

Statement on Safe Sport

Policy Title: Statement on Safe Sport

Effective Date: December 9, 2024

Applies To: Staff, Coaches, Board Members, Members, Athletes and Volunteers

Niagara Falls Lightning Gymnastics Club (NFLGC) has a fundamental obligation and responsibility to protect the health, safety and physical and mental well-being of every individual that is involved in our gymnastics community.

NFLGC takes situations involving misconduct or maltreatment very seriously. For this reason, we are committed to enacting and enforcing strong, clear, and effective policies and processes for preventing and addressing all forms of misconduct or maltreatment.

NFLGC's policies are intended to promote a Safe Sport environment in a manner that allows for consistent, immediate, appropriate, and meaningful action should any issues arise. They are also intended to prevent issues from arising in the first place by communicating expected standards of behaviour.

To this end, NFLGC has adopted the [Gymnastics Ontario Code of Conduct](#), which includes the [Universal Code of Conduct to Prevent and Address Maltreatment in Sport](#) (UCCMS), to ensure all participants engaged in NFLGC activities are able to engage in a positive sport environment free of abuse, misconduct and Prohibited Behaviour and Maltreatment (as those terms are defined in the UCCMS, as amended from time to time), and potential harm.

Concerns should be addressed directly with the person involved first. If unresolved or if it's not feasible to address with the individual, please notify the Board by emailing the President at president@nflgc.ca.

Anyone wishing to report an incident or concern about misconduct or maltreatment involving anyone associated with NFLGC, including but not limited to staff, athletes, coaches, officials, volunteers, and parents/guardians of Athletes, may do so through the Complaints Resolution process.

NFLGC makes the following commitments to a sport environment free from misconduct and Maltreatment:

- a) All participants in sport can expect to play, practice, and compete, work, and interact in an environment free from misconduct and Maltreatment.
- b) Addressing the causes and consequences of misconduct and Maltreatment is a collective responsibility and requires the deliberate efforts of all participants, broader sport community, sport club administrators and organization leaders.
- c) Participants in positions of trust and authority have the general responsibility to protect the health and well-being of all other participants.

- d) Adult participants have a specific ethical and statutory duty and the additional responsibility to respond to incidents of misconduct and Maltreatment involving Minors and other vulnerable participants.
- e) All participants recognize that misconduct and Maltreatment can occur regardless of age, sex, sexual orientation, gender identity or expression, race, ethnicity, Indigenous status, or level of physical and intellectual disability and their intersections. Moreover, it is recognized that those from traditionally marginalized groups have increased vulnerability to experiences of misconduct and Maltreatment.
- f) All participants recognize that individuals who have experienced misconduct and Maltreatment may experience a range of effects that may emerge at different time points and that can profoundly affect their lives.
- g) All adults working with children and youth have a duty to prevent or mitigate opportunities for misconduct.
- h) Individuals affiliated with NFLGC may be required to complete appropriate mandatory training on preventing and addressing harassment and abuse.
- i) In recognition of the historic vulnerability to discrimination and violence amongst some groups, which persists today, participants in positions of trust and authority have a duty to incorporate strategies to recognize systemic bias, unconscious bias, and to respond quickly and effectively to discriminatory practices.

Creating and fostering a Safe Sport environment and culture is paramount in the administration and delivery of all gymnastics programs in Ontario. Everyone has a responsibility to create and foster this environment by:

- a) Prioritizing the current and future well-being of all participants above all else.
- b) Acting in the best interests of all participants involved in our programs and activities.
- c) Respecting, valuing, and championing the rights of all participants in the gymnastics community at all times.
- d) Engaging in behaviours and practices that are ethical, developmentally appropriate, and support the physical, psychological, social, and emotional welfare of Individuals.
- e) Actively encouraging meaningful inclusion of participants irrespective of their age, race, colour, gender identity or expression, sexual orientation, language, religion, national or social origin, property, birth, physical or developmental abilities, athletic ability, or other status.
- f) Striving to create joyful, positive, and growth-enhancing sport experiences.
- g) Advocating for safe environments on local, national, and international stages.

NFLGC recognizes Gymnastics Canada's and Gymnastics Ontario's jurisdiction and, where applicable, elements of their safe sport policies, for which NFLGC and its participants shall follow.

