymCan's organisational structure (which as mentioned above may need to be reassessed as part of the Gymnastics Culture Review).

## Suggestions

The Director of Safe Sport should be assisted by a ‘Safeguarding Team’ to the extent possible including a Lead Safeguarding Officer and trained Safe Sport officers/volunteers at the national and provincial level.

The IRT trusts that the newly hired Director of Safe Sport is not tasked with overseeing the complaint mechanisms, as the previous individual who held the role became consumed with managing complaints. It would be more productive for the Director of Safe Sport to focus his or her attention on developing and implementing a strategic Safe Sport programme, including public awareness campaigns and the development of integrated Safe Sport education tools, as well as general oversight of all related policies.

### [\*\*4.3.5 Safe Sport Section on the GymCan Website\*\*](#)

Not a single individual interviewed had anything positive to say about how Safe Sport is communicated on the GymCan website. This includes issues related to the accessibility of Safe Sport information as well as its content and navigation. It is not satisfactory in its current form and in serious need of an overhaul.

GymCan must commit to and expressly voice and publicize its engagement to making any and all Safe Sport documents, processes, policies, Q&As etc. accessible to all — front and center on its website.

## Suggestions

- Safe Sport should be front and center in an inconspicuous spot on the GymCan website.
- All policies, reporting mechanisms, resources etc. should be clearly and easily accessible.
- Links to confidential hotlines should be highly visible and easy to reach.
- Links to each relevant province’s Safe Sport policies and hotlines should be visible and easy to reach.
- Clear instruction on who and where to file a complaint or report a Safe Sport concern should be front and center.

E.g. If you currently compete at the provincial level – your complaint should be raised with your provincial federation.

- All these suggestions go hand-in-hand with the need to better educate athletes, coaches, judges, parents and GymCan Staff about Safe Sport policies in general, as well as responsibilities and accountabilities.
- Fun, engaging education materials and videos must be accessible to all and disseminated in several ways that best reach all stakeholders.

#### 4.3.6 Disseminating Positive Safe Sport Materials

An often-stated concern by many stakeholders is that the current Safe Sport messages are negative and mostly about “*what no to do*”. Also most educational materials are dry, prescriptive and rather than being didactic in an engaging way, they are tedious. Given the varying levels, age, and experience of stakeholders, awareness and education needs to be provided in a more appetizing way and through varying mediums.

Safe Sport education and its dissemination needs to be more palatable and from its interviews, the IRT safely concludes that the way the education is delivered and disseminated should be descriptive rather than prescriptive.

##### Suggestions

- Rather than focusing on the negative (what is wrong, what not do to, what to avoid) the gymnastics community would be better served by positive examples and messages.

E.g. If I feel like I am not being treated right, what should I do? where should I report it?

- ✓ Your body needs fuel! Enjoy eating.
- ✓ Proper open communication between coach and athletes leads to better results.
- ✓ How to spot properly.
- ✓ Open conversations and communications with the leaders in your club leads to positive outcomes.
- ✓ If we work together to create a safe and fun environment for our athletes everybody benefits.
- ✓ Judges and Coaches unite!

- Engage Volunteers, coaches, parents, athletes, former athletes, positive influencers to this end. Individuals who are passionate, motivated, knowledgeable, and willing to

make a change for the positive. Get a mix of different individuals, male, female, different ages, disciplines, levels of competition, races and ethnicity etc. Inclusion and diversity is imperative to the success of such an initiative.

- Include all this content in social media blitzes, informative, positive clips that can be sent off. These should also be housed on the website for easy and regular access and viewing. This will allow the content and principles of your policies to be better known and understood whilst being consumed in a positive and engaging way.
- There are individuals who have already voiced interest in this undertaking. Their names can be provided to GymCan upon request. All of these individuals have great ideas about how to deliver and disseminate messages that are positive, informative and catchy and that always provide links to relevant policies, documents, processes etc.
- Another element that is imperative is teamwork. All Stakeholders need to work together, to acknowledge the importance of Safe Sport, to recognise mutual responsibilities and accountabilities under the applicable GymCan and PTO policies. Everyone has a role to play in protecting athletes, themselves, each other and the sport.

#### 4.4 Conclusion

As stated at the outset, GymCan's current policy framework has no glaring shortcomings. The IRT's review of GymCan's Safe Sport policies was exhaustive and all suggestions provided in this Report need not be fully realized.

GymCan may wish to undertake the suggested specific modifications or amendments to its policies in short order. With regard to the IRT's general suggestions, further to the completion of the Gymnastics Culture Review, it will be up to GymCan to prioritise amongst the suggestions and to carefully consider which to implement and how, depending on outcomes of the Culture Review. It may be that upon completion of the Culture Review, the eventual CRLT will make additional policy recommendations.

The IRT nonetheless suggests that upon completion of the Gymnastics Culture Review, when it is time to consider and undertake the suggested policy amendments, these following guiding principles should always be front of mind.

## Suggested Guiding Principles

- Commit to and trust that the intended impact of a successful culture review and corollary policy review will result in a more positive sport experience for everyone involved in gymnastics (athletes, coaches, judges, parents and GymCan staff).
- Establish and implement values-based sport and demonstrate the value of Safe Sport as the platform of choice in all policies.
- Build capacity of diverse GymCan stakeholders to establish and implement transparent and consistent Safe Sport practices and policies, and make tools and resources that support values-based sport available and easily accessible and understandable.
- Develop and support a network of members and partners that understand and champion a holistic and inclusive approach to values-based Safe Sport.
- Advocate for change in policies, regulations and funding that create the conditions for sector-wide adoption of values-based sport.
- Look to reduce negative sport experiences by shifting to positive behaviours, attitudes relationships and communications and reflect this shift in the implementation of policies (remember actions mean more than words).
- Keep risk management, mitigation of risk (for all involved) in mind.
- Increase opportunities for excellence based on a sincere belief (and modified culture mindset) that it is possible for athletes to evolve into stronger, resilient, successful and happy individuals if everyone is committed to advocate for values-based sport.
- Restore stakeholders trust in governance – this can only be done by:
  - being sincere and vocal in wanting to reconcile the past in order to be able to look to a more positive future for all athletes, and others involved in gymnastics at all levels.
  - making meaningful operational and regulatory changes.
  - implementing all Safe Sport policies effectively and consistently.
  - ensuring oversight and accountability of all PTOs.
  - ensuring oversight and accountability of all GymCan stakeholders - including but not limited to athletes, coaches, judges, IST, GymCan staff and GymCan executive.
  - educating everyone on the positive benefits of Safe Sport.
  - remembering that gymnastics, whatever the level, is meant to be safe and fun.
  - Making your policies and processes accessible and easy to understand and ensuring that they are respected and implemented.

## Chapter 5: International Gymnastics Reviews

This Chapter provides an executive summary of several international gymnastics reviews that have recently been undertaken. These summaries include attention to the overall methodology used to conduct the reviews for the purpose of informing the development of a bespoke culture review framework for gymnastics in Canada. Each summary includes a description of stakeholders, methodology, strengths, limitations and themes. The Table below provides a comparison of key features.

### Comparison of Key International Gymnastics Review Features

Review Features	GBR	AUS	NZ	SUI	USA
Time to complete review	22 months	8 months	6 months	10 months	6 months
Size of review team	3	3	3	11	7
Human rights-based approach	☒	☑	☒	☒	☒
Safeguarding statement, protocol, or procedural link to report abuse	☑	☒	☑	☒	☑
On-site observation at clubs	☒	☒	☒	☒	☑
Dedicated review website	☑	☒	☒	☒	☒
Analysis of filed reports of abuse	☑	☑	☒	☒	☑
Interviews or meetings (# interviewed)	190	57	100	108	160
Surveys (# survey responses)	☒	☒	☒	970	☒
Written responses	400	138	200	☒	☒
Oversight of recommendations	☒	☒	Steering Committee	☒	☑
'Child-friendly' summary	☒	☑	☒	☒	☒

Denotes a distinguishing feature

Note: Belgium excluded from comparative chart due to insufficient information

### The Whyte Review ('WR') (United Kingdom) - 2022

The Whyte Review is an independent investigation commissioned by Sport England and UK Sport focused on British Gymnastics ('BG'), the National Governing Body, following allegations of mistreatment within the sport. As the report's title suggests, it was named after Anne Whyte, QC, who was appointed by UK Sport and Sport England to review concerns that had been raised. The

IRT interviewed Ms. Whyte for this Report. Ms. Whyte was tasked to determine whether between 2008 and 2020 (the ‘period of Review’):

- “i. gymnasts’ well-being and welfare is (and has been) at the centre of the culture of BG, its registered clubs and member coaches and if not, why not;
- ii. safeguarding concerns and complaints have been dealt with appropriately in the sport of gymnastics and if not, why not;
- iii. gymnasts, or their parents, carers or guardians, have felt unable to raise complaints with appropriate authorities and if so, why.”<sup>78</sup>

The ‘period of Review’ was intended to mirror the Olympic cycle. The reviewer was tasked with investigating the nature and volume of complaints received by BG, how complaints were resolved and reasons for delays in bringing forward complaints. The reviewer also investigated how safeguarding and handling complaints were adopted and implemented by BG, including how they were monitored and assessed within clubs. The culture and practices of BG, including at the club level, relating to the treatment of gymnasts and their welfare was reviewed.

### Stakeholders

- UK Sport;
- Sport England;
- British Gymnastics;
- Gymnasts;
- Parents;
- Coaches;
- Clubs.

### Methodology

The WR took approximately 22 months to be completed. In August 2022, the WR put out a call requesting anyone with relevant information or evidence of mistreatment to submit it to the review team. A website was created to keep the public informed about progress including pages dedicated to answering Frequently Asked Questions (‘FAQs’), explanations of confidentiality, privacy policy, various policy documents and a safeguarding statement and protocol. The

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<sup>78</sup> The Whyte Review, “An independent investigation commissioned by Sport England and UK Sport following allegations of mistreatment within the sport of gymnastics,” June 2022.

secretariat addressed questions about how individual information was used and whether a person had a right to remain anonymous. This information was provided in response to hesitancy on behalf of some in the gymnastics community to share their experiences.

A total of 409 written submissions were received including current and former gymnasts (N=133, 33%); parents, carers, and guardians (N=146, 36%), current and former coaches (N=60, 15%); registered clubs (N=11, 3%); individuals associated with British Gymnastics (N=10, 2.5%); current and former welfare officers (N=8, 2%), and others (N=41, 10%). A total of 55 submissions were eliminated because they were determined to be out of scope; either because (1) they lacked sufficient substance or (2) they concerned events outside the review period (August 2008 – August 2020).

All written material was summarised into a central spreadsheet to help identify themes and inform strategies for holding meetings with individuals. Requests related to anonymity and privacy concerns were recorded in the database as well as the basis for processing individuals' data.

A total of 271 meetings were requested, while 190 meetings were actually held. The largest cohort of meetings was with parents (N=68), followed by gymnasts (N=46), coaches (N=39), clubs (N=8), and welfare officers (N=6), and others (N=23).

The review team tried to ensure a representative selection of gymnastics stakeholders taking into account involvement in gymnastics, types of issues raised in the written submission, whether experiences were positive or negative, geography, discipline, and competitive level. A summary sheet of key points was created following each meeting. A transcript was produced and sent to the person who was interviewed to confirm accuracy or provide edits with a two-week response period.

The review team engaged with BG and reviewed an extensive amount of documentation. The document review was facilitated by establishing a data-sharing protocol that set out how information was to be provided by the review team and how the information would be handled. Types of information requested by the WR included the following:

- BG policies and processes;
- Structure and organisation of BG;
- BG complaint handling systems;
- Statistics and data about complaints received by BG;
- Complaint files for 26 individual coaches and 7 clubs;
- 66 individual complaint files.

The review team received approximately only five percent of the total number of complaint files held during the review period. However, the reviewer felt that this was a proportionate number to develop an understanding of how the complaints were handled. A summary sheet of each complaint file was created including an explanation of the concern(s) raised, the manner in which BG handled the concerns and the outcome of the complaint.

In addition to an extensive document analysis of BG, several executives and staff members were interviewed including the CEO, Board of Directors, members of the Integrity Unit, Education Team, Community Services Team and Performance Team (including coaches). In advance of each meeting, individuals were provided with broad topics to be discussed, including the following:

- Governance of BG;
- Interaction between teams and individuals;
- Personal experiences of complaint handling of BG;
- Interaction between BG and member clubs;
- BG safeguarding structure;
- Understanding and application of relevant policies and procedures;
- Culture;
- Themes raised by gymnastics community in Call for Evidence.

Many individuals were anxious about the risks associated with participating in the WR. The reviewer was careful when referring to anecdotes of individuals by using gender-neutral language, omitting certain identifiable features and removing references to Olympic athletes because it is an easily identifiable cohort. The WR only named individuals where it was necessary, fair and reasonable. If named, the individual was notified in writing and the individual was given the chance to comment on the references and respond to any criticisms.

Given the potential for the review team to receive allegations of abuse, a process of referral to statutory authorities was established. The reviewer was required to refer information to statutory authorities if information received (either through written submissions or interviews) was of a criminal nature, raised immediate safeguarding concerns, or potentially violated anti-doping rules. The reviewer developed internal decision-making documents to assist team members in reviewing and acting on safeguarding issues. Consent was always sought before referring information and contact details to relevant authorities. In some situations, the reviewer would make the referral without the consent of the individual if the conduct in question was particularly serious. Many individuals requested the referral be made anonymously due to fear of repercussions. In total, 70 referrals were made to statutory authorities.

The approach to making findings and recommendations included the application of the civil standard of proof (i.e. 'more likely than not') when deciding on the merits of information. Recommendations were focused on coach education, safeguarding at the club and high-performance level, complaints handling and governance. The approach to the findings included a focus on providing realistic (actionable) recommendations as opposed to wide overarching suggestions or recommendations that required the involvement of other agencies and organisations.

### Strengths

A core strength of the WR was the detailed methodology including attention to how information was used and cataloged. A dedicated website, FAQs and addressing the concerns of participants including confidentiality and fear of reprisal are hallmarks of the WR.

The number of people who were interviewed was helpful in understanding the depth and complexity of issues that would not have been possible strictly through surveys and written submissions. Moreover, the sheer number of documents received and reviewed including policy and complaint files enhanced the validity of Ms. Whyte's findings and patterns associated with BG.

Attention was paid by the review team to anticipate, inform, and act on safeguarding issues raised. This included a specific process of referral to statutory authorities as described herein. The confidentiality strap around the entire process facilitated the consent of individuals to speak with Ms. Whyte. Individuals also were provided with the opportunity to have someone present with them during the interview process; this is particularly important for victims of abuse.

Individuals were advised that they did not have to answer all of the questions and were also allowed to take breaks. Individuals were not questioned on acts that constitute abuse, a strategy to avoid triggering secondary trauma. When Ms. Whyte learned of potential abuse during an interview, she would ask whether or not they had reported the allegation and the outcome of the complaint process. She also probed further on reporting including why they may not have reported the allegation and if they had confided in others such as their parents. In some cases, safeguarding referrals were made to the Local Authority Designated Officer ('LADO'), akin to a social worker in Canada. *"The role of the LADO is to be involved in the management and oversight of allegations against people who work with children. They are not responsible for undertaking investigations. They can provide advice and guidance to employers and voluntary organisations."*<sup>79</sup>

The WR also benefitted from its focus on providing recommendations that can actually be implemented; the reviewer was deliberate in avoiding vague guidance or unrealistic suggestions.

### Limitations

The time allotted to conduct the WR was a limiting factor given the plethora of documents and interviews. For example, BG underestimated the amount of time it would take to manage the data processing requirements including a six-month delay in getting access to files. As a result of these time constraints, the review team received approximately five percent of the total number of complaint files that were held during the 12-year review period.

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<sup>79</sup> Gloucestershire Safeguarding Children Partnership ('GSCP'), *"The Role of the LADO & The Allegations Management process,"* Online: <https://www.goucestershire.gov.uk/gscp/lado-allegations/> [Last accessed: 23 October 2022].

It may not have been necessary to have a review period that included three Olympic cycles in order to assess the current culture of BG given that many improvements had been made between the past era and the current era. A shorter review period would have provided greater focus for the review team given capacity issues that emerged.

The reviewer was assisted by two advisors, one of whom was a former elite athlete (British diver). However, the WR would have benefitted from involving an athlete(s) from the gymnastics community and an expanded interview team.

Some of the issues addressed in the WR appear to stem from the rules and/or interaction with the international governing body for gymnastics, the Fédération Internationale de Gymnastique ('FIG'). However, the WR does not offer any recommendations as to how issues stemming from the FIG can be remedied. In fact, it concludes that nothing can be done. It is important to recognise that the WR, by design, did not want to include recommendations that require the engagement of international bodies like FIG. In doing so, the WR acknowledges the organisational limitations of such an approach.

According to the WR, judging is subjective in gymnastics and one of the problems related to the sport's culture, however, very few judges engaged in the process.

BG is responsible for enacting the recommendations of the WR, with specific obligations to report (e.g. 3 months, 6 months, 9 months, etc.); however, this is a limitation given there is no obligation to fulfill them. There should be oversight mechanisms to monitor the implementation of the recommendations.

### Themes

An analysis of the written responses determined that 70% were deemed "*primarily negative*." A total of 125 of 252 negative responses (50%) were from Women's Artistic Gymnastics ('WAG'), including 79 from elite competitive gymnasts. Approximately 13% of responses were "*primarily positive*", with other responses categorised as mixed, neutral, or unknown. The greatest number

of submissions (N=227) were from female participants. WAG was over-represented in submissions while trampoline and disability gymnastics were underrepresented.

There were three foundational questions asked in the WR, as follows:

1. Has gymnast welfare been at the centre of the culture of the sport?
2. Have safeguarding complaints been dealt with appropriately?
3. Have gymnasts or parents felt unable to raise complaints?

Based on the findings, the reviewer provided recommendations grouped into four major themes, as follows:

1. Safeguarding and Welfare;
2. Complaints Handling;
3. Standards and Education;
4. Governance and Oversight.

Safeguarding includes protection from conduct or practices that may risk physical, emotional, mental, or sexual harm. Approximately 75% of BG's members are children under 12 years of age and young people are more vulnerable and less likely to identify inappropriate behaviour.

Over 40% of written submissions described physically abusive behaviours including physical punishment and chastisement and excessive training. For example, standing on a beam, hanging on bars, climbing ropes, or running the treadmill for excessive amounts of time. Examples also included extra conditioning as a form of punishment either for an individual or for an entire team. Other physical abuse included being pinched or squeezed when late for practice, being slapped for having un-pointed toes and being publicly humiliated. Although BG Child Protection Policies indicate that physical chastisement is prohibited, there is no clear guidance on physical punishment and chastisement in training materials.

The WR found that training hours for artistic gymnasts on performance pathways ignored guidance. It is common for high-performance teenage athletes to train more than 30 hours per week and some 7-8 year-olds were found to be training more than 20 hours per week. Holidays and sick days were found to be discouraged. A member of the women's technical committee felt there is a disconnect between BG and the clubs on training hours. There also appears to be an

assumption that training limits do not apply to elite athletes. However, the prevailing view questioned the need to train more than 30 hours per week. The WR found that BG has not invested enough attention in educating and monitoring the gymnastics community about training limits.

BG dealt with thousands of complaints between 2008 and 2020 including allegations of mistreatment, sexual abuse, mental abuse, physical abuse, bullying and harassment and discrimination. BG's case management system generally could not keep up with the volume of cases resulting in an inaccurate understanding of trends. The WR also found that the complaints management system suffered from poor quality of documentation, mis-categorisation of complaints, delays in resolving complaints, and insufficient guidance on how to conduct investigations, communicate with complainants, resolve conflicts of interest and determine appropriate outcomes. Notably, approximately 89% of complainants were unhappy with their experience making a complaint. Another issue raised by the WR was gymnast's and parent's reluctance to lodge complaints out of fear of repercussions, a lack of trust in the complaints process, concerns with conflicts of interest and the normalisation of abusive conduct.

The WR also identified inadequacies in the training and education of coaches and welfare officers. The WR found that educational materials failed to reflect modern coaching styles, as there was too much emphasis on the technical aspects of the sport and lacked sufficient training on soft skills like communication and respecting athlete autonomy and welfare. There were also concerns that safeguarding training was not adequately tailored to specific gymnastics contexts or coaching levels and that there was no continuing education requirement for elite level coaches. The WR also found that BG was too slow to recognise the need to develop policies and procedures related to athlete welfare, like weight management, over-stretching and communication between coaches, parents and gymnasts.

Governance and oversight were also found to be an issue. Despite numerous red flags about the cultural problems within BG, the Board and CEO were often reluctant to act on issues and bring about change. For example, leadership appeared disinterested in investigating media reports alleging a culture of fear within the organisation and failed to implement recommendations made

in an independent review that identified issues with the handling of safeguarding cases. Additionally, leadership's response to criticism was often defensive and non-transparent.

### **Gymnastics Australia Review ('GAR') - 2021**

The Gymnastics Australia Review was the first independent cultural review into the sport of gymnastics focused on all levels of the sport. The GAR followed a previous review that was more narrowly focused on high-performance programs at the Australian Institute of Sport. The primary focus of the GAR was *“on the experience of athletes, particularly regarding the nature and impact of misconduct, bullying, abuse, sexual harassment and assault on athletes within the sport, the systemic trends and drivers for such conduct and the measures in place to prevent and respond to”* these experiences. The Terms of Reference for the GAR did not include any form of investigation into specific incidents or allegations of child abuse and neglect, misconduct, bullying, abuse, sexual harassment or assault.

The GAR was conducted by the Australian Human Rights Commission after it was engaged by Gymnastics Australia in August 2020. The review team consisted of three individuals employed by the Commission. Sixteen other Commission staff members are mentioned in the 'Acknowledgements' section at the very beginning of the GAR, though their contributions to the GAR or the review process itself are unclear.

#### **Stakeholders**

- Current athletes;
- Former athletes;
- The families of athletes;
- Gymnastics staff;
- Coaches;
- Other “relevant personnel”.

#### **Methodology**

The GAR took approximately eight months to complete between September 2020 and April 2021. It was conducted using qualitative research methods (interviews). Participation was

voluntary and all data was treated as confidential. The GAR offered to facilitate focus groups with three cohorts: current and former athletes; parents and family members; and staff, coaches, officials and administrators — although no focus groups were conducted due to a lack of interest on behalf of participants and privacy concerns.

A total of 47 semi-structured interviews were conducted with 58 participants including the stakeholders described herein. Despite the low number of interviews, the reviewers were nonetheless confident that the *“wide range of responses paints a strong picture of the sport currently, how it has changed over time, and the challenges that persist.”*

The interviews focused on individual experiences, perceptions of the culture of gymnastics and recommendations for improved organisational practice. Three sets of interview questions were developed to ensure they were appropriate for different age groups. Interviews with those under the age of 18 years required consent from both the interviewee and their parents. All interviews were recorded and transcribed with written and verbal consent and conducted via video conference. The reviewer also undertook four meetings with Gymnastic Australia senior executives to update them on the progress of the GAR and to clarify and test themes that had emerged through the subject interviews.

A total of 138 written submissions were received during the review period. An online submission form was made available on the reviewer’s website and included optional questions on the culture of the sport, risk factors, and recommendations for improved practice. Participants were provided with the opportunity to make anonymous submissions.

The reviewer undertook a high-level review of relevant corporate policies and protocols at multiple levels of the sport. The GAR also analysed statistical summaries related to recent reports of misconduct, abuse, bullying, sexual harassment and assault of athletes and action taken at all levels of the sport. Documents requested and reviewed include:

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- Policies, protocols, and procedures relating to abuse, bullying, and other forms of harassment;
- Education strategies, programs, and resources pertaining to the safety and well-being of athletes;
- Documentation relevant to reporting and complaint-handling frameworks;

- Governance and accountability structures relating to the management of allegations of misconduct;
- Reports from past reviews undertaken since 2015 into the culture of gymnastics in Australia;
- Statistical summaries relating to recent reports of misconduct, abuse, and other forms of harassment.

