

Sport Environment Assessments (“**SEA**”) serve a dual function in both addressing and preventing maltreatment, discrimination and other prohibited behaviour related to the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (“**UCCMS**”). A SEA is designed to identify and remedy alleged systemic issues.

Unlike an investigation, in a SEA, there is no complainant or respondent. Survey respondents and interviewees (“**Assessment Participants**”) are asked to provide answers that describe their experiences. Therefore, the information in the SEA reflects how the Assessment Participants perceived the issues, systems or dynamics within the sport environment subject to the SEA.

The answers that Assessment Participants provide in interviews or to surveys are not subject to further examination to establish validity; it constitutes their individual perspectives.



Report to
Office of the Sport Integrity Commissioner

In this matter of

SPORT ENVIRONMENT ASSESSMENT

Submitted by Jennifer Hawkins,
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August 22, 2024



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Scope and Background

I was retained by the Office of the Sport Commissioner of Canada (“OSIC”) to conduct an assessment of the administration and organization of Wrestling Canada Lutte (“WCL”) (the “Assessment”). The Assessment has been assigned the following case number by OSIC: 2023-01-0008 SEA. The Assessment focuses on WCL in its capacity as a national sport organization (“NSO”) and in the context of the WCL community it has direct responsibility for (as opposed to the sport of wrestling in Canada generally).

Organization and WCL Community

WCL is a mid-sized NSO in Canada. There are approximately six or seven WCL staff members, led by the Executive Director.

There are four major training centres in Canada (located in Montreal, Vancouver, St. Catharines, and Calgary). I understand that athletes and coaches from the training centres rarely come together and when they do, they are in a very competitive head space. The only time athletes, coaches, and support personnel come together as the National Team is for international competitions, such as the Pan American Games, the world championships, or the Olympic Games. Many athletes train with a club as well as with a varsity team, often working with the same coach (such that the coach coaches the club and varsity teams).

Individual athletes and coaches are members of their respective Provincial/Territorial Sport Organizations (“PTSOs”), and the PTSOs are members of the NSO (WCL).

WCL describes the National Team as comprised of individuals who are:

- Competing internationally, requiring an international licence;
- Receiving a coaching grant; or
- Travelling with the National Team as a support person.

The National Team composition is fluid, meaning individuals from the WCL community may transition on and off the National Team. As such, it is difficult to pinpoint the exact number of athletes, coaches, and support personnel who are part of National Team at any given time.

Bennett Report

On July 16, 2017, David Bennett, LL.B, C. Med., was retained by WCL to conduct an independent review of the coaching culture in WCL. He issued a 41-page report, dated December 2, 2018, titled *Report Concerning Independent Review of Coaching Culture for Wrestling Canada Lutte* (the “Bennett Report”).¹ Mr. Bennett reviewed concerns pertaining to the following: sexual relationships; sexual abuse; problems in coaching; drinking culture; concussions and injuries; disordered eating; issues particular to women in wrestling; head office and control of the NSO; the complaint process; and coaches’ compensation. He made 52 recommendations (located on pages 39 to 41 of the Bennett Report; see **Appendix A** for a list of

¹ David Bennett, “Report Concerning Independent Review of Coaching Culture for Wrestling Canada Lutte” (2018), online (pdf): WCL <<https://wrestling.ca/wp-content/uploads/2018/12/FINAL-WCL-Report-for-Release-December-2-2018.pdf>>.



recommendations). As is outlined below, I was tasked with reviewing the implementation of these recommendations.

Abuse-Free Sport Program

On December 29, 2022, WCL formally adopted the *Universal Code of Conduct to Prevent and Address Maltreatment in Sport*² (“UCCMS”) and joined the Abuse-Free Sport³ program.

WCL has a comprehensive *Safe Sport Policy Manual* that contains policies intended to promote a safe sport environment. The *Safe Sport Policy Manual* includes certain policies that also apply to matters beyond safe sport (for example, the *Appeal Policy*) and those policies are also published separately on WCL’s website. The current version of the *Safe Sport Policy Manual* is found on WCL’s website,⁴ and includes the following WCL policies:

- *Athlete Protection Policy;*
- *Code of Conduct & Ethics;*
- *Abuse Policy;*
- *Discipline & Complaints Policy;*
- *Appeal Policy;*
- *Reciprocation Policy;*
- *Social Media Policy; and*
- *Screening Policy.*

The Introduction section of the *Safe Sport Policy Manual* explains that individuals and participants involved with wrestling programs can report any instance of misconduct or maltreatment directly to WCL’s Independent Third Party, who then determines the appropriate jurisdiction and/or manner to address the complaint.

The *Safe Sport Policy Manual* starts with an overarching Definition section, and ‘Maltreatment’ is “as defined in the UCCMS.” Maltreatment is also referred to in the *Code of Conduct & Ethics* in the section Prohibited Behaviour. ‘Prohibited Behaviours’ in that policy are defined to include those under the UCCMS, including the following: physical and psychological maltreatment; neglect; sexual maltreatment; grooming; boundary transgressions; discrimination; failing to report; aiding and abetting; retaliation; interference with or manipulation of process; and false reports.

Under the UCCMS, ‘maltreatment’ is defined as “an act and/or an omission that results in harm or has the potential for physical or psychological harm.” It includes sexual maltreatment and grooming. Examples

² Sport Dispute Resolution Centre of Canada, “Universal Code of Conduct to Prevent and Address Maltreatment in Sport” (31 May 2022), online (pdf): OSIC <<https://sportintegritycommissioner.ca/files/UCCMS-v6.0-20220531.pdf>>.

³ Visit <https://abuse-free-sport.ca/> to learn more about the Abuse-Free Sport program.

⁴ WCL, “Safe Sport Policy Manual” (January 2023), online (pdf): WCL <https://wrestling.ca/wp-content/uploads/2023/01/Safe_Sport_Policy_Manual-January-2023-1.pdf>.



include the following: sexual harassment; infliction of physical harm; spreading false rumours; humiliation; body shaming (includes setting unreasonable weigh-in goals and prescribing inappropriately restrictive diets); denial of nutrition; encouragement or permission to return prematurely to wrestling following an injury; use of exercise for the purposes of punishment; and neglect.

Assessment Scope

The overall objective of this Assessment is to offer proactive, transparent, and preventative measures to alleged systemic issues related to the UCCMS in order to cultivate safe, welcoming, and inclusive sport environments. This Assessment entails a detailed examination of the following categories:

1. A review of the Bennett Report recommendations and WCL's progress in respect of the implementation of the recommendations from the Bennett Report;
2. An assessment of WCL's ability to prevent and address misconduct, and how complaints have been managed (reporting, investigations, and resolutions); and
3. An assessment of whether there are systemic issues of maltreatment within WCL.

This Assessment is limited in scope as outlined in the three bullets above and does not involve a fulsome review of the efficacy of WCL generally as an organization.

Methodology

OSIC identified that based on publicly available information and information shared directly with OSIC, participants might be hesitant to take part in this Assessment because of the Bennett Report (and the Bennett assessment processes) and the perceived lack of implementation of the Bennett Report. I took steps to better understand the concerns arising from the Bennett Report process so that I could approach this Assessment differently in order to ensure participants would feel comfortable sharing their experiences candidly with me. One step I took was to explain in all communications the distinct purpose of this Assessment and the efforts I would make to ensure confidentiality and anonymity.

WCL also publicized its support of the Assessment. For example, very early in the Assessment process, WCL communicated with the PTSOs and WCL's Board of Directors (the "Board") to advise this Assessment would be taking place. WCL also posted on its website an announcement about the Assessment.⁵

To ensure I gathered feedback from the broad WCL community, I engaged in the following tasks during this Assessment:

- Reviewed existing documents;
- Issued a survey to members of WCL's community; and
- Conducted individual interviews.

⁵ WCL, "WCL to participate in Sport Environment Assessment" (4 August 2023), online: WCL <<https://wrestling.ca/wcl-to-participate-in-sport-environment-assessment/>>.



Below, I provide an overview of the positive changes that have been made within WCL during the last five years. I then review WCL’s progress in implementing the Bennett Report recommendations and identify where participants suggest gaps may still remain. I follow that with a review of how complaints are being managed by WCL and participant perceptions of barriers or concerns in this regard. Finally, I speak to whether any systemic concerns of maltreatment were identified in the course of the Assessment.

Documentary Review

I reviewed and considered all documents provided by participants in this Assessment, which included emails, arbitration awards and court decisions, policies and procedures, and the Bennett Report.

I reviewed information on WCL’s website,⁶ which in addition to information about competitions, athletes, and other news stories, includes links to all relevant policies, the Board Bylaws, training requirements for all WCL community members, and links to access the training.

Survey

I prepared a survey with questions pertaining to WCL’s efforts to address safe sport-related recommendations in the Bennett Report and participant comfort with the UCCMS and reporting mechanisms (the “Survey”). The Survey asked 30 questions about safe sport policies and initiatives, effectiveness of training on these policies and initiatives, and the sport environment in terms of WCL-sanctioned activities at the national and international levels within the last five years (and specifically in relation to sexual harassment and maltreatment).

I emailed the Survey to 281 individuals, including the Board and WCL staff members (28), PTSO representatives (21), officials (29), coaches (41), and national level athletes (162). The Survey was also available on both WCL’s and OSIC’s websites. My communications to the WCL community are included at **Appendix B**.

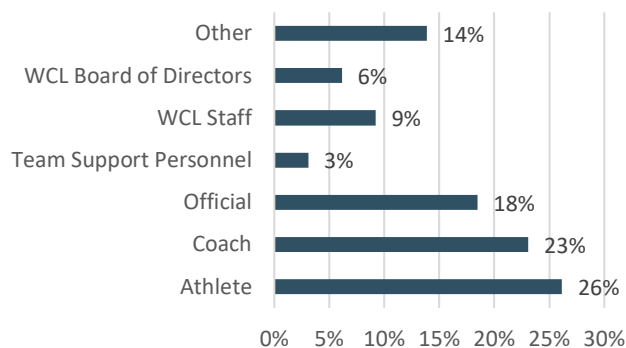


Figure 1: Survey Respondent Groups

I received 74 responses to the Survey. Figure 1 depicts the groups to which the respondents belonged.

A summary of the Survey responses is attached at Appendix B. I have not included individual comments as doing so would risk sharing identifying information. Appendix B also includes a copy of the Survey questions.

Interviews

I interviewed 15 people in person and virtually between September 2023 and December 2023. These individuals noted on their Survey that they were open to participating in an interview with me. Interviewees included individuals who were involved in the sport for many decades, and some who

⁶ Visit <https://wrestling.ca/> for more information on WCL.



participated in the sport in more than one capacity over the years (including as athlete, official, and WCL staff member).

All interviewees were advised of the need for honesty and confidentiality. To protect their confidentiality, they were told their names would not be identified in this Assessment report and wherever possible, the information would be presented under ‘themes’ as opposed to a summary of each interviewee’s evidence.

Prior to issuing this report, I shared my summary of the interviews with the interviewees for review and comment to ensure the summary captured their views. I have incorporated their feedback in this report.

Assessments Versus Investigations

I clarified with interviewees that the Assessment was not an investigation but rather a review carried out with a view of providing a summary of their experiences with WCL and of any concerns, and of making recommendations for addressing the same. Interviewees were encouraged to be open and forthcoming about their perceptions and experiences.

I confirmed with them that none of my recommendations would include the termination of employment or volunteer position, or discipline of anyone employed by or associated with WCL. As was emphasized to every interviewee, the issues identified through this Assessment are not about any particular individual in the performance of their duties or in relation to a specific complaint where there is a respondent and/or a complainant. Rather, and consistent with the process being an assessment (versus an investigation into misconduct), I have detailed recommendations that I hope will assist WCL in addressing any concerns in the spirit of positive change.

To further clarify, unlike an investigation, in an assessment, there is no complainant or respondent, and survey respondents and interviewees (“Participants”) were asked to provide information that described their experiences in WCL. The information in the report reflects how Participants perceived the issues, systems, and dynamics within WCL. Where the same or similar information about the culture or environment was disclosed by multiple Participants, I have specifically made note of this. The information that Participants provided in their interviews or in responses to the Survey questions was not subject to further examination to establish validity; it constituted their individual perspectives. In short, this report contains my assessment of the environment but does not contain any findings of fact.

Positive Reflections from Participants

The Assessment is, by design, a process used to identify challenges and concerns and to consider opportunities for improvement. However, it is important to highlight the positive information shared by Participants.

Survey Questions 16 and 17 provided an opportunity for respondents to reflect on their Sport Environment⁷ and overall, the responses were positive.

⁷ Survey respondents were provided with the following definition of ‘Sport Environment’: “The ‘Sport Environment’ means Wrestling Canada Lutte sanctioned activities, at the national / international level, within the last five years.”



Question 16 asked respondents to rate their overall experience in the Sport Environment and, as shown in Figure 2, of the 65 respondents, 46% described their experience as “really good,” and 43% said it was “average.” Only 11% identified that their experience was “poor.”

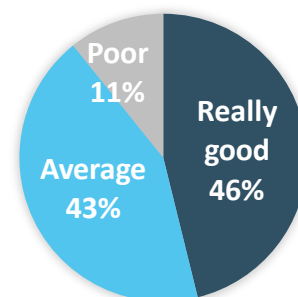


Figure 2: Overall Experience in Sport Environment

Question 17 asked respondents to list the three best things about the Sport Environment. I received 137 responses to this question and compiled the individual responses into the following themes, shown in Figure 3. Highlights include the 48 responses reflecting a supportive, collaborative, and cooperative environment, and the 20 responses focusing on camaraderie and positive interactions between athletes and between athletes and those supporting them (such as coaches and support personnel). The responses also focused on the competition aspect of the Sport Environment (27 responses commented on the competitive environment, the competitions and related fair selections, the pride for team and country, and being able to travel to compete), while 17 responses noted WCL’s commitment to improving the Sport Environment and its focus on safe sport.