Athlete Protection Policy

Policy Title: Athlete Protection Policy

Effective Date: December 9, 2024

Applies To: Staff, Coaches, Board Members, Members, Athletes and Volunteers

- **Key Principle – “Rule of Two”:** Wherever possible, ensure two adults are present when interacting with athletes, especially minors, to protect all parties. Solo interactions only occur in open or observable spaces.
- **Communication Guidelines:**
 - Communication with athletes must be professional and focused on club-related matters.
 - Coaches and other adults are not permitted to send private messages on social media platforms like Snapchat. Texts and emails are to be used only for essential team information, ideally in group format or with parents copied.
- **Travel and Supervision Requirements:**
 - For all club-sanctioned travel, ensure that two adults are present. For mixed-gender groups, have an adult from each gender.
 - Avoid sharing rooms with athletes unless the adult is the athlete’s parent or guardian.
 - For minors, locker rooms or changing areas are supervised by two adults or accessible for immediate assistance, but without unnecessary presence to respect privacy.

Code of Conduct and Ethics Acknowledgment

Policy Title: Code of Conduct and Ethics Acknowledgement

Effective Date: December 9, 2024

Applies To: Staff, Coaches, Board Members, Members, Athletes and Volunteers

Acknowledgment

1. As part of registering or agreeing to participate or attend NFLGC Events, all NFLGC Participants are required to follow the [Gymnastics Ontario Code of Conduct and Ethics](#), found here.
2. The purpose of ensuring compliance with the *Gymnastics Ontario Code of Conduct and Ethics* is to ensure a safe and positive environment within the programs, business, activities, and events of NFLGC by making all Individuals aware that there is an expectation, at all times, of appropriate behaviour consistent with Gymnastics Ontario's core values, mission, and policies.

Discipline and Complaints Policy

Policy Title: Discipline and Complaints Policy

Effective Date: December 9, 2024

Applies To: Staff, Coaches, Board Members, Members, Athletes and Volunteers

Complaint Submission: Concerns that cannot be resolved directly between involved parties are to be submitted in writing to the President at president@nflgc.ca. The President will appoint a Dispute Resolution Officer (DRO) who will review and determine the appropriate course of action, including whether the complaint should be escalated to Gymnastics Ontario or handled within the club.

When to Notify Gymnastics Ontario:

- **Serious Violations:** The club must notify Gymnastics Ontario if the complaint involves severe infractions, including but not limited to:
 - Allegations of abuse, harassment, or misconduct involving minors.
 - Incidents of physical violence or threats.
 - Complaints involving criminal activity or significant ethical breaches.
- **Mandatory Reporting Requirements:** Any complaint involving issues that Gymnastics Ontario mandates for reporting, such as breaches of its Code of Conduct or incidents with safeguarding implications, will be forwarded promptly to Gymnastics Ontario.
- **Referral for Expertise:** If a complaint requires handling beyond the club's capacity, NFLGC will refer the complaint to Gymnastics Ontario for investigation or resolution.

Club-Level Complaint Handling Process (if NFLGC handles the complaint):

1. **Receipt and Initial Review** - Complaints are submitted to president@nflgc.ca. The President appoints a Dispute Resolution Officer (DRO), which may be an individual or a panel. The DRO must be free of any involvement or conflict with respect to the matter under review. The DRO acknowledges receipt of the complaint within 3 business days, confirming that it is under review. The DRO assesses whether the complaint falls within NFLGC's handling scope or requires immediate escalation to Gymnastics Ontario.
2. **Complaint Assessment and Determination of Pathway** - For minor issues, such as misunderstandings or minor breaches, the DRO may attempt to facilitate an informal resolution directly between parties. If the complaint involves more substantial issues, the DRO will initiate a formal review, including conducting interviews and reviewing relevant documentation.