### Strengths

The GAR used a human rights-based approach to ensure that all aspects of its implementation, from design to data collection, were founded on the principles of dignity, equality and respect. This approach was critical in ensuring that the voices and experiences of children and youth were recognised and elevated. Specifically, the GAR was guided by the United Nations Convention on the Rights of the Child in the development of its scope, methodology and recommendations.

The GAR also considered cultural variation across different levels of the sport. Highlighting this distinction is important given that there appears to be a greater likelihood of toxic cultures being experienced at more competitive high-performance levels of the sport in many countries.

The GAR is generally well-organised and easy to follow. This largely stems from consolidating and categorising various complaints, themes, and insights into cognisable, distinct categories. The inclusion of a ‘cultural snapshot’ is helpful in articulating the culture of gymnastics in Australia.

The use of qualitative research methods (interviews, open-ended written responses) amongst a variety of different stakeholders provided direct testimonial support for various conclusions offered. Direct, personal accounts are effective in telling personal stories and providing important context to an individual’s experience, both positive and negative.

Other more practical elements of the GAR include a “child-friendly” summary. This approach adequately caters to young gymnasts and their families which is an important approach given that this demographic comprises a large portion of the gymnastics community. An information sheet with statistics about the gymnastics community in Australia is a helpful resource that allows the reader to better understand the composition of the different groups of people at risk as identified in the GAR.

## Limitations

Although there are advantages associated with qualitative research methods as described above, the absence of quantitative benchmarking data to inform the GAR and its recommendations is a limitation. Given the small sample size of stakeholders, the findings may not be generalisable to the entire population involved in the sport of gymnastics in Australia. Moreover, this limitation becomes more acute when one deliberates the beneficial approach of considering cultural variations — or sub-cultures — across different levels of the sport which was an aim of the GAR.

Although the GAR set out to examine the sport at all levels, there were difficulties examining certain elements such as governance and education policies, particularly at the club level and in consideration of the dramatic variance across different gymnastics clubs.

The GAR acknowledged that those who have experienced trauma may need time to consider whether or not to engage with the review process. The GAR itself concedes that it likely did not provide ample time for individuals who have experienced trauma to decide if they were comfortable participating.

As noted, the development of ‘cultural snapshots’ is helpful, including sections dedicated to various aspects of gymnastics in Australia including coaching, athlete experience, complaints and investigations and governance. However, the GAR would have benefitted from a more precise explanation concerning how these various inputs interact and inform the culture(s) within the sport at various levels. A more rigorous methodological examination of this interaction to understand not only what the culture is purported to be, but how it develops and is informed by common experiences perhaps may have led to the discovery of deeper, more resolute recommendations to address negative aspects of the culture(s).

## Themes

The GAR provided a ‘cultural snapshot’ of key issues and described the culture of gymnastics in Australia as “toxic.” The findings also demonstrated the gendered treatment of gymnasts. There

were variations between gymnastics disciplines, clubs, and training environments including experiences of harassment, abuse, bullying, neglect, racism, sexism and ableism within the community. The following cultural risk factors were identified as fostering an abusive environment:

- Win at all costs approach;
- Young age of female gymnasts and the inherent power imbalances;
- Culture of control;
- Tolerance of negative conduct.

Coaching issues identified include authoritarian and highly disciplinary coaching styles. There were issues in the relationships between coaches, athletes and parents of athletes. These issues included coach and parent expectations and ambition and accountability of clubs concerning the employment and supervision of coaches.

Several issues were highlighted concerning the athlete experience. Participants shared experiences about how the structure and expectations of the sport of gymnastics can put athletes in a vulnerable position; for example, training loads from a young age. Participants shared accounts of abuse and other harmful behaviours such as verbal abuse, physical abuse, emotional abuse, medical negligence, sexual abuse, negative weight management practices and body shaming. This conduct had significant short and long-term impacts.

Governance and structural issues within the federated operating structure (where state and territory associations are treated as distinct entities) were identified, including the following:

- Duplication and inconsistency of policies and procedures;
- Challenges with complaint management;
- Pressures related to funding that pose a risk to the organisational culture as well as the health and well-being of athletes.

### **Gymnastics New Zealand Cultural Review ('NZR') - 2021**

The objective of the Gymnastics New Zealand Cultural Review ('NZR') was to develop a holistic view of Gymnastics New Zealand's ('GNZ') sporting culture and make recommendations for GNZ policies, procedures, processes, education and behaviours that can be improved to change its culture.

In July 2020, GNZ “was made aware of a number of distressing and concerning allegations of abuse within the sport.” The NZR was commissioned by Gymnastics New Zealand and Sport New Zealand (‘SNZ’) and took approximately six months to complete. The NZR was led by David Howman, a highly respected lawyer and former Director-General of the World Anti-Doping Agency, who was a member of the Australian Government’s Panel reporting on Sport Integrity in 2018. Mr. Howman was supported by Lesley Nicol and Rachel Vickery.

The purpose of the NZR was to:

- Identify common themes and areas for improvement;
- Identify if, and what, policies and procedures are followed when complaints are laid;
- Identify if the policies and procedures followed are appropriate; and, if not, what actions should be taken;
- Make recommendations to remedy identified inadequacies.

#### Stakeholders

- Gymnastics New Zealand (GNZ);
- Sport New Zealand (SNZ);
- Gymnasts (past and present);
- Parents;
- Coaches;
- Judges;
- Club officials.

#### Methodology

The reviewer circulated an announcement to all GNZ stakeholders, notifying them of the review and providing them with contact information if they had information to share. Information was received via written submissions, telephone interviews, and other discussions. GNZ provided several documents including reports, meeting minutes, emails, complaints, regulations and policies, as well as access to the club portal.

More than 200 submissions were received by the review team; follow-up interviews or discussions took place with approximately 100 of those who made submissions. This included a cross-section of the gymnastics community including over 70 gymnasts (past and current),

parents, coaches, judges, club officials, as well as past and current GNZ officials. The NZR also relied on input from other sources including international experts.

### Strengths

The strengths of the NZR include the support and funding provided by SNZ. Terms of Reference were developed by GNZ and SNZ to guide implementation by David Howman and a small team including one former gymnast and a medical practitioner. Having individuals with on-the-ground knowledge of gymnastics on the review team was an important element to inform the NZR and its implementation.

Although the NZR was not an investigation, a procedural link was made “*alongside the Sport New Zealand Interim Complaints Mechanism and the Gymnastics New Zealand Safe Sport mechanism*”<sup>80</sup> to support the complaint management process triggered by the NZR. If during the course of an interview allegations of maltreatment were raised, they were directed by the review team to this complaint management process. This allowed the review team to stay focused on the culture review while supporting any complainants with a stand-alone complaint management process. Referrals were also made to mental health support services where necessary.

Following the NZR, “*Gymnastics New Zealand created a ‘Statement of Commitment’ to publicly commit to implementing the recommendations and to reinforce its living commitment to change across all levels and aspects of the sport. Gymnastics New Zealand also issued a public apology and set up an Independent Complaints Service.*”<sup>81</sup>

Several important procedural steps and levels of oversight were implemented following the completion of the NZR. Expressions of interest were sought for participation in an independent nine-member GNZ Steering Committee which was tasked to “*propose changes to implement the Independent Review recommendations.*”<sup>82</sup> Sally McKechnie, a public and administrative lawyer, was appointed by the GNZ Board to Chair the GNZ Steering Committee. The GNZ Steering Committee was announced in December 2021, whose mandate is described as follows:

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<sup>80</sup> Gymnastics New Zealand, “*Shaping the Future of Gymnastics in Aotearoa*,” July 2022.

<sup>81</sup> Ibid.

<sup>82</sup> Ibid.

*“The Steering Committee is responsible for engaging and collaborating with many people and groups, including survivors, former and current athletes, clubs, coaches, volunteers, relevant experts, as well as representative bodies – both past and present – to ensure an inclusive and equitable process is undertaken, as it advises and proposes changes to the Board, to implement recommendations from the Independent Review. The Steering Committee will make proposals to the Board of Gymnastics New Zealand on changes in the areas of leadership and culture, policies, procedures, and regulations [...].”<sup>83</sup>*

### Limitations

The description of the methodology was limited and would have benefitted from a more precise explanation of how the various steps in the NZR were undertaken. For example, the NZR did not identify if and how interview guides were developed and implemented; however, the IRT learned through a follow-up interview that structured interview guides were developed and tailored to the various stakeholder groups identified.

The NZR focused exclusively on a qualitative, subjective approach and did not gather quantitative data that could have been relied upon to provide comparative insights, including between different stakeholder groups (as could be achieved, for example, by gathering quantitative metrics through standardised surveys). Although this is presented as a limitation, the IRT was advised that due to the relatively small population of gymnasts in New Zealand the reviewers decided that relying on interviews, conversations and written submissions was the most effective way to consult with the gymnastics stakeholders.

While the recommendations are important, there is a lack of specificity in how the recommendations should be operationalised to address key issues. For example, the NZR makes several references to “developing a culture” but routinely fails to identify concrete steps to achieve the goal.

A significant organisational limitation for GNZ is its small operating budget. A feasibility report published in September 2020 suggested that GNZ did not have the resources or capability to manage some of the complaints received. By and large, addressing the issues raised in the NZR

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<sup>83</sup> Gymnastics New Zealand, “*Shaping the Future of Gymnastics in Aotearoa*,” July 2022.

and implementing all of the recommendations does not appear to be financially viable given the current state of funding for GNZ.

### Themes

The key findings of the NZR were organised into ten themes as follows:

1. Well-Being/Health and Safety;
2. Gymnasts;
3. Coaches;
4. Judges;
5. Competitive Pathways and High-Performance;
6. Education;
7. Gymnastics New Zealand;
8. Clubs;
9. Complaint Processes;
10. Financial Resources.

Common health and safety issues among present and retired gymnasts include poor physical and mental well-being, nutrition and body image. The NZR also found limited access to medical treatment, reduced adherence to medical protocols and medical problems including eating disorders. Specific findings related to the health and safety of child gymnasts were noted including a power imbalance between adult coaches and child gymnasts. Abusive behaviours may be normalised by children who don't know any better, making it difficult to assess the extent to which abuse arises. Child development may be negatively affected if the culture of being "*told what to do*" in the gyms translates into disempowerment outside of the gym context. Issues surrounding puberty also were raised by young women including a general lack of knowledge about puberty's impact on performance. Parents and female gymnasts expressed that some gymnasts feel vulnerable and embarrassed wearing leotards, especially during menstruation.

The fact that gymnastics is a perfection sport can impact well-being; skills and routines are judged from the perspective of finding fault. Young athletes often lack the emotional maturity to understand the difference between a performance critique and a personal critique unrelated to performance. Self-identity of "*never being good enough*" was expressed as an ongoing issue by many retired gymnasts, stemming from their earlier gymnastics experiences.

Additional health and safety issues include being forced to train while injured as reported by gymnasts and parents. A lack of knowledge on how to properly rehabilitate and train around an injury was reported by gymnasts and parents. Gymnasts cited fear of falling out of favour with their coach if they do not train while injured, further exacerbated by the power imbalance between coaches and gymnasts.

Parents reported feeling shut out from ensuring their child's well-being due to club policies banning parents from viewing practice or traveling and staying with children at competitions. Some parents fear retribution for their child if they were to report inappropriate conduct. Moreover, parents expressed regret for not intervening when they witnessed inappropriate behaviour in training or competition.

Negative coaching behaviours cited in the NZR include the following:

- Verbal, psychological or emotional abuse;
- Bullying, harassment, and trolling;
- Manipulation;
- Shaming (including body shaming);
- Isolation;
- Physical abuse, including physical exercise as punishment.

Problematic styles of coaching include the “*Eastern European*” coaching style that was copied in New Zealand over the last few decades. This style of coaching is antithetical to well-being and normalises abusive coaching practices. Although this style of coaching is less common today, it is still a concern. There is no overarching coaching association in New Zealand, nor is there a clear pathway for coaches beyond taking FIG courses to increase stature and rank.

The NZR also found themes related to inappropriate behaviour and pressure from judges including making inappropriate comments about gymnasts within earshot of gymnasts and spectators. The NZR found that some interviewees were concerned about judging bias that negatively impacts gymnasts from smaller clubs or regional areas. The NZR also documented instances where junior judges felt pressure from senior judges to change scores without explanation.

Issues related to competitive pathways include decisions to put very young gymnasts on a competitive development track. Young gymnasts who do not display the requisite level of skill for competitive gymnastics at a very young age are often relegated to non-competitive tracks or feel pressure to quit. Additionally, the pressure and expectation imposed by parents and coaches to master the body control and strength necessary for very complicated competitive maneuvers at a young age led some young gymnasts to injure themselves in training or experience mental health issues.

A general lack of education about many of the issues noted in the NZR was found to be prevalent, as well as a lack of concern expressed by individuals about their respective roles. For example, coaches were largely uneducated about the emotional toll that more aggressive coaching styles take on gymnasts. Likewise, parents often lack information regarding the diagnosis and treatment of gymnastics injuries. Several current education and guidelines are not based in science but rather have existed as “*rules of thumb*” for years. For example, the recommendation that gymnasts participate in a number of training hours per week equal to their age in years is not grounded in science.

Several issues were raised about GNZ that impacts culture. Many community members lack trust in GNZ and cite a disconnect between the GNZ head office and the gymnastics community. Some community members feel that feedback is ignored by GNZ which may be the result of poor communication by GNZ. The GNZ head office is portrayed as having an “*us versus them*” mentality.

Although several issues were raised about GNZ, so too were strengths. GNZ members were cited as acting with the best of intentions and GNZ staff members were proactive in addressing some existing issues within the sport. At times, communication from GNZ was strong. Policies and processes are well-written according to the NZR. GNZ was also cited as being innovative in addressing integrity matters, which is reflected in new disciplinary rules. Moreover, the safeguarding and child protection rules set a high standard.

The role of clubs was addressed in the NZR. Concerns include poor communication between gymnasts and clubs or coaches as well as poor club structures and independent governance.

These poor structures are further impacted by reliance on volunteers and growing dependence on parents to take on additional responsibilities, often with little experience or knowledge. Together, this also creates conditions ripe for conflicts of interest.

A concern amongst many NSOs in New Zealand is how independent, qualified investigators are recruited and resourced to conduct an investigation following a complaint of misconduct. Specific concerns related to GNZ include inadequate communications and that the process does not move fast enough. Other concerns include processes where allegations of misconduct towards a child gymnast are made; a fundamental concern is whether the adult adversarial legal process is appropriate for complaints of misconduct made by child gymnasts. The adult adversarial legal process protects the rights of alleged perpetrators and does not do enough to recognise the rights of victims and survivors of abuse, especially when these are children.

Several concerns are raised in the NZR involving allegations of abuse against an employee of GNZ or a club. Issues in the complaints process include reluctance to pursue complaints against a club or an employee for fear of retribution. Also, as it relates to confidentiality, third-party reporting of outcomes in employment misconduct cases is not permitted unless all those involved consent to publication; for this reason, it is possible that an alleged perpetrator could inflict further harm in a new position because of the confidential nature of previous misconduct.

Several systemic macro issues within the sporting culture of New Zealand are cited in the NZR that have an impact on sporting culture, including gymnastics. For example, the Sport Integrity Review conducted by SNZ in 2019 indicates that only 14% of survey participants felt that sport organisations they were affiliated with are willing and able to handle cases of harassment, bullying and abuse. Clubs are expected to shoulder the burden of social and legal issues that are not just sport-related, but that are national societal concerns. The Feasibility Report (2020) undertaken by Phillipa Muir and John Rooney for SNZ indicates that GNZ does not have the capability and resources to effectively deal with some complaints, particularly those involving inappropriate behaviour.

## Switzerland National Investigation into Rhythmic and Artistic Gymnastics Incidents ('SNI') - 2021

In 2020, allegations were made by former elite female rhythmic and artistic gymnasts of abuse, intimidation and humiliation at the Swiss Gymnastics Federation's national performance centre. At the national level in Switzerland, the Federal Department of Defence, Civil Protection and Sport ('DDPS') launched an investigation into these incidents and published a summary and recommendations on 8 October 2021.<sup>84</sup> The review team consisted of 8 full-time members, 1 part-time advisor, and 2 supervisors.

The SNI investigated the factual circumstances published in 'Das Magasin' on 31 October 2020 to analyse the existing rules and instruments in place to protect young athletes, identify improvements and make recommendations to prevent similar issues in the future. The following areas were to be examined:

- Roles of bodies involved and what they did to prevent the incidents;
- Indications of other similar incidents in the field of artistic/rhythmic gymnastics at Magglingen and/or regional performance centres and the cantonal training centres;
- Whether this kind of abuse is systemic in sport disciplines that are comparable to rhythmic gymnastics and artistic gymnastics;
- The instruments currently available to the players in the Swiss sport system to ensure correct ethical treatment and to identify and prevent incidents;
- Other sport disciplines comparable to rhythmic gymnastics and artistic gymnastics that require action;
- Approaches taken in other countries similar to Switzerland;
- Whether rules and instruments that could prevent similar incidents in the future are missing.

### Stakeholders

- Athletes;
- Parents of athletes;
- Coaches;
- Sports bodies and federations;
- Key Personnel (Directors, Board members, etc.).

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<sup>84</sup> Government of Switzerland, Federal Department of Defence, Civil Protection and Sport, "External investigation report in connection with the incidents pertaining to rhythmic and artistic gymnastics," 8 October 2021.

## Methodology

The SNI went back as far as 1 January 2016 and, in some circumstances, examined incidents from 1 January 2011 forward if they were related to findings after 2016. The investigation concluded on 16 August 2021. Key elements of the investigation included the following:

- **Personal Interviews** - A total of 108 personal interviews were conducted. Interviewees included members of the Swiss Federal Office of Sport, Swiss Olympic Committee, Swiss Gymnastics Federation, Swiss Aquatics, Swiss Ice Skating, athletes from the “*Magglingen Protocols*” and rhythmic gymnasts.
- **Surveys** – An anonymous survey targeted athletes from technical compositional sports disciplines including women’s artistic gymnastics, men’s artistic gymnastics, trampoline (Swiss Gymnastics Federation), figure skating (Swiss Ice Skating), and artistic swimming and diving (Swiss Aquatics). Surveys also targeted coaches from technical compositional sports disciplines including rhythmic gymnastics, women’s artistic gymnastics and men’s artistic gymnastics, regional performance centres and cantonal training centres for rhythmic and artistic gymnastics, as well as the Swiss Gymnastics Federation. A total of 970 athletes completed the surveys.
- **Examination of Situations Abroad** – This included an examination of the state of gymnastics in comparable countries including Belgium, the Netherlands, New Zealand, Germany, France, Italy and Austria.
- **Examination of International Scientific Research** – This included research by Dr. Natalie Barker-Ruchti, Associate Professor, Örebro University, Sweden. The purpose of this examination was to identify the general scientific findings and characteristics of technical compositional sports and to examine the duty of care towards athletes as well as the scientific background on violence transgressions and neglect in technical compositional sports.
- **Appointment of Experts** – Experts were appointed to provide input including expert groups of athletes and coaches from rhythmic gymnastics, women’s artistic gymnastics and men’s artistic gymnastics.
- **Legal Assessment** – A legal assessment was performed by the investigative team who considered human rights and children’s rights, employment law and criminal law.

## Strengths

The SNI used both qualitative and quantitative methods including interviews and surveys allowing for greater depth of inquiry and statistical analysis. The SNI benefitted from adopting a broad methodology and relying on a variety of primary and secondary research sources. For example, the SNI presents scientific information, background research and information about technical compositional sports, which provides context to readers.

The recommendations are comprehensive. Each recommendation includes a justification, detailed explanation and violence-inhibiting factors. The recommendations provided are clear and specific which eliminates potential confusion regarding their implementation.

The SNI also benefitted from examining and comparing the state of gymnastics communities in comparable countries. As a result, the SNI was able to identify a common issue: the need for additional training and support of coaches.

## Limitations

Although the SNI interviewed multiple gymnasts and athletes from other sports, the investigation team did not include a gymnast or athlete from any other sport to provide an athlete perspective in the design of the investigation.

The SNI would have benefitted from an executive summary outlining its key findings.

## Themes

The findings were grouped into the following seven categories:

1. Scientific Consideration of Technical Compositional Sports;
2. Swiss Sports System from a Legal Standpoint;
3. View of Experts on the Target State;
4. Situation Abroad;
5. Technical Compositional Sports;

6. Allegations in the “Magglingen Protocols”;
7. Incident-Reporting Options.

Responses from athletes indicated that athletes experience mental and psychological violence, physical violence and boundary violations, sexual violence, neglect and lack of regular medical care.

Responses from coaches indicated a lack of familiarity with the content of ethical guidelines and unsatisfactory working conditions (i.e. not enough opportunities to discuss issues with superiors, regular unpaid overtime work, inadequate pay). The responses also highlighted problems with the young age of athletes in rhythmic gymnastics and women's artistic gymnastics, that objectives related to health, welfare and ethics are considered secondary to success, and that communication between parents and coaches is less common at the national level than at lower levels. Additionally, the results indicated a positive relationship between coaches and athletes, which contrasted with the responses given by athletes.

Responses from regional performance centres and cantonal training centres indicated that incidents have been reported at all regional performance centres and cantonal training centres and that there have been reports of violations of the Ethics Charter and Code of Conduct. The responses also highlighted weight as a controversial issue, insufficient funding, the pressure put on coaches to meet the goal of increasing revenues, and the need for improvements regarding injury and pain management.

Allegations in the “Magglingen Protocols” included those of physical and verbal abuse, psychological issues, control over weight and eating disorders, violence and neglect, stress, unrealistic goal setting, emphasis on sporting success, training on injuries, negative attitudes from coaching staff, unsatisfactory behaviour towards parents, insulting and humiliating comments and racism. Allegations were also made against Swiss Gymnastics Federation for failing to take the situation seriously, tolerating the poor treatment of athletes by coaches, hardly ever questioning the board, not giving enough care to the implementation of ethical policies, not reporting ethical violations to the FIG and failing to take action. The results found that the Federal Office of Sport failed to take immediate action despite being aware of the physical and psychological maltreatment of athletes, and did not give enough care to violations and the

implementation of ethical principles and the handling of public funds. The results also indicated that Swiss Olympic did not give enough care to the implementation of ethical principles and that the performance-oriented classification system encouraged unrealistic performance goals. Responses also indicated that Swiss Olympic claimed that there was a lack of ethical violations, which was inconsistent with responses from athletes.

With regard to incident-reporting, the SNI found that resources, procedures and access to the services provided by the Ethics Committee require improvement. Results indicated issues with the lack of anonymity when reporting incidents at the national level.

The recommendations were grouped into the following six categories:

1. Development of Basic Principles;
2. Introduction of Fundamental Control Mechanisms;
3. Clarification of Access to and Working Methods of Reporting Office;
4. Changes to Funding System;
5. Changes to Situation of Athletes;
6. Changes to Situation of Coaches.

### Dutch Gymnastics Investigation ('DGI') – 2020

The following summary is drawn from a translated English summary of the DGI that was published in Dutch and additional published news accounts. Analysis by the IRT is limited by the fact that this is a short summary rather than a full translation of the Dutch report. As such, there is incomplete information for the IRT to comment on the methodology or the strengths and weaknesses of the DGI.

The objective of the DGI was to investigate unacceptable behaviour and intimidation into Dutch Gymnastics following allegations of abuse in 2020.<sup>85</sup> In support of the DGI, “*the Center for Safe Sports in the Netherlands, which falls under the umbrella of the Dutch National Olympic Committee, called on any gymnasts who have suffered abuse to come forward and speak about*

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<sup>85</sup> AP News, “Dutch gymnastics federation halts training over abuse probe,” 29 July 2020. Online: <https://apnews.com/article/netherlands-sanne-wevers-sports-europe-2020-tokyo-olympics-gymnastics-295babeebe954dad10e8fd28689a92ad> [Last accessed 21 October 2022].