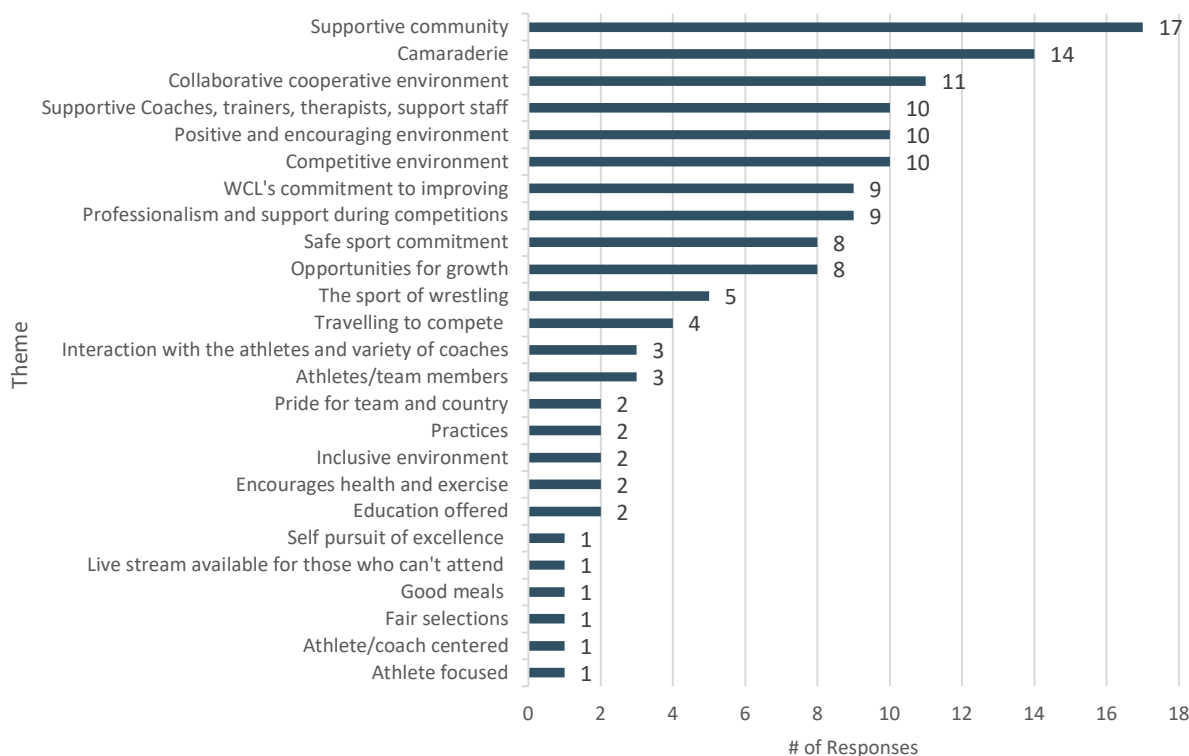


Figure 3: Three Best Things

Reflections from Athletes

The COVID-19 pandemic was particularly challenging for contact sports such as wrestling. Despite the very significant hurdles that distancing requirements placed particularly on the athletes between 2020 and 2021, some Participants noted that WCL continued to make progress in implementing the



recommendations from the Bennett Report (see **Appendices C and D** for November 2023 and March 2023 WCL updates). Many athlete Participants highlighted that in the face of the pandemic challenges, they had maintained both a consistent strong relationship with other athletes and their love of the sport. One Participant reflected that this was due to *“sheer intensity and grittiness, unspoken mutual respect and gratitude.”*

One athlete Participant identified that they felt empowered following the Bennett Report as it highlighted *“very key issues,”* and they felt emboldened to speak up about and to report misconduct. Another athlete Participant said they felt supported and heard, and was clear that *“if something were to happen, I would come forward.”* They identified that they felt this in particular since 2018 (after the release of the Bennett Report and the *“push for safe sport”* by WCL).

Board Improvements

Some Participants noted that since the release of the Bennett Report, positive changes were made in the composition of the Board. These Participants recounted that Board members historically had various conflicts of interest, and *“they always had a whole bunch of coaches sitting on the Board and influencing decisions.”* Another Participant identified that conflicts on the Board also existed as some Board members had the potential to gain financially as a result of certain decisions that were made.

Some Participants shared that there had been changes to increase the requirements for independence on the Board. One Participant noted that new Bylaws were passed in June 2023 to *“create independence on the Board,”* and noted the Board worked with Benoit Girardin, LL.B. (a sports lawyer who specializes in governance and operational reviews) to develop an improved governance structure and to create new eligibility criteria. Some Participants who were aware of the recent changes to the Board membership (details are outlined in the paragraphs below) expressed excitement *“to see what happens with a new, more independent structure.”*

Board Bylaws were ratified by Special Resolution of the Members of the Corporation on June 28, 2023. The following provisions aim to ensure diversity on the Board, and to eliminate conflicts of interest:

23. The Board will consist of a minimum of seven (7) or a maximum of nine (9) Directors, elected by the Members at a Meeting of Members where elections occur, to serve two (2) years.

In the case of a nine (9) Directors’ Board, the composition shall be as follows:

- a) One (1) Director being a retired national team athlete (retired for a minimum of 2 years and a maximum of 6 years from the original time of nomination or election);*
- b) One (1) Director being a coach not actively involved at the national or international level;*
- c) One (1) Director being an official not actively involved at the national or international level;*
- d) Six (6) independent Directors.*

In the case of a seven (7) Directors’ Board, the composition shall be the same with the exception of four (4) independent Directors instead of six (6).

[...]



25. *The Corporation recognizes that diverse perspectives, experiences and backgrounds provide for optimal Board performance as prescribed in the Corporation's policies. To promote this diversity, the Board shall:*

- a) *Be representative and inclusive of the community at large and take into consideration individuals from equity deserving groups;*
- b) *Have a majority of independent Directors with diverse perspectives, experience, skills and competencies;*
- c) *Have no more than 60% of the Directors that shall be of the same gender;*
- d) *Strive to have equitable geographical representation in the Board.*

Finally, it was reported by WCL that effective November 29, 2023, all of the previous Directors and Officers ceased to hold office, and an entirely new Board was elected.⁸ WCL confirmed the new Board included members who identified as follows: three males, four females, three people of colour, one Indigenous person, and at least one person who was bilingual.

Training and Policy Improvements

In respect of training, official Participants highlighted that until very recently, officials had to pay for their training, which for some became prohibitive. Offering free safe sport training was certainly viewed as a positive step forward by these Participants.

WCL clearly outlines training requirements for Participants on its website.⁹ WCL offers 'Respect in Sport for Activity Leaders' for staff, coaches, medical personnel, team leaders, and the Board via the National Coaching Association of Canada, for a small fee.

Several Participants favourably highlighted changes to WCL's *Safe Sport Policy Manual*. One Survey respondent wrote:

WCL, including its staff, athletes, coaches, officials, administrators, have spent a considerable amount of time, energy and resources to implement and improve the Safe Sport Environment over the past 5 years. Changes have begun to take root, but true culture change takes time. ... Our culture change still has some room to improve, but from where we were in the past, WCL has made great process and is improving.

Complaint Process Improvements

It was noted by several Participants that within the last five years, a Complaints Officer was hired to receive complaints pertaining to WCL's *Code of Conduct*,¹⁰ including matters pertaining to carding and team selection (this role was to manage the complaints process, and not to be a decision maker). Prior to engaging the Complaints Officer, I heard that there were lawyers from different firms appointed to

⁸ WCL, "WCL Elects Board of Directors Under New Bylaws" (1 December 2023), online: WCL <<https://wrestling.ca/wcl-elects-board-of-directors-under-new-bylaws/>>.

⁹ Visit <https://wrestling.ca/safe-sport/> for more information on safe sport training requirements.

¹⁰ WCL, "Code of Conduct" (June 2017), online (pdf): WCL <https://wrestling.ca/wp-content/uploads/2018/03/Code_of_Conduct.pdf>.



manage the complaints process, and some Participants said these lawyers often had “conflicts” (such as having represented WCL in proceedings) and were not viewed as neutral case managers. I was told that more recently, WCL had engaged ITP Sport¹¹ to provide independent complaint management services to WCL. A Participant raised concerns with a particular member of the ITP Sport team; however, this was not a broadly held view (based on interviews and the Survey) and the concerns did not involve the ITP Sport representative I interviewed as part of this Assessment and with whom WCL advised they worked most closely.

Participant Concerns, Experiences, and Observations

I reviewed the information gathered in the Assessment and summarized it under the three categories defined in the scope:

1. Bennett Report – outcomes and gaps;
2. WCL’s ability to prevent and address misconduct (including maltreatment); and
3. Systemic issues of maltreatment.

1. *Bennett Report – Outcomes and Gaps*

Scope: A review of Bennett Report recommendations and WCL’s progress to implement recommendations and to identify gaps.

Concerns Arising from the Bennett Report

Though it was published five years ago, and this Assessment covers the period following its publication, it is important to start with an outline of issues that arose as a result of the Bennett Report itself. What I heard about the process of gathering information and the manner in which the Bennett Report was written informed my process (and I note that OSIC’s assessment process is different from the one used by Mr. Bennett, and this Assessment was conducted for different purposes). Further, it was clear that for many Participants, the content of the Bennett Report spurred conflict that negatively impacted the ability of WCL to move forward as an organization to improve its culture. For example, in the Survey at Question 25 which asked for the respondents’ top three concerns with the Sport Environment, 9 responses identified negative outcomes flowing from the Bennett Report, and this ‘theme’ was the fourth highest concern of respondents.

I heard from several Participants that the process leading to the Bennett Report was damaging as people were warned not to participate by peers and leaders in the sport, and some who did share information with Mr. Bennett suffered retaliation. Most Participants who were involved in some way in the Bennett Report explained that the Bennett Report was intended to be confidential and anonymous; however, given the way it was written, a reader was able to determine in some circumstances who the concerns

¹¹ For more information about ITP Sport’s independent complaint management services, visit <https://itpsport.ca/service/independent-complaint-management/>



pertained to and who had reported the concerns, and as such, *“the damage was done.”* One issue with the Bennett Report was that he listed the names of coaches, staff members, and support team individuals he interviewed. Though the 27 current and former athletes who were interviewed were not named, I was advised many of them were identifiable in the report due to the information they shared.

After its publication, many Participants described retaliatory behaviors, including *“battles between different clubs”* (for example, clubs protecting their member who was the subject of concern in the Bennett Report, while other clubs protected their member who reported the concern), with the ultimate result that athletes from certain clubs were not welcome to train at other clubs that hosted camps or other group events. Most identified that it was coaches, and not athletes, who *“held grudges”* and would not talk to one another, but noted the impact trickled down, and athletes felt obliged to toe the line and similarly not engage with the *“opposing club.”*

One specific example relayed by several Participants took place the week following the publication of the Bennett Report when some coaches refused to attend a previously scheduled *“off mat camp,”* which negatively impacted the athletes in attendance and was viewed by some as an intentional act of retaliation to disclosures made within the Bennett Report. As an aside, the athletes who attended the camp engaged in a workshop with an external facilitator about the culture of wrestling, but the Bennett Report was not discussed, which these athlete Participants described as an *“odd gap.”*

Several Participants identified that there was a lack of clarity regarding the recommendations and other outcomes following the Bennett Report.

A number of Participants advised that following the publication of the Bennett Report, WCL itself and various individuals connected to the sport of wrestling then faced many *“challenges and legal issues.”* They referred me to court cases and arbitration decisions, some of which they said were directly linked to disclosures made in the Bennett Report. This issue is highlighted later in the report (see *Other Forms of Complaints / Vexatious Complaints and Retaliation*) and was overall the most consistent concern raised by Participants as an outcome of the Bennett Report.

Finally, I met with Participants who, between the Bennett Report and their interview, had chosen to leave their roles within WCL because they were, as one Participant put it, *“so disillusioned”* with WCL.

Gaps in Implementation

The recommendations listed in the Bennett Report are attached at Appendix A.

On September 19, 2019, WCL published on its website an 11-page report titled *Update on Report Concerning Independent Review of Coaching Culture at Wrestling Canada Lutte*¹² (“Update Report”) to meet its commitment to doing a *“pulse check”* partway through the year following the release of the Bennett Report to monitor progress and make necessary adjustments. At that point, there were still recommendations outstanding, but WCL had made good progress on many of the Report’s recommendations.

¹² WCL, *“Update on Report Concerning Independent Review of Coaching Culture at Wrestling Canada Lutte”* (September 2019), online (pdf): WCL <https://wrestling.ca/wp-content/uploads/2019/09/Safe-Sport-Update-Report_Final.pdf>.



WCL maintained a working chart in which it highlighted progress on each of the recommendations pertaining to safe sport in the Bennett Report. A version of this working chart, dated March 2023, is attached at Appendix D (this version was provided to me at the start of the Assessment). WCL noted that all recommendations were implemented and marked as green as of March 2023 (almost a year prior to this Assessment report) except numbers 11, 12, 37, and 38. Recommendations 37 and 38 pertain to the composition of the Board, and as of the date of this report, there was gender parity on the Board and a diverse composition, and the new Bylaws were implemented. In respect of recommendation 11, an independent investigator reviewed the allegations made to ITP Sport, the Minister of Sport, and WCL, and prepared a report.

Recommendation 12 identified areas in which it was recommended WCL implement mandatory training for coaches who participate internationally. In March 2023, WCL noted this recommendation was “*in progress*” and in the most recent version of the working chart, dated November 2023 and attached at Appendix C, it was marked as “*evergreen*.” I note all recommendations were marked as green for complete, or light green for evergreen (ageless or ongoing) and I am satisfied WCL has implemented all of the Bennett Report recommendations.

To my knowledge, WCL did not publicize its implementation progress after the Update Report was released.

Despite the implementation of the Bennett Report recommendations, in my view, there remains a culture of mistrust amongst some in the sport, evidenced by the following conduct, described to me by several Participants: individuals audio recording conversations; an individual taking video footage of a peer being served court documents; and individuals sending copies of written communications not only to WCL but also to the Prime Minister, the Minister of Sport, Sport Canada, Own the Podium, and others (including national-level WCL athletes). Such actions were explained by these Participants as being necessary because of a belief that WCL made poor decisions, ignored concerns, and targeted or punished those who spoke out against wrongdoing.

Several Participants expressed empathy for the Executive Director, noting that she was in a “*terrible and unusual position*” and despite the recommendations in the Bennett Report, WCL remained a “*factitious organization*.”

Several athlete Participants shared that although the Bennett Report was posted online, they did not receive any communications about the Bennett Report or WCL’s plan to address the recommendations made therein. For example, one athlete Participant said they never saw any update from WCL about what steps were taken in response to the Bennett Report.

One Participant stated they did not believe WCL, at the time of this Assessment, had ever set up a task force to implement the recommendations. However, I met with interviewees who were involved in implementing recommendations and involved in the committee tasked with doing so, who of course shared an opposing view. And, as outlined earlier, WCL did publish the Update Report on September 19, 2019.

The recommendations from the Bennett Report that pertained to governance and staffing were identified as an area of growth by many Participants. Though several of these Participants generally expressed praise for recent changes to the Board composition (discussed above under *Positive Reflections from*



Participants, Board Improvements), they remained concerned about the flow of information to and from the Board. Some Participants with knowledge of the Board structure advised there was a representative from each province on the Board, and an expectation or assumption that the representative would share pertinent information following Board meetings within their province; however, it was unclear whether this was happening consistently.

I also heard concerns that WCL staff members did not share sufficient and necessary information with Board members, and a recent matter that received media attention was provided as an example. Some questioned whether WCL was transparent and honest with the Board, including about staffing decisions within WCL's office (such as why certain individuals were no longer working in the office, and whether their employment had been terminated). In addition, in the Survey at Question 25, seven responses identified a lack of transparency and communication at all levels, which was the fifth highest concern in the Sport Environment of respondents.

A few Participants also expressed skepticism about certain hiring decisions and turnover within WCL, and questioned whether WCL staff were contributing to the culture concerns more broadly. Most interviewees, however, relayed that they did not know the staff or who to contact for what issue. WCL's staff group was described by many (not including WCL staff Participants) as *"a black hole."*¹³

2. *WCL's Ability to Prevent and Address the Misconduct*

Scope: A review of information pertaining to prohibited forms of behaviours under the UCCMS (section 5.9–5.14) including WCL's ability to prevent and address the misconduct, and how complaints have been managed (reporting, investigations, resolution).

The UCCMS *"sets harmonized rules to be adopted by sport organizations that receive funding from the Government of Canada to advance a respectful sport culture that delivers quality, inclusive, accessible, welcoming and safe sport experiences."*¹⁴

Sections 5.9 to 5.14 of the UCCMS prohibit those in positions of authority from subjecting a 'participant'¹⁵ to the risk of maltreatment, aiding or abetting others in the commission of maltreating, failing to report maltreatment, and intentionally reporting a false allegation. The full text for sections 5.9 to 5.14 is reproduced at **Appendix E**.

While I share participant observations of maltreatment below, this section of the Assessment report is focused on the mechanisms available to address such concerns, and how WCL has prevented and/or addressed such issues since the Bennett Report.

Overall Observations on Misconduct

In the Survey at Question 25, I asked for the respondents' top three concerns with the Sport Environment. 'Incidents of maltreatment' garnered the most responses (14). Pairing it with the themes of 'Inappropriate

¹³ Staff members, their titles, and emails are published on WCL's website at <https://wrestling.ca/about/staff/>.