3. **Alternative Dispute Resolution (if applicable)** - NFLGC encourages alternative dispute resolution (ADR) as a preferred first step. The DRO may organize mediation sessions to help both parties reach a mutually agreeable resolution. If a resolution is reached, a written agreement summarizing the outcome is prepared and signed by both parties, ending the complaint process.
4. **Formal Investigation Process (if ADR is unsuccessful or inappropriate)** - The DRO establishes an investigation plan, which includes gathering all relevant facts to ensure a fair assessment of the situation, and may involve appointing or hiring outside professional services. Confidential interviews are conducted with the complainant, respondent, and any witnesses, while maintaining objectivity and impartiality. The DRO reviews all statements, documents, and available evidence to clarify the complaint's context.
5. **Resolution and Disciplinary Measures** - Based on the investigation's findings, the DRO determines if there was a policy violation and, if so, the appropriate disciplinary action. Depending on the severity, sanctions may include a verbal or written warning, suspension from activities, or, in serious cases, expulsion from the club. The DRO prepares a written report summarizing the investigation, findings, and any disciplinary measures imposed. A summary of the decision is provided to both the complainant and respondent, the NFLGC Board and Gymnastics Ontario.
6. **Appeal Process** - The complainant or respondent may appeal the decision if they believe there was a procedural error or if new evidence has emerged. Appeals must be submitted within seven (7) days of the decision, in writing, and must outline the grounds for appeal. The NFLGC Board reviews the appeal and may uphold, modify, or overturn the DRO's decision. The decision from the appeal process is final.
7. **Follow-Up and Record Keeping** - If sanctions are imposed, NFLGC will monitor compliance to ensure they are followed. All records related to the complaint, investigation, resolution, and any appeals are securely stored per the club's privacy policy.

Follow-Up and Coordination with Gymnastics Ontario:

- If a complaint is referred to Gymnastics Ontario, NFLGC will coordinate with their investigation and resolution procedures, deferring to their findings and providing necessary assistance.

Confidentiality: All complaint details will be kept confidential within NFLGC and Gymnastics Ontario, with information shared only as needed for effective resolution. All documentation will be stored securely following the club's privacy standards.

Screening and Background Checks Policy

Policy Title: Screening and Background Checks Policy
Effective Date: December 9, 2024
Applies To: Staff, Coaches, Board Members and Volunteers

Purpose: NFLGC recognizes that a comprehensive screening process is essential to maintain a safe and trustworthy environment for athletes, especially minors and other vulnerable individuals. Screening helps identify any potential risks associated with individuals who occupy positions of authority or trust.

Screening Levels and Criteria:

Screening Level	Description	Examples of Roles	Screening Requirements
Level 1 – Low Risk	Roles with limited supervision, minimal athlete interaction, and no financial or sensitive responsibilities.	Occasional volunteers, event assistants.	<ul style="list-style-type: none"> • Brief application • Reference check if needed • Criminal Record Check (CRC) not required
Level 2 – Medium Risk	Roles involving regular athlete interaction, some supervisory duties, or limited financial oversight.	Coaches under supervision, board members, administrators.	<ul style="list-style-type: none"> • Criminal Record Check (CRC) • At least two references • Signed agreement to uphold club policies
Level 3 – High Risk	High-trust roles with direct, unsupervised access to athletes (especially minors) or significant financial control.	Head coaches, team managers, individuals with signing authority.	<ul style="list-style-type: none"> • Criminal Record Check (CRC) • Vulnerable Sector Check (VSC) • Multiple references • Screening disclosure form • Safe Sport training (depending on position) • CRC and VSC renewed at least every three years

Screening Procedure:

- **Application Process:** Each individual subject to screening must complete an application form detailing their background, experience, and any relevant certifications.
- **Reference Checks:** For medium- and high-risk roles, applicants are required to provide at least two professional or character references. The President or authorized personnel will verify these references to assess suitability for the position.

- **Background Checks:** For individuals in high-risk roles, a Vulnerable Sector Check is mandatory to identify any past convictions or legal restrictions. Screening checks are conducted prior to the start of duties and every three years thereafter, with interim checks if concerns arise.
- **Interview (if required):** For high-risk or sensitive roles, the President may require an interview to clarify the applicant's experience, suitability, and understanding of the responsibilities and expectations of the position.

Cost of Screening Checks:

- For remunerated positions, applicants are responsible for covering the cost of their Criminal Record Check (CRC) and Vulnerable Sector Check (VSC), if required, as part of the hiring process.
- For volunteer positions, including Board members, NFLGC will cover the cost of any required CRC and VSC to support community involvement.
- For existing employees and volunteers undergoing required re-screening, NFLGC will bear the cost to ensure compliance with ongoing screening requirements.