*their experiences. It said any information received would be kept confidential and that victims of abuse would have the option of reporting their experiences anonymously.*<sup>86</sup> Questionnaires were used to interview former athletes concerning their entire gymnastics career, whereas current athletes were asked about their most recent year competing in the sport.

### Stakeholders

- Dutch Gymnastics (KNGU);
- Current athletes;
- Former athletes;
- Trainers;
- Center for Safe Sports;
- Institute of Sports Justice;
- Dutch Olympic Committee;
- Dutch Sports Federation.

### Themes

The key findings were grouped into the following six categories:

1. Nature and scale of transgressive behaviour;
2. Level and discipline that transgressive behaviour occurs in;
3. Background and characteristics of offenders and victims;
4. How culture contributes to transgressive behaviour;
5. Reporting transgressive behaviour;
6. Policies and legislative measures concerning Safe Sport.

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<sup>86</sup> DW, “Dutch gymnastics hit by abuse allegations,” 29 July 2020. Online: <https://www.dw.com/en/dutch-gymnastics-hit-by-abuse-allegations/a-54365448> [Last accessed 21 October 2022].

## USA Gymnastics Review ('USAGR') - 2017

In late 2016, following myriad reports of “young women allegedly abused by persons affiliated with USA Gymnastics as members or contractors over a lengthy period of time [...]”<sup>87</sup> USA Gymnastics retained Deborah J. Daniels, a former federal prosecutor and Managing Partner of Krieg DeVault LLP, “to conduct an independent review of USA Gymnastics’ bylaws, policies, procedures, and practices related to handling sexual misconduct matters.”<sup>88</sup>

Ms. Daniels partnered with an organisation called Praesidium<sup>89</sup> “in order to conduct an extensive review and analysis of the gymnastics community and culture, as well as how the policies of USA Gymnastics might be amended in order to improve its ability to protect young athletes.”<sup>90</sup>

The IRT interviewed Ms. Daniels who provided additional insights into the USAGR.

### Stakeholders

- USA Gymnastics leadership and staff, Board members, and professional and instructional members;
- Club owners;
- Meet directors;
- National Team staff and coaches;
- Athletes;
- Parents;
- United States Olympic Committee leadership;
- U.S. Centre for SafeSport leadership and other Safe Sport leaders;
- United States House and Senate staff members;
- Law enforcement representatives.

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<sup>87</sup> Deborah J. Daniels, “Report to USA Gymnastics on Proposed Policy and Procedural Changes for the Protection of Young Athletes,” 26 June 2017.

<sup>88</sup> Ibid.

<sup>89</sup> Praesidium: [Helping Organizations Prevent Abuse | Praesidium \(praesidiuminc.com\)](https://www.praesidiuminc.com) [Last accessed: 13 October 2022].

<sup>90</sup> Deborah J. Daniels, “Report to USA Gymnastics on Proposed Policy and Procedural Changes for the Protection of Young Athletes,” 26 June 2017.

## Methodology

The USAGR was conducted over a period of six months, from late 2016 to May 2017 including interviews with over 160 individuals, none of whom are quoted directly in the report, for confidentiality reasons. However, it is not stated what percentage of the total number of interviews occurred with the different stakeholder groups. Most of the interviews were conducted by telephone. Additionally, the names of individuals who were interviewed were not disclosed to USA Gymnastics, who funded the review.

The involvement of Praesidium acted as a “*force multiplier*” in conducting the review, including five additional individuals who supported Ms. Daniels in the interview process and site visits.

The review team also attended a developmental camp at the USA Gymnastics National Team Training Centre, during which they observed coaching practices and conducted additional interviews. The review team made 25 site visits to member clubs, as well as attended 5 gymnastics competitions, and an in-person visit to the national office of USA Gymnastics and the USA Gymnastics National Team Training Centre. Gymnastics club visits included a cross-section of large and small clubs throughout the United States.

Advance notice was given with respect to club visits. Interviews were conducted with gym owners and coaches. Athletes were not interviewed as part of the club visits. Club policies were also reviewed. An audit of physical spaces during club visits helped to identify areas of risk for abuse.

There were no specific date parameters for the USAGR, therefore the review period was open-ended by design. Although there was no limit imposed on how far back the review might examine allegations of abuse, the USAGR was “*forward-leaning*” in its approach.

A thorough policy review was undertaken, consisting of the following documents:

- USA Gymnastics Bylaws;
- USA Gymnastics policies and procedures;
- US Centre for SafeSport governing documents;
- USA Gymnastics online and in-person training materials;
- Sample abuse prevention resources provided by USA Gymnastics;

- We Care and Clubs Care Campaigns;
- Together We Can Initiative;
- Safe Sport programs for other National Governing Bodies;
- International Gymnastic Federation practices;
- S.534 an H.R. 1973 (legislation pending in the US Congress);
- Ted Stevens Olympic and Amateur Sports Act;
- Minutes of USA Gymnastics Board Meetings and Committee Meetings;
- Various articles and books.

The USAGR examined participation at all levels of the sport, from grassroots recreational to high-performance environments. The USAGR found that the higher up the ranks, the greater the pressure and the greater the chance of abuse. Although there is a lesser chance of abuse at lower, recreational levels of the sport according to the reviewers, one cannot assume that abuse is not happening. This was the rationale for examining all levels of the sport, although there was a greater focus on high-performance levels with particular attention paid to women's artistic gymnastics.

The methodology also included a random audit of complaint files focused on the process associated with complaints and associated actions.

As it concerns the implementation and oversight of recommendations, two audits have been completed by Ms. Daniels, with updates provided on the USA Gymnastics website for full transparency.

### Strengths

The collaborative approach between Ms. Daniels and Praesidium is a unique feature of the USAGR. Engaging with this company brought a special level of expertise that may have helped to foster trust in the culture review process, as well as act as a “force multiplier” expanding the capacity to undertake club site visits.

Augmenting personal interviews with in-person visits to the USA Gymnastics Training Centre and 25 visits to clubs is a strength of the USAGR.

Recommendations were specific and actionable. For each recommendation, there was a paragraph that explained why the recommendation was needed and how it could be implemented. For example, the recommendation that USA Gymnastics clarify prohibited conduct included a list of specific conduct that should be included.

The review team carried out their work independently of USA Gymnastics and was not impeded by USA Gymnastics.

### Limitations

The USAGR included interviews with 160 individuals, a relatively low number compared to the number of stakeholders of USA Gymnastics. However, the review had to be completed in 6-months. This sense of urgency to complete the review was a limiting factor.

The USAGR did not provide a breakdown of the stakeholders according to their role(s) within the USA Gymnastics community (e.g. athlete, coach, parent, judge, staff, etc.). Furthermore, the USAGR did not provide a comparative analysis of findings between disciplines where there may be different sub-cultures within the sport.

Although information was also gathered through visits to 25 clubs, the USAGR would have benefitted from increasing the number of pathways to participation. For example, as illustrated in other international gymnastics reviews, some individuals may feel more comfortable providing written submissions or completing a survey.

The USAGR was very policy driven. Beyond a short section at the beginning of the report that discussed the environment in gymnastics, the USAGR did not contain many anecdotes from the gymnastics community or explore in depth how the athlete experience, coaching styles, among other factors contributed to the culture of USA Gymnastics.

Another limitation was the reluctance of current athletes to participate in the review process. There was limited access to victims of abuse. Many current athletes did not trust the process given the significant public attention to ongoing scandals in USA Gymnastics.

## Themes

The findings and recommendations were grouped into nine categories, as follows:

1. Board structure and duties;
2. Administrative management of USA Gymnastics;
3. Member requirements and enforcement;
4. Screening and selection of coaches, volunteers, and other adults with access to athletes;
5. Process for filing reports of misconduct;
6. Education, training, and athlete support;
7. Encouraging reports of suspected violations;
8. National team training center;
9. National team selection process.

Membership on the Board is subject to thorough policies meant to afford representation to a large number of constituency groups who are involved with USA Gymnastics such as former athletes, representatives of each gymnastics discipline and representatives from various gymnastics organisations. While this representation is desirable, the underlying policies make it difficult for the Board to recruit individuals to serve as members of a well-rounded Board. It also makes it difficult for the Board to recruit individuals who are external to competitive gymnastics. Also, Board members are not trained in child abuse prevention and seemingly spend little time discussing Safe Sport issues.

The administrative management of gymnastics places a premium on winning competitions at the expense of gymnasts' safety. Also, excessive and inappropriate power is given to the president. Generally, USA Gymnastics staff from the top down lack sufficient expertise to protect athletes from abuse. Until very recently, USA Gymnastics did not have any staff whose sole responsibility was the protection of athletes.

Member requirements and enforcement includes a belief by USA Gymnastics that it lacks the ability to exert influence and control over clubs. However, this belief is not rooted in policy given that USA Gymnastics has the ability to grant or deny membership privileges; moreover, clubs that wish to have an athlete compete in a USA Gymnastics-sanctioned event must be members. Volunteers in clubs are not screened or held accountable for athlete protection. Furthermore, USA Gymnastics does not ensure that all clubs adhere to the required membership standards.

According to the Participant Welfare Policy in effect as of mid-June 2017, there is no obligation or requirement for members to report instances of suspected abuse to USA Gymnastics officials. Furthermore, persons with ownership interests in clubs are not required to be members of USA Gymnastics. As a result, these stakeholders could effectively bypass USA Gymnastics' policies, including Safe Sport policies.

The screening and selection of coaches, volunteers, and other adults with access to athletes was found to be problematic. Although USA Gymnastics consistently conducts criminal background checks on membership applicants and member clubs often conduct background checks and call references, clubs do not consistently check the 'permanently ineligible' list when hiring; or hire despite a prior history of questionable conduct. Furthermore, there is no organised method for a club to learn of prior dismissals. The USAGR also found that there are no official qualifications to become a coach, including no standards concerning Safe Sport and child protection.

The USAGR included findings concerning the process for filing reports of misconduct. There are only two official methods for processing allegations of misconduct, one of which requires the victim to provide a signed written statement. There is no written protocol for how abuse allegations should be handled. Reviewers of complaints do not have any formal training in child abuse, child protection or investigating abuse.

The review also found that there is no auditing or oversight of the complaint handling process and other issues with the complaint procedures. For example, the burden of proof is not explicitly stated in the complaint procedure and those tasked with deciding the outcome of a complaint have not been given formal training on administrative hearings or the dynamics of child abuse. USA Gymnastics does have a right to ensure the rights of the accused during the complaint process, but this must be balanced against the need to protect young athletes. There is a time limitation on bringing some complaints (either one year or one year following an individual's 18<sup>th</sup> birthday in the case of a minor).

Several findings were reported concerning education, training and athlete support. Professional members are required to complete a 'Fundamentals of Gymnastics' course upon registration

and a 'Safety/Risk Management' course every four years. However, not all adults interacting with young athletes (e.g. coaches, club owners, volunteers) are considered professional members.

One chapter of the safety course focuses on preventing child abuse; however, not all recommendations regarding one-on-one interactions between an athlete and a coach are followed by clubs. Limitations include one section of the course that deals with how to respond to abuse; however, this section does not clearly mandate immediate reporting.

USA Gymnastics provides voluntary abuse prevention training for members, parents and athletes, but many clubs are unaware of these resources. Moreover, many clubs do not distribute or promote the abuse prevention materials for parents provided by USA Gymnastics. There is also a lack of awareness that risks of sexual abuse are not limited to male-female athlete relationships. Perhaps most striking in the findings is that abuse prevention education for athletes is lacking.

Several issues were found concerning the reporting of suspected violations including that the environment of competitive gymnastics suppresses reporting. Reasons include the age and emotional development of athletes, power imbalances, the culture of mental toughness and concerns about retaliation. Also, the cumbersome complaints process discourages complaints. Some club owners are reluctant to report because they are desperate to keep coaches or do not want their club to get a bad reputation. Further compounding these issues is the fact that USA Gymnastics' policies have not always required immediate reporting.

The National Team Training Center ('NTTC') was the subject of several findings. Coaches and athletes are given little information about the experience at the NTTC before attending. Several concerns are noted, including little supervision of athletes outside of the training sessions at the gym and that there is no policy prohibiting coaches and athletes from traveling one-on-one together to the NTTC. At Talent Opportunity Program ('TOPS') camps, counselors are not trained in abuse prevention. Other issues with the NTTC include the athlete recovery room being unsuitable for medical examination (minimal visibility, one-on-one situations), and concerns that athletes do not have sufficient opportunities to contact their parents.

## List of Acronyms

AA	Athlete's Agreement
ACR	Acro
AERO	Aerobic
BG	British Gymnastics
CAAT	Culture of Excellence Assessment and Audit Tool
CAC	Coaching Association of Canada
CAM	Club Accreditation Model
CLP	Club Licensing Program
COC	Canadian Olympic Committee
COPSSIN	Canadian Olympic and Paralympic Sport Institute Network
CPC	Canadian Paralympic Committee
CRC	Criminal Record Check
CRLT	Culture Review Leadership Team
CSCG	Canadian Sport Governance Code
DDPS	Federal Department of Defence, Civil Protection and Sport (Swiss)
DEI	Diversity, Equity and Inclusion Policy
DGI	Dutch Gymnastics Investigation
DMT	Double Mini Trampoline
DSO	Director of Sanctions and Outcomes
EPIC	Enhanced Police Information Check
FIG	Fédération Internationale de Gymnastique
G4C	Gymnasts for Change
GAR	Gymnastics Australia Review
GC	Gymnastics Community
GFA	Gym for All
GNZ	Gymnastics New Zealand
GymCan	Gymnastics Canada
HPD	High-Performance Director
IOC	International Olympic Committee
IR	Independent Review
IRT	Independent Review Team
IST	Integrated Support Team
JDWG	Judge Development Working Group
LADO	Local Authority Designated Officer
MAAPP	Minor Athlete Abuse Prevention Policies
MAG	Men's Artistic Gymnastics
MGSS	McLaren Global Sport Solutions Inc.
NCAA	National Collegiate Athletic Association
NCCP	National Coaching Certification Program
NSO	National Sport Organisation
NTTC	National Team Training Center (USA)
NZR	Gymnastics New Zealand Culture Review
OSIC	Office of the Sport Integrity Commissioner
OTP	Own the Podium
PAGU	Pan-American Gymnastics Union
PTOs	Provincial and Territorial Organisations
RFP	Request for Proposal

<b>RG</b>	Rhythmic Gymnastics
<b>SDRCC</b>	Sport Dispute Resolution Centre of Canada
<b>SNI</b>	Swiss National Investigation
<b>SNZ</b>	Sport New Zealand
<b>TOP</b>	Talent Opportunity Program
<b>TRA</b>	Trampoline
<b>TSN</b>	The Sports Network
<b>TUM</b>	Tumbling
<b>UCCMS</b>	Universal Code of Conduct to Prevent and Address Maltreatment in Sport
<b>UNCRC</b>	U.N. Convention on the Rights of the Child
<b>USAGR</b>	United States of America Gymnastics Review
<b>VSC</b>	Vulnerable Sector Check
<b>WAG</b>	Women's Artistic Gymnastics
<b>WR</b>	Whyte Review

## Appendix A: Survey of Provincial and Territorial Gymnastics Organisations

The Independent Review Team ('IRT') invited the Executive Directors or CEOs of all Provincial and Territorial Organisations ('PTOs') who govern gymnastics in Canada to complete a survey focused on Safe Sport and input to a culture review process. A total of 14 responses were received representing a response rate of 88%. Every Canadian province is represented in the survey results. No responses were received from territorial gymnastics organisations.

### 2.2.1 Participant Data by Province

The following Table provides an approximation of the number of participants associated with each of the PTOs that were surveyed. This information is foundational to inform a culture review process.

#### Gymnastics Participation by Province

Governing Body	# Athlete Participants	Ratio of F/M Participants	# Coaches	# Officials/Judges	# Member Clubs	# Gymnasts on Nat'l Team
Alberta Gym. Fed.	37,925	74%/26%	971	132	74	8
Rhythmic Gym. AB	400	95%/5%	50	20	11	0
Gymnastics BC	38,928	69%/31%	1,126	174	15	3
BC Rhythmic Gym.	1,200	100% F	86	15	15	3
MB Gymnastics Assn.	6,855	83%/17%	278	17	17	0
Rhythmic Gym. MB	400	99%/1%	25	15	7	1
New Brunswick Gymnastics Assn.	3,654	81%/19%	144	24	8	3
Rhythmic Gymnastics NB	395	100% F	41	12	8	1
Gymnastics Nfld. and Labrador	5,100	80%/20%	160	25	11	3
Gymnastics NS	7,307	81%/19%	208	40	13	2
Ontario Gymnastics Federation	90,104	Not Provided	3,880*	*included in # coaches	200	Unknown. Not provided.
Gymnastics PEI	1,448	63%/27%	52	3	15	0
Gymnastique Québec	57,433	80%/20%	1,671	239	98	26
Gymnastics SASK	14,928	75%/25%	489	196	44	4
Total	266,077 <sup>91</sup>	n/a	9,180 <sup>^</sup>	912 <sup>^</sup>	536	54 (excludes Ontario)

<sup>91</sup> Total for coaches includes judges/officials from Ontario.

The IRT did not receive responses from Yukon Gymnastics and Rhythmic Gymnastics Nova Scotia.

<sup>91</sup> Note: The GymCan 2019-2020 Annual Report indicated a total of 312,058 participants (from August 1, 2018 to September 30, 2019).

This data suggests that the total number of gymnasts has decreased by approximately 45,980 individuals or 17% over the past 3 years. This is consistent with interviews with PTOs and GymCan leadership who indicated that decreases in participation are largely due to the COVID-19 pandemic, with commensurate decreases in user fees to the governing bodies. However, one cannot dismiss the potential impact of the negative attention focused on Safe Sport issues in gymnastics as a factor that also may be related to some participants choosing to leave the sport and other individuals choosing not to enter the sport.

### Gymnastics Participation by Province and Discipline

PTOs were asked to indicate the approximate percentage of participants in each of the following disciplines noted in the Table below.

#### **Gymnastics Participation by Province and Discipline (as reported by PTOs)**

Governing Body	WAG	MAG	TRA	TUM	DMT	ACR	AER	RG	GFA
Alberta Gymnastics Federation	7%	1%	1%			1%			91%
Rhythmic Gymnastics Alberta								50%	50%
Gymnastics British Columbia	6%	1%	1%						92%
British Columbia Rhythmic Gymnastics								90%	10%
Manitoba Gymnastics Association	10%	1%	1%						88%
Rhythmic Gymnastics Manitoba								50%	50%
New Brunswick Gymnastics Association	7%	1%	1%						91%
Rhythmic Gymnastics New Brunswick								100%	
Gymnastics Newfoundland and Labrador	75%	15%	10%						
Gymnastics Nova Scotia	4%	1%	1%	1%	1%				92%
Ontario Gymnastics Federation	5%	1%	1%	1%	1%	1%		1%	89%
Gymnastics Prince Edward Island	67%	27%							
Gymnastique Québec	18%	5%	5%					1%	70%
Gymnastics Saskatchewan	5%	1%	1%	1%	1%	1%	1%	1%	92%

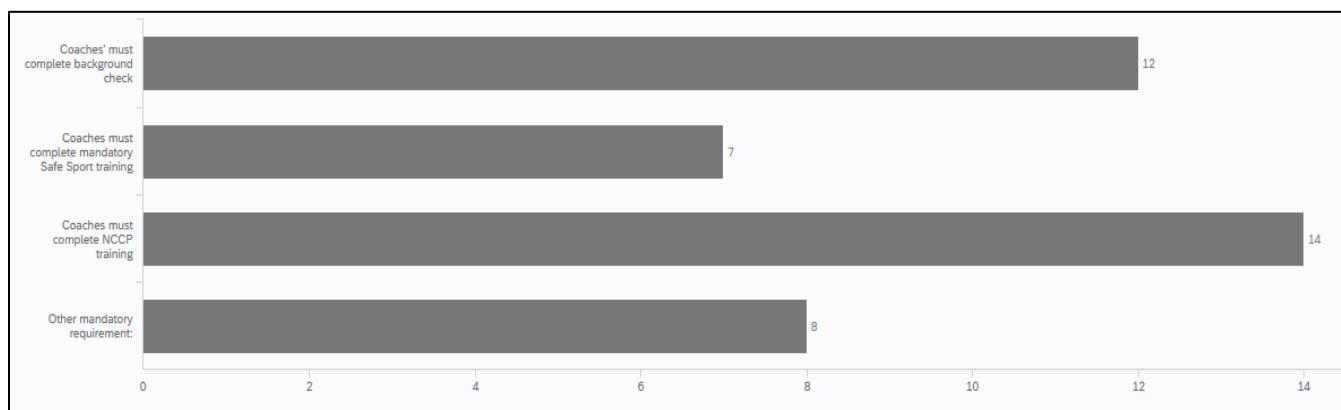
This data implies that more than 222,000 gymnastics participants in Canada (n=222,064; 83%) are involved at the foundational recreational level of the sport – “Gym for All” (‘GFA’). Therefore, approximately 44,000 gymnasts are involved in other competitive disciplines. Women’s Artistic Gymnastics (‘WAG’) includes the largest cohort of competitive gymnastics representing 10% of

all participants nationwide and accounting for 60% of competitive gymnastics across all disciplines.

## 2.2.2 Mandatory Requirements – Coaches and Officials

The vast majority of paid gymnastics coaches in Canada are employed (or volunteer) by local clubs. Very few PTOs directly employ coaches, including no coaches employed by PTOs in most provinces. Thus, the first line of oversight of these coaches rests with local clubs. However, given that clubs are members of a PTO, the IRT set out to better understand provincial oversight as it relates to coaches.

### Mandatory Requirements for Coaches by Provincial Gymnastics' Governing Bodies

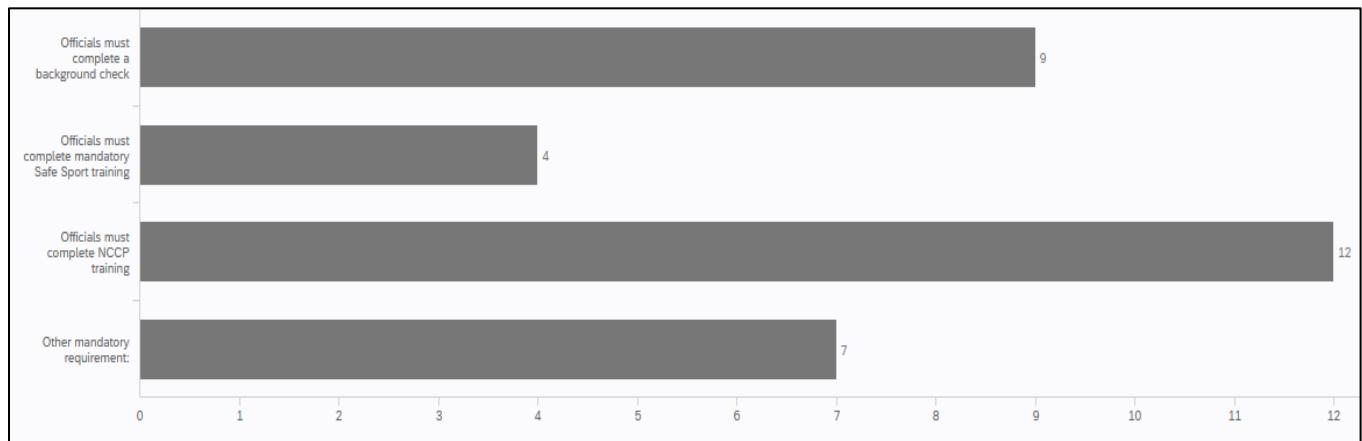


This data illustrates different approaches to mandatory coaching requirements. For example, seven PTOs indicated no mandatory Safe Sport education requirements for coaches. However, six of these seven PTOs indicated that they require coaches to complete Respect in Sport training which is considered a surrogate for Safe Sport training; although it is not strictly focused on Safe Sport curriculum – as evidenced by one PTO that stated, *“Respect in Sport includes some Safe Sport* (emphasis added). Background checks also vary according to province. In fact, four PTOs indicated that no background checks are required because they do not employ coaches. According to one PTO, screening and background checks are primarily a club responsibility; this begs the question as to how these screening and background checks are carried out and the role of PTOs as it relates to oversight and compliance.