¹⁴ Sport Dispute Resolution Centre of Canada, "Universal Code of Conduct to Prevent and Address Maltreatment in Sport" (31 May 2022), online (pdf): OSIC <<https://sportintegritycommissioner.ca/files/UCCMS-v6.0-20220531.pdf>>.

¹⁵ The UCCMS defines 'participant' as "Any individual who is subject to the UCCMS. Participants could include, without limitation, athletes, coaches, officials, volunteers, administrators, directors, employees, trainers, parents/guardians, etc."



focus on weight and body' (10 responses) and 'Defining boundary transgressions'¹⁶ (1 response) illustrates that respondents viewed maltreatment as a significant concern.

'Maltreatment' was defined at Question 3 in the Survey using the UCCMS definition: *"an act and/or an omission that results in harm or has the potential for physical or psychological harm. It includes sexual maltreatment and grooming."* I asked respondents at Question 18 if they had ever witnessed someone within the Sport Environment being treated in a way that they felt was inappropriate or unfair; unfortunately, 57% said they had. I then asked a series of questions about witnessing specific incidents of maltreatment. Highlighting the types most witnessed, these results along with the top three concerns demonstrate that maltreatment continues to exist in the Sport Environment (recall that the Survey and interviews did not pinpoint dates or occurrences and this information is based on individual perspectives):

- 50% witnessed spreading false rumours;
- 45% witnessed encouraging or permitting a premature return to wrestling following an injury;
- 44% witnessed humiliation;
- 35% witnessed body shaming;
- 35% witnessed the use of exercise for the purpose of punishment;
- 33% witnessed grooming or sexual maltreatment; and
- 28% witnessed boundary transgressions.

Further, in relation to officials, some interviewees identified that officials must have *"thick skin"* and there were some coaches who *"totally cross the line"* in terms of how they treated officials. Some noted attrition of more junior officials because *"they mentally can't handle it [the negative behaviour towards them]."* It was interesting to note that coach and official Participants were unanimous in their view that the *"newer coaches understand all of the safe sport stuff and are sensitive to it. They behave differently than the coaches on their way to retirement."* Overall, there was a sense among many Participants that there had been a lack of attention to WCL's *Code of Conduct* as it related to the treatment of officials who continued to be subject to misconduct, such as being yelled at and having items thrown at them.

In the following section, I discuss WCL's efforts to prevent misconduct via training and policy development. I then review reporting and the complaint management process (including jurisdictional complications and informal resolution), sanctions and resolutions, and finally other forms of litigation that have been used by some in the community and concerns regarding retaliatory conduct.

Prevention – Training

In terms of the Sport Environment in general, in the Survey at Question 25, only 2 responses identified insufficient safe sport training as a top concern. In contrast, 2 responses highlighted the education on offer as one of the best things about the Sport Environment.

As noted above, the Bennett Report recommended specific training. Several interviewees acknowledged they participated in training following the Bennett Report, though they were unclear whether or how the

¹⁶ The Survey defined 'boundary transgression' as occurring *"when interactions or communications do not meet the threshold of maltreatment, but nonetheless are viewed as inappropriate in the circumstances."*



training was tied to the recommendations in the Bennett Report. Of the 73 Survey respondents to Question 11 on whether they had received training in the last year about bullying, harassment, and sexual harassment; nutrition, weight cutting, and eating disorders; and/or physical contact between coach or support personnel and athlete, 54 (74%) said they had. As illustrated in Figure 4, they characterized the effectiveness of the bullying, harassment, and sexual harassment training as most effective (87% said somewhat to very effective) followed by the physical contact between coach or support personnel and athlete training (75% somewhat to very effective), while the nutrition, weight cutting, and eating disorders training was effective to a lesser extent (67% said somewhat to very effective).

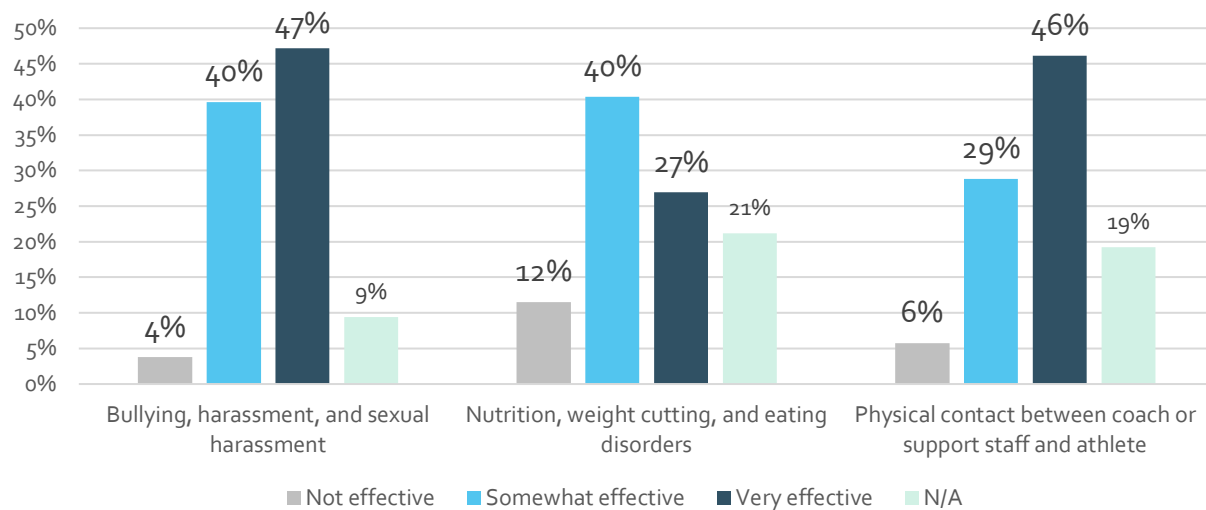


Figure 4: Effectiveness of Training

In terms of how to improve the training, several Participants made suggestions, including the following: the training systems needed to be more accessible as currently they were challenging to use as “*there is not a consistent portal for people to go to*” and the courses were not offered at enough different times and locations; the training could be more tailored to reflect the group (for example, one version for athletes and another for parents, achieved by asking the groups what they needed from the training); the training could have more wrestling specific content; it could be cheaper (or free); and it could be less time consuming. Two thirds of the Survey respondents said they preferred to receive future training and education on safe sport-related topics via e-learning and the rest (one-third) said they preferred in person, had no preference, or would like to see a combination of in-person and virtual sessions. Suggestions for future training included courses on athlete responsibilities, behaviour standards in the daily training environment, conflict resolution, WCL policies, gender equity / how to keep females in the sport, how to report maltreatment, how to implement safe sport initiatives, how to maintain a respectful workplace, and weight cutting and eating disorders.

I received negative feedback about a particular session regarding consent that was delivered by a “*consent coordinator*” from movie productions. Interviewees who attended this training said it was unhelpful in the sense that the “*rules are very clear in terms of touching*” in wrestling.

One interviewee said, “*There is no sport specific [physical] abuse ... rather it’s bullying, harassment and neglect.*” From the interviewee’s perspective, the primary harms were psychological; physical abuse was not prevalent in WCL. Specifically, this interviewee noted that it was “*the mental stuff*” that was the most



challenging to understand, and they suggested this was what was missing in the current training. To clarify, this interviewee suggested questions such as the following should be answered: *“Is it maltreatment when a coach focuses more on one athlete than another? What if the coach doesn’t talk to me at practice one day? Where is the line, and what needs to be reported? As a bystander, what should I do?”*

One Participant said that from their perspective, *“There isn’t a coach out there now who does not know that what they were doing was wrong. They know.”* This Participant suggested that additional training should be focused not on what constituted maltreatment, but on skills to address, defuse, or disrupt the behaviours. In this same vein, several other Participants advocated for training for athletes that would *“give them a voice,”* teach them to advocate for themselves, encourage camaraderie, and provide tools to support one another through challenging situations.

Finally, it was noted that the Bennett Report and various recommendations from the Bennett Report were heavily focused on the athletes and coaches, with less emphasis on the officials. Participants proposed ensuring examples were inserted into the training program pertaining to the treatment of officials.

Prevention – Policy Development

Survey respondents were asked whether they agreed that WCL had implemented policies and initiatives in the last five years related to providing a safe sport environment. As shown in Figure 5, 72% agreed, 9% disagreed, and 19% said they did not know.

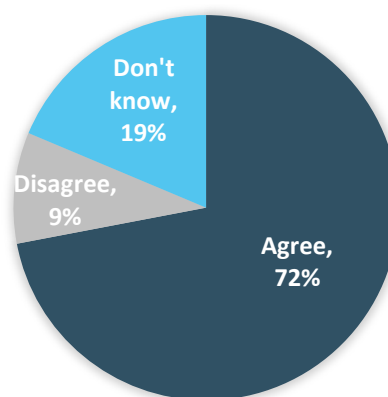


Figure 5: Agreement with Policy Implementation

WCL’s *Safe Sport Policy Manual* is accessible online¹⁷ and I confirm that it includes rules (relevant to the Bennett Report recommendations) in the *Athlete Protection Policy* section pertaining to:

- The Rule of Two (whereby there are always two adults present with an athlete);
- Intimate and romantic relationships;
- Communications between persons in authority and athletes;
- Physical contact;
- Consumption of alcohol, tobacco, and cannabis; and
- Athlete-specific actions, such as acting in the best interest of an athlete’s development as a whole person; supporting an athlete; avoiding compromising the present and future health of an athlete by communicating and cooperating with sport science and sport medicine professionals in diagnosis, treatment, and management, including when discussing optimal nutritional strategies or weight control methods.

¹⁷ WCL, “Safe Sport Policy Manual” (January 2023), online (pdf): WCL <https://wrestling.ca/wp-content/uploads/2023/01/Safe_Sport_Policy_Manual-January-2023-1.pdf>.



While the rules and policies exist, several Participants said they were not aware of them. For example, only 66% of the Survey respondents said they were aware of rules and expectations around the consumption of alcohol when coaches, athletes, officials, team support personnel, and/or WCL staff were together; 23% said they were “unsure” if such rules existed; and 11% said they did not exist.

Regarding the Rule of Two, the awareness was higher as 92% of Survey respondents said they had heard of it, and as shown in Figure 6, 72% said it was usually or always implemented by WCL staff, team support personnel, coaches, officials, and the Board.

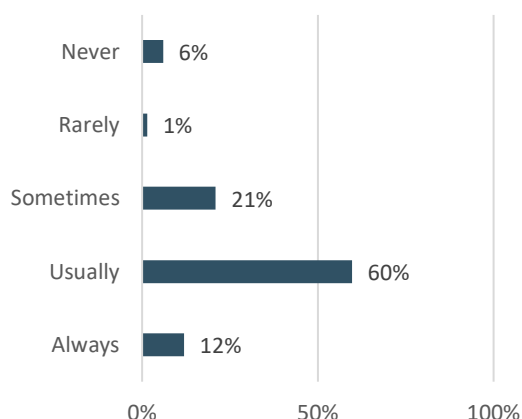


Figure 6: Rule of Two Implementation

Some interviewees relayed that they found some of the rules and policies related to safe sport to be challenging to apply at times. A few Participants felt that some safe sport policies were not practical and suggested dialogue or training in “real life scenarios.” One Participant provided the following scenario:

What if an athlete approached a coach in a state of trauma, and wanted to talk about their suicidal ideations immediately, in a remote location when there was not another adult present. How should that coach support that athlete and apply the Rule of Two (which requires two adults to be present in a conversation with an athlete)?

Reporting

The Survey asked an overall question about whether the respondent had ever witnessed someone within the Sport Environment being maltreated: 57% said they had, 12% were unsure, and 31% said they had not. The Survey then asked about more specific conduct, including boundary transgressions, sexual harassment, and specific incidents of maltreatment. Of the 18 respondents who had witnessed boundary transgressions and 22 respondents who had witnessed grooming / sexual maltreatment, as shown in Table 1, less than half reported the conduct.

Table 1: Reporting Statistics

	% who witnessed conduct	Of those who witnessed, % who reported
Boundary transgressions	28% (18 respondents)	32% (7 respondents)
Grooming or sexual maltreatment	33% (22 respondents)	46% (11 respondents)

The witnessing versus reporting percentages were more variable when I asked Survey respondents about specific incidents of maltreatment within the Sport Environment. Table 2 identifies the number of Survey respondents who answered Question 24 that asked them if they had witnessed forms of maltreatment within the Sport Environment, and if yes, whether they reported it.



Table 2: Yes, I Witnessed This

Response option	Total: YES, I witnessed this	% of respondents who answered question
Denying nutrition	8	13%
Neglect	9	15%
Infliction of physical harm	12	19%
Body shaming	22	35%
Use of exercise for the purposes of punishment	22	35%
Humiliation	28	44%
Encouraging or permitting a premature return to wrestling following an injury	29	45%
Spreading false rumours	32	50%

As illustrated in Figure 7, in all the incidents where respondents said they had witnessed the maltreatment, more said they did not report the conduct than those who said they did. The largest gap between witnessing and reporting was witnessing the use of exercise for the purposes of punishment (a gap of 29%), followed by encouraging or permitting a premature return to wrestling following an injury (a gap of 27%).

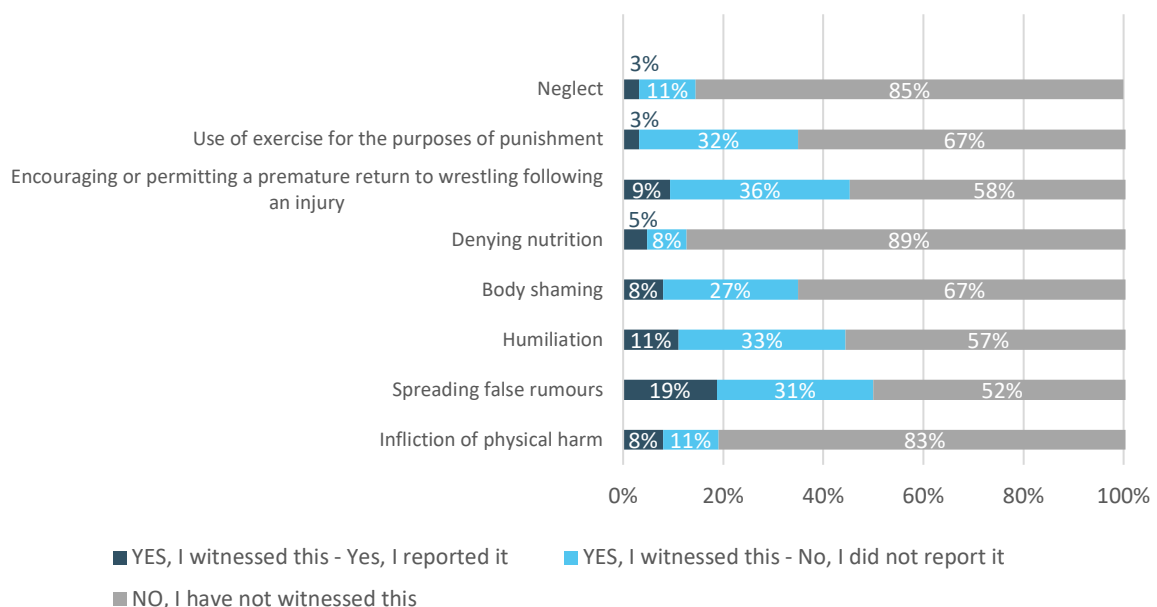


Figure 5: Maltreatment Witnessing Versus Reporting



When asked if they knew how to report concerns of maltreatment that occurred with the Sport Environment, 87% said they knew how to report, but, as shown in Figure 8, only 64% said they would feel comfortable reporting maltreatment if they experienced it. Slightly more (70%) said they would feel comfortable reporting if they observed maltreatment occurring to someone in their regular daily training environment, while even fewer (57%) said they would feel comfortable reporting maltreatment if they saw it happening outside their training environment.