Confidentiality and Privacy in Screening:

- All personal information gathered during the screening process, including CRC and VSC results, is kept strictly confidential and accessible only to authorized personnel involved in the selection and screening process.
- Results are stored securely following NFLGC's privacy policy, ensuring that sensitive information is protected and only used for the purposes of determining eligibility for the specified role.

Follow-Up and Monitoring:

- **Renewal of Checks:** Vulnerable Sector Checks and Criminal Record Checks must be renewed every three years for all individuals in high-risk positions or more frequently if mandated by Gymnastics Ontario or changes in legislation.
- **Ongoing Monitoring:** NFLGC reserves the right to conduct random or targeted checks if an individual's behavior raises concerns or if an incident requires re-evaluation of suitability.
- **Non-Compliance:** Any individual who fails to comply with screening requirements, provides false information, or is found to have a record of behavior that poses a risk to club members may face suspension or removal from their position.

Review of Screening Outcomes:

- The President, in consultation with the board if necessary, will review any concerns raised by the screening results and make determinations on an individual's eligibility to serve in a specific role.

- In cases where screening reveals a past conviction or potential risk, the President will evaluate the severity, relevance, and recency of the findings. A decision to allow, restrict, or deny participation in a role will be made on a case-by-case basis, balancing safety with fair consideration.

Appeals and Reconsideration: If an individual is denied a position based on screening results, they have the right to appeal this decision through the club's appeal process as outlined in the Discipline and Complaints Policy.

Privacy and Confidentiality Policy

Policy Title: Privacy and Confidentiality Policy

Effective Date: December 9, 2024

Applies To: Staff, Coaches, Board Members and Volunteers

Commitment to Privacy: NFLGC is committed to protecting the privacy of all members, coaches, volunteers, and staff involved in any complaint process. The club adheres to strict standards for handling personal and sensitive information in accordance with applicable privacy laws and regulations.

Handling of Personal Information: Any personal information collected during the complaint process – including statements, evidence, and investigation reports – will be used solely for the purposes of resolving the complaint. This information will not be disclosed to third parties without the consent of the individuals involved, except as required by law or in cases where Gymnastics Ontario must be notified due to the nature of the complaint.

Confidentiality During the Complaint Process:

- All parties involved in a complaint, including the complainant, respondent, witnesses, and investigators, are expected to maintain strict confidentiality throughout the investigation and resolution process.
- Information about the complaint will only be shared with individuals directly involved in the investigation, such as the Dispute Resolution Officer, Gymnastics Ontario (if notified), and any other designated personnel who are necessary for resolving the complaint.
- Any breach of confidentiality by any party involved in the complaint process may result in disciplinary action, depending on the circumstances and the severity of the breach.

Record Keeping and Secure Storage:

- Documentation related to complaints, including all statements, investigation notes, resolutions, and appeal records, will be securely stored in a confidential file system accessible only by authorized personnel.
- All records will be retained for a minimum period as required by law or by NFLGC's policy, after which they will be securely destroyed in a manner that safeguards the confidentiality of all individuals involved.

Disclosure of Investigation Findings:

- Findings of an investigation and any resulting disciplinary actions will be shared only with the complainant and respondent, except when a disclosure is necessary to enforce a disciplinary sanction, protect member safety, or as required by law.

- When required by Gymnastics Ontario, NFLGC may provide summaries of investigation outcomes, ensuring that confidential or identifying information about minors or vulnerable individuals is protected.

Privacy and Confidentiality Training: All individuals handling complaints within NFLGC, including the Dispute Resolution Officer and any appointed investigators, will receive privacy and confidentiality training to ensure that personal information is handled appropriately and that the rights of all participants are respected.

Social Media and Communication Policy

Policy Title: Social Media and Communication Policy

Effective Date: December 9, 2024

Applies To: Staff, Coaches, Board Members, Members, Athletes and Volunteers

Purpose and Scope: NFLGC recognizes the widespread use of social media for communication and understands its role in building community, promoting club activities, and supporting athlete development. However, all members, coaches, staff, and volunteers must adhere to standards that ensure safety, respect, and professionalism in all online interactions.