One PTO indicated that a background check is dependent on an individual's "risk profile". Some provinces mandate the Coaching Association of Canada's ('CAC') Safe Sport training which was developed as a requirement related to the Universal Code of Conduct to Prevent and Address Maltreatment in Sport ('UCCMS').<sup>92</sup> The IRT questions why NCCP Making Ethical Decisions is a mandatory requirement only for competitive coaches in some jurisdictions as this would be valuable and important content for coaches at every level of the sport. Together this suggests a need for greater consistency and further examination of compliance mechanisms associated with these varied requirements as part of the Gymnastics Culture Review.

The IRT offers for comparison the Table below which summarises mandatory requirements for judges/officials.

#### **Mandatory Requirements for Officials by Provincial Gymnastics' Governing Bodies**



A comparison of the latter Tables illustrates several differences between coaching and judging requirements as they concern background checks and Safe Sport education. In some provinces there are less rigorous requirements related to background checks and Safe Sport education for judges. For example, one PTO requires competitive coaches to complete "Making Ethical Decisions" offered through the NCCP program, but there is no comparable requirement for judges who would also benefit from this training.

<sup>92</sup> Note: Respect in Sport was granted equivalency to the mandatory CAC Safe Sport education requirement, thus completion of either training fulfils any mandatory education requirement.

In some provinces that have dual governance structures for gymnastics and Rhythmic Gymnastics ('RG'), there are differences in mandatory requirements for coaches and judges between the two separate governing organisations. This illustrates gaps that can occur in these dual governance structures that are not aligned within a province.

### Performance Management – Local/Provincial Coaches

The majority of PTOs do not provide written performance reviews for coaches because the vast majority of coaches are employed by local clubs. However, the IRT asked the leaders of PTOs to describe how the performance of provincial team coaches is evaluated to better understand the PTO's role in this critical area of oversight.

#### **How is the Performance of Provincial Team Coaches Evaluated?**

- *"(PTO) does not have any coaches on staff. All coaches are employed through the clubs. Provincial coaches are selected based on their athlete's placement on Team (PTO)."*
- *"Provincial team coaches are named for events like Atlantics, Easterns and Canadians. They must have a certain level of certification in order to attend but they are not evaluated."*
- *"NCCP certified as per competition level as per GymCan, Atlantic or Eastern criteria. Provincially JO 7-10 NCCP 3 or equivalent."*
- *"Annual review - written reporting on goals and objectives."*

The IRT received responses from only four PTOs (28%) in response to this question. Only one PTO indicated a formalised annual review process. Two respondents indicated standards of certification, but did not expand on the PTO's role in systematically monitoring and evaluating coaches who represent the province. Furthermore, given the several hundred local clubs in Canada, it is a reasonable assumption that the performance management process for local coaches varies considerably both within and between provinces. This assumption, together with the PTO's role in ensuring common coaching evaluation standards as a condition of membership in the PTO requires further examination through the Gymnastics Culture Review.

### Athletes on Provincial/Territorial Board of Directors

PTOs were asked if they have any current gymnasts on their Board of Directors or in any type of advisory capacity to the Board. Only three PTOs answered yes. Providing greater opportunities within gymnastics governance for the athlete voice to be expressed should be a priority and an area of attention in the Gymnastics Culture Review.

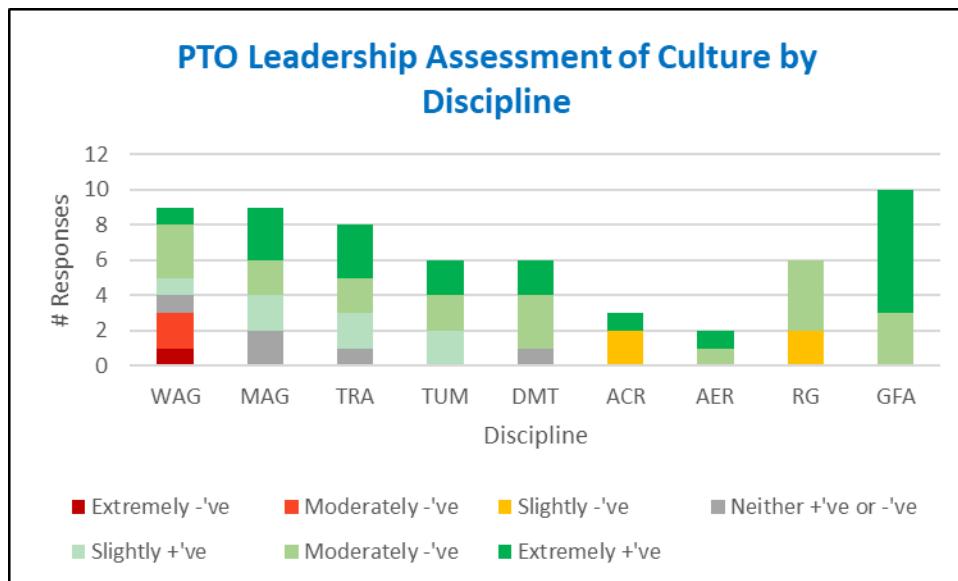
#### **2.2.3 Feedback About a Culture Review Process for Gymnastics in Canada**

The leaders of PTOs were asked several questions about a culture review of gymnastics in Canada to identify areas of consensus as well as other opportunities and challenges associated with undertaking a Gymnastics Culture Review. This is important to inform the culture review process and to ensure support for the process when implemented.

Every PTO leader who responded (n=14; 100%) is in agreement that a culture review of gymnastics is important. Similarly, every PTO leader agrees that there is not a singular culture within gymnastics, but rather a mosaic of sub-cultures by discipline. There also is consensus that a culture review must include an examination of all levels of the sport including recreational participation and competitive and high-performance streams.

### Assessment of Culture by Gymnastics Discipline

PTO leaders were asked to provide their assessment of the relative cultures of the various disciplines offered, on a 7-point scale from “Extremely Negative” to “Extremely Positive”. The results are provided below.



Only one discipline – WAG – was rated “Extremely Negative” or “Moderately Negative” (33%). This appears in the red colour scheme above. However, more PTO leaders considered WAG to be “Moderately Positive” (33%) or “Extremely Positive” (11%) seen in the green colour scheme. Other disciplines of concern according to PTO leaders include Acro (‘ACR’) and RG with some suggesting that these disciplines are “Slightly Negative.” This is seen in the amber colour scheme. More PTO leaders considered “Gym for All” an extremely positive discipline versus all others. Men’s Artistic Gymnastics (‘MAG’), Trampoline, Tumbling, Double-Mini Trampoline and Aerobic were all considered to be more positive than WAG, ACR, and RG.

#### Concerns Related to Mental or Physical Health Risks for Athletes

PTO leaders were asked to indicate their level of concern about how different factors might be related to mental or physical health risks for athletes participating in the sport of gymnastics in Canada. This is illustrated below.

## Concerns Related to Mental or Physical Health Risks for Athletes

Factors Related to Mental or Physical Health	Not concerned at all	Slightly Concerned	Moderately Concerned	Very Concerned	Extremely Concerned	Total
Body image perceptions/sensitivities	15.38%	2	7.69%	1	30.77%	4
High demand for results	23.08%	3	0.00%	0	61.54%	8
Authoritative coaching	23.08%	3	0.00%	0	30.77%	4
Frequency of training load	15.38%	2	23.08%	3	30.77%	4
Pressure to engage in early specialization	15.38%	2	15.38%	2	46.15%	6
Parental influence	15.38%	2	7.69%	1	53.85%	7
Other factor? Please list and rank.	0.00%	0	33.33%	1	0.00%	0
Other factor? Please list and rank.	0.00%	0	0.00%	0	0.00%	0
Total		14		8		33
						21
						6
						82

This data illustrates the concern that PTO leaders have for all of the factors listed in the above Table. Almost 77% of PTO leaders expressed some level of concern about the impact of authoritative coaching practices and the high demand for results. Almost 85% of PTO leaders expressed some level of concern about all the other factors listed.

### 2.2.4 Feedback About Safe Sport Policies and Procedures

PTO leaders were asked to provide feedback about their own organisation's Safe Sport policies as well as those of Gymnastics Canada ('GymCan'). This data is provided below.

#### Self Assessment of PTO Safe Sport Policies

Statements about PTO's Safe Sport Policies	Strongly Agree		Agree		Somewhat Agree		Neither Agree nor Disagree		Somewhat Disagree		Disagree		Strongly Disagree		Total
	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	
Our Safe Sport policies are comprehensive	14.29%	2	71.43%	10	7.14%	1	7.14%	1	0.00%	0	0.00%	0	0.00%	0	14
Our Safe Sport policies are effective	7.14%	1	71.43%	10	7.14%	1	14.29%	2	0.00%	0	0.00%	0	0.00%	0	14
Our Safe Sport policies are well understood by our participants and members	7.14%	1	21.43%	3	35.71%	5	28.57%	4	7.14%	1	0.00%	0	0.00%	0	14
Procedures to report allegations of maltreatment are clearly outlined in our Safe Sport policies	35.71%	5	42.86%	6	21.43%	3	0.00%	0	0.00%	0	0.00%	0	0.00%	0	14
Our Safe Sport policies have been communicated to our provincial membership	42.86%	6	35.71%	5	21.43%	3	0.00%	0	0.00%	0	0.00%	0	0.00%	0	14
Our Safe Sport policies are successfully implemented	35.71%	5	21.43%	3	28.57%	4	14.29%	2	0.00%	0	0.00%	0	0.00%	0	14

PTO leaders are in general agreement that their Safe Sport policies are comprehensive.<sup>93</sup> The strongest agreement is with the statement “Our Safe Sport policies have been communicated to our provincial membership.” There also is strong agreement with the statement that “Procedures to report allegations of maltreatment are clearly outlined in our Safe Sport policies.” However, the weakest agreement is with the statements “Our Safe Sport policies are effective” and “Our Safe Sport policies are well understood by our participants and members.” Therefore, despite agreement that reporting procedures are clearly outlined in policies, such procedures are rendered ineffective if people are unaware of the procedures or do not fully understand them. This is a consistent theme that emerged through the public survey and personal interviews and represents a significant gap.

### PTO Assessment of Gymnastic Canada’s Safe Sport Policies

Statements about GymCan's Safe Sport Policies	Strongly Agree		Agree		Somewhat Agree		Neither Agree nor Disagree		Somewhat Disagree		Disagree		Strongly Disagree		Total
	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	
GymCan's Safe Sport policies are comprehensive	7.14%	1	57.14%	8	21.43%	3	7.14%	1	7.14%	1	0.00%	0	0.00%	0	14
GymCan's Safe Sport policies are effective	0.00%	0	50.00%	7	28.57%	4	7.14%	1	14.29%	2	0.00%	0	0.00%	0	14
GymCan's Safe Sport policies are well understood by our participants and members	0.00%	0	14.29%	2	28.57%	4	14.29%	2	21.43%	3	14.29%	2	7.14%	1	14
Procedures to report allegations of maltreatment are clearly outlined in GymCan's Safe Sport policies	14.29%	2	28.57%	4	35.71%	5	14.29%	2	0.00%	0	7.14%	1	0.00%	0	14
GymCan's Safe Sport policies have been communicated to our provincial membership	7.14%	1	28.57%	4	35.71%	5	21.43%	3	0.00%	0	0.00%	0	7.14%	1	14
GymCan's Safe Sport policies are successfully implemented	7.14%	1	7.14%	1	14.29%	2	35.71%	5	14.29%	2	7.14%	1	14.29%	2	14
We have fully adopted GymCan's Safe Sport policies as written with no changes	0.00%	0	21.43%	3	7.14%	1	0.00%	0	21.43%	3	35.71%	5	14.29%	2	14
We are aligned with most of GymCan's Safe Sport policies but have adapted some provisions to reflect other organisational requirements within our PTO	21.43%	3	64.29%	9	7.14%	1	0.00%	0	0.00%	0	7.14%	1	0.00%	0	14

PTO leaders are in agreement that they are aligned with most of GymCan's Safe Sport policies (92% agreement), although fewer (28%) agree that their PTO has fully adopted GymCan's Safe Sport policies as written with no changes. The latter finding comes as no surprise to the IRT given the need in many provincial jurisdictions to adjust policies to be in compliance with provincial mandates.

<sup>93</sup> Note: PTO Safe Sport Policies have not been independently reviewed by the IRT as this was outside the Terms of Reference for this Review.

A majority also agree that GymCan's Safe Sport policies are comprehensive (85% agreement) and effective (78% agreement). Most PTO leaders also agree that procedures to report allegations of maltreatment are clearly outlined in GymCan's Safe Sport policies (78% agreement). Furthermore, more than 70% of PTO leaders indicated that GymCan's Safe Sport policies have been communicated to provincial members. However, despite this vote of confidence in GymCan's Safe Sport policies generally, there appears to be a gap between the content of the policies and the awareness and understanding of these policies amongst many in the gymnastics community. This finding is consistent with the relative disagreement of PTO leaders with the following two statements:

- “GymCan’s Safe Sport policies are well understood by participants and members.” (42% disagreement)
- “GymCan’s Safe Sport policies are successfully implemented.” (35% disagreement)

Therefore, although there is overall satisfaction with the Safe Sport policies of GymCan, there are concerns about how these policies are implemented and understood by participants and members.

PTO leaders were asked to indicate their overall level of satisfaction with each of the following Safe Sport policies of GymCan.

#### PTO Satisfaction with Gymnastic Canada's Safe Sport Policies

GymCan Policy	Extremely dissatisfied		Somewhat dissatisfied		Neither satisfied or dissatisfied		Somewhat satisfied		Extremely satisfied		Total
	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	
National Safe Sport Policy	0.00%	0	8.33%	1	16.67%	2	58.33%	7	16.67%	2	12
Code of Ethics and Conduct Policy	0.00%	0	8.33%	1	16.67%	2	58.33%	7	16.67%	2	12
Complaints and Discipline Policy and Procedures	0.00%	0	36.36%	4	27.27%	3	27.27%	3	9.09%	1	11
Abuse, Maltreatment, and Discrimination Policy	0.00%	0	9.09%	1	9.09%	1	54.55%	6	27.27%	3	11
Diversity, Equity, and Inclusion Policy	0.00%	0	18.18%	2	0.00%	0	54.55%	6	27.27%	3	11
Screening Policy	18.18%	2	9.09%	1	9.09%	1	36.36%	4	27.27%	3	11
Rule of Two Guidelines	0.00%	0	16.67%	2	16.67%	2	33.33%	4	33.33%	4	12
Travel Policy	0.00%	0	42.86%	3	28.57%	2	28.57%	2	0.00%	0	7
National Team Travel Responsibilities Manual	0.00%	0	40.00%	2	20.00%	1	40.00%	2	0.00%	0	5
National Team Handbook	0.00%	0	25.00%	1	50.00%	2	25.00%	1	0.00%	0	4

PTO leaders are most satisfied with GymCan's 'Abuse, Maltreatment and Discrimination Policy' (81% satisfied) as well as the 'Diversity, Equity and Inclusion Policy' (81% satisfied). This is followed by strong satisfaction with the 'National Safe Sport Policy' (75% satisfied) and the 'Code of Ethics and Conduct Policy' (75% satisfied). A majority of PTO leaders are also satisfied with GymCan's 'Rule of Two' Guidelines (66% satisfied) and 'Screening Policy' (63% satisfied). There is more dissatisfaction with GymCan's 'Travel Policy' (43% dissatisfied) and 'Complaints and Discipline Policy and Procedures' (36% dissatisfied).

PTO leaders were provided with the opportunity to provide any recommendations as to how GymCan's Safe Sport policies might be improved. The responses are provided in the Table below.

### **PTO Recommendations to Improve GymCan's Safe Sport Policies**

<b>Communications &amp; Awareness of Policies</b> <i>"GymCan policies should be much more easily accessible on their website. They are difficult to find."</i>  <i>"Sharing of the national team handbooks for all disciplines with all PTO CEOs in order to assure alignment."</i>
<b>Equity &amp; Inclusion</b> <i>"A better understanding of inclusion and what that looks like for national team members."</i>  <i>"Ethics/Equity/Inclusion policies need to developed and outdated Diversity &amp; Inclusion policies need to be revised to encompass more and broader policies (gender, culture, etc.)."</i>
<b>Reporting and Alignment</b> <i>"Better following of their guidelines (reporting, case management) in terms of what cases are their responsibility and what are not."</i>  <i>"Ideally the GymCan policies could have been finalised with templates prepared for PSO/PTO members. Specifically, the intake process involving the Sport Welfare Officer has resulted in several individual complainants not receiving timely responses or updates relating to their submitted complaints. These frustrated complainants have taken their concerns to the media, to social media, and have collaboratively called for change."</i>
<b>GymCan Staffing, Capacity and Member Support</b> <i>"There should be a Safe Sport Director in place to continually review, revise and uphold policies."</i>  <i>"The policies themselves may be strong, the implementation of the policies is not happening in a way that is meeting needs of PTOs or complainants and respondents. As a PTO member who has experienced multiple inter-provincial complaint scenarios - GymCan has been very hesitant to take leadership or direct these complicated and important issues."</i>  <i>"The financial burden of maintaining the current processes seems very expensive. Despite this high cost, the only staff member that I am aware of that is involved in Safe Sport matters is the CEO of GymCan. The</i>

*Director, Safe Sport position was not filled even though it was vacated more than 12 months ago. This creates a vacuum in a very important space."*

### **Screening Policies**

*"I have a draft Screening Policy from January 2019 - I have never seen an approved, final version circulated and it is not on the website. I think one of the tricks with these sorts of procedural policies is that everything can sound good on paper and seem to make sense, but until you actually walk through the process in real life, you may not pick up on issues, inconsistencies, tweaks that need to be made. Otherwise, I think the other documents/policies are in good shape. I'll just refer back to my previous comment that I think some of the language could be simplified throughout."*

PTO leaders were asked to indicate their level of agreement with the following statements pertaining to jurisdiction.

### **PTO Feedback on Jurisdiction**

Statements about Jurisdiction	Strongly Agree		Agree		Somewhat Agree		Neither Agree nor Disagree		Somewhat Disagree		Disagree		Strongly Disagree		Total
	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	
PTOs have primary jurisdiction over provincial clubs, provincial teams, provincial athletes, and provincial staff	66.67%	8	33.33%	4	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	12
GymCan has primary jurisdiction over national team programs, national team athletes, and national team staff	58.33%	7	33.33%	4	8.33%	1	0.00%	0	0.00%	0	0.00%	0	0.00%	0	12
Complaints that arise at the provincial level that do not involve national team participants are, for the most part, dealt with at the provincial level according to our policies (via our PTO's complaint and reporting procedures)	50.00%	6	50.00%	6	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	12
Complaints that arise at the national level involving national team participants are, for the most part, dealt with at the national level according to GymCan's policies (via GymCan's complaint and reporting procedures)	33.33%	4	41.67%	5	25.00%	3	0.00%	0	0.00%	0	0.00%	0	0.00%	0	12
Local gymnasts at the club level who are not associated with a national team program have little interaction with Gymnastics Canada	75.00%	9	8.33%	1	8.33%	1	0.00%	0	8.33%	1	0.00%	0	0.00%	0	12

The responses confirm what is generally understood about the jurisdiction of gymnastics in Canada. PTOs have primary jurisdiction over provincial stakeholders and GymCan has primary jurisdiction over national team programs, athletes and staff. PTO leaders also agree that this jurisdiction extends to the reporting of complaints, depending on where the complaint arises. However, there are exceptions to this jurisdiction of reporting complaints including circumstances when GymCan can intervene. There is much confusion about this process based

on feedback provided to the IRT, including comments from one PTO leader who recommended *“There needs to be better following of their (GymCan) guidelines (reporting, case management) in terms of what cases are their responsibility and what are not.”*

PTO leaders also strongly agree that local gymnasts at the club level who are not associated with a national team program have little interaction with GymCan. This is addressed further in Chapter 2 of the Report.

PTO leaders were provided with the opportunity to provide any additional comments, concerns, or recommendations concerning the jurisdiction of gymnastics in Canada. The responses are provided in the Table below.

### **PTO Feedback on Jurisdiction**

#### **General Comments**

*“Jurisdiction needs to be clearly identified.”*

*“PTOs also have received less support when required for dealing with complex jurisdictional issues (inter-provincial complaints) that have a medium/low severity where leadership is very important.”*

#### **Reporting and Complaint Management**

*“I recommend that GymCan ensure they are only taking on Safe Sport complaints that fall within their jurisdiction and their policies.”*

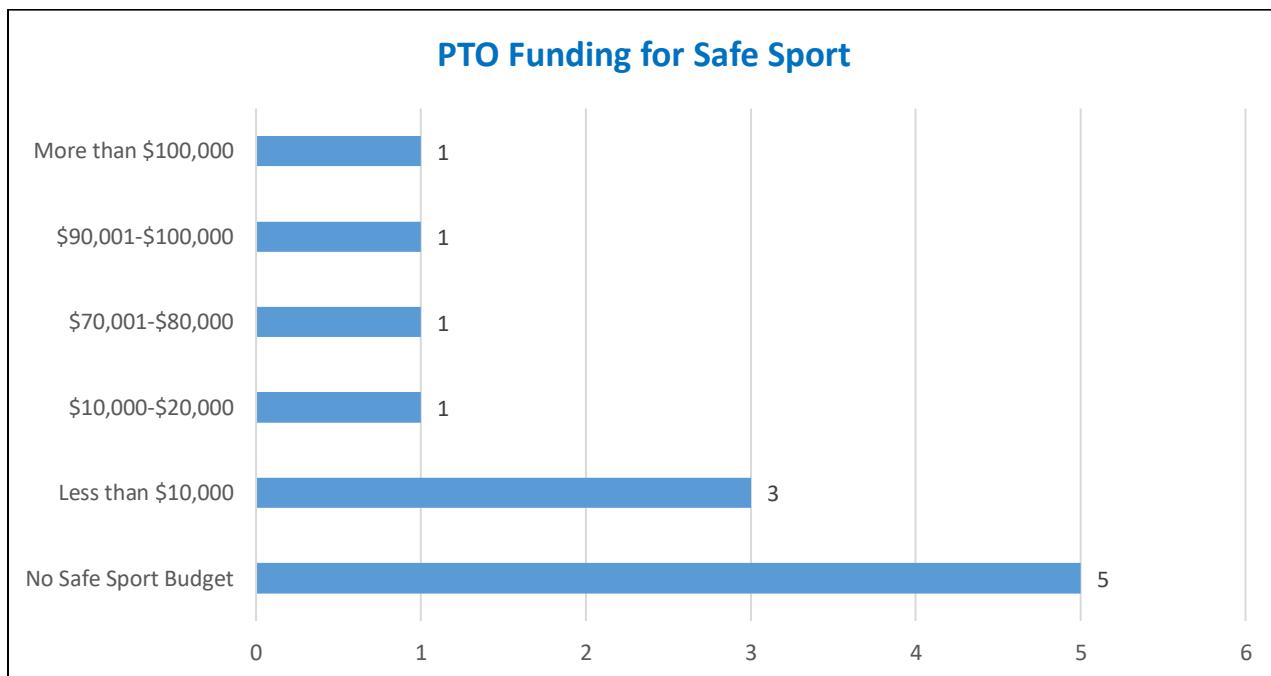
*“In my experience GymCan has accepted complaints based more on severity rather than jurisdiction. Meaning, the more severe the complaint, the more likely GymCan will insert its own process. This may be related to its level of trust with its member organisations and the local clubs - as well as the diverse capacities from each province to address these matters.”*

*“With regards to national team athletes - it still depends a bit on the complaint as to whether it is under GymCan or provincial jurisdiction. If it is a complaint about their personal coach's behaviour in the daily training environment - that would fall under provincial jurisdiction. It may be that there is cross-over.”*

*“Similarly, we have some cross-jurisdiction between clubs and provincial level matters. National team members are also provincial members, and as such GymCan needs to keep PTOs better informed regarding any complaints or disputes related to these individuals.”*

*“Most PSOs can be bankrupted with court or legal costs.”*

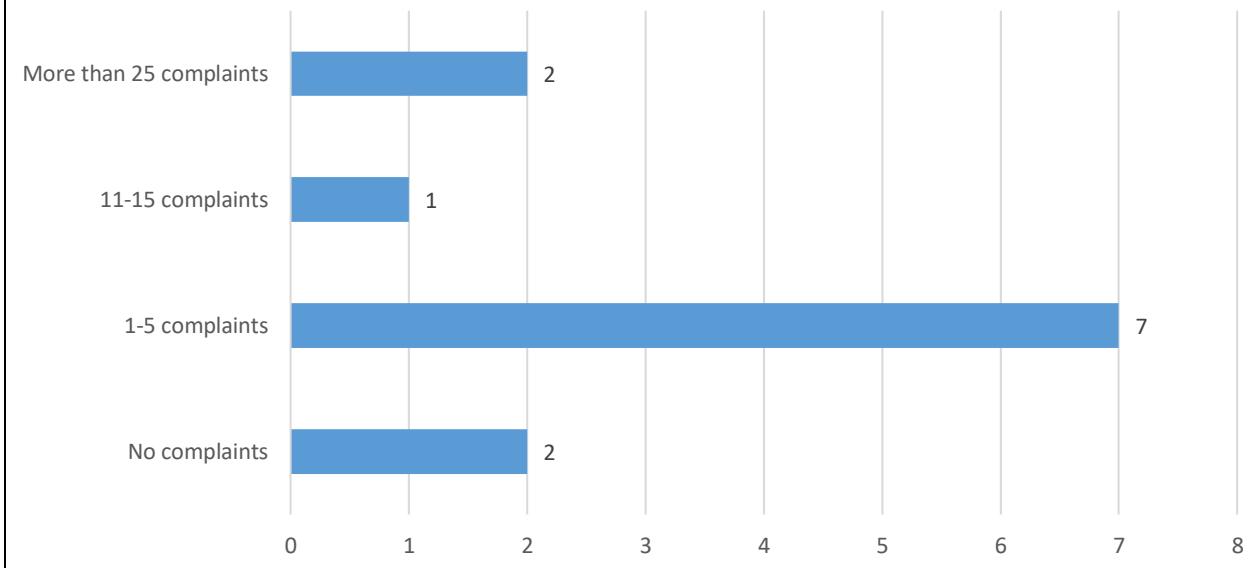
PTOs were asked to indicate their approximate current annual level of funding for Safe Sport functions including education, staffing, programming and dispute resolution (i.e. complaint management and resolution).