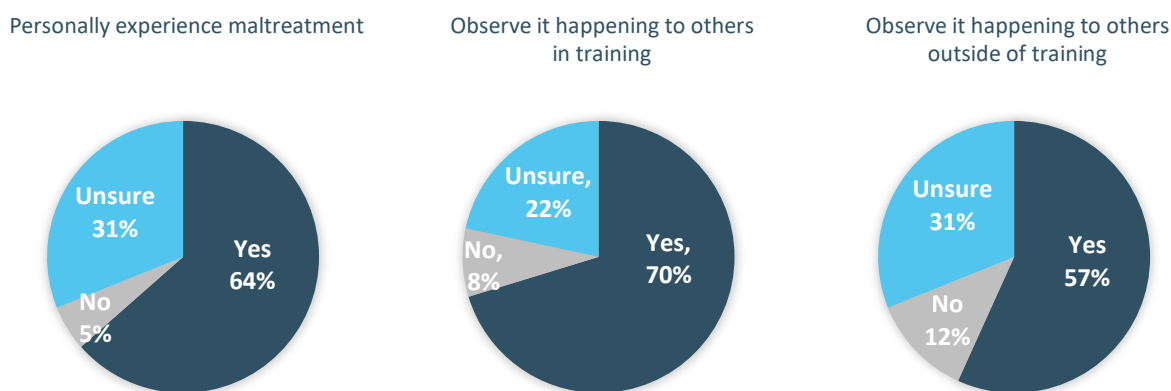


Figure 6: Comfort Level of Reporting Maltreatment

When asked in the Survey at Question 25 about the top three concerns within the Sport Environment, 10 responses identified issues with reporting incidents, which was the second highest concern in the Sport Environment of respondents.

Complaint Management Process

Participants noted several issues with the Complaint Management process, including: 1) staffing of the Complaint Manager role; 2) confusion around jurisdiction; 3) lack of informal resolution options; 4) breaches of confidentiality; 5) inadequate sanctions and resolutions; 6) misuse of litigation; and 7) other forms of retaliation.

Complaint Manager Role

Some Participants said they raised what they called “serious concerns” (including about impartiality and competence) with WCL about the previous Complaint Managers (sometimes referred to as the Safety Officers) who were engaged by WCL to manage complaints following the release of the Bennett Report. One Participant indicated a small group clearly articulated their concerns in respect of several of these Complaint Managers over the years to WCL, and eventually the incumbent was replaced.

As discussed above under *Complaint Process Improvements*, I heard one complaint about a particular ITP Sport team member; however, I did not otherwise hear concerns with the current model where ITP Sport would receive and manage the complaints.

One Participant identified that when they raised concerns of bullying and harassment with WCL, despite their deep connection with WCL and its staff, they were not supported by WCL and had to navigate the process on their own.



ITP Sport noted that they spent “*an inordinate amount of time*” explaining the complaint resolution process to WCL community members and that it could be challenging as they were not entitled to provide advice in their role as Complaint Manager.

Jurisdiction

During the interviews, I learned of several hurdles when WCL community members chose to proceed with a complaint, one of the key ones being jurisdiction. They said the question asked would be, “*Who do I submit my complaint to?*”

One of the challenges in identifying to which jurisdiction a WCL community member belonged became apparent as I set about communicating with National Team-level Participants in the course of this Assessment – the members of that group shifted continually. For example, it was not always clear who was or was not a National Team-level athlete at any given time, and athletes could fall under this category if they were carded, or if they attended an international competition in any given year.

Another challenge identified related to training versus competition. I learned that as athletes often trained at clubs as well as on varsity teams, and then might attend a national event, there were different codes of conduct and rules that would apply, and when a complaint was lodged, the responsible entity would depend on when and where the incident occurred. Interviewees noted that it was not always clear whether they were governed by the PTSO’s rules and policies, or those applicable at the national level. One Participant summarized this challenge, stating, “*Am I at a national event or a provincial event? If it’s not a WCL sanctioned event, I can’t complaint to them.*”

The introduction section of the *Safe Sport Policy Manual* provides that:

This WCL Safe Sport Manual, applicable to Registered Participants in WCL’s jurisdiction, contains policies intended to promote a safe sport environment in a manner that allows for consistent, immediate, appropriate and meaningful action should any issues arise, but also to prevent issues from arising by communicating expected standards of behaviour to all participants.

A footnote at page 3 states that “*WCL Member organizations, including Provincial / Territorial Sport Organizations (PTSOs) and the Canadian Association of Wrestling Officials (CAWO) are required to have comparable safe sport policies as a condition of membership with WCL.*”

Despite this, WCL advised me that at the time of this Assessment, not all of the PTSOs had adopted the same safe sport policies as WCL. This was described as a “*huge gap in the system*” and I learned that PTSO priorities were directed by the provincial and territorial bodies and the funding available to them. As such, while WCL identified a desire to rectify the “*system disconnect*” by creating consistent national, provincial, and territorial safe sport procedures, this had not yet occurred.

I spoke with an ITP Sport representative, and they observed that WCL community members often filed complaints in multiple places, such as with their PTSO, the NSO, and OSIC. As discussed above under *Jurisdiction* and *Reporting*, several Participants described the complaint resolution process as “*muddy*” when OSIC did not have jurisdiction and the concerns crossed provinces and territories (for example, an athlete from Province A is at a tournament in Province B and misconducts themselves).



In terms of assessing jurisdiction, the ITP Sport representative said when they received a complaint in respect of WCL, deference was given to OSIC. They said OSIC may either accept the complaint, determine it was not within its jurisdiction, or deem the conduct within its jurisdiction but determine it did not constitute maltreatment. In the latter case, they said the matter would be returned to ITP Sport to manage pursuant to WCL policies.

The ITP Sport representative advised that WCL and ITP Sport used a software platform called Integrity Counts, which allowed individuals to report concerns by phone or written complaint. When the complaint was received, ITP Sport would connect with WCL to determine if the individual was an OSIC participant, and if yes, the matter would be referred to OSIC; if no, ITP Sport would examine whether the complaint fell within WCL's *Code of Conduct*. Similarly, another interviewee indicated that the process to file complaints was clear, and a complainant was not responsible for sorting out jurisdiction (noting it was for ITP Sport and OSIC to do that). I note that several Survey respondents disagreed, and said they had issues reporting incidents related to jurisdiction.

In describing the role of the Complaint Manager, the ITP Sport representative explained that the Complaint Manager's decision-making authority was limited to determining the admissibility of a complaint where parties were not OSIC participants and to making recommendations for provisional suspension or other interim measures for the parties' organizations to impose. I understand from my interviews that very rarely are non-OSIC complaints investigated. The interviewees who discussed this said decision-making authority on findings and sanctions for complaints proceeding to a discipline process rested with the appointed discipline panel or adjudicator.

ITP Sport advised that WCL would be notified when there was an admissible complaint, in part because WCL was responsible for confirming the fee for the hearing panel.

Informal Resolution

The ITP Sport representative said matters would often go straight to hearing, pursuant to the complaint and discipline procedures, and skip an investigation because the necessary information was available at the time of submission. They said matters could be appealed to the Sport Dispute Resolution Centre of Canada ("SDRCC") after internal appeal mechanisms were exhausted, though the SDRCC did not hear discipline matters. They added, *"I'm not sure people recognize that it is a litigious process, and they will have to defend their case."*

The ITP Sport representative highlighted a gap in the complaint resolution process: specifically, there was no longer a clear path for alternative dispute resolutions ("ADR") such as mediation. If an ADR process was to be offered, the ITP Sport representative said the sport organization would have to pay for it, whereas historically, there was an agreement with the SDRCC to have mediation support for a flat, and reasonable, fee. The ITP Sport representative noted that many disputes they had seen in their work at ITP Sport (including with different sports) could have been resolved through mechanisms other than formal complaints and hearings. At least one Participant said they did not think ITP Sport had ADR, investigation, or legal training, which caused them concern.

A few Participants suggested that the majority of concerns arising since WCL joined the Abuse-Free Sport program were not egregious and indeed quite *"resolvable,"* but people did not know how to informally resolve them. These Participants suggested those in leadership roles within WCL did not have the skillset



or comfort level to respond to conflict in a de-escalating manner. Others similarly suggested that there needed to be a less formal, more collaborative alternative process to resolve issues. One Participant in a leadership role said an athlete told them, *“It would be nice if I had someone I could talk to about how I’m feeling without it going to arbitration – something in between. That’s what stops people from coming forward. [We need] something in between and where confidentiality can be maintained.”*

One Participant highlighted efforts they had made to informally address concerning behaviour directly after observing it and imparted their concern that the information was shared without their consent. Their story suggested a disregard for principles of confidentiality by the person to whom they reported the concern, and a lack of sophistication in addressing concerns informally. This Participant said it was unclear to them, and they believed also to most other WCL community members, whether there were informal or reconciliation processes available to them short of filing a complaint.

Confidentiality

Given the small size of the sport, several Participants said they feared their complaints would not remain anonymous. One Participant said, *“Wrestling is such a small sport and we’re all stakeholders. When something like that [such as an investigation report or a SDRCC decision] comes out, it is a flurry of text messages and the link [to the decision / report] is shared.”* Several Participants suggested that inappropriate conduct was not reported because *“people don’t want to put their name on record.”* Survey respondents who said they did not report maltreatment gave a variety of reasons why, including a fear of retaliation and not staying anonymous (this is addressed further under *Retaliation*).

Addressing Maltreatment (Sanctions / Resolutions)

I heard from several interviewees examples of false allegations not being addressed, and where serious allegations were substantiated, there was no follow through to ensure the safety of those in WCL’s community (for example, by ensuring that the individual against whom a complaint was made (known as the respondent) no longer participated in the sport).

Several Participants noted that within a short time, WCL had to prepare and respond to complaints at SDRCC hearings because *“when people didn’t like something, they would go to the disciplinary process.”* While it was agreed by several Participants that the SDRCC complaint resolution process could be effective and necessary, in some cases it left participants struggling to repair *“burned bridges”* on their own. Several Participants recognized the immense burden on WCL resources required to respond to such complaints.

Some Participants said they were aware of individuals with substantive complaints who chose not to come forward because they weighed the time and emotional impact against their belief that there would be little, if any, repercussion to the respondent and determined *“it just was not worth it.”* In respect of WCL’s response to breaches of the *Code of Conduct* (and now maltreatment under the UCCMS), coach, athlete, and official Participants shared the view that *“there’s no real follow through; no one is held accountable. We can do better.”*

One Participant asserted that WCL failed to post discipline decisions on its website and failed to enforce sanctions. Some Participants shared specific examples of complaints about harassing conduct that were substantiated, where the respondent in their perspective was *“not really punished.”* There was a common observation in the few examples I heard that the conduct became worse following the complaint resolution process. In one example, the Participant advised others from the respondent’s club who were



not involved in the complaint also started to mistreat the complainant. In this example, I was told that eventually, it was the complainant who had to isolate themselves to avoid the continued inappropriate conduct.

Similarly, I heard of breaches of confidentiality that though substantiated during an investigation, were, according to interviewees, seemingly not addressed by WCL. One Participant recalled that *“there were certain individuals who were enabled, over and over again”* and as a result, their behaviors continued.

A concern was raised in respect of consistency in sanctioning by a Participant, who noted that there did not seem to be much guidance in respect of how the PTSOs might respond to a decision versus how the NSO (in this case, WCL) would respond.

Other Forms of Complaints / Vexatious Complaints

Several Participants relayed information (with varying levels of specificity and personal involvement) pertaining to conflicts being resolved outside of OSIC’s process and one aptly noted that WCL was *“struggling to address harm in general and things that don’t fit into specific procedures,”* some of which appeared to be retaliatory to things said in the Bennett Report, or to complaints that were subsequently filed.

These Participants provided the following examples:

- Individuals who wrote inflammatory letters with *“false allegations,”* copying many people involved in the sport of wrestling and involved in sport governance generally (this theme is mentioned earlier in the section titled *Gaps in Implementation*):
 - I interviewed a few Participants who said they were engaged in submitting complaints and letters. They justified the conduct on the basis that WCL was making unreasonable decisions and other less litigious forms of persuasion had not impacted the desired changes;
- Coaches who used conflict and the legal or discipline processes to target individuals to gain an advantage for their own athlete; one Participant described it as, *“Everyone complains about everything. It’s a culture of complaints”*;
- Individuals who filed complaints repeatedly against the same people (including in court) to *“tie them up in a process”*;
- Individuals who said *“whatever they wanted* [for example, in the letters which were broadly distributed] *with no recourse”* and *“no accountability”*; and
- Individuals who used other forms of disputes or litigation as weapons and their complaints were often retaliatory in nature.

One Participant aptly noted that the ongoing litigation was the result of matters from several years ago, and *“we are having the right conversations now.”* They stated, *“I can understand why OSIC is doing this review; there is a fair amount of activity going on ... continued allegations.”* However, they added there was nothing that could be done to stop someone from continuing to file the complaints, except a clear finding from a court, a tribunal, or a panel that the complaint was vexatious and brought in bad faith.



The damage caused by the disputes was summarized by one Participant as follows:

It makes me sad for our country because I think if we have this level 10 passion and we used it in the right direction, we'd be unstoppable. But instead, it's aggression in different directions. ... These actions won't grow the sport and attract new people. If I was a parent and googled WCL and 17 different law suits came up, I'd steer clear.

I also heard that some WCL staff members did not feel safe, could not sleep, and wanted to resign from their positions because of the conduct towards them by others in the WCL community (including the letter campaigns and litigation identified above). One Participant said WCL did not do anything about the conduct towards staff, *"maybe because they did not think there was enough to say it was bullying and harassment?"*

Several Participants expressed frustration at the amount of funding being directed to WCL's defence of complaints and said WCL was not raising funds and focusing on what should be the priority. Board member participants also expressed frustration that the focus in recent years was on the conflict between certain individuals and obtaining legal advice in respect of the same, rather than on the athletes and the sport. One Participant reflected their view that this was due to errors made by previous ITP Sport team members.

In respect of the individuals who were described above as being embroiled in various complaints and court cases (not via OSIC), those Participants who discussed this issue with me said the people they were complaining about had created a toxic environment and had bullied other members of the sport, and there was no recourse for their conduct.

Retaliation

In my assessment, the most prevalent form of maltreatment, from the athlete perspective, was *"isolation and lack of support"* which arose, at least in part, as a form of retaliation following the Bennett Report, as outlined earlier in the *Concerns Arising from the Bennett Report and Other Forms of Complaints / Vexatious Complaints* sections. Specifically, it was disclosed by some Participants that athletes from one club were not allowed to participate at a camp held at another, and coaches were observed not shaking hands with athletes (which is an expected form of civility following a match). In a more extreme example, I was advised that a coach did not attend an international event, which a few Participants attributed to the *"rift"* between certain clubs and coaches as a result of the Bennett Report. One Participant said they felt WCL handled this situation *"poorly"* and was not transparent about what had occurred.

Athlete Participants, absent the coaches' conflict, said they had good relationships with one another; however, when the coaches were present, there was an expectation that the athletes from the different clubs would not speak to each other. One athlete Participant identified that their training was compromised because a particular coach would not help them, as the coach associated that athlete with other people who the coach did not like. The athlete Participant said, *"I had nothing to do with anything"* and the dynamic caused the athlete to be *"the most uncomfortable [they had] ever been."* Finally, one Participant provided an example of retaliation when after an athlete spoke out about maltreatment, other coaches were unwilling to work with the athlete who came forward with the complaint.