Standards of Conduct on Social Media:

- **Professional and Respectful Communication:** All members are expected to communicate respectfully and professionally on social media. Posts, comments, or images that are disrespectful, abusive, discriminatory, or offensive are strictly prohibited and may lead to disciplinary action.
- **Positive Representation of NFLGC:** Ensure that social media posts reflect positively on NFLGC. Any online activity that damages the reputation of the club or undermines trust within the community may result in disciplinary measures.
- **Cyberbullying and Harassment:** NFLGC has a zero-tolerance policy for cyberbullying, harassment, or negative behavior directed at members, coaches, officials, or others within the gymnastics community. This includes spreading rumors, threats, or insults, and creating or contributing to online forums or groups that promote negativity about NFLGC or its members.

Boundaries with Athletes:

- **Rule of Two for Online Communication:** In line with the Rule of Two, all communication with minor athletes are to take place in group formats or with a parent/guardian copied. Private, one-on-one communication between coaches or other adult members and minors on social media is not permitted.
- **Platform Restrictions:** Communication with athletes on platforms such as Snapchat, where messages disappear, is prohibited. Text messages and emails may be used for team-related communication only and must be professional and necessary for team management purposes.
- **Friend Requests and Follows:** Coaches and other adult members are to avoid “friending” or “following” minor athletes on personal social media accounts to maintain professional boundaries. Official club accounts may follow athletes if used strictly for sharing club-related information.

Content Guidelines for Posting:

- **Photo and Video Sharing:** Any photo or video featuring NFLGC athletes, especially minors, must not be posted on social media without the written consent of the athlete's parent or guardian. Images or videos that could be deemed embarrassing, inappropriate, or that expose athletes in a vulnerable way are strictly prohibited.
- **Promotion of Safe Sport Values:** All content shared by members is to reflect the club's commitment to safe sport values, including inclusivity, respect, and support for all athletes.
- **Club Events and Celebrations:** Members are encouraged to celebrate club achievements and milestones on social media. However, posts avoid singling out individual minors without parental consent, and all content contributes to a positive club image.

Reporting Concerns on Social Media:

- If a member observes any inappropriate behavior or violation of this policy on social media, they are to report it to the President at president@nflgc.ca. NFLGC will review all reports and take appropriate action, ensuring the confidentiality of the reporting individual.
- Members who believe they are being harassed or bullied online by another member are encouraged to report the incident, following the complaint process in the Discipline and Complaints Policy.

NFLGC's Role and Responsibilities:

- **Monitoring:** NFLGC may periodically review public posts related to the club or its members to ensure that social media activity aligns with this policy and the Code of Conduct. The club will not monitor private accounts but may act if a public issue arises.
- **Official Club Accounts:** Only authorized individuals may manage or post on behalf of NFLGC's official social media accounts. All posts on club accounts must align with NFLGC's mission and values, promote inclusivity, and support a safe, positive environment.
- **Removal of Content:** NFLGC reserves the right to request that members remove or modify any social media content that violates this policy. Failure to comply may result in disciplinary action.

Social Media Guidelines for Members:

- **Privacy Settings and Control:** Members are encouraged to use privacy settings to control who can view their content and to be mindful of how their online activity reflects on NFLGC.

- **Permanent Nature of Posts:** Remember, social media posts are often permanent and may be shared widely, even if deleted. NFLGC advises members to think carefully before posting.
- **Compliance with the Code of Conduct:** Behavior on social media is subject to NFLGC's Code of Conduct and may be reviewed under the Discipline and Complaints Policy if necessary.

Safety and Emergency Response Policy

Policy Title: Safety and Emergency Response Policy

Effective Date: December 9, 2024

Applies To: Staff, Coaches, Board Members and Volunteers

Purpose

To ensure the health, dignity, and safety of all children under the organization's care by establishing clear guidelines for reporting incidents and managing emergencies related to facility issues or unforeseen challenges.

Policy Statement

The organization is committed to maintaining the highest standards of care and respect for the children it serves. All staff, coaches, and volunteers are required to promptly report any incidents that affect the health, dignity, or safety of children and adhere to established emergency protocols for addressing such situations.

Scope

This policy applies to all activities and programs involving children at Niagara Falls Lightning Gymnastic Club, including sports, recreational, educational, and other events held on or off organization premises.

Definitions

- **Incident:** Any event or situation that compromises the health, safety, or dignity of a child, including but not limited to injuries, bullying, harassment, or lack of basic facilities such as restrooms.
- **Emergency:** Any unexpected situation that disrupts the normal operation of activities and requires immediate action to ensure safety and well-being.