The results indicate that few PTOs are equipped financially to support Safe Sport, which is especially concerning given its growing importance and associated risks. Consider, for example, that only one PTO (Gymnastics British Columbia) employs a dedicated Safe Sport Officer. Five PTOs indicated no budget for Safe Sport and three PTOs indicated a budget of less than \$10,000 including one that indicated “\$1,000” and another that indicated “as needed.” A total of three PTOs have Safe Sport budgets in excess of \$70,000 and only one in excess of \$100,000.

PTOs were asked to indicate how many complaints/reports of maltreatment have been made to their organisation in the last five years. This is illustrated below.

## Number of Safe Sport Complaints Received by PTOs in Last 5 Years



Two PTOs received more than 25 Safe Sport complaints in the last five years. This compares with seven PTOs that have received between 1-5 complaints, and one PTO that has received between 11-15 complaints over a five-year period. Two PTOs received no Safe Sport complaints in the past five years.

### PTO Feedback on the UCCMS

Several questions were asked about the UCCMS which are summarised below.

#### **Has your organisation adopted or incorporated any portion of the UCCMS in your policies?**



The majority of PTOs (n=7; 58%) have not adopted or incorporated any portion of the UCCMS in their policies. This suggests that the “universal” aspirations of the UCCMS are not being met at present in the sport of gymnastics particularly at the grassroots level.

GymCan has adopted the UCCMS and signed an agreement with the Office of the Sport Integrity Commissioner ('OSIC') as it involves the role of the OSIC as the independent national mechanism to which GymCan complaints can be filed. However, the scope of the UCCMS as it pertains to "*Individuals Subject to and Protected by the UCCMS*"<sup>94</sup> is entirely dependent on how GymCan defines "*Participants*." Only half of the PTO respondents are aware of how GymCan has defined "*Participants*" as it pertains to who is bound by the OSIC and UCCMS. In fact, only national team participants including athletes, coaches and staff are defined as Participants subject to the UCCMS and the centralised national reporting mechanisms of the OSIC. Therefore, allegations of maltreatment at the local and provincial levels that do not involve a national team coach, athlete, or other staff members must cede to provincial jurisdiction. Therefore, the vast majority of participants at the recreational and provincial competitive levels do not have access to the reporting procedures of the OSIC. This includes more than 222,000 recreational gymnastics participants which represents more than 83% of gymnastics participation in Canada. Given that GymCan has signed on to the UCCMS and the OSIC, coupled with jurisdictional issues that already are apparent with reporting, it is critical that the gymnastics community in Canada is fully educated about who has access to the UCCMS and the OSIC.

PTO leaders also were asked if individuals under their jurisdiction should have access to the national independent reporting mechanism through the OSIC. Three indicated yes, three indicated no, and six were unsure. This suggests the need for more dialogue between national sport leaders and funding agencies, the OSIC and PTOs about provincial access to the OSIC national independent mechanism.

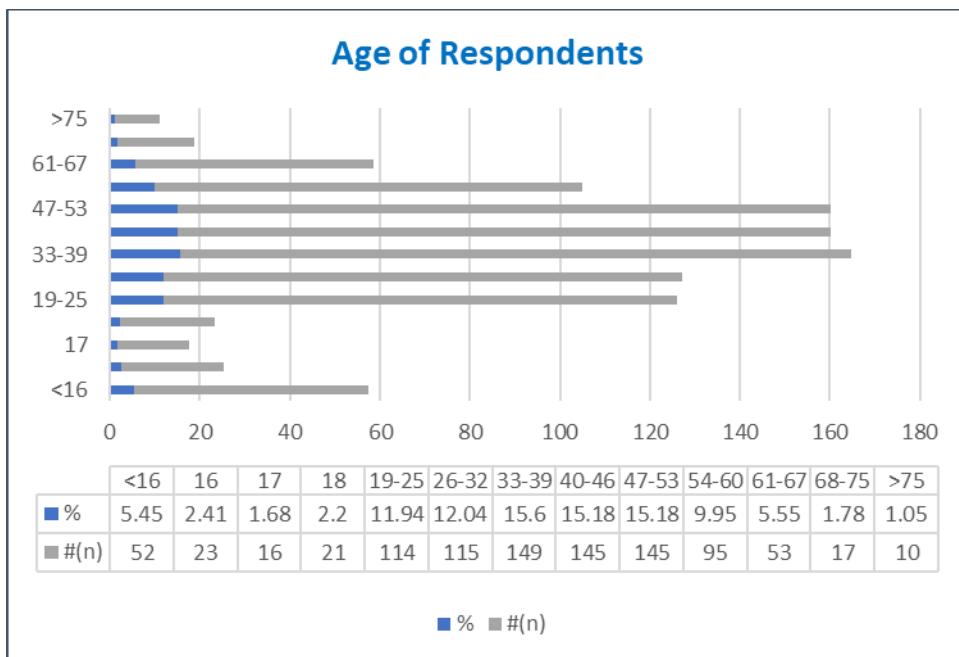
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<sup>94</sup> Office of the Sport Integrity Commissioner, "*UCCMS Version 2022 (6.0)*," 31 May 2022.

## Appendix B: Public Survey of the Canadian Gymnastics Community

The results of the public survey are provided below including a brief interpretation of findings. Open-ended questions are summarised by theme areas that have been identified.

### 2.3.1 Demographic Profile

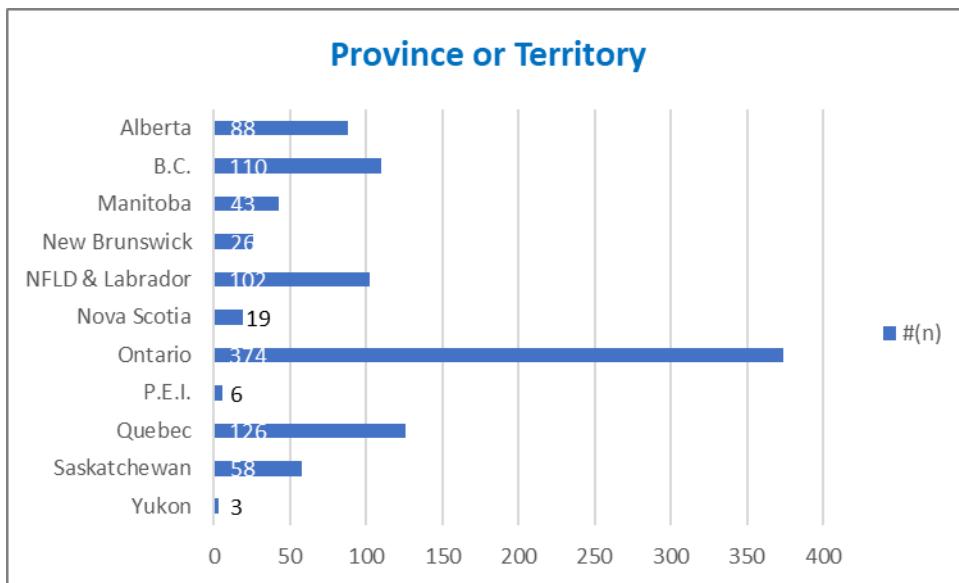


Approximately 12% of responses were from individuals 18 years of age or younger (n=112), including 52 responses (n=52) from youth participants under the age of 16. The largest cohort of responses was in the 40-46 years category (n= 145; 15%) and 47-53 years category (n=145; 15%).

### Breakdown of Survey Responses by Gender Identity



Survey responses included 79% (n=752) who identify as female, 20% (n=191) who identify as male and less than 1% (n=4) who identify as non-binary.



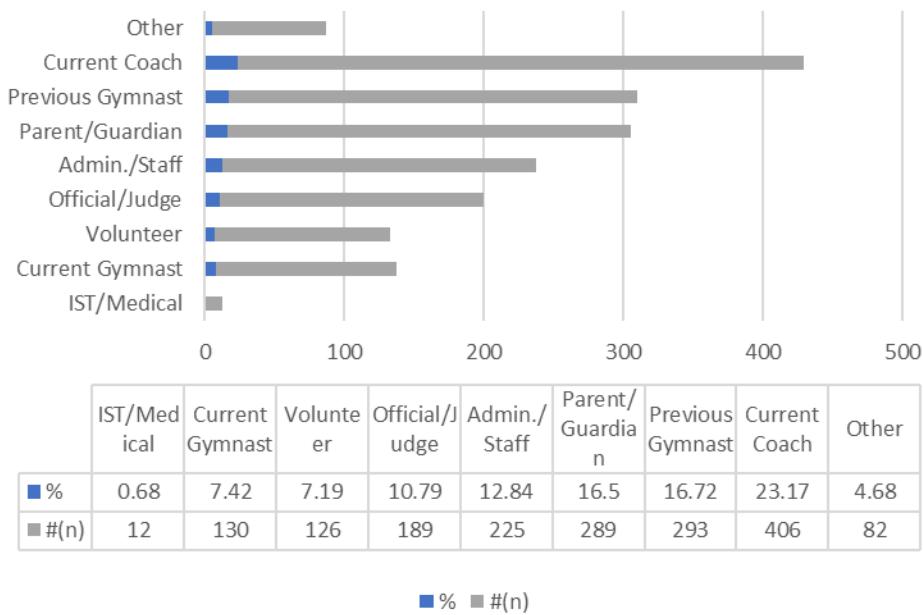
Every province is represented in the survey as illustrated above, with the most responses from Ontario (n=374; 39%), followed by Quebec (n=126; 13%) and British Columbia (n=110; 12%). A surprising finding is that more than 10% of responses are from Newfoundland and Labrador which, according to the 2021 Canadian Census, accounts for only 1.38% of the Canadian population. Compare this, for example, with Ontario which is in line with Census data indicating that the province represents 38.45% of the Canadian population. Thus, the number of survey responses may be equally represented, under-represented, or over-represented by province when compared against Canadian Census statistics.<sup>95</sup>

### 2.3.2 Gymnastics Background

Individuals were asked to indicate their affiliation with gymnastics and were provided with the opportunity to select multiple roles. A total of 1,752 affiliations amongst 955 respondents were reported which demonstrates that many individuals have multiple affiliations with the sport.

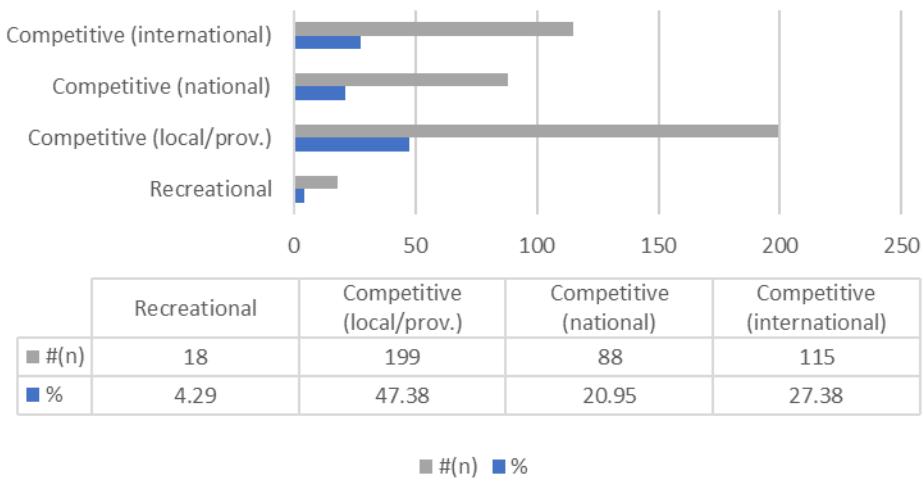
<sup>95</sup> Statistics Canada, "Population and dwelling counts: Canada, provinces and territories," 9 February 2022.

## Gymnastics Affiliations (Roles)

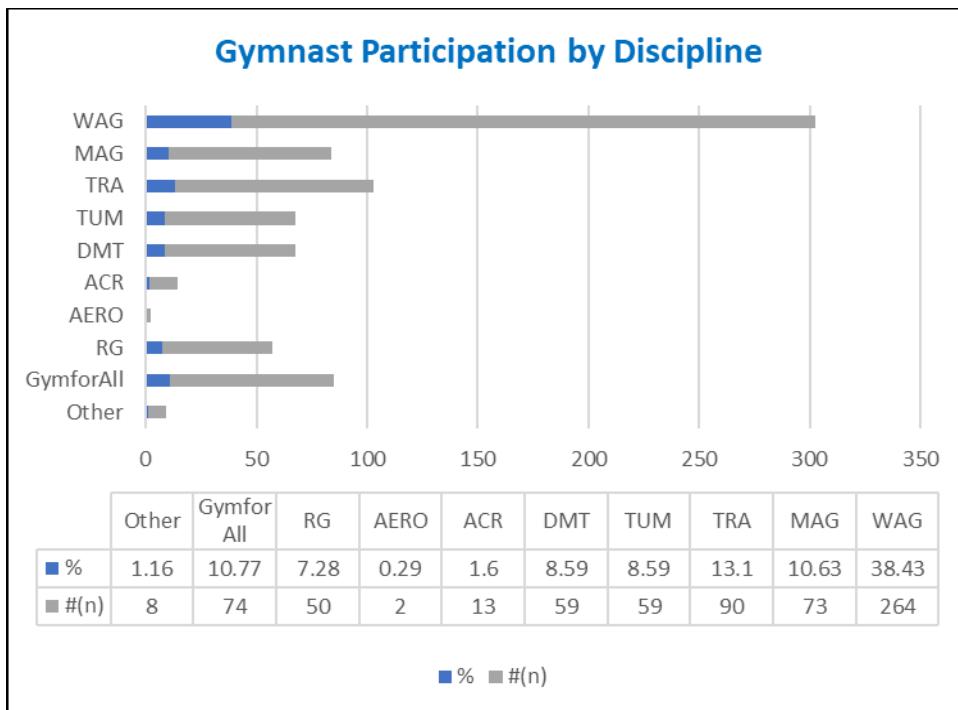


The largest cohort of respondents is gymnasts (n=423; 24%). This includes both current gymnasts (n=130; 7.42%) and previous gymnasts (n=293; 16%). The next largest cohort is current coaches (n=406; 23%), followed by parent/guardian (n=289; 16%). By comparison, few IST/Medical staff participated in the survey (n=12; <1%). “Other” roles include a combination of these various roles, for example, “parent of a previous gymnast.”

## Highest Level of Gymnastics Participation

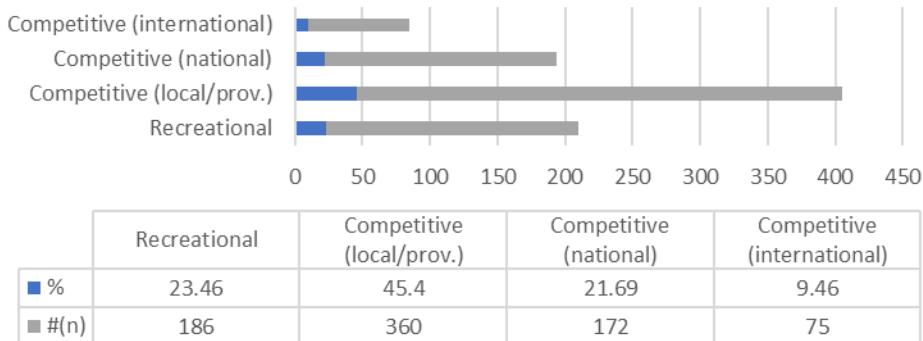


Amongst current and previous gymnasts, the large majority of respondents indicated that their highest level of gymnastics participation was in the competitive stream. A total of 18 gymnasts (4%) indicated recreation-only participation versus 96% who indicated progression through the competitive ranks. The competitive levels of participation are further differentiated by progression through local/provincial, national and international levels of competition. These discreet categories of participation are compared across other variables later within this Chapter to identify if there may be differences in gymnastics experiences according to the highest level of gymnastics participation.



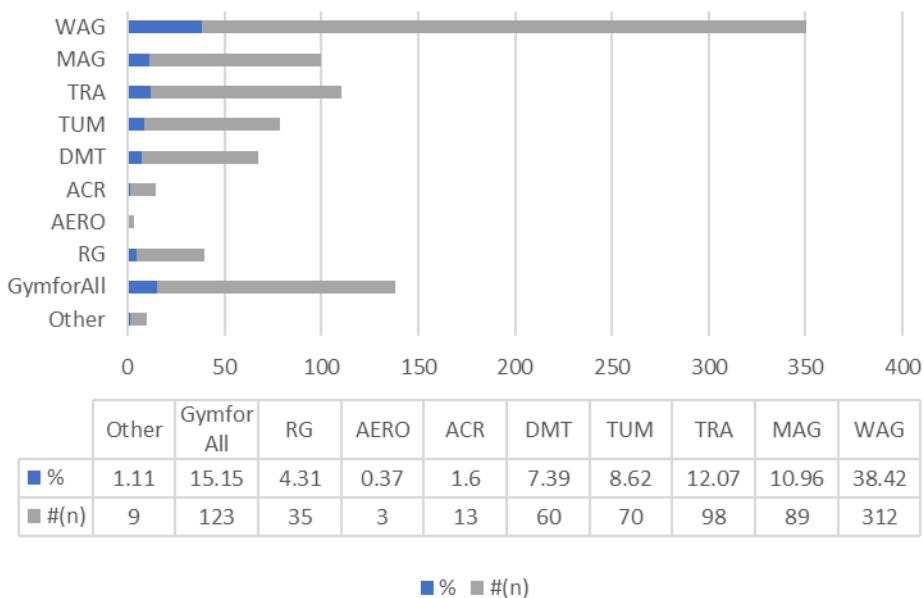
The largest cohort of gymnasts who responded to the survey represent the discipline of Women's Artistic Gymnastics ('WAG'), including 264 responses (38% of total responses). This is understandable given that WAG includes the most participants in the sport. All other disciplines are represented in the survey; however, responses from those in Aerobic ('AERO') gymnastics are negligible. At the grassroots level, more than 10% of responses were from individuals who participate(d) in Gym for All ('GFA'). "Other" includes other grassroots levels of participation including responses such as "kindergym", "for kids" and "high school".

## Highest Level of Coaching or Judging



Current coaches and judges were asked to indicate the highest level of their progression in the sport. Almost one-quarter indicated their highest level of coaching or judging was at the recreational level compared with 76% who had progressed to a competitive stream, with the largest cohort (n=360; 45.4%) at the local/provincial competitive level. Over 31% of coaches and judges indicated they had progressed to national or international levels of competition.

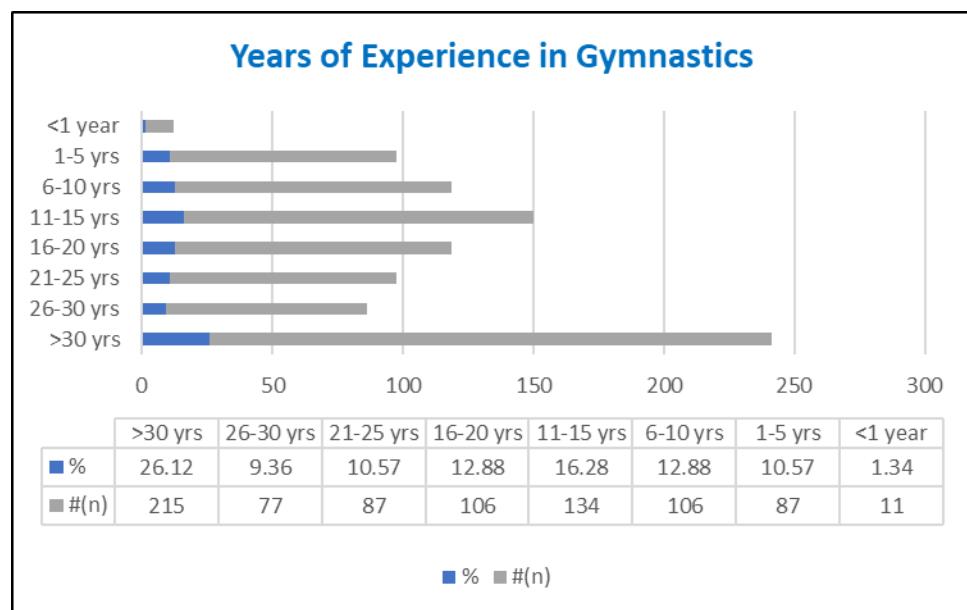
## Disciplines Currently Coached or Judged



More coaches and judges in WAG (n=312; 38%) completed the survey than any other discipline, consistent with the percentage of athletes in WAG who completed the survey. "Other" disciplines provided by respondents include "parkour", "active start (ages 2-5)" and "Gymnastics for seniors."