Given the small community, these examples appear to be widely known, and it is clear from both the interviews and the Survey that there is a reluctance to report maltreatment, as illustrated in the Survey responses at Question 23, shown in Table 3.



Table 3: Reasons for not reporting

Theme	# responses
Fear of retaliation / not staying anonymous	4
Uncertainty at the time about if actions were objectionable	3
Young and uncertain of what to do	3
Occurred long ago before a reporting structure	2
Unsure of how to report	2
Unsure of jurisdiction / outside of club	2
Embarrassment	1
Fear of damaging someone reputation	1
It was already reported	1
Lack of faith anything will be done	1
Not a personal issue (bystander)	1

3. Systemic Issues of Maltreatment

Scope: An assessment of whether there are systemic issues of maltreatment within WCL.

OSIC requested that during this Assessment, which pertained to the implementation of the Bennett Report and WCL's ability to manage complaints, I consider information pertaining to possible systemic issues of maltreatment.

Maltreatment is defined in the UCCMS as any "act and/or omission described in sections 5.2 – 5.6 that results in harm or has the potential for physical or psychological harm." Maltreatment includes Psychological Maltreatment, Physical Maltreatment, Neglect, Sexual Maltreatment, Grooming, Boundary Transgressions, and Discrimination.

Recall that in section 2 above "WCL's Ability to Prevent and Address the Misconduct" we applied sections 5.9-5.14 of the UCCMS: Subjecting a Participant to the Risk of Maltreatment, Aiding and Abetting, Failure to Report, Intentionally Reporting a False Allegation, Interference with or Manipulation of Process, and Retaliation.

While I obtained information about certain forms of maltreatment through interviews and the Survey, I did not find there were systemic issues of maltreatment within WCL. I did not identify patterns of behaviours or system or other influences that contributed to or perpetuated athlete maltreatment and the examples, which were shared in a general fashion with me, were individual. I have however, included recommendations to address the information shared with me.

As noted above in Section 2, there are concerns of retaliation and other fears of reporting maltreatment. Similarly, there is a perception that sanctions are not equally imposed or are ineffective. These issues remain, from my perspective, the most significant hurdles for WCL to overcome. It is not surprising, nor do I suspect unique to the sport of wrestling, that the majority of Participants who said they observed maltreatment did not report it. I think it is commonly understood that while safe sport initiatives are



improving reporting rates, athletes in particular are reticent to speak out for fear of retribution and for other reasons outlined in the Survey at Question 23.

Recommendations

After reviewing of all the information received during the Assessment, I recommend the following, grouped by the three scope categories. These recommendations are intended as options for consideration by WCL, as needs and resources allow, to work toward the overall goal of continuing to ensure a safe sport environment where maltreatment and other forms of misconduct are prevented and if they occur, are properly addressed.

In making these recommendations, I have considered and incorporated Participant suggestions and recommendations on how to resolve the issues they raised.

Bennett Report – Outcomes and Gaps

While WCL has taken steps to implement each of the safe sport outcomes from the Bennett Report, it was clear in the Assessment that some Participants were unaware of changes or felt that certain steps were insufficient or could be done better. Therefore, I make the following recommendations.

1. WCL should post the “Bennett Report Recommendations – November 2023” chart (attached at Appendix C) on its website.
2. Transparency is critical to building trust. Appreciating that many in the WCL community do not regularly review their emails or look at WCL’s website, I would still encourage WCL to post and share information using these mechanisms and consider expanding communications to various social media platforms, where they might find a wider audience. For example, it may have been useful for WCL community members to know that WCL struck a committee to implement the Bennett Report recommendations, and to have updated the community on the progress in implementing the recommendations beyond the Update Report published on September 19, 2019.
3. I encourage WCL’s community members to regularly visit WCL’s website as it includes information about WCL staff and their roles, safe sport, training expectations, and relevant policies. WCL also posts arbitration decisions and other timely information (such as information about this Assessment and a link to the Survey when it was open). WCL should also encourage its community members to visit these resources.
4. Consider offering self-advocate workshops. Some Participants (including coaches and athletes) indicated a desire for workshops to give athletes the tools to advocate for themselves in various situations, including in circumstances when a coach pushes an athlete to continue training through injury. They said this training would have the effect of giving the athletes a voice and providing tools to support them in advocating for themselves.
5. Consider opportunities to revamp current training to incorporate Participant feedback, including:



- Review how training is offered (format/ platforms) to ensure it meets the needs of the WCL community.
 - Adding examples and relevant information for officials;
 - Canvassing coaches and athletes to understand areas they find difficult to navigate or continue to have questions about (such as how to implement some of the “*hard and fast rules like the Rule of Two*” in crisis situations when no other adult is present);
 - Focus on building skillsets such as:
 - De-escalating conflict and problem solving; and
 - Bystander training, reporting, and protections from reprisal.
6. Ensure that the Board receives training regarding its role, and the type of information it can expect to be privy to, and information or decisions that are within WCL’s purview.
7. Establish clear expectations between the Board and WCL of the type of information that must be shared with the Board and the timing (for example, something that is likely to hit the media or allegations of maltreatment must be shared immediately).

WCL’s Ability to Prevent and Address the Misconduct

8. Develop a resource to support complainants at the very beginning of the complaint process before ITP Sport is engaged. Resources should include information on when the respondent learns of the complaint, and at what point information in the process could become public.
9. Efforts should be made at all levels to try to resolve interpersonal conflict before they escalate. Coaches, support people, staff members, and athletes all have a responsibility to ensure a safe sport environment and they are encouraged, in appropriate circumstances, to be open to trying to resolve conflict prior to resorting to formal complaints and adjudication.
- WCL community members should be empowered to problem solve and work through conflict. This will be supported by training proposed above. I encourage leaders in the sport (coaches/ officials/ staff) to find opportunities to incorporate the topic into discussion. For example, at coaches’ meetings or training camps, take the opportunity to talk to participants about respectful behaviours and how to approach someone about concerns with their conduct.
 - Consider offering the Executive Director additional training in this area so that this role can function as a support and give advice to others in the sport community as they take steps to de-escalate conflict.
10. While the *Discipline & Complaints Policy*, within the *Safe Sport Policy Manual*, contemplates ADR methods, it appears to be used infrequently. WCL and ITP Sport could connect with one (or more) experienced mediators and have this resource ready. WCL should consider whether funding that otherwise goes towards adjudications could be used towards mediation if the parties agree.



11. A consistent approach should be implemented, and action must be taken, when safe sport policies are breached. A *Reciprocation Policy* exists within the *Safe Sport Policy Manual* and should be enforced to ensure that sanctions are imposed consistently.
12. WCL must ensure a safe work environment for staff and must address issues of misconduct (including harassment) towards WCL staff members. Consider a review of WCL's internal complaint reporting mechanisms to ensure staff have a means of raising complaints and that complaints are addressed confidentially and promptly.
13. WCL must ensure complaints pertaining to the treatment of officials are treated consistently as those involving athletes. Coaches and athletes must be held accountable for misconduct towards officials.
14. Consistency could be better achieved if the PTSOs and clubs have safe sport policies in alignment with the NSO's / WCL's policies, and also have access to ITP Sport. This could also resolve questions around jurisdiction and a would-be complainant's concerns about where to report. Creating consistent expectations of conduct throughout all levels of the sport could go a long way towards ensuring compliance and redress.
15. In respect of the other forms of legal action and retaliation, it will take time for these complaints to work through the adjudicative systems. Those involved should trust that decision makers will consider the evidence and reach fair conclusions, including determinations that complaints have been filed in bad faith. As financially impactful as these processes are, there is nothing that WCL can or should do to prevent legitimate complaints from being filed. As noted above, I recommend WCL strongly encourage and support alternate forms of resolution wherever possible.

Systemic Issues of Maltreatment

While I did not observe systemic issues of maltreatment, Participants highlighted concerns around maltreatment, such as isolation, rumors, and those with a physical component (such as body shaming, use of exercise as punishment, and return to sport when injured). In addition to the recommendations above, I add the following.

16. WCL's *Code of Conduct & Ethics* requires at section 15 e) that "*coaches and athlete support personnel support the coach and athlete support personnel of a training camp provincial team, or National Team*" should an athlete qualify for participation in one of these programs. There is an expectation that coaches are to work collaboratively with other coaches and athletes. To minimize incidents of isolation and rumours, WCL must hold them to account when this does not occur.
17. Continued focused training on prevention of physical forms of maltreatment helps all community members to understand what is permissible and what is not. Training that focuses on athlete empowerment and tools to support all community members to speak up (on their own behalf and on behalf of others) is also important in addressing these concerns.
18. WCL's continued commitment to creating an environment that encourages reporting of safe sport issues and effectively addressing any concerns of retaliation is necessary to fostering more reporting. Continued communications about OSIC and ITP Sport, while seemingly repetitive, may be necessary to achieve improved reporting rates.



It will be important that OSIC monitor pursuant to section 7(g) of the OSIC Guidelines Regarding Sport Environment Assessments.

Conclusion

As is set out above, the Assessment revealed WCL has acted over the previous five years to implement the Bennett Report recommendations. However, I have determined there are still opportunities for improvement and growth. As such, I have made recommendations with the goal of assisting WCL to improve the Sport Environment for all WCL community members.

I sincerely thank you for the opportunity to work with OSIC and WCL on this Assessment.

All of which is respectfully submitted.

Jennifer Hawkins*

Dated: August 22, 2024

*Professional Law Corporation



Appendix A: Recommendations from the Bennett Report

(Page references refer to pages in the Bennett Report)

- 1) A prohibition on sexual relationships between national team coaches and athletes (p 12)
- 2) A prohibition on sexual relationships between national team coaches and other coaches (p 12)
- 3) A prohibition on sexual relationships between national team coaches and WCL staff (p 12)
- 4) A prohibition on sexual relationships between staff and staff (p 12)
- 5) A prohibition on sexual relationships between staff and athletes (p 12)
- 6) Mandatory Vulnerable Sector Check for all WCL staff and coaches (p 13)
- 7) Mandatory Vulnerable Sector Check for all provincial staff and coaches (p 13)
- 8) Creation of a coach and athlete database to ensure they have met the requirements to be licensed, including the completion of a background screen, signature of the coaching Code of Conduct and the identification of coaches who have breached the coaching Code of Conduct (p 13)
- 9) Rule of Two policy implemented for athletes under eighteen (p 13)
- 10) There should be an annual review of all safety policies (p 13)
- 11) There should be an independent review of the allegations made by the two anonymous parties to OTP, the Minister of Sport and WCL (p 13)
- 12) Mandatory training for all coaches who participate internationally, including:
 - a. How to deal with the modern athlete
 - b. Coaching the female athlete (Coaching males and females differently)
 - c. Psychological motivation
 - d. How to communicate with the modern athlete
 - e. How to motivate an athlete: What is the difference between motivating and bullying
 - f. Nutrition
 - g. Weight cutting
 - h. Training about the ways the body and mind can react to stress
 - i. Training about how to spot eating disorders and disordered eating
 - j. Sexual harassment
 - k. Ethics and conduct (representing Canada) (p 19)
- 13) There should be no physical contact between coaches and athletes (p 20)
- 14) Verbal abuse, including swearing, yelling, using pejorative language (slut, lazy, fat, useless) should be prohibited by the Code of Conduct (p 20)
- 15) Coaches should not be pushing their athletes physically until they vomit or are on the mat in tears from exhaustion (p 20)
- 16) Coaches and staff need to be reminded that they are there for the athletes and not the other way around (p 20)
- 17) There needs to be more opportunities for new and young coaches (p 20)
- 18) There needs to be the development and promotion of more women coaches (p 20)
- 19) Protocol around contacting athletes (p 20)
- 20) Discontinue the practice of “Birthday Beats” (p 20)
- 21) Prohibit drinking between coaches and athletes (p 22)
- 22) Develop a policy concerning alcohol consumption (p 22)
- 23) Develop a policy on cannabis for coaches and staff members (p 23)
- 24) There should be mandatory education for all coaches and athletes around concussions (p 25)
- 25) If an athlete is funded by WCL then they should use WCL’s medical treatment for concussions and other major injuries (p 25)
- 26) There needs to be a formalized written medical clearance before an athlete can go back to practice or competition (p 25)

- 27) It should be mandatory that coaches receive training on healthy eating, dieting, weight loss, disordered eating and eating disorders (p 27)
- 28) Athletes need to be given more resources for healthy eating (p 27)
- 29) The nutritionist needs to be doing more to work with the athletes outside of Calgary (p 27)
- 30) Develop and promote a national initiative that promotes healthy attitudes towards food (p 27)
- 31) It should be added into the Code of Conduct that coaches should not be asking athletes to cut weight (p 27)
- 32) Coaches should be given mandatory training on coaching the female athlete (p 29)
- 33) There needs to be the development and promotion of more women coaches (p 29)
- 34) WCL should conduct a study of how women's monthly cycles impacts their weight and weight class (p 29)
- 35) Coaches should be given access to child care (p 29)
- 36) Clarify Job Positions Among WCL Staff (p 32)
- 37) Have a More Professional Board of Directors Composed and Increased Gender Parity Among Board Members (p 32)
- 38) Bring in more women to serve on the Board of Directors (p 33)
- 39) Develop a Database of Athletes and Coaches (p 33)
- 40) Create a harassment policy (p 33)
- 41) Provide athletes training on the new sexual harassment policy (p 33)
- 42) Create a reporting mechanism for sexual harassment claims and outline the process in the Code of Conduct (p 33)
- 43) Investigate all future leaks of sensitive information and sanction those responsible (p 33)
- 44) Respond to athletes' and coaches' requests for information in a timely manner (p 34)
- 45) Conduct exit interviews with all athletes and employees who leave (p 34)
- 46) Review whether any board members of WCL are in a Conflict of Interest (p 34)
- 47) Establish an independent Complaints Person (p 35)
- 48) Advise athletes of their rights to appeal a decision under the Appeal Policy and to the SDRCC (p 35)
- 49) WCL should lobby with the other NSOs to create an ombudsman for sport (p 35)
- 50) Coaches' salaries at the National Centres should be reviewed and a better compensation package should be paid (p 36)
- 51) Athletes should be involved in the implementation of the recommendations made in this report (p 37)
- 52) There should be an audit carried out after six months and a second audit after a year to evaluate whether the recommendations in this report have been implemented (p 37)

Appendix B: Survey

Introduction

Jennifer Hawkins, Partner, Southern Butler Price LLP (SBP) was tasked with circulating a survey to Wrestling Canada Lutte (WCL) athletes, coaches, officials, team support personnel, WCL staff members, and WCL Board of Directors as part of a Sport Environment Assessment meant to offer proactive, transparent and preventative measures to alleged systemic issues related to the Universal Code of Conduct to Prevent and Address Maltreatment in Sport in order to cultivate safe, welcoming and inclusive sport environments. The Assessment is also an opportunity to evaluate the positive changes that have been made within the WCL within the last five years and to identify where systemic gaps may still remain.

Survey Statistics

- Survey distributed via web link August 2, 2023
- Reminder sent early September 2023
- Survey closed September 15, 2023
- Total surveys received: 74 (73 in English and 1 in French)

The survey asked 30 questions about safe sport policies and initiatives, effectiveness of training on these policies and initiatives, and the sport environment in terms of Wrestling Canada Lutte sanctioned activities, at the national and international levels, within the last five years (and specifically in relation to sexual harassment and maltreatment).

Cover Letter

Subject: Wrestling Canada Lutte Survey / Questionnaire pour Wrestling Canada Lutte

As you know, Wrestling Canada Lutte is participating in and supporting a Sport Environment Assessment (the "Assessment") being conducted by Abuse-Free Sport and the Office of the Sport Integrity Commissioner (OSIC) been engaged as an independent assessor to conduct the Assessment.