Emergency Protocol

In any emergency disrupting normal operations or situations where basic facilities (e.g. restrooms, clean drinking water) are unavailable, staff must follow these steps:

1. Assess the situation and take appropriate actions to prioritize children's health and safety, which may include:
 - Implement pre-established emergency protocols, including evacuation or relocation if necessary.
 - Contact appropriate authorities (e.g. emergency services)
2. Immediately inform the President (or Vice-President or Staff Liaison if President is unavailable) of the situation and follow their direction.
3. If unable to reach the President or their delegate, make decisions required and take appropriate actions to protect the health, safety, or dignity of children, including closing the facility and contacting parents to pick up their children.

Reporting Requirements

Any staff member, coach, or volunteer who becomes aware of an incident affecting a child's health, dignity, or safety must:

1. Immediately inform the President (or Vice-President or Staff Liaison if President is unavailable) of the situation.
2. Document the incident, including:
 - Date and time of the incident.
 - Description of the incident, including individuals involved and witnesses.
 - Actions taken to address the situation.
 - Any recommendations for follow-up or resolution.
 - Injuries must be documented in accordance with Gymnastics Ontario reporting requirements.

Compliance and Enforcement

1. **Non-Retaliation Clause:**
Staff who report incidents or make decisions in good faith will not face retaliation or disciplinary action.
2. **Protocol Review and Collaboration:**
The Board will collaborate with staff annually to:
 - Review and revise emergency protocols.
 - Conduct training and drills to prepare staff for emergency situations.
3. **Monitoring:**
The Board will regularly review incident reports and emergency responses to ensure compliance with this policy.
4. **Disciplinary Action:**
Failure to report incidents or adhere to emergency protocols may result in disciplinary action, up to and including termination.

Endnotes

1. **Alternative Dispute Resolution (ADR):** Methods for resolving complaints outside of formal investigation or court proceedings, including mediation and negotiation, that aim to achieve mutually agreeable outcomes.
2. **Cyberbullying:** Any form of bullying or harassment that takes place over digital platforms, including social media, texts, or email, and may include spreading rumors, threats, or posting hurtful content about someone.
3. **Dispute Resolution Officer (DRO):** An individual or panel designated by NFLGC Board to review complaints, conduct investigations, and recommend resolutions for issues raised within the club.
4. **Gymnastics Ontario:** The provincial governing body for gymnastics in Ontario, responsible for setting standards, codes of conduct, and safe sport policies that clubs like NFLGC must follow.
5. **Individual(s):** All categories of participants engaged with NFLGC, who are subject to the policies, rules and regulations of NFLGC, as well as all persons employed by, contracted by, or engaged in activities with NFLGC, including, but not limited to, employees, contractors, athletes, coaches, instructors, officials, volunteers, judges, Athlete Support Personnel, managers, administrators, parents or guardians, spectators, committee members, or directors and officers.
6. **Member:** An individual or entity that is formally registered with NFLGC and, as such, is entitled to participate in club activities and programs. Members may include athletes, coaches, volunteers, board members, parents/guardians of minor athletes, and others actively involved in the club's operations or governance. Membership requires adherence to the club's code of conduct, policies, and any applicable fees or registration requirements. Members are also subject to the rules and standards set by the club and any governing bodies (e.g., Gymnastics Ontario) with which the club is affiliated.
7. **Minor:** Any individual under the age of 18 years. In the context of these policies, interactions with minors require additional precautions to ensure their safety and privacy.
8. **Rule of Two:** A safe sport guideline that requires at least two responsible adults to be present when interacting with athletes, particularly minors, to protect both the athlete and the adult from situations that could lead to misconduct or accusations.
9. **Safe Sport:** A framework that seeks to create a respectful, inclusive, and abuse-free environment for all athletes. Safe Sport principles guide the policies around conduct, athlete protection, and member interactions.
10. **Sanctions:** Disciplinary actions imposed as a result of a policy violation, which can include warnings, suspensions, or expulsions, depending on the severity of the misconduct.
11. **Vulnerable Individuals:** Individuals who may be at a higher risk of harm or exploitation, often including minors, people with disabilities, or those in positions that are dependent on others.