### 2.3.3 Gymnastics Experience

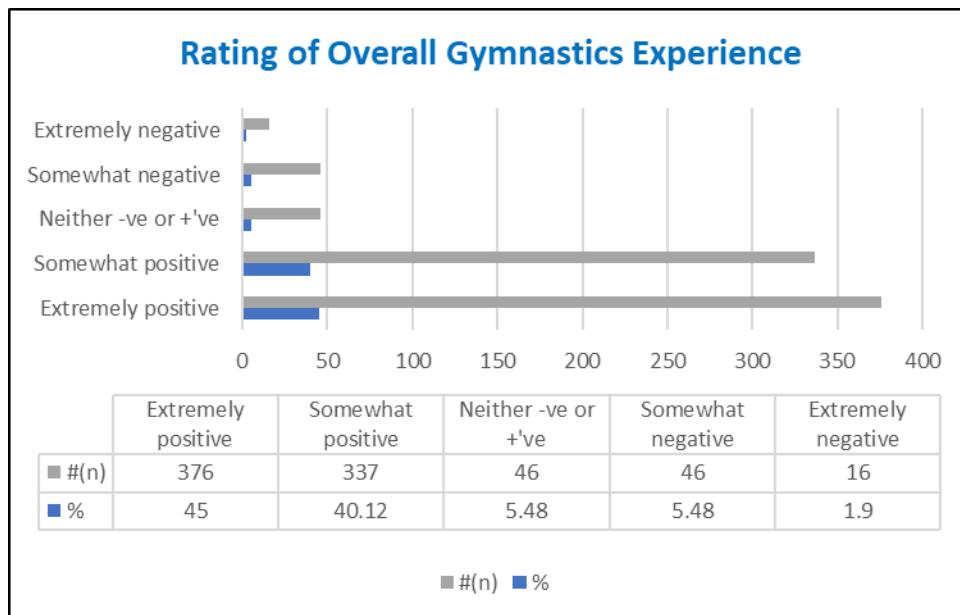
Individuals were asked several questions about their experience in the sport of gymnastics.



The number of years of experience in the sport of gymnastics (across all different affiliations/roles in the sport) ranges from less than one year (n=11; 1%) to more than 30 years of experience (n=215; 26%). Overall across different roles, survey respondents have a long history of involvement with the sport. A total of 87 respondents (10%) have been involved with the sport between 1-5 years.

#### Self-Assessment of Overall Gymnastics Experience

The survey asked individuals to rate their overall gymnastics experience, from "Extremely Negative" to "Extremely Positive" on a five-point scale. The results are illustrated below.



A total of 781 responses were received for this question and the large majority of respondents across different roles rated their experience as “Extremely Positive” (n=376; 45%) or “Somewhat Positive” (n=337; 40%). Together, more than 85% indicated a positive experience with the sport. Conversely, very few individuals rated their experience as “Extremely Negative” (n=16; 1.9%) or “Somewhat Negative” (n=46; 5.4%). Together, only slightly more than 7% of respondents indicated a negative experience with the sport. More than 5% of respondents rated their experience as “Neither Positive or Negative.”

The IRT conducted a cross-tabulation analysis of the overall gymnastics experience broken out by discipline. This is illustrated below.

#### Rating of Overall Gymnastics Experience by Discipline (Gymnasts)

Discipline	Extremely negative		Somewhat negative		Neither +ve or -ve		Somewhat positive		Extremely positive		Total
	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	
Women's Artistic Gymnastics ('WAG')	2.82%	7	10.48%	26	8.47%	21	38.31%	95	39.92%	99	248
Men's Artistic Gymnastics ('MAG')	0.00%	0	2.90%	2	2.90%	2	36.23%	25	57.97%	40	69
Trampoline ('TRA')	2.53%	2	8.86%	7	5.06%	4	32.91%	26	50.63%	40	79
Tumbling ('TUM')	1.82%	1	7.27%	4	5.45%	3	34.55%	19	50.91%	28	55
Double Mini Trampoline ('DMT')	1.85%	1	9.26%	5	1.85%	1	35.19%	19	51.85%	28	54
Acro ('ACR')	0.00%	0	12.50%	1	0.00%	0	25.00%	2	62.50%	5	8
Aerobic ('AER', 'AERO')	0.00%	0	0.00%	0	0.00%	0	50.00%	1	50.00%	1	2
Rhythmic ('RG')	0.00%	0	6.52%	3	6.52%	3	34.78%	16	52.17%	24	46
Gym for All	1.43%	1	8.57%	6	10.00%	7	28.57%	20	51.43%	36	70
Total		12		54		41		223		301	631

This analysis yields some interesting findings. As would be expected from the previous Table, the overall experience within each discipline is more positive than negative. However, when comparing between disciplines, the most negative experiences appear within WAG (n=33/248; 13.3% negative). This is significantly more negative than reported within MAG (n=2/60; 2.9% negative). Acro ('ACR') is next at 12.5%, however, these results may not be reliable given that only 1/8 individuals in ACR responded as having a negative experience. Over 11% of Trampoline ('TRA') participants indicated a negative experience (n=9/79) as well as 11% of Double Mini Trampoline ('DMT') participants (n=6/54). In total, 10% of Gym for All participants (n=7/70) reported a negative experience, followed by Tumbling ('TUM') (n=5/55; 9% negative) and Rhythmic Gymnastics (n=3/46; 6.5% negative).

The differences between WAG and MAG are consistent with the findings of several other international gymnastics reviews which paint WAG as being the most negative discipline. Furthermore, this is consistent with personal interviews conducted by the IRT which suggest the culture within WAG is significantly different and more negative than MAG. These results also suggest that there are pockets of negativity within most disciplines including at the recreational level, although the overall experience reported by respondents is positive.

The IRT conducted a similar cross-tabulation analysis of the overall gymnastics experience broken out by the discipline of coaches and judges. This is illustrated below.

#### Ratings of Overall Gymnastics Experience by Discipline (Coaches and Judges)

Discipline	Extremely negative		Somewhat negative		Neither positive nor		Somewhat positive		Extremely positive		Total
	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	
Women's Artistic Gymnastics ('WAG')	0.00%	0	6.14%	18	6.14%	18	39.93%	117	47.78%	140	293
Men's Artistic Gymnastics ('MAG')	0.00%	0	4.76%	4	1.19%	1	34.52%	29	59.52%	50	84
Trampoline ('TRA')	1.15%	1	5.75%	5	2.30%	2	36.78%	32	54.02%	47	87
Tumbling ('TUM')	0.00%	0	9.84%	6	4.92%	3	40.98%	25	44.26%	27	61
Double Mini Trampoline ('DMT')	0.00%	0	9.26%	5	1.85%	1	40.74%	22	48.15%	26	54
Acro ('ACR')	0.00%	0	27.27%	3	0.00%	0	27.27%	3	45.45%	5	11
Aerobic ('AER', 'AERO')	0.00%	0	0.00%	0	0.00%	0	66.67%	2	33.33%	1	3
Rhythmic ('RG')	0.00%	0	8.82%	3	11.76%	4	41.18%	14	38.24%	13	34
Gym for All	0.89%	1	8.04%	9	8.04%	9	35.71%	40	47.32%	53	112
Other. Please specify below:	0.00%	0	0.00%	0	0.00%	0	44.44%	4	55.56%	5	9
Total		2		53		38		284		362	739

Amongst coaches and judges, the most negatively reported experience is in ACR; however, the low sample size (n=3/11) suggests that these results may not be reliable. More than 9% of coaches and judges in TUM and DMT reported negative experiences, followed by more than 8% of coaches and judges in RG and Gym for All. Approximately 6% of coaches and judges in WAG reported negative experiences followed by 4.8% in MAG.

Interestingly, there is less distinction in negative experiences between coaches and judges in WAG and MAG compared with gymnasts in these disciplines where there is a significantly higher number of gymnasts in WAG who reported negative experiences versus gymnasts in MAG.

#### Gymnast Feedback on Experience Ratings:

Gymnasts were provided with an open-ended response option and were asked to briefly explain why they chose to rate their experience as they did. A total of 623 responses were received which illustrates a strong level of engagement with the survey. A summary of the number of responses to this question in each self-rated experience category is provided below:

- “Extremely Negative” – 10 responses (1.6%)
- “Somewhat Negative” – 60 responses (9.6%)
- “Neither Positive or Negative” – 33 responses (5.3%)
- “Somewhat Positive” – 240 responses (38.5%)
- “Extremely Positive” – 280 responses (45%)

The IRT identified through the content analysis of all responses the following negative and positive themes, including selected responses that illustrate each theme.

<b>Negative Themes</b>	<b>Responses that illustrate themes</b>
<i>“Extremely Negative” (n=10; 1.6%)</i> <i>“Somewhat Negative” (n=60; 9.6%)</i>	
<b>Maltreatment and Abuse</b>	<i>“While the coaches that actually coached her were always professional and good with our child, the overall management and atmosphere of the competitive program was nothing short of manipulative, abusive and negative. There was a sense of fear instilled in the athletes, fear based on their accomplishments, what their bodies looked like...”</i>

	<p><i>“Body focused, extremely manipulative, name-calling, throwing shoes at us when falling, excessive conditioning.”</i></p> <p><i>“My experience as a provincial level competitive athlete was damaging. My relationship to my coach was blurred, and she - like many foreign trained coaches in the 90s - used language and techniques that are now unacceptable.”</i></p> <p><i>“I find that often coaches from other countries are given a ‘free’ pass when Canadian coaches have to go through rigorous training. International coaches should also go through all the training that we have to - not just completing a few online courses.”</i></p> <p><i>“Problematic experience with adults involved in the sport: In general (this does not apply to every coach, but is present often in various forms), tendency (of coaches) to be abusive in their conversations and actions both with other adults and gymnasts under their care.”</i></p> <p><i>“My daughter was exposed to repeated abusive coaching practices, including, weight shaming, name-calling, excessive sweating exercises, bullying, and embarrassment in front of other gymnasts and coaches.”</i></p> <p><i>“I was psychologically, verbally, physically, and sexually abused by my coach.”</i></p> <p><i>“(Women’s) Artistic gymnastics experience was full of neglect and emotional abuse/ manipulation.”</i></p> <p><i>“I was bullied both in person and cyberbullied by teammates. Yelled at and put down by coaches. A coach made and posted a sign in the gym making fun of me. Another coach yelled at me that ‘my mom pays her to tell me what to do’ until another coach came over and made her stop.”</i></p> <p><i>“Exhausting trying to navigate through abusive coaches to support my child in her love for gymnastics and her love of spending time in a sport with her friends. Contacted AGF numerous times. They turned a blind eye to all complaints.”</i></p> <p><i>“The sport’s culture, as athletes move to higher levels is to sacrifice all for the sake of the sport or be ignored. This means long training hours,</i></p>
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	<p><i>holiday training, punishment or downgraded levels if choosing time away to heal. It means an athlete being refused the opportunity to advance if a parent insists on improvements to the coaching environment..."</i></p> <p><i>"I think throughout my gymnastics career the sport was extremely toxic due to the coaching I was receiving at my gym &amp; training camps. I was pushed beyond my limits while injured, not allowed to eat, extremely detrimental comments were made towards me at every practice every single day."</i></p>
<b>Governance and Administration</b>	<p><i>"Political, unfair treatment, no real regulation on the sport by governing bodies."</i></p> <p><i>"Way too political in Ontario. We definitely don't work as a country."</i></p> <p><i>"Constant conflict of interest (coaches-judges, parents-judges, administrators-judges)."</i></p> <p><i>"At the administrative level, lack of administrative knowledge/ interest (legal, financial, risk management) and often vision."</i></p> <p><i>"My experiences coaching have primarily been extremely positive. Unfortunately, many of my employers have not been effective managers. I would say 2 gyms I've worked at were very good, 4 were not. My current facility is thankfully the best I've ever worked at, and my experiences here have been excellent."</i></p> <p><i>"There is a lot of politics in gymnastics. Clubs are more concerned about keeping their athletes there at all costs instead of what is best for the athlete."</i></p> <p><i>"I worked directly with the athletes in my role at GymCan and the experience I had working with them was very positive. What was negative was the often toxic culture within the GymCan office. There were some long-time serving staff that should have been let go long before they were that really fostered the toxic environment."</i></p> <p><i>"As a Gymnastics Canada staff member, not only do I feel overwhelmed with the volume of responsibilities being assigned to me, but I also do not feel support in achieving any of these responsibilities. Not only from</i></p>

	<p><i>other GymCan staff members or leaders, but also from the PTOs and members of the community.”</i></p> <p><i>“There is no system of support for clubs producing high level gymnasts. There is no feeling of being a part of Canadian gymnastics. No transparency or accountability for anything. Our federation is led by non professionals in the sport. Ppl with no ideas, no leadership or experience in the sport of RG. Usually retired, using the same failing models of organization, year after year with absolutely no accountability for anything.”</i></p> <p><i>“I’ve worked at a board run gym for 11 years and it was awful. The gym had a board that very much demonstrated that organizations rot from the top down. They set the tone for everyone else. They were cruel to staff (yelling, belittling, hitting walls when frustrated, gaslighting, leering, intimidating staff). We had coaches making rape jokes and didn’t get fired as admin was afraid to tell the board and our PTO. I was afraid about the cost of courage to go to our PTO and over my bosses head.”</i></p> <p><i>“The gym sweeps all issues under the rug and I’m barely touching the surface of what I’ve witnessed in my decade in gymnastics...Nothing has changed, a staggering amount goes unreported.”</i></p> <p><i>“Expressing concerns to the PSO has been a horrible experience - instead of addressing concerns, the PSO sweeps them under the rug. The PSO is biased and toxic, and does not treat its members equitably/fairly. People who bring forward concerns are automatically classified as “problematic,” instead of being listened to.”</i></p>
<b>Staff Impacts</b>	<p><i>“Due to the terrible misconduct of too many people in the past I feel that those who have been passionate and well-intentioned in the sport are burnt out and are increasingly vulnerable. I think clubs should be able to protect their staff just as much as they need to protect the vulnerable athletes.”</i></p> <p><i>“The sport has given me many positive experiences and allowed me to build a career as well as many good relationships. The past 5-8 years have been stressful - with all of the new developments and news that has come out it has become increasingly difficult to feel safe</i></p>

	<i>coaching/officiating - it is sad because it is the result of the actions of a handful of bad coaches."</i>
<b>General Comments About Culture</b>	<p><i>"It's been difficult to find a gym with a positive culture."</i></p> <p><i>"I find that competitive gymnastics is a "blood sport", very result oriented and as a parent, it is heartbreaking to see all the 'politics' involved and the struggles and unfairness of the entire gymnastics system."</i></p> <p><i>"Part of the culture of gymnastics that allows for abuse is the culture of keeping parents shut out. Your opinion is not valued or wanted. If you speak up, or question, there will be unspoken consequences..."</i></p> <p><i>"Coaches tried their best to disconnect parents from the equation. Attitudes like parents should not watch practices, they should not ask the gymnasts questions about what goes on at practices. Many coaches created environments when the gymnasts were afraid to speak up for themselves, they were expected to follow the 'orders' of the coaches without question, and parents' questions were frowned upon."</i></p> <p><i>"It is difficult to rate my 'experience' of gymnastics overall. I love this sport, I love that I learned so much about myself and that I achieved success and had some great mentors and coaches along the way but unfortunately, the negative experiences weigh so heavily on me and outshine the good ones."</i></p> <p><i>"My negative experiences were all pressure situations created by my parents."</i></p> <p><i>"Overall my experience in the sport has been extremely positive - however, I worked in Calgary for a high performance program for 4 years and it was the most toxic, unhealthy, high-performance experience and opened my eyes to how the top of our sport behaved for years (I do think it's gotten better). At the time I was a young coach who was shaped by both Gymnastics Canada and my club to participate in an absolutely horrendous win at all cost culture."</i></p>
<b>Positive &amp; Mixed Themes</b>	<b>Responses that illustrate themes</b>
<p>"Extremely Positive (n=280; 45%)</p> <p>"Neither +'ve or -'ve (n=33; 5.3%)</p> <p>"Somewhat Positive" (n=240; 38.5%)</p>	

<b>Coaching</b>	<p><i>“As a competitive gymnast I had great coaches and felt it was a positive environment.”</i></p> <p><i>“Fun and positive coaching environment.”</i></p> <p><i>“Overall my gymnastics experience as an athlete and a coach has been great. I love the sport, most of my coaches have been extremely supportive and I feel that gymnastics has really given me a sense of purpose in life.”</i></p> <p><i>“My coaches were inspirational and provided the guidance and safety to reach my goal of NCAA scholarship.”</i></p> <p><i>“My girls have learned very valuable skills on work ethic and commitment. That to get what you want sometimes takes hard work. They have learned that physical strength is as important as mental resilience. Their coaches have always been there to encourage and support them.”</i></p> <p><i>“This sport is very demanding of mental and physical work, so of course it can’t be all positive, but my coach and teammates are the best and I’m in love with the beauty of this sport very much.”</i></p> <p><i>“The coaches and environment were very positive and encouraging, made me feel heard and helped me try new things.”</i></p> <p><i>“My experience was positive (between somewhat positive and extremely positive). I trained in a positive environment with good coaches that were demanding and expected a lot from us - but in a positive way. It shaped a lot of the person I am today. It allowed me to get a great education and become a successful professional.”</i></p>
<b>Discipline Specific</b>	<p><i>“My experience in trampoline has been a great positive experience, but my experience in WAG was definitely not a great one.”</i></p> <p><i>“Both my brother and I had a positive experience in tumbling, however, we both quit around the same time and (my brother) decided to try MAG. His experience in MAG deeply damaged his mental health.”</i></p> <p><i>“Have had an extremely positive experience since I switched into Trampoline Gymnastics, and have had no complaints for the past 11</i></p>

	<p><i>years. The 5 years I spent in Women's artistic gymnastics at the start of my athletic career were less positive.</i>"</p> <p><i>"Me, my wife and all three of my kids feel that gymnastics has been instrumental in our current physical and mental fitness. It has been fun, sad, hard, frustrating, rewarding. We've made friends, found life partners, earned money, (spent LOTS of money), travelled to new places. The biggest negative has been a lack of a well organised provincial and national MAG program (disorganised, underfunded, poor communication). We've never witnessed or been subject to any kind of abuse or harassment."</i></p>
<p><b>General Comments About Culture</b></p>	<p><i>"There has been a notable shift in approach to gymnastics. I have enjoyed the sport more as this shift has occurred."</i></p> <p><i>"Overall positive experience, but systemic changes needed to improve the experience further for future generations of gymnasts."</i></p> <p><i>"The sport itself is beautiful. There are so many good values it instills in athletes as well as a sense of community for all involved. I have met many wonderful people who care about the athletes as more than their identity in the sport. Another positive aspect I love is the passion which members commonly have. Although I do believe the culture of the sport can play a negative toll on the members, as it creates a system of pressure regarding results. Overall there has been much goodness that I have felt from being involved the sport and I appreciate and respect all of the members I have worked with, although the culture itself needs to shift."</i></p> <p><i>"The sport is amazing, and the coaches have been for the most part great. Organisation of the sport is poor. But the experience I wouldn't change."</i></p> <p><i>"I rated my experience somewhat positive because although I had some negative experiences I would say overall the positive experiences outweighs any negatives."</i></p> <p><i>"Our club has maintained a culture of positivity. We had a negative experience with one coach and maltreatment, but quickly solved the issue."</i></p>

	<p><i>"Gymnastics has been a big part of my life, as a gymnast I participated in High-Performance at a club with a positive gym culture and I also travelled with the Alberta team sometimes supervised by men and I fortunately only had fun, positive experiences in this environment."</i></p> <p><i>"The environment and atmosphere in the gym have improved significantly over my involvement. There was a lot more intimidation of the athletes, pressure to succeed, whereas now there is a more supportive and positive environment, which is actually resulting in more success!"</i></p> <p><i>"I have always had good mentors in this sport who value the athletes' safety both physically and mentally. I also make it my mission to bring Safe Sport to the forefront of our organisation, something I believe in very much. I know others who did not have my experience and feel that those who did not contribute to a positive environment have cast a shadow on those of us who try so hard to give every child a positive experience."</i></p> <p><i>"I love the sport of gymnastics! However there have been cultural issues through the years that I was disturbed by as a parent, volunteer, employee and judge that I am glad we are finally shedding light on."</i></p>
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### 2.3.4 Feedback about a Culture Review of Gymnastics in Canada

Several questions on the survey asked respondents for their feedback about a culture review of gymnastics in Canada. Results are provided in the following Tables below.

#### Support for a Culture Review and Scope

Almost 90% of survey respondents (n=681; 89.37%) agreed with the statement that a culture review of gymnastics in Canada is important. There is very strong agreement (n=705; 93%) that there are different sub-cultures in gymnastics in Canada and the scope of a culture review must include a review of both high-performance environments as well as the experiences of recreational participants at the grassroots (club) level.

## Concerns Related to Mental or Physical Health Risks for Athletes

Survey respondents were asked to indicate their level of concern about how different factors might be related to mental or physical health risks for athletes participating in the sport of gymnastics in Canada. This is important exploratory information to identify specific issues that require targeted attention as part of the Gymnastics Culture Review.

### **Concerns Related to Mental or Physical Health Risks for Athletes**

Factors Related to Mental or Physical Health	Not concerned at all		Slightly Concerned		Moderately Concerned		Very Concerned		Extremely Concerned		Total
	%	#(n)	%	#(n)	%	#(n)	%	#(n)	%	#(n)	
Body image perceptions/sensitivities	7.66%	57	16.13%	120	26.48%	197	26.75%	199	22.98%	171	744
High demand for results	9.73%	72	13.11%	97	31.22%	231	27.84%	206	18.11%	134	740
Authoritative coaching	11.04%	82	13.32%	99	25.03%	186	26.38%	196	24.23%	180	743
Too heavy of a training load (over-training)	13.48%	100	15.36%	114	27.76%	206	23.85%	177	19.54%	145	742
Pressure to engage in early specialization	22.51%	167	19.41%	144	28.71%	213	16.58%	123	12.80%	95	742
Parental influence/pressure	12.55%	93	19.03%	141	31.04%	230	22.67%	168	14.71%	109	741
Pressure from a gymnastics organisation/staff	20.16%	149	20.70%	153	28.82%	213	19.35%	143	10.96%	81	739
Other factor? Please list below.	18.54%	33	4.49%	8	10.67%	19	21.35%	38	44.94%	80	178
Other factor? Please list below.	25.00%	26	3.85%	4	6.73%	7	17.31%	18	47.12%	49	104
Total		880		880		1502		1268		1044	5473

Although previous results in this Chapter indicate that experiences in gymnastics are positive for the majority of participants in the sport, there is concern about many factors related to the physical and mental health of athletes expressed by the gymnastics community. This suggests that, although fewer individuals in this survey personally have had negative experiences in the sport, a significant majority of all respondents are concerned about the impact of these factors on the mental and physical health of gymnasts whose experience is negative. These findings suggest that the Gymnastics Culture Review should carefully review these concerns in greater depth.

Amongst the factors identified in the Table above, the most concern (n=687; 92.34%) is related to the impact of body image factors on an athlete's physical and mental health. This is followed by concerns about the high demand for results (n=668; 90.28%) and authoritative coaching (n=661; 88.86%) as the top three concerns. However, significant overall concerns also were expressed about parental influence/pressure (n=648; 87.45%), heavy training loads (n=642; 86.51%), pressure from a gymnastics organisation/staff (n=590; 79.82%) and pressure to engage in early specialisation (n=575; 77.5%).

A total of 282 “other factors” were provided as open-ended responses that indicate concerns about many other variables related to mental or physical health risks for gymnasts. The IRT summarised these into the following key themes. The top three most common areas of concern are as follows: 1) Coaching Behaviors, 2) Lack of Accountability and 3) Insufficient Education.