The overall Assessment objective is to offer proactive, transparent and preventative measures to alleged systemic issues related to the Universal Code of Conduct to Prevent and Address Maltreatment in Sport in order to cultivate safe, welcoming and inclusive sport environments. WCL sees this Assessment as an opportunity to evaluate the positive changes that have been made within the organization within the last 5 years and identify where systemic gaps may still remain.

As part of the Assessment, I request that you complete this survey that will assist me in gauging awareness and experiences of participants. This survey is directed at athletes, coaches, officials and team support personnel at the national / international level, as well as WCL staff and Board of Directors. I will be welcoming responses from the broader community as well.

Your survey response will be sent directly to me and will not be shared with OSIC. The data collected from the survey will be anonymized and the final report will not disclose your name nor personally associate you with your survey feedback. The final report will be publicly available on OSIC's Assessment Database at the end of the Assessment.

The survey link is below. Please complete the survey by **September 15, 2023**.

Link: xx

Thank you
Jennifer Hawkins
Partner, Southern Butler Price LLP

Survey Questions

Safe Sport Policies and Initiatives

Do you know what the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS) is?

- Yes
- No

Do you agree or disagree with this statement: 'Wrestling Canada Lutte has implemented policies and initiatives in the last five years related to providing a safe sport environment.'

- Agree
- Disagree
- Don't know

Do you know what constitutes 'maltreatment' in sport?

- Yes, I have a solid understanding
- Somewhat – I get the concept but could not list the forms of maltreatment
- No, I have no idea

Under the UCCMS, maltreatment is an act and/or an omission that results in harm or has the potential for physical or psychological harm. It includes sexual maltreatment and grooming.

Do you know how to report concerns of maltreatment that occur within the Sport Environment?

- Yes
- No

Would you feel comfortable reporting maltreatment if you experienced it?

- Yes
- No
- Unsure

Would you feel comfortable reporting maltreatment if you observed it happening to someone in your regular daily training environment (core group)?

- Yes
- No
- Unsure

Would you feel comfortable reporting maltreatment if you observed it happening to someone outside of your regular daily training environment?

- Yes
- No
- Unsure

Are there rules or expectations about the consumption of alcohol when coaches, athletes, officials, team support personnel, and/or WCL staff are together?

- Yes
- No
- Unsure

Have you heard of the “Rule of Two”?

- Yes
- No

Definition of Rule of Two

(If no) Simply defined, the Rule of Two ensures there are always two adults present with an athlete.

(If yes) How often have you observed it being implemented by Wrestling Canada Lutte staff, team support personnel coaches, officials, and the Board of Directors?

- Always
- Usually
- Sometimes
- Rarely
- Never

Training Effectiveness

Have you received training in the last year about any of these subjects: 1) Bullying, harassment, and sexual harassment; 2) Nutrition, weight cutting, and eating disorders; 3) Physical contact between coach or support staff and athlete?

- Yes
- No

(If yes) How effective was that training?

- Very effective
 - Somewhat effective
 - Not effective
 - N/A
- 1) Bullying, harassment, and sexual harassment
 - 2) Nutrition, weight cutting, and eating disorders
 - 3) Physical contact between coach or support staff and athlete

Please provide any comments you have on the training you received. (For example, was it accessible and of high quality? Was it tailored to your needs as a coach / athlete / team support personnel, or official?)

Future Training

What is your preferred method to receive future training and education on safe sport related topics?

- E-learning
- In person
- Other (please specify)

Do you have any suggestions for future training offerings?

Sport Environment

All questions in this section pertain to your experience at the NATIONAL / INTERNATIONAL level within the past 5 years. (The 'Sport Environment' means Wrestling Canada Lutte sanctioned activities, at the national / international level, within the last five years.)

How would you rate your overall experience in the Sport Environment?

- Really good
- Average
- Poor

What would you say are the 3 best things about the Sport Environment?

Have you ever witnessed someone within the Sport Environment being treated in a way that you felt was inappropriate or unfair?

- Yes
- No
- Unsure

Boundary Transgressions

Boundary Transgressions occur when interactions or communications do not meet the threshold of maltreatment, but nonetheless are viewed as inappropriate in the circumstances. Examples include where one person uses contact information available to the person for the purpose of sport, to make contact with a person for a purpose that is not related to sport; a Participant inappropriately shares personal photographs; and providing personal gifts.

Have you ever witnessed a boundary transgression within the Sport Environment?

- Yes
- No
- Unsure

(If yes) Did you report it?

- Yes
- No

If No, why not?

Sexual Harassment

Have you ever witnessed grooming, or sexual maltreatment (includes hazing, jokes, gestures, comments or conduct) within the Sport Environment?

- Yes
- No
- Unsure

(If yes) Did you report it?

- Yes
- No

If No, why not?

Sport Environment – Maltreatment Examples

Please identify if you have witnessed the following forms of maltreatment within the Sport Environment, and whether you reported them.

YES, I witnessed this - Yes, I reported it

YES, I witnessed this - No, I did not report it

NO, I have not witnessed this

- Infliction of physical harm
- Spreading false rumours
- Humiliation
- Body shaming (includes setting unreasonable weigh-in goals, prescribing inappropriately restrictive diets)
- Denying nutrition
- Encouraging or permitting a premature return to wrestling following an injury
- Use of exercise for the purposes of punishment
- Neglect
- Other

If you identified "Other" as a type of maltreatment, please describe it here.

What do you view as the top 3 concerns within the Sport Environment?

Getting to know you

What group do you belong to? (Choose one)

- Athlete
- Coach
- Official
- Team Support Personnel
- WCL Staff
- WCL Board of Directors
- Other (please specify)

How long have you been in that group at the National level?

- 0 to 2 Years
- 3 to 5 Years
- 6 + Years

Do you identify as: a person of/with colour; Indigenous; a woman; a person with a disability; gender diverse; 2SLGBTIA+; a person of another marginalized or equity-seeking group?

- Yes
- No
- Would rather not say

If willing, please identify to the group(s) to which you belong:

Wrap Up

Would you like to be interviewed by Ms. Hawkins as part of this Assessment? It would be a virtual interview that would take approximately 30 minutes. (Again, your responses would be anonymous and not attributed to you.)

- Yes
- No
- Maybe

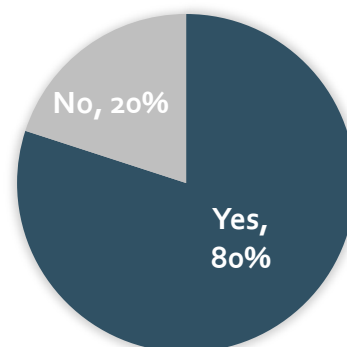
If you think there is someone else Ms. Hawkins should interview, please provide their name and email address (if you have it), and the reason you think they should be interviewed.

Is there anything else you would like to add about the Safe Sport Policies and Initiatives, the Sport Environment, Wrestling Canada Lutte or this survey?

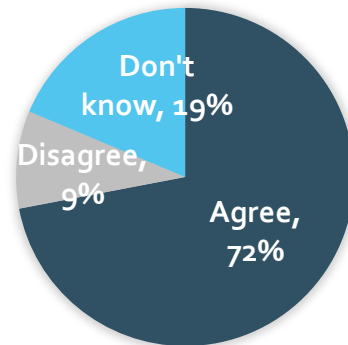
Survey Results

Safe Sport Policies and Initiatives

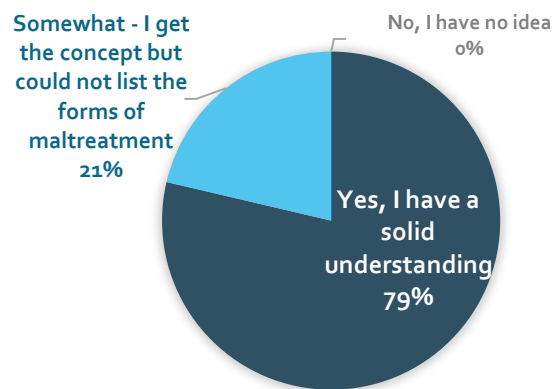
Question 1 Do you know what the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS) is?



Question 2 Do you agree or disagree with this statement: 'Wrestling Canada Lutte has implemented policies and initiatives in the last five years related to providing a safe sport environment.'



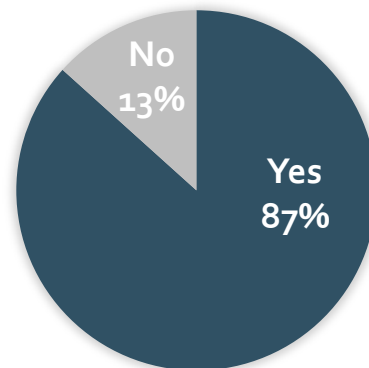
Question 3 Do you know what constitutes 'maltreatment' in sport?



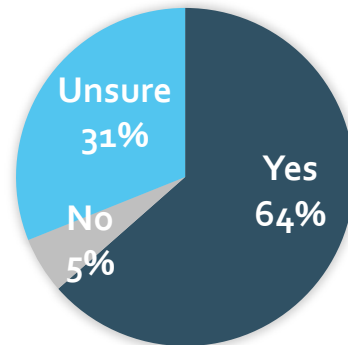
Definition of 'Maltreatment'

Under the UCCMS, maltreatment is an act and/or an omission that results in harm or has the potential for physical or psychological harm. It includes sexual maltreatment and grooming.

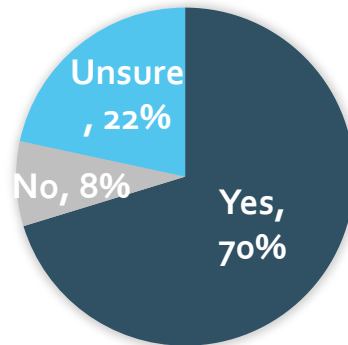
Question 4 Do you know how to report concerns of maltreatment that occur within the Sport Environment?



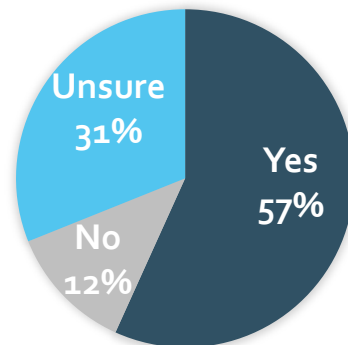
Question 5 Would you feel comfortable reporting maltreatment if you experienced it?



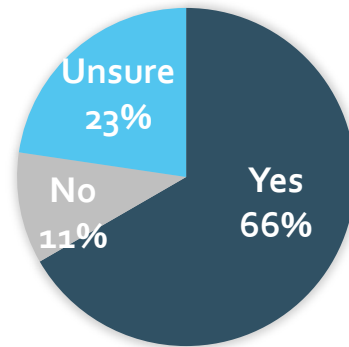
Question 6 Would you feel comfortable reporting maltreatment if you observed it happening to someone in your regular daily training environment (core group)?



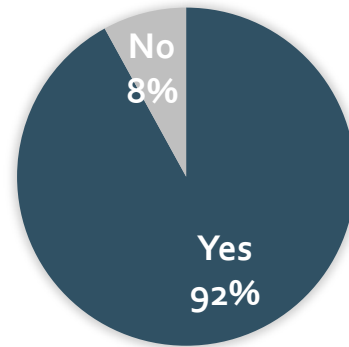
Question 7 Would you feel comfortable reporting maltreatment if you observed it happening to someone outside of your regular daily training environment?



Question 8 Are there rules or expectations about the consumption of alcohol when coaches, athletes, officials, team support personnel, and/or WCL staff are together?



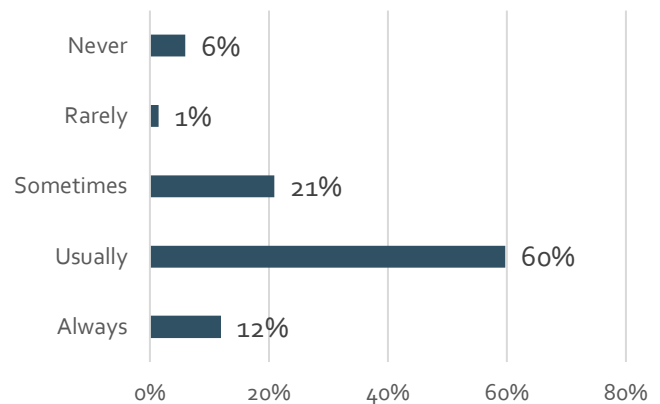
Question 9 Have you heard of the “Rule of Two”?



Definition of Rule of Two

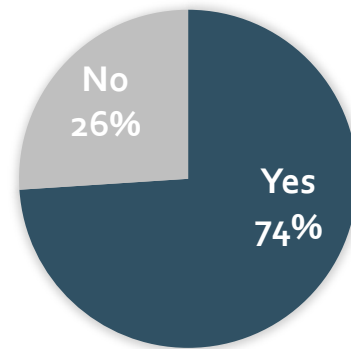
Simply defined, the Rule of Two ensures there are always two adults present with an athlete.

Question 10 (If yes) How often have you observed it being implemented by Wrestling Canada Lutte staff, team support personnel coaches, officials, and the Board of Directors?

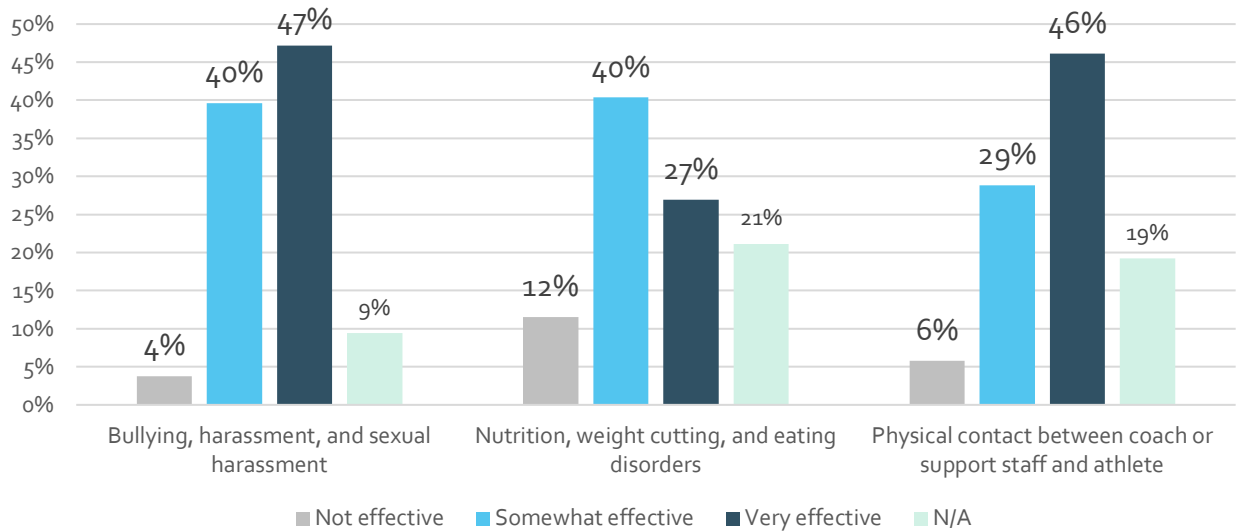


Training Effectiveness

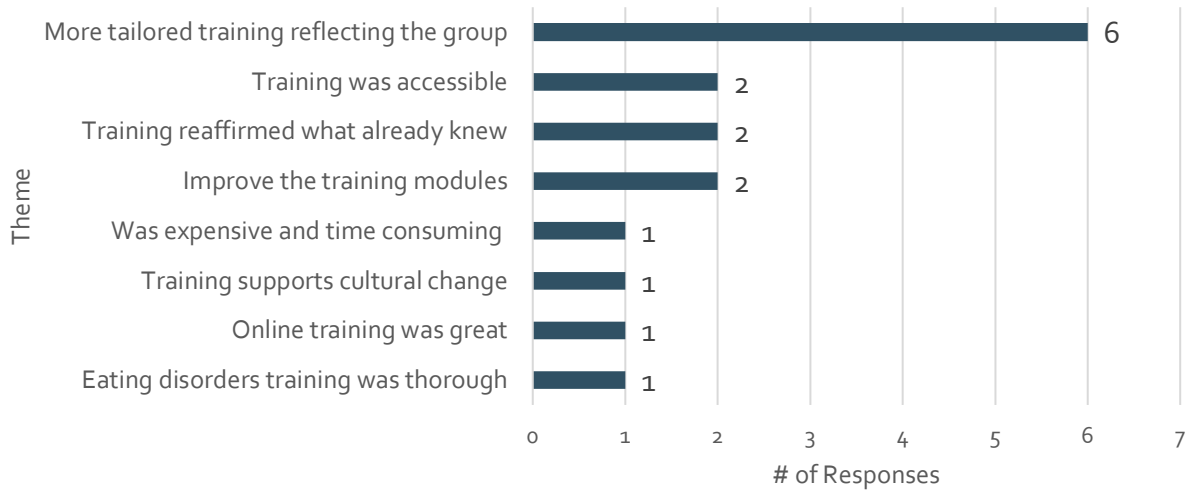
Question 11 Have you received training in the last year about any of these subjects: 1) Bullying, harassment, and sexual harassment; 2) Nutrition, weight cutting, and eating disorders; 3) Physical contact between coach or support staff and athlete?



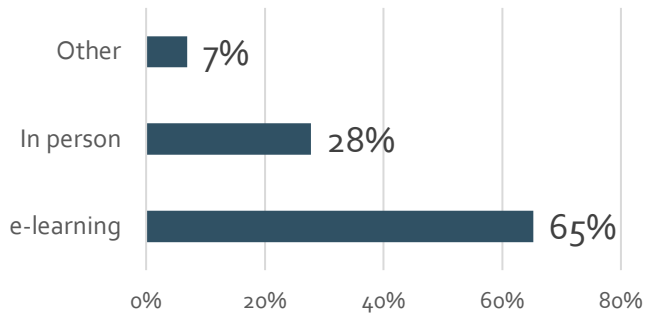
Question 12 (If yes) How effective was that training?



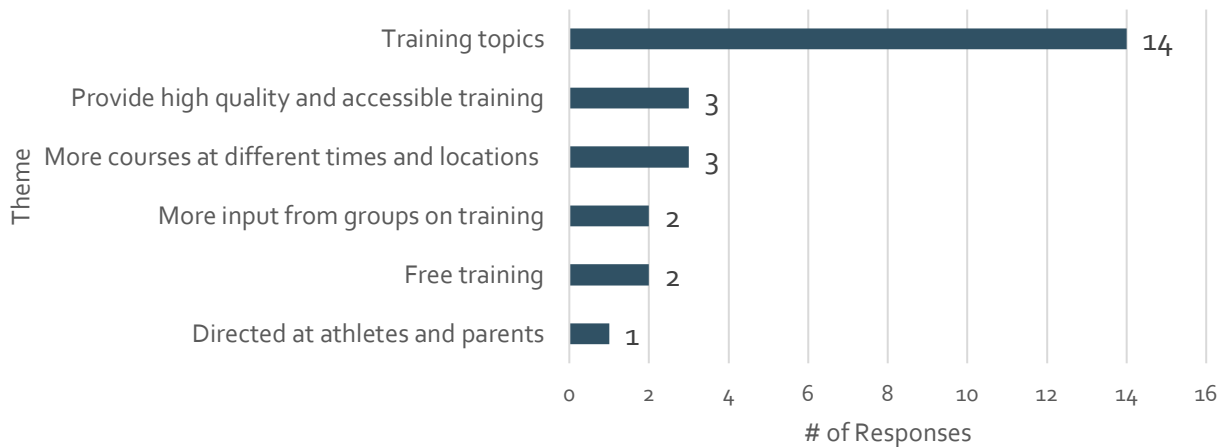
Question 13 Please provide any comments you have on the training you received. (For example, was it accessible and of high quality? Was it tailored to your needs as a coach / athlete / team support personnel, or official?)



Question 14 What is your preferred method to receive future training and education on safe sport related topics?



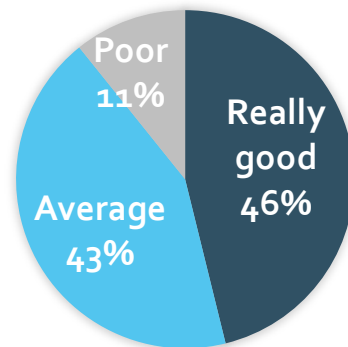
Question 15 Do you have any suggestions for future training offerings?



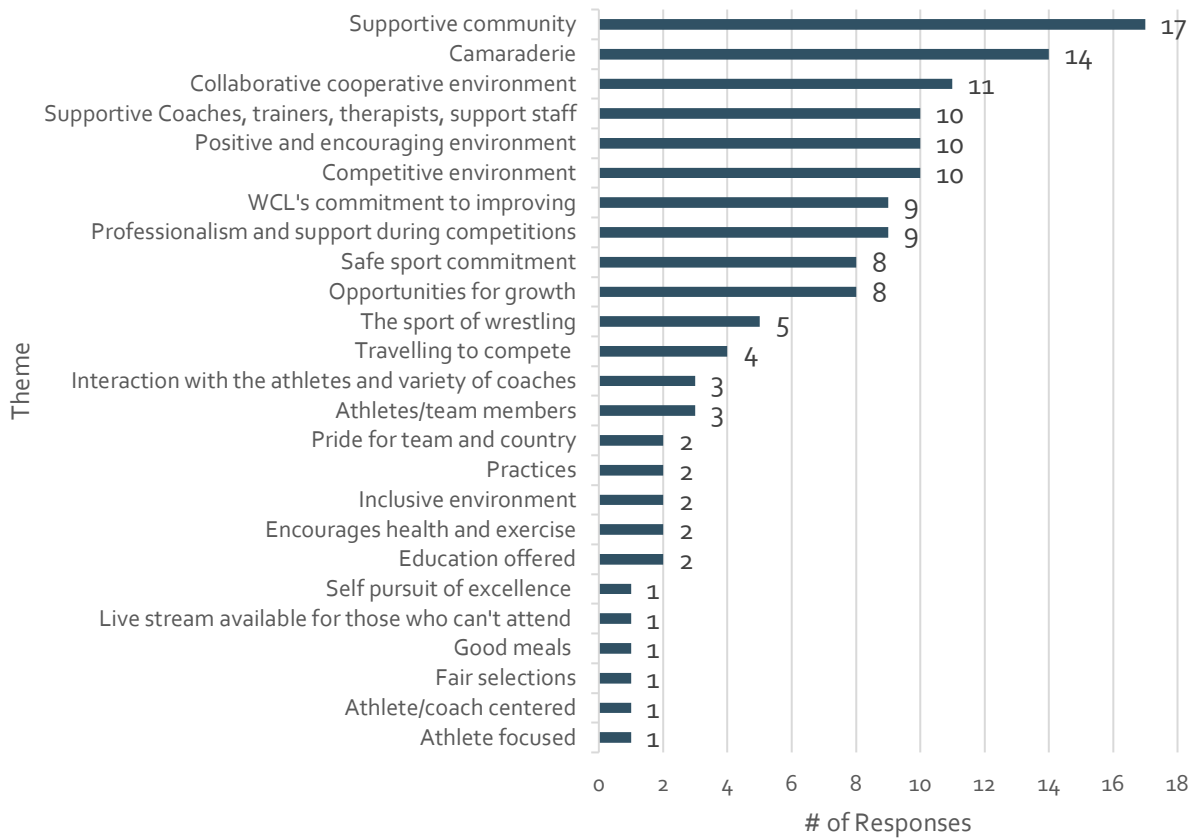
Sport Environment

All questions in this section pertain to your experience at the NATIONAL / INTERNATIONAL level within the past 5 years. (The 'Sport Environment' means Wrestling Canada Lutte sanctioned activities, at the national / international level, within the last five years.)

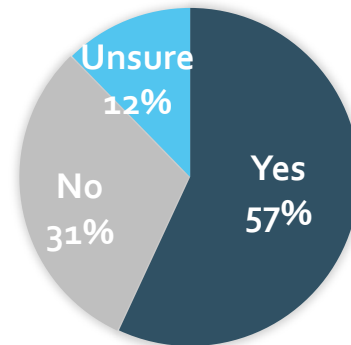
Question 16 How would you rate your overall experience in the Sport Environment?



Question 17 What would you say are the 3 best things about the Sport Environment?



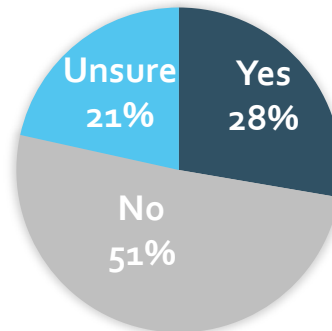
Question 18 Have you ever witnessed someone within the Sport Environment being treated in a way that you felt was inappropriate or unfair?



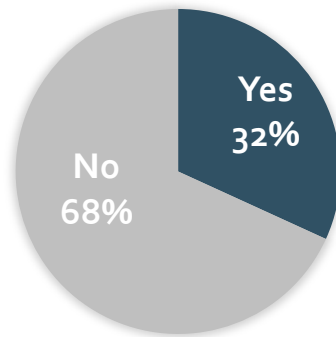
Boundary Transgressions

Boundary Transgressions occur when interactions or communications do not meet the threshold of maltreatment, but nonetheless are viewed as inappropriate in the circumstances. Examples include where one person uses contact information available to the person for the purpose of sport, to make contact with a person for a purpose that is not related to sport; a Participant inappropriately shares personal photographs; and providing personal gifts.

Question 19 Have you ever witnessed a boundary transgression within the Sport Environment?

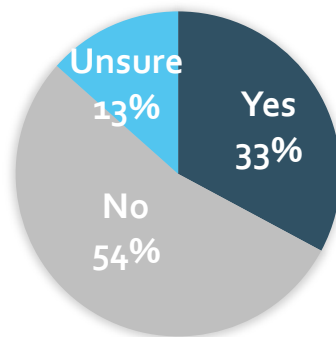


Question 20 (If yes) Did you report it?

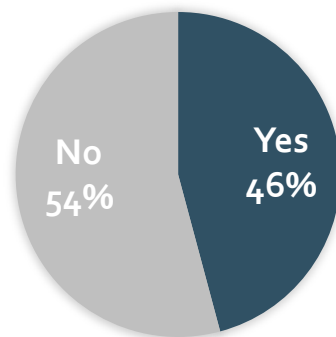


Sexual Harassment

Question 21 Have you ever witnessed grooming, or sexual maltreatment (includes hazing, jokes, gestures, comments or conduct) within the Sport Environment?



Question 22 (If yes) Did you report it?

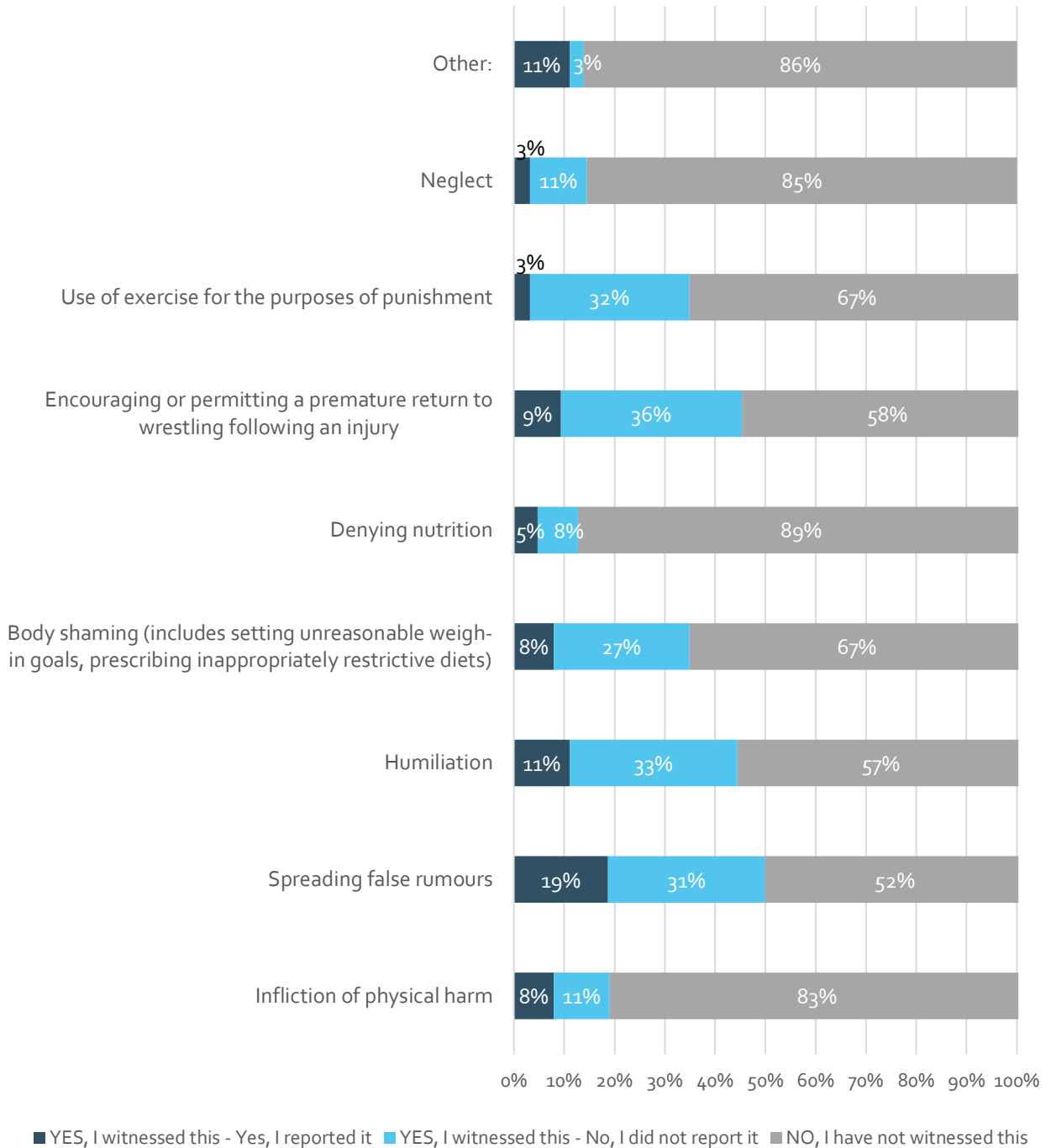


Question 23 If you did not report it, why not?