### Other Factors of Concern Related to Mental or Physical Health of Gymnasts

Area of concern	Responses that illustrate area of concern
<b>Coaching Behaviors</b>	<p>“<i>Shortage of coaches.</i>”</p> <p>“<i>Lack of oversight of coaches once a coach is hired.</i>”</p> <p>“<i>Insufficient screening of coaches.</i>”</p> <p>“<i>Verbally abusive coaches.</i>”</p> <p>“<i>Competitive coaches.</i>”</p> <p>“<i>Lack of strong professional association that can weed out extreme coaching behaviors.</i>”</p>
<b>Lack of Accountability</b>	<p>“<i>Lack of discipline against coaches.</i>”</p> <p>“<i>Risk of lack of oversight leading to physical and sexual abuse.</i>”</p> <p>“<i>Safety of gym space and equipment ... should be regular inspections by third party experts.</i>”</p> <p>“<i>Ombudsman to support lack of club support or agreement.</i>”</p>
<b>Lack of Education</b>	<p>“<i>Lack of evolving coach education.</i>”</p> <p>“<i>Access to coach education.</i>”</p> <p>“<i>Parental education. Parents need to be educated about what to look for in a positive gym, and what to avoid at others.</i>”</p>
<b>Poor Communication</b>	<p>“<i>Misinformation of what it takes to compete, especially at a high level.</i>”</p> <p>“<i>Poor communication at provincial and national level.</i>”</p>
<b>Resources</b>	<p>“<i>Lack of government funding.</i>”</p> <p>“<i>Our governing body is spread so thin. There are disciplines that aren't shown the proper support.</i>”</p> <p>“<i>Lack of support for athletes who transition/are forced out of national team.</i>”</p>
<b>Values</b>	<p>“<i>Lack of understanding about the past culture vs the now (they are completely different values and mindsets).</i>”</p> <p>“<i>Old school thought and mentality not up on new.</i>”</p>

<b>Culture of Fear</b>	<i>“Authoritative administrators using fear tactics to silence people.” “There is a fear of speaking out. It will affect your chances of getting chosen and also bias your scores domestically.” “Shame and fear based teaching.”</i>
<b>Pressure</b>	<i>“Pressure from Sport Canada, Canadian Olympic Association, OTP.”</i>
<b>Inclusivity</b>	<i>“Inclusivity of LGBTQ2S+ athletes not having options or Pathways.”</i>
<b>Media</b>	<i>“Negative influence of media in relating facts of our sport.”</i>

The extent to which these factors are impacting the experiences of gymnasts and other stakeholders in the sport at different competitive levels as well as by discipline is a foundational research question that should guide the Gymnastics Culture Review. Given the positive experiences of the majority of stakeholders expressed through the survey, it is important that the Gymnastics Culture Review identifies the specific environments and contexts where these factors are negatively impacting the physical and mental health of athletes.

#### Additional Feedback About Undertaking a Culture Review of Gymnastics in Canada

The IRT received extensive feedback (24 pages of responses; 20,400 words) from the gymnastics community about what should be included in a culture review of the sport in Canada. The following Table summarises this feedback by theme areas. The most persistent theme is the need for much closer examination of culture within the gymnastics club environment, including attention to the factors that impact culture at the club level (e.g. governance; accountability mechanisms; relationship to PTOs and GymCan; education of parents, coaches, athletes).

Theme Area	Responses that illustrate the theme area
<b>Scope of Review</b>	<i>“The review needs to happen at the top but also at the individual recreational club level.”</i>  <i>“Biased assumptions need to be guarded against to give a true picture. Don’t over emphasise issues from the competitive side of the sport.”</i>

	<p><i>“Since the majority of gymnasts in Canada are recreational (as opposed to competitive), more emphasis (Social Media and communication of all types) needs to demonstrate the importance of Gymnastics for All.”</i></p>
<b>Disciplines</b>	<p><i>“There are some disciplines that require more of a culture review than others. Even though they must work together, there is still lots of difference in the overall culture of each one of them. All too often one of the disciplines becomes the bad apple in the bushel and the public paints all gymnastics disciplines with the same brush.”</i></p> <p><i>“I cannot emphasise enough that although maltreatment and abuse can and does occasionally occur in other disciplines, the absolutely vast majority occur in Women’s Artistic and Rhythmic gymnastics. The fact that the problem of abuse is portrayed in the media and elsewhere as a ‘gymnastics’ problem is simply not true. And it is the same around the world. Until we focus the light on those two sports and force those communities to take an honest look at themselves we will not move forward.”</i></p> <p><i>“MOST of the problems occur in WAG (Women’s Artistic Gymnastics) in competitive levels. The higher the level of competition, the more problems occur. Highest priority for any analysis and change should be focused on WAG first. New policies could then be expanded to cover all the Gymnastics disciplines.”</i></p> <p><i>“It definitely needs to be treated one discipline at a time. I think T&amp;T (Trampoline and Tumbling) has done an amazing job at making gymnastics non-gendered, healthy, and with manageable training hours for the highest level athletes. MAG and WAG and Acro seem to be worse for promoting specific body types, being incredibly gendered, and having ridiculous numbers of training hours.”</i></p> <p><i>“The biggest cultural change that needs to take place is in coaching and administrating in Women’s Artistic Gymnastics (WAG). For many years that discipline has accepted (and rewarded) any coaching behaviour that produced the best performance results. This was particularly true of the national staffing (both W.A.G. administrators to national coaches). This almost always favoured the most severe coaching behaviours that were then emulated by other coaches. This culture was strongly influenced by East European coaching behaviours - particularly Russian and to a lesser extent Romanian.”</i></p>

	<p><i>"In our experience there is a huge difference in a gymnast's experience based on the discipline. I personally competed in WAG &amp; Trampoline. One of my sons has done both MAG &amp; T&amp;T. Based on my past experience and my boys' current experiences I find that the culture in Trampoline from coaching, admin, other clubs, parents it is a family environment. Everyone supports everyone. In the WAG &amp; MAG experiences I never felt like it was a team/family environment it was everyone on their own right from parents to coaches."</i></p>
<b>Gymnastics Governance</b>	<p><i>"PSOs and NSOs are very disconnected from clubs and athletes."</i></p> <p><i>"Until such a time that the National Organisations in sport gain much more authority of club and coach licencing we will continue to see issues."</i></p> <p><i>"Culture change needs to be directed through strong policy expectations and policing of norms in local and grassroot club governance and operations. Clubs are the organisations that hire coaches and staff not the PSOs and the NSOs so the culture shift needs to happen here first and built up not changed first in the NSOs and built down - this model of top down doesn't work."</i></p> <p><i>"Need to take into consideration Board structures at local gyms as this can impact the environment in the gym, particularly when volunteer parents are on the Board."</i></p> <p><i>"When I think of the issues we face in gymnastics in Canada right now, I see a gap between the 'old' and 'new' - people, processes, governance, oversight, etc. From my perspective, many problems exist because of 'legacy issues' - lack of turnover in volunteers (no new blood = no new perspectives, experiences, education, etc.), old governance structures (e.g. Board composition - no or few mandatory independent director positions, volunteer-driven decision making but staff accountability - volunteers who have technical knowledge but also have a vested interest in outcomes/conflicts of interest are often making or trying to make decisions that should be at the staff level, rather than truly functioning in an advisory capacity)."</i></p> <p><i>"The Chair and CEO are both gym owners and there is a conflict of interest in so many ways. The Board members do not get a voice and systemic changes is needed at the Ontario level."</i></p>

	<p><i>“When parents are board members, that is hard to follow through on as impartiality is compromised.”</i></p> <p><i>“I believe that most of the issues in the sport are between a small percentage of coaches and their athletes, at the competitive levels, and in some disciplines more than others (i.e. Rhythmic). The primary place to be aware of an abusive culture is at the club level, then the provincial level, and finally at the Gym Can level. Gym Canada needs to set the tone and develop the Safe Sport pathways, but the Provinces and Clubs need to ensure, with parents, that the proper culture is being maintained between the coaches and the athletes. The National body takes a lot of flak, but has very few mechanisms to oversee individual relationships unless complaints come up through the system.”</i></p> <p><i>“There’s been some biased hiring over the years at the governing bodies. (i.e. insiders and friends getting positions they aren’t necessarily the best candidate for and using their position to benefit their own children or their own club).”</i></p>
<b>GymCan Org. Structure &amp; Philosophy</b>	<p><i>“Gymnastics Canada is understaffed, underfunded and not currently able to meet the needs of the PSO’s.”</i></p> <p><i>“I am very concerned that the current staffing structure at GymCan does not enable it to successfully implement their current policies and education initiatives.”</i></p> <p><i>“Gymnastics Canada needs to do better in order for athletes to feel supported and safe.”</i></p> <p><i>“Review the positions and responsibilities of the office staff.”</i></p> <p><i>“GymCan is mostly ‘results’ driven and has designed their culture and program structures to reflect that. The philosophy needs to be ‘safe participation for all’.”</i></p> <p><i>“Nurturing a strong organisational culture will help in several ways: - improve performance &amp; productivity - attract the best talent - reduce turnover rates &amp; retain employees - be more competitive.”</i></p> <p><i>“There are multiple issues: 1) GymCan needs to have stability in staffing and improve its timeliness, particularly in regard to communicating. 2) I believe</i></p>

	<p><i>many problems exist at the provincial sport organisation level. GymCan needs to provide more assistance and education to its PSOs."</i></p> <p><i>"GymCan is very good about Rules/Regs/Manuals/Organisation (bureaucracy) but seem clueless when it comes to supporting and connecting directly with and respecting the clubs/the people who are out there across Canada daily/yearly, year after year bringing the training of young athletes to fruition."</i></p>
<p><b>Club Level Analysis</b></p>	<p><i>"Success is largely determined by clubs and coaches, and we must not lose sight that governing bodies can only provide so much leadership and guidance."</i></p> <p><i>"There is such a range of extremes when examining this issue. There are clubs with incredible cultures in Canada that are giving young people an important and rewarding experience, a place to grow and learn. A place to falter and learn. Then there are other clubs where the coaches are in it for the awards, personal recognition, and their own success. Most of these clubs use fear to intimidate and do not put the athletes' best interest first. These are the clubs and coaches that need to be eradicated. There needs to be actual methods for reporting these types of coaches and actual tangible things that are done to deal with them."</i></p> <p><i>"Each club has a culture dictated by owners or parent run boards."</i></p> <p><i>"Coaching at club level and ability of monitoring at club level."</i></p> <p><i>"The culture in the most damaging environments (gyms) across the country are controlled by the abuser/s. They manipulate staff, parents, and parent run boards through fear of retribution, selection for teams, coaching positions."</i></p> <p><i>"Need to examine the atmosphere in local gyms."</i></p> <p><i>"There needs to be an overarching view of trends/club (e.g. rate of athlete exit) to generate a flag for further investigation."</i></p> <p><i>"A survey is very important at the Provincial level for Member clubs, that is when you will fully uncover root cause issues."</i></p>

	<p><i>"I think there is a gap between grass roots clubs and high performance clubs and the importance of inclusion and communication to all clubs."</i></p> <p><i>"I believe beyond a shadow of a doubt that the problems of maltreatment and abuse we find in gymnastics occur mostly at the local level, and far below the authority of GymCan."</i></p> <p><i>"Culture needs to be changed in each individual club. There is a gross 'need' from clubs, parents and athletes in many clubs to focus on high level competitive skill and success, often at the health and well-being of both the coaches and the athletes."</i></p> <p><i>"More independent reviews on the relationship between coaches and their clubs. Are their conflicts of interest? How are coaches held accountable?"</i></p> <p><i>"The culture of gymnastics varies significantly at a provincial and club level. I think one of the things that would help unlock some of the key factors in true success is to identify clubs that not only have successful athletes, but those that score highly on athlete satisfaction."</i></p> <p><i>"While GymCan &amp; national team coaches are the easiest to probe at because they are outward facing, the truth is the federation actually has little to no impact on how day-to-day gym operations run. Clubs are insured by their provincial orgs and their provincial orgs play a larger role in their standards and culture."</i></p> <p><i>"There are many gyms including the one that I work for that strive for and are very successful in creating a positive gym culture and have been doing so for over 20 years. Gymnastics Canada should reach out to these clubs and talk to the people that are heading up these environments. They are the true experts to navigate and help to inform people to do a better job of providing a positive sports experience at all levels. My Club the Glacier Gymnastics Club in BC has a very positive environment and has a goal of creating strong, confident and successful girls and women. Parents from other gyms are always commenting on how happy our gymnasts are and in the quality of gymnastics. Proving that both of these things are possible. Our club would be willing to consult on this topic."</i></p> <p><i>"The number one priority in my opinion is that the kids have fun and enjoy their time in the gym when training and competing."</i></p>
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<b>Sport System Structures</b>	<p><i>"Review of sport system structures that influence GymCan ..."</i></p> <p><i>"We are currently overfocused on results and sacrificing the humans in the process. How does Sport Canada, COC, and OTP evaluate the 'human' experience as a condition of funding?"</i></p> <p><i>"The culture of all sports in Canada have changed as there is more expectation of higher levels of "success". We need to focus on the quality of our sports in all aspects including human impacts."</i></p> <p><i>"I'm concerned that the review so far has only focused on Gymnastics Canada and not the external bodies that fund it and hold large sway over its policies i.e., Sport Canada, Canadian Olympic Association, Own the Podium. These organisations and their expectations have greatly shaped the culture."</i></p> <p><i>"I'm happy to see that it appears that you are asking a broad spectrum of stakeholders from the system to participate. While I cite a lack of leadership as a serious problem - I also extend that to Sport Canada and the lack of support that sport in general receives in Canada. Our sport organizations are not set-up to succeed."</i></p>
<b>Accountability Mechanisms</b>	<p><i>"It's imperative we have systems in place to watch for those who would seek to harm others, especially children."</i></p> <p><i>"Oversight should be welcomed, standards set for code of conduct by coaches and staff."</i></p> <p><i>"I think it is important to employ some kind of overseeing in clubs, via in-person inspections and interviews, regular anonymous surveys, etc., so that there is a maintenance of the changes that are laid out."</i></p> <p><i>"Creating a safe and effective way for parents/athletes coaches/judges to request a review of concerning practices amongst clubs and peers. Not to punish but to help facilitate and educate in order to make a change in behaviours and treatments of all who are affiliated with gymnastics."</i></p> <p><i>"It is very difficult for officials (coaches and judges) to report unethical behaviours we see (threatening athletes, Psychological abuse etc.) without compromising our own careers. We all know of several coaches whose behaviours make us uncomfortable, however, these coaches hold a position</i></p>

	<p><i>of power in the provincial organisation. Since reports and investigations cannot be made anonymously, reporting these coaches would end our own careers in the sport. Everyone sees these behaviours on the competition floor, but no one will file an official complaint out of fear."</i></p> <p><i>"Club owners and managers see the 'abuse' daily and do not act."</i></p> <p><i>"This isn't a GymCan issue. It's a business of gymnastics issue and one that is being passed up the chain because accountability is not part of today's culture."</i></p> <p><i>"I think it's vital that the Canadian gymnastics community knows the exact process for reporting abusive behaviour. Currently, I think the process is vague and many do not know what to do if they witness abuse."</i></p> <p><i>"Information either doesn't reach the governing bodies or the governing bodies are afraid to rock the boat or don't have tools to apply different accountability measures ..."</i></p> <p><i>"Someone needs to review the complaints and concerns ... and compare them to the action that was taken."</i></p> <p><i>"How we respond to complaints is an essential part of the culture. Please review."</i></p> <p><i>"There has been a complete lack of professional oversight of coaches ..."</i></p> <p><i>"Bullying within the team training together should also be reviewed with a clear plan for raising bullying issues and dealing with them."</i></p> <p><i>"Can the National team have clearer guidelines to making the team? For those trying to make it on to the national team, it always feels like a secret. It would be great to have access to earned carding point summaries, or even rationale for why certain athletes are placed on the national team."</i></p> <p><i>"Coaches need to learn and be provided with best practices, and then performance reviews need to happen."</i></p> <p><i>"Please recommend a culture review of how the adults in this sport treat each other. There is rampant abuse, bullying, abuse of power and intimidation happening. This not only affects the well-being of the adults</i></p>
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	<p><i>who are involved with our gymnasts, but also creates environments that drive our retired athletes and volunteers away as soon as they see what's happening."</i></p>
<b>Consultation with Athletes</b>	<p><i>"The review should have extensive consultation with athletes."</i></p> <p><i>"Not only should athletes take place in the review, they should help lead it. DO NOT underestimate the capacity of athletes to contribute to the process. If you want to be genuine here, move this process out of the hands of those who created and continue to foster an oppressive culture, and move it into the hands of those who want to do the sport and know how they want to be supported in success."</i></p> <p><i>"Athlete advocacy needs to be a huge part of gymnastics in order for athletes to be successful and safe. They need to be able to have open communication so that they are able to speak when they feel overwhelmed or pushed to far or injured. If athletes felt that speaking up for themselves and being able to advocate for themselves would not have negative repercussions on their success in the sport, many of the problems we face in the sport would be greatly mitigated."</i></p>
<b>Consultation with Coaches</b>	<p><i>"Don't forget that coaches need to be protected as much as athletes."</i></p> <p><i>"What is happening in the Media and on social media right now is inexcusable. While there are many people that have been negatively impacted and affected by coaching and culture practices in previous years, those that are stating 'nothing has changed' are absolutely wrong. The changes are very large and visible. As coaches, we are jumping through hoops to still achieve without being able to actually coach. This is critically important for society and our Federations to understand. Mark my words: Coaches are leaving."</i></p> <p><i>"I have a concern about attracting and retaining excellent coaches in an environment where coaches don't have an organisation that supports them in the event of accusations. Is the review including some sort of assessment of support for coaches?"</i></p> <p><i>"A better vetting process for coaches is a must. However coaches are few and far between and may coach for many reasons. We're burnt out."</i></p>

	<p><i>"Gymnastics coaching has become highly risky because of an unclear and unfair dispute resolution process and the recent tendency of athletes and media to publish unproven allegations in news outlets and social media."</i></p> <p><i>"Please, please help us coaches currently involved, who are willing to change with the new expectations. We are drowning in all of this negativity! We are AFRAID!"</i></p>
<b>Consultation with Parents</b>	<p><i>"The role of parents has been completely left aside. Most times, athletes and/or coaches are reacting/acting in order to please the parent(s). A lot of gym clubs are non-profit organisation run by board of directors whose members are this same parents. How can a healthy relationship develops when the parents of your athletes are also your bosses?"</i></p> <p><i>"The influence of parents is one of the most challenging dynamics for coaches, clubs and organisations to deal with. A parent trumps everyone else in the relationship, and a "Safe Sport" can not exist without the explicit involvement of a child's parent as part of the equation."</i></p> <p><i>"Parents play a crucial role in this culture."</i></p> <p><i>"Communication for everything is poor. Parental ability to speak and have a safe environment to express their concerns ... athletes' parents are clearly told to do as I say, don't question or communicate with us, don't criticise, there is no avenue for them to safely express thoughts, concerns."</i></p> <p><i>"One of the issues is the secrecy around the gym. Parents are not allowed to view trainings which allows abuse to happen. There is also this chain of command where parents are not allowed to talk to Gymnastics Canada directly. This allows abuse to be swept under the rug."</i></p> <p><i>"Why is it alright for coaches to text their athlete but parents can't text the coach?"</i></p> <p><i>"I think there are three parts to the sport: coaches, gymnasts and parents. I do not think parents have taken much responsibility for the issues that some of the gymnastics victims have brought up. Circumstances are not all just about coaches! Many times parents also abuse coaches and this rarely, if ever, is addressed."</i></p>

<b>Other Consultation</b>	<p><i>“It is very important to gain insight from all participants, athletes, coaches, admin, parents, physiotherapists/nutritionists/psychologists, etc. and for these people to be current and former participants. This will assure the greatest level of clarity regarding culture in gymnastics.”</i></p>
<b>Education and Training</b>	<p><i>“Coaches training and parental training/education.”</i></p> <p><i>“Coaches should be trained on mental health basics.”</i></p> <p><i>“What is more important for me has always been education in all areas. Coaches need to take courses in mental health, psychology, medicine etc. that makes them understand the impact their decisions have in their athletes, they are the ones in constant direct contact with athletes. Right now our NCCP system is lacking the proper education and resources in those areas.”</i></p>
<b>Independent Investigation</b>	<p><i>“I am extremely disappointed that GymCan is not listening to athletes and has ignored the request for an independent investigation. I do not consider a ‘culture review’ equivalent to an independent investigation.”</i></p>
<b>Implementation of Recommendations</b>	<p><i>“I know a culture review is important, but we cannot stop there. Recommendations made by experts are great, but the implementation is key. Something worth noting is that the implementation will be in the hands of the people that are in leadership positions that have benefitted from the way the system is built and the toxic culture that currently exists.”</i></p> <p><i>“Worried that the people doing the culture review won't be interested in radical change or have progressive enough ideologies.”</i></p>
<b>Other Feedback</b>	<p><i>“A values based approach to sport can make a strong difference.”</i></p> <p><i>“Culture is shaped and modeled and lead by leadership. If you want to elucidate the root causes of cultural toxicity in any environment, begin with a fulsome review of the principles and practices of leadership, top down.”</i></p> <p><i>“The current number of supposed complainants (many of whom should not be taken seriously at all) has created the illusion of a problem that has sucked all the oxygen out of the room, that has created hysteria and has prevented a level-headed discussion on other matters of real concern: accountability of sport administrators, breath of jurisdiction of National and Provincial governing bodies, government funding model, etc.”</i></p>

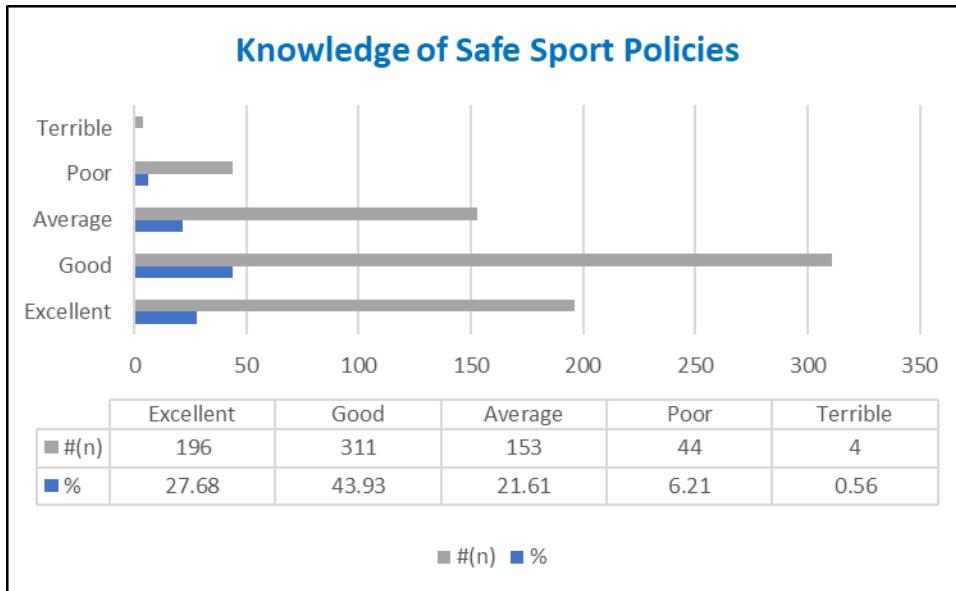
	<p><i>"I am 100% in favour of looking into the culture. However, I also believe that we will not find anything that hasn't already been found in similar studies/reviews done around the world. Thus, I would spend more time analysing the root causes and other factors that have been established through this survey. You can assume that there are problems with the culture, but we need to better understand 'why'?"</i></p> <p><i>"A culture review isn't good enough. We already know the culture is toxic and that athletes are being abused. There needs to be a judicial review - one that can mandate change, not simply make suggestions."</i></p> <p><i>"The culture in gymnastics is mostly understood, so we need to be more focused on specific strategies to CHANGE the culture!."</i></p> <p><i>"This is long overdue. I believe there should be an independent investigation, not just an internal culture review."</i></p> <p><i>"I am so glad this is being completed here. Their best interests need to be considered, in particular their mental health ..."</i></p> <p><i>"I think it's important to seek and learn from the cultural failures, but it's also equally important to define what leads to positive outcomes."</i></p> <p><i>"I hope that the results of the review will be shared with the public and used to make meaningful permanent changes to the culture."</i></p>
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### 2.3.5 Feedback about Safe Sport Policies and Procedures

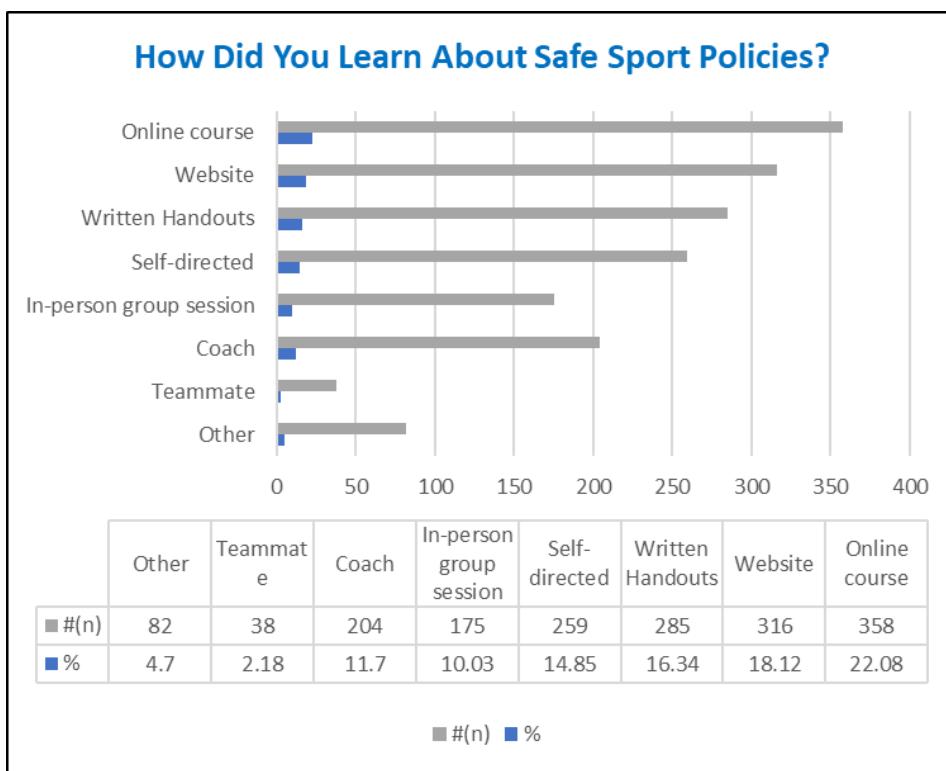
Several questions were asked about knowledge and understanding of Safe Sport policies concerning gymnastics in Canada. The International Olympic Committee's ('IOC') definition of Safe Sport was provided on the survey as an introduction to this section. The IOC defines Safe Sport as follows: *"Safe Sport is an environment where athletes can train and compete in healthy and supportive surroundings; an environment which is respectful, equitable, and free from all forms of harassment and abuse."*<sup>96</sup>

<sup>96</sup> International Olympic Committee, "Safe Sport," Online: [Safe Sport - Athlete365 \(olympics.com\)](https://www.olympics.com/safe-sport-athlete365) [Last accessed: 15 November 2022].

## Knowledge of Safe Sport Policies



More than 71 percent of respondents indicated a “Good” or “Excellent” understanding of Safe Sport policies. By comparison, less than 7% indicated a “Terrible” or “Poor” understanding and 21% indicated an “Average” understanding of Safe Sport policies.



Respondents learned about Safe Sport policies and procedures through a wide variety of methods, with online learning as the most common (n=358; 22.08%). The course that was mentioned often during the IRT's interviews is “*Respect in Sport*” which is offered by The Respect Group Inc.<sup>97</sup>

These findings suggest there is a risk of individuals receiving inconsistent information about Safe Sport policies given the multiple ways they learn about these policies. Examples of “Other” responses are listed below.

- “*Common sense, caring for the gymnasts, patience, many years of experience.*”
- “*It's been a passion of mine for years to create a safe space in sport for kids.*”
- “*Under the circumstances of having been a witness for a disciplinary hearing.*”
- “*Gymnastics Ontario Annual General Meeting.*”
- “*As part of sports psychology training.*”
- “*University education.*”
- “*I'm not even sure I read anything for gymnastics; I have read other things for other sports.*”
- “*Child Protection Canada program was launched.*”
- “*My daughter's therapist directed me to the national code of conduct in sport.*”
- “*Involved in another sport that had an amazing club leader.*”
- “*I learned about Safe Sport policies through this survey.*”<sup>98</sup>
- “*Training in a related discipline.*”
- “*NCCP courses.*”
- “*I do not know of them ... which is concerning given the length of time in the sport.*”

These other responses further illustrate the varied ways that individuals learn about Safe Sport policies. Moreover, some of these responses indicate gaps in the system such as first learning about Safe Sport policies at the time of a disciplinary hearing, rather than through a systematic process of education. Also, certain responses suggest a generalised knowledge of Safe Sport policies from other contexts (e.g. “*University education*”, “*Training in a related discipline*”) versus specific knowledge about gymnastics policies at the local, provincial or national level.

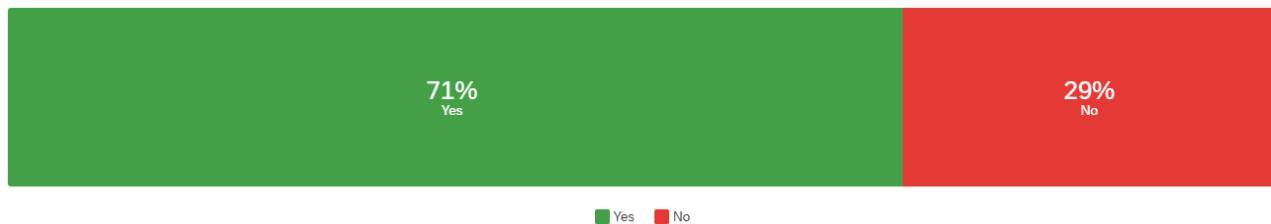
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<sup>97</sup> The Respect Group Inc. Online: [Respect Group Inc](http://Respect Group Inc) [Last Accessed: 12 January 2022].

<sup>98</sup> Note: The public survey included several links to Safe Sport policies and resources.

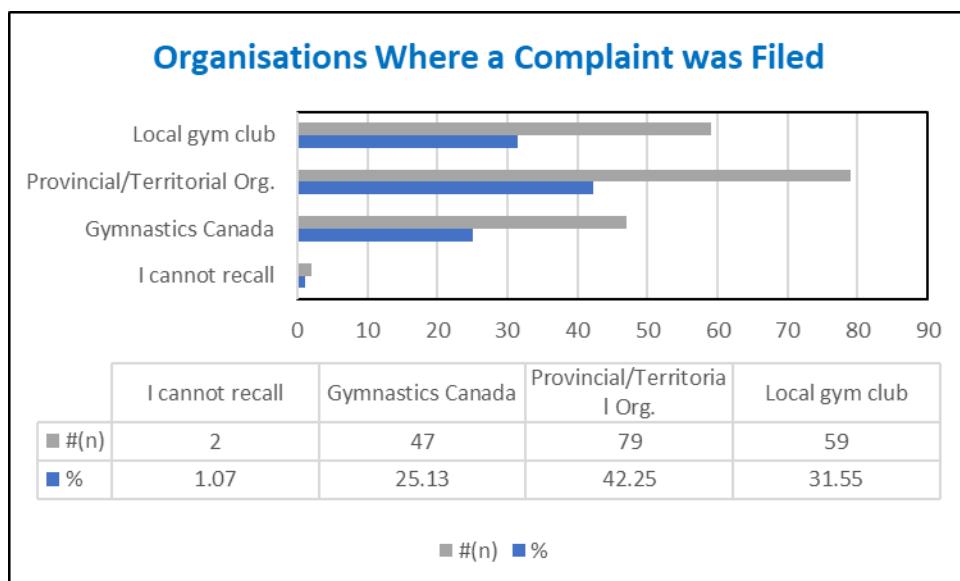
## Reporting Maltreatment

### Are you familiar with how to report a complaint?



A majority of respondents (n=493; 71%) indicated they are familiar with how to report a complaint compared with 29% (n=206) who are not. However, the IRT learned through personal interviews that many individuals who claim to have a good or excellent understanding of Safe Sport policies and reporting procedures, in fact, demonstrated an incomplete or poor understanding of how these policies function in practice. This is particularly evident as it concerns reporting procedures. This suggests for many individuals there is a gap in understanding between one's perceived knowledge and the written policies and reporting procedures of gymnastics organisations.

Respondents were also asked if they ever filed a complaint (of any kind) with their club, provincial organisation or GymCan. Almost 20% of individuals (n=137; 19.63%) indicated they had filed a complaint compared with the majority of individuals (n=561; 80.37) who had not. The figure below illustrates the various organisations where complaints were filed.



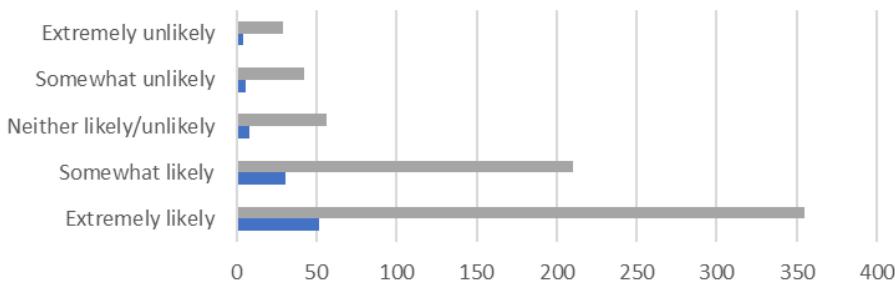
This data illustrates the various channels related to reporting which is a function of local, provincial and national jurisdiction. The most common reporting is to PTOs (n=79; 42.25%), followed by local gymnastics clubs (n=59; 31.55%). By comparison, only 25% of the individuals who filed a complaint did so with GymCan. The relationship between jurisdiction and reporting is an important area of inquiry for the Gymnastics Culture Review, particularly as it relates to Safe Sport reporting and issues concerning transparency and accountability raised by several individuals. Together, these concerns are negatively impacting culture within the Canadian gymnastics community.

#### **Was your complaint well-handled?**



The majority of respondents who filed a complaint indicated that it was not well-handled (n=98; 73.13%) compared with less than a third of respondents who were satisfied with the complaint process (n=36; 26.87%). This does not come as a surprise given many questions raised through the consultation process about a lack of clarity concerning jurisdiction and “who does what” including the complaint management process. This dissatisfaction also contributes to negative perceptions of culture and trust within the sport, including lack of transparency and accountability as it concerns how complaints are managed. However, some individuals informed the IRT that due to confidentiality requirements, information must be withheld in some circumstances. Together, this suggests the need for more education about reporting processes including a clear explanation of who is responsible for what as well as limitations within these processes that should be better explained.

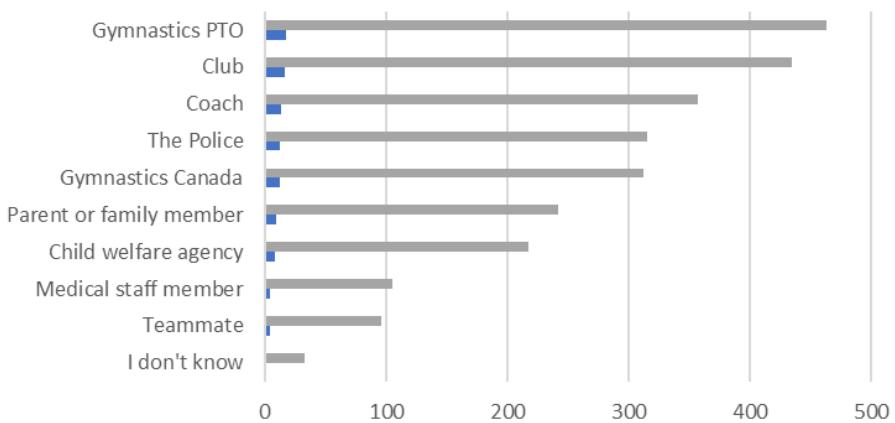
## Likelihood of Reporting Maltreatment



■ #(n) ■ %

Respondents were asked “if you experienced or observed any form of maltreatment in gymnastics, how likely would you be to report it?” About half of individuals (n=355; 51.3%) would be extremely likely to report. However, it is troubling to the IRT that almost half of respondents expressed uncertainty about their likelihood of reporting maltreatment.

## Who Would You Report Maltreatment To?



■ #(n) ■ %

Respondents were asked “*If you experienced or observed maltreatment and planned to report it, where/to whom might you report it?*” Interestingly, only 11 percent (n=312) indicated they would report to GymCan. This could be the result of different factors, including policies at the club and PTO level that direct individuals to report to their local club or PTO. Moreover, the majority of gymnastics participants who participate at the club or PTO level and who are not part of the national team program are not listed under Article 3.1 ‘Policy Application’ of GymCan’s ‘*Complaints and Discipline Policy and Procedures*.’ Some individuals also expressed that they do not trust GymCan and lack confidence in GymCan’s ability to manage a complaint and this is another reason to consider for the low percentage of individuals who would make a report to the NSO. Respondents are more likely to report to their PTO (n=463; 17.49%) and/or their local club (N-434; 16.4%). The total number of responses (n=2,574) also demonstrates that individuals are likely to report to multiple individuals and organisations.

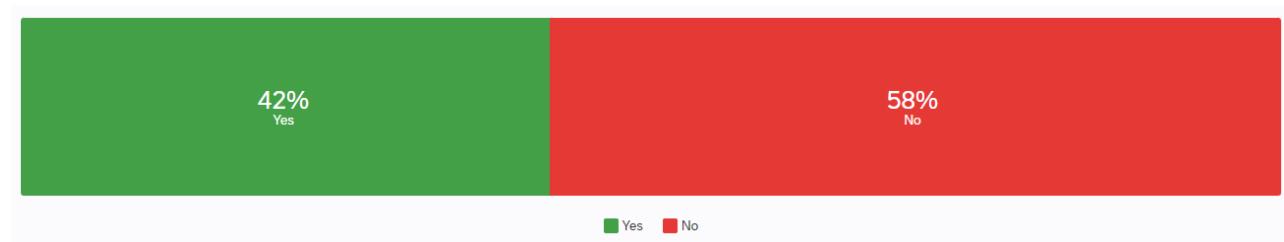
#### Awareness of National Safe Sport Programs and Resources

Individuals were asked questions about their awareness of national Safe Sport programs and resources including the UCCMS, Abuse Free Sport, and the Canadian Sport Helpline.

#### **Are you aware of the Universal Code of Conduct to Prevent and Address Maltreatment in Sport?**



#### **Are you aware of Abuse Free Sport – Canada’s Independent System for Preventing and Addressing Maltreatment in Sport?**



**Are you aware of the Canadian Sport Helpline – the national toll-free helpline that offers help to victims or witnesses of harassment, abuse, or discrimination in sport?**



Together, these responses indicate a need for better promotion and education of these national Safe Sport mechanisms.

**Additional Feedback about Safe Sport Policies**

Individuals were provided with the opportunity to share additional open-ended comments about Safe Sport policies. The IRT received 150 responses to this question. Key themes are summarised below. The top three most common themes are: 1) Underreporting, 2) Lack of Accountability/Transparency and 3) Insufficient Education.

**Additional Feedback About Safe Sport Policies**

Theme Area	Responses that illustrate Theme Area
<b>Underreporting</b>	<p><i>“It (Safe Sport) is an underreported issue provincially and nationally for competitive levels.”</i></p> <p><i>“We need to see many more people, especially parents, speaking out and reporting.”</i></p> <p><i>“There needs to be stricter guidelines for individual member clubs to formally report those who bully, harass, and abuse a victim when the victim does not know to do so.”</i></p> <p><i>“The system in place for Safe Sport reporting in Ontario is broken. When you call to report Safe Sport, they direct you to Gymnastics Canada, who then directs you to the President of Gymnastics Ontario ...”</i></p> <p><i>“No information has been provided by GymCan who to report to.”</i></p>

	<p><i>“Many people are unsure if it is appropriate to report a story ‘if it is not our story’ but cases and examples of toxic coaching that have been told to us but not observed ourselves.”</i></p> <p><i>“I am an NCCP course instructor. Coaches are encouraged to report abuse when they see it, but it doesn’t get reported often. Coaches reporting on coaches is not done a lot.”</i></p> <p><i>“When you report a problem, it gets swept under the rug and the person reporting it gets targeted and bullied even more.”</i></p> <p><i>“I fear reporting concerns. I know athletes who have reported things and heard nothing back.”</i></p> <p><i>“I think reporting can be difficult to address because a) parents want their child to be successful, and may sacrifice their well-being to achieve their goals, and b) may have a personal relationship with the coach/official and defend their actions. When I brought up instances of physical and emotional abuse to my club’s gymnastics coach, the head coach’s actions were defended for both of these reasons.”</i></p> <p><i>“The GymCan staff always mention Safe Sport but never told us how to report an incident ...”</i></p> <p><i>“I have no idea where to report any kind of mistreatment.”</i></p>
<b>Lack of Accountability/Transparency</b>	<p><i>“There is zero accountability for abusers and enablers of abuse. Having policies in place is necessary, but if they are not enforced, what’s the point?”</i></p> <p><i>“The policies are great. The actions when Safe Sport is not followed seem nearly non-existent.”</i></p> <p><i>“No one takes any accountability or makes any lasting changes.”</i></p> <p><i>“I would like to see more accountability for coaches.”</i></p> <p><i>“Where are the independent audits of gyms. Why aren’t there trained professionals dropping in once or twice a year ...?”</i></p> <p><i>“Canada should have the same Safe Sport rule about parent’s being able to view their child’s training as the U.S. does.”</i></p> <p><i>“What about streaming video of gyms? Our gym has a large amount of cameras ...”</i></p>

	<p><i>“Policies and procedures are useless without assistance to and oversight of the individual clubs.”</i></p> <p><i>“There needs to be better sharing of statistics about complaints so they be addressed more strategically.”</i></p> <p><i>“Have a process to separate from the ‘old boys club’. Hold people accountable.”</i></p>
<b>Insufficient Education</b>	<p><i>“I believe that all coaches and volunteers who work with children in sport should have to take Safe Sport training and yearly refreshers.”</i></p> <p><i>“Safe sport needs to be communicated more to athletes. They have no idea if what they are experiencing while training is inappropriate. They need to learn what they can speak up for.”</i></p> <p><i>“More in-depth Safe Sport courses should be available and mandatory for coaches.”</i></p> <p><i>“Education. Education. Education. Parents, athletes, coaches, administrators, volunteers, staff, and mandatory education for club owners and boards of directors.”</i></p> <p><i>“Most coaches in the two clubs I’ve worked in have done the Safe Sport course. Most didn’t even know there was a rule of two.”</i></p> <p><i>“Need access to more Safe Sport training through in-person delivery, not just on-line.”</i></p> <p><i>“I was never aware of Safe Sport policies and any of those things my coaches might have needed to complete.”</i></p> <p><i>“Have a liaison come to each club and talk with the athletes and their coaches (even make it mandatory somehow).”</i></p>
<b>Jurisdiction</b>	<p><i>“Jurisdiction needs to be clarified (as it relates to reporting). We must be consistent.”</i></p> <p><i>“The national organisation (GymCan) is controlled by the provincial bodies because the bulk of their funding comes from them. This issue makes for a difficult and slower process of change.”</i></p> <p><i>“Each club runs independently.”</i></p>

	<p><i>“Gymnastic Canada’s Safe Sport Framework is an excellent starting point. Unfortunately, PTO’s have not bought into it.”</i></p> <p><i>“People are falling between the cracks because of a lack of coordination and communication between local, provincial and national levels.”</i></p> <p><i>“Provincial leadership for many years has been entrenched, powerful, and resistant to change especially regarding national initiatives.”</i></p>
<b>Access to Policies</b>	<p><i>“I think the most difficult thing for people is that the information regarding Safe Sport policies and procedures in gymnastics is found in too many places. You have to search multiple sites to get the information.”</i></p> <p><i>“I think the Safe Sport information should be easier to access. The only information I know about Safe Sport is what I have learned myself.”</i></p> <p><i>“The policies are cumbersome and need to be reviewed and simplified. Stakeholders haven’t been educated about them or what they mean. Policies are difficult to access on the website.”</i></p> <p><i>“Policies must be easily accessible to athletes and parents in particular, front and centre on the club, PSO, and NSO’s webpage.”</i></p>
<b>Coaching Fears</b>	<p><i>“Coaches are under a microscope and a great deal of our efforts are spent walking on eggshells and avoiding misunderstandings.”</i></p> <p><i>“Many good coaches have been abused by the non-action of Gymnastics Canada ... by turning a blind eye to coaches.”</i></p> <p><i>“Many coaches are suspicious of Safe Sport in the USA and Canada, worrying it might result in more innocent people being wrongly accused.”</i></p>
<b>Lack of Awareness/Effectiveness of National Mechanisms</b>	<p><i>“GymCan and all the provincial organisations should be sending out the Safe Sport helpline and reporting options to all members. I own a club and I wasn’t even informed that there was a helpline. This information needs to be more transparent for everyone.”</i></p> <p><i>“I have reported to my club, however I am unaware of the proper communication lines to report anything further.”</i></p> <p><i>“I tried to use the helpline to report. Because it wasn’t related to the national team they referred me back to my own organisation. It was useless.”</i></p>

<b>Inefficiencies in Complaint Management Processes</b>	<p><i>"I was part of 2 investigations. Both were handled differently, however what they had in common was the fact that they were quite inefficient and very long."</i></p> <p><i>"The process is extremely long."</i></p> <p><i>"The process is not conducive to athletes wanting to report because the process takes too long."</i></p> <p><i>"I have been involved in or aware of a number of recent Safe Sport complaints raised through GymCan and have been able to observe the procedures in action. It is a slow, painstaking process that is difficult for all involved, however, it is thorough. I believe that sports organisations could perhaps do more to manage expectations with participants, particularly complainants, as to what to expect (from the process)."</i></p>
<b>Communication</b>	<p><i>"Changes at the national level are not well communicated to the lowest level (a parent or coach in a provincial club)."</i></p> <p><i>"Parents in the gymnastics community are not informed by Gymnastics Canada of what is going on."</i></p>
<b>Other Feedback</b>	<p><i>"Whistleblower protection in the most fulsome definition of that protection must be codified."</i></p> <p><i>"Safe Sport in BC was handled TERRIBLY prior to 2019. I have been ignored and turned away. BC then hired a Safe Sport Officer and things have been much better."</i></p> <p><i>"There is a lot of room for improvement at the national level."</i></p> <p><i>"Gymnastics is a safe sport. The bad apples and the bad administrators are the problem, not the sport."</i></p> <p><i>"Look again at the NEGATIVE starting point in Canada ... e.g. 'ABUSE free Sport'. In Great Britain they cover the same content with headings like: "Safeguarding and Protecting Children. A more positive starting point."</i></p>

## Appendix C: Letter to Gymnasts for Change Canada



1800-140 Fullarton Street  
London, Ontario  
Canada N6A 5S1

October 4, 2022

Kim Shore  
Gymnasts for Change  
Sent Via Email: [REDACTED]

Dear Ms. Shore,

As you are aware, McLaren Global Sport Solutions ('MGSS') is undertaking an independent review of Gymnastics Canada's safe sport policies, as well as developing recommendations to inform an eventual cultural review within the sport of gymnastics in Canada. For your information, here is a link to the Terms of Reference: [TermsOfReference\\_MGSS\\_GymCan.pdf \(mclarenglobalsportsolutions.com\)](https://mclarenglobalsportsolutions.com/TermsOfReference_MGSS_GymCan.pdf)

As part of our consultation process, we have just launched a public survey and invite all stakeholders in the gymnastics community in Canada to participate – athletes, parents, coaches, judges/officials, administrators/staff, and medical support personnel, among others. We invite you to participate by completing the survey and encourage you to share it with your network. Here is the link to complete the survey: [https://survey.co1.qualtrics.com/jfe/form/SV\\_ePyLbAOaEMUWPA2](https://survey.co1.qualtrics.com/jfe/form/SV_ePyLbAOaEMUWPA2)

A fundamental tenet of our work is to ensure that the athlete voice is heard and reflected in our report, among the other stakeholders as noted. Our intent is to develop a bespoke culture review process that reflects the input of the gymnastics community in Canada and international best practices.

Additionally, we are keenly interested in your insights given your advocacy role with Gymnasts for Change, and invite you to participate in an interview (via Zoom) at your convenience during the week of October 17.

We look forward to your reply.

Sincerely,

Bob Copeland (bcopeland@mgsportsolutions.com)  
Janie Soubliere (janie.soubliere@gmail.com)