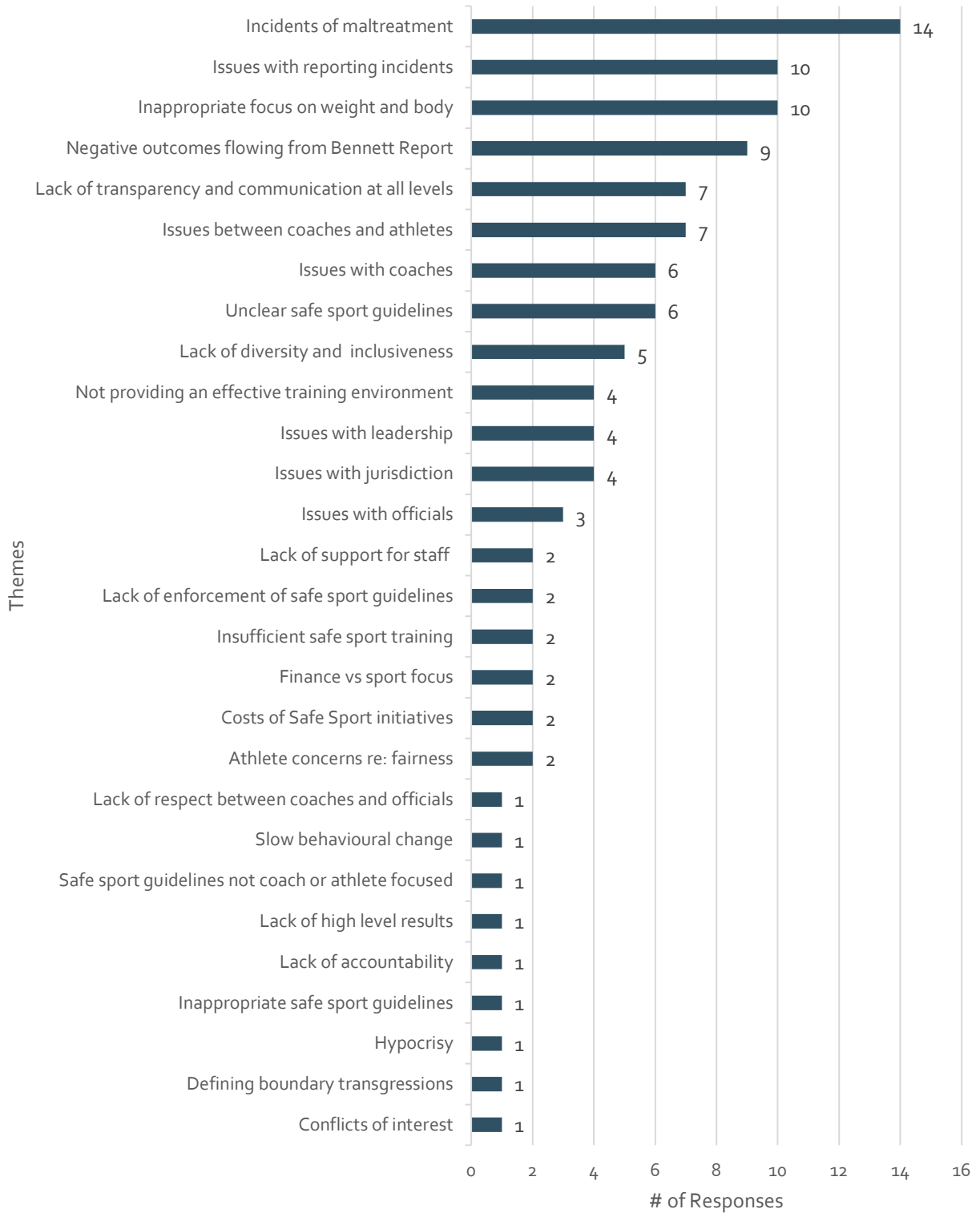
Theme	# responses
Fear of retaliation / not staying anonymous	4
Uncertainty at the time about if actions were objectionable	3
Young and uncertain of what to do	3
Occurred long ago before a reporting structure	2
Unsure of how to report	2
Unsure of jurisdiction / outside of club	2
Embarrassment	1
Fear of damaging someone reputation	1
It was already reported	1
Lack of faith anything will be done	1
Not a personal issue (bystander)	1

Sport Environment – Maltreatment Examples

Question 24 Please identify if you have witnessed the following forms of maltreatment within the Sport Environment, and whether you reported them.

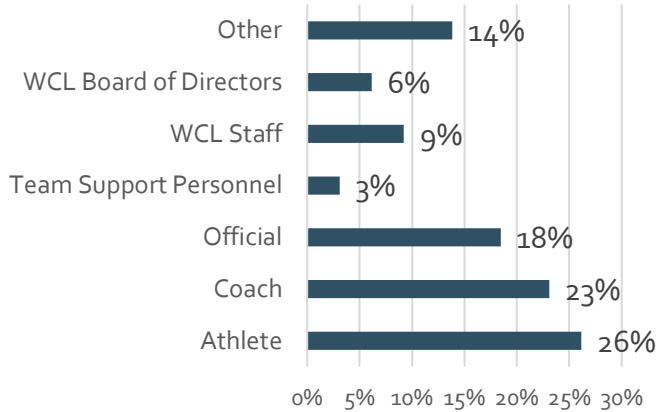


Question 25 What do you view as the top 3 concerns within the Sport Environment?

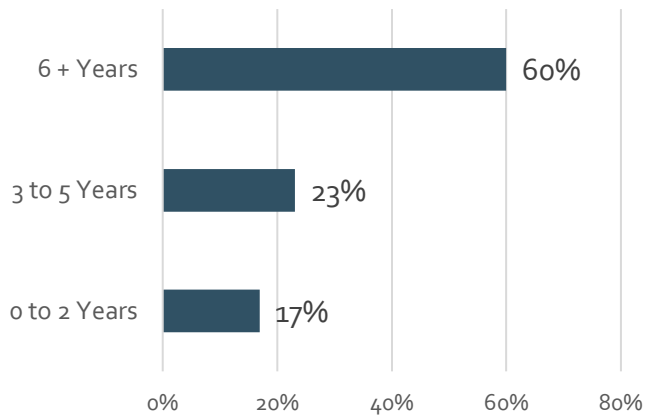


Getting to know you

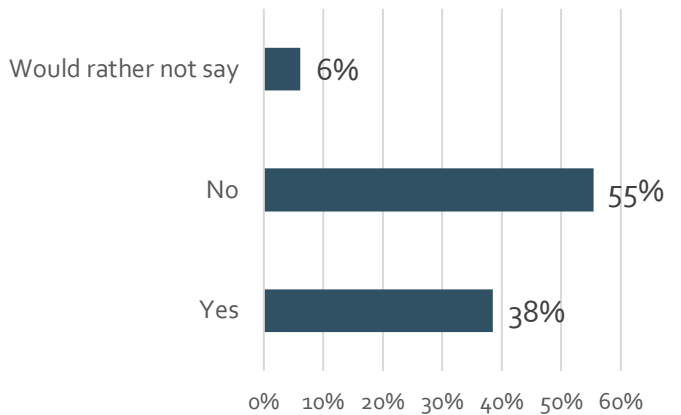
Question 26 What group do you belong to?
(Choose one)



Question 27 How long have you been in that group at the National level?



Question 28 Do you identify as: a person of/with colour; Indigenous; a woman; a person with a disability; gender diverse; 2SLGBTIA+; a person of another marginalized or equity-seeking group?



Appendix C: WCL’s Chart “Bennett Report Recommendations – March 2023”



REPORT CONCERNING INDEPENDENT REVIEW OF COACHING CULTURE FOR WRESTLING CANADA LUTTE

SUMMARY OF ACTIVITIES AS OF MARCH 2023

- Green – complete
- Light Green – evergreen
- Yellow – in progress
- White – no progress

Recommendation Number	Description	Pillar	Date of Completion	Notes / Next Steps
11	There should be an independent review of the allegations made by the two anonymous parties to OTP, the Minister of Sport and WCL (p 13)	ITP	In progress	Ongoing process. WCL continues to attempt to resolve issues with VOWL. WCL has secured the services of Erin Durant as an independent investigator and is waiting for a report to be released.
12	Mandatory training for all coaches who participate internationally, including: <ul style="list-style-type: none"> • How to deal with the modern athlete • Coaching the female athlete (Coaching males and females differently) • Psychological motivation • How to communicate with the modern athlete • How to motivate an athlete: What is the difference between motivating and bullying • Nutrition • Weight cutting • Training about the ways the body and mind can react to stress • Training about how to spot eating disorders and disordered eating • Sexual harassment • Ethics and conduct (representing Canada) (p 19) 	Policy Education/ Training	In progress March / April 2023 May / June 2023	Most topics are addressed in mandatory safe sport training, in current NCCP coach education content and through content delivery with our IST leads (eg. nutrition & weight cutting) and available on protected pages on WCL’s website. WCL to participate in OTP’s Culture Assessment & Audit Tool (CAAT). In partnership with OTP, WCL IST providers to deliver education and training to coaches on physiology and nutrition related topics described. Coach oversight and reinforcement of learning by WCL’s HPD has been identified as an important accountability component.





37	Have a More Professional Board of Directors Composed and Increased Gender Parity Among Board Members (p 32)	Other	September 2019 Fall 2023	<p>Bylaws reflect language around gender parity targets.</p> <p>Through the support of COC's Return to Sport funding, WCL is working on additional governance related projects towards meeting all the Canadian Sport Governance standards. This includes a review and revision of bylaws to strengthen bylaws around gender parity, as well implementation of a nomination committee.</p> <p>WCL has struck a working group and has contracted Benoit Girardin as an expert consultant.</p> <p>WCL's new 2027 strategic framework through also includes initiatives related to the implementation of an EDI policy.</p>
38	Bring in more women to serve on the Board of Directors (p 33)	Other	September 2019 Fall 2023	<p>Bylaws reflect language around gender parity targets.</p> <p>See #37 above.</p>
27	It should be mandatory that coaches receive training on healthy eating, dieting, weight loss, disordered eating and eating disorders (p 27)	Education/ Training	Evergreen	<p>Specific education around nutrition related to wrestling (a weight-cutting sport) is integrated into WCL's NCCP Comp Dev module.</p> <p>Education / training is also being delivered at training camps.</p> <p>WCL IST personnel to continue research and consult with other sports on best practices.</p>
30	Develop and promote a national initiative that promotes healthy attitudes towards food (p 27)	Education/ Training	Evergreen	<p>Nutrition lead conducts education sessions at national training camps.</p> <p>WCL to consult with other sports on best practices.</p>





32	Coaches should be given mandatory training on coaching the female athlete (p 29)	Education/ Training	Ongoing	Current NCCP coach education content and content delivered with our various IST personnel (eg. nutrition & weight cutting during menstruation, identifying the best weight class) are specific to coaching female athletes.
41	Provide athletes training on the new sexual harassment policy (p 33)	Education/ Training	October 2021 Ongoing February 2023	WCL included athletes in its mandate for Safe Sport training for all WCL sanctioned activity. Additional athlete training was intended to occur during national team training camps, which have not taken place due to COVID since the summer of 2019. WCL is holding an information session on Feb 2, 2023 on WCL's new safe sport policy manual. Additional information sessions are scheduled throughout the year and during national team camps.
44	Respond to athletes' and coaches' requests for information in a timely manner (p 34)	Other	Evergreen	Ongoing. WCL is often understaffed which may result at times in delayed response times.
45	Conduct exit interviews with all athletes and employees who leave (p 34)	Other	Evergreen	Not enforceable from an HR perspective. Athletes don't always formally declare their retirement.
1	A prohibition on sexual relationships between national team coaches and athletes (p 12)	Policy	June 2021 November 2022 January 2023	https://wrestling.ca/wp-content/uploads/2022/06/Safe_Sport_Policy_Manual-September-2021.pdf https://wrestling.ca/wp-content/uploads/2023/01/Safe_Sport_Policy_Manual-January-2023-1.pdf
2	A prohibition on sexual relationships between national team coaches and other coaches (p 12)	Policy	June 2021	





3	A prohibition on sexual relationships between national team coaches and WCL staff (p 12)	Policy	June 2021	
4	A prohibition on sexual relationships between staff and staff (p 12)	Policy	June 2021	
5	A prohibition on sexual relationships between staff and athletes (p 12)	Policy	June 2021	
6	Mandatory Vulnerable Sector Check for all WCL staff and coaches (p 13)	Policy	July 2019	
7	Mandatory Vulnerable Sector Check for all provincial staff and coaches (p 13)	Policy	n/a	n/a as this is PTSO jurisdiction. New membership database will support tracking this information.
8	Creation of a coach and athlete database to ensure they have met the requirements to be licensed, including the completion of a background screen, signature of the coaching Code of Conduct and the identification of coaches who have breached the coaching Code of Conduct (p 13)	Other	July 2019	Database work is currently underway in partnership with Interpodia. Work was delayed during COVID. Notwithstanding, this information is being tracked.
9	Rule of Two policy implemented for athletes under eighteen (p 13)	Policy	June 2021	
10	There should be an annual review of all safety policies (p 13)	Policy	December 2022	Revised policy suite approved Nov / Dec 2022.
13	There should be no physical contact between coaches and athletes (p 20)	Policy	June 2021	
14	Verbal abuse, including swearing, yelling, using pejorative language (slut, lazy, fat, useless) should be prohibited by the Code of Conduct (p 20)	Policy Education/ Training	June 2021	
15	Coaches should not be pushing their athletes physically until they vomit or are on the mat in tears from exhaustion (p 20)	Policy / Education/ Training	June 2021	
16	Coaches and staff need to be reminded that they are there for the athletes and not the other way around (p 20)	Other	August 2022	Updated language in WCL strategic plan supports this. For example, we use the term "Athletes & other Participants" when we wish to highlight "athlete-centric".
17	There needs to be more opportunities for new and young coaches (p 20)	Policy	April 2022	Updated coach selection policy.
18	There needs to be the development and promotion of more women coaches (p 20)	Other	2019-2022	Through Sport Canada's Gender Equity funding, WCL offset the cost





	Same as recommendation 33.			<p>of female coaches undergoing coach education training for the last two years.</p> <p>WCL has also secured grants for female coach education through United World Wrestling.</p> <p>Other activities under “Women of Wrestling” project were either postponed or unable to be completed due to COVID.</p>
19	Protocol around contacting athletes (p 20)	Policy / Education/ Training	June 2021	
20	Discontinue the practice of “Birthday Beats” (p 20)	Other	June 2021	This has never been a practice of WCL, however, this is emphasized in training and education and policy.
21	Prohibit drinking between coaches and athletes (p 22)	Policy	June 2021	
22	Develop a policy concerning alcohol consumption (p 22)	Policy	June 2021	
23	Develop a policy on cannabis for coaches and staff members (p 23)	Policy	June 2021	
24	There should be mandatory education for all coaches and athletes around concussions (p 25)	Policy / Education/ Training	October 2018	
25	If an athlete is funded by WCL then they should use WCL’s medical treatment for concussions and other major injuries (p 25)	Education/ Training	October 2018	<p>Concussion Protocol: https://wrestling.ca/wp-content/uploads/2020/05/Concussion_Protocol_v2.pdf.</p> <p>Information is also available in Athlete Handbook and Athlete Agreements.</p> <p>Treatment of athletes is resource dependent.</p>
26	There needs to be a formalized written medical clearance before an athlete can go back to practice or competition (p 25)	Policy	October 2018	Currently in place for athletes at national / international level training / competition (see Concussion Protocol Medical Clearance Letter).
28	Athletes need to be given more resources for healthy eating (p 27)	Education/ Training	June 2018	Resources available on WCL’s website on a protected Athlete page and being delivered at national team training camps.





29	The nutritionist needs to be doing more to work with the athletes outside of Calgary (p 27)	Education/ Training	Summer 2022	There is a new national nutrition lead based in Saskatoon. The scope and reach of work are resource dependent.
31	It should be added into the Code of Conduct that coaches should not be asking athletes to cut weight (p 27)	Policy	June 2021	
33	There needs to be the development and promotion of more women coaches (p 29)	Other	2019-2022	See #18.
34	WCL should conduct a study of how women's monthly cycles impact their weight and weight class (p 29)	Education/ Training	November 2019	This is already in existence and was delivered to our HP Coaches previously. WCL recorded a webinar "Determining Appropriate Weight Classes for Wrestlers" that is available on WCL's coach protected webpage.
35	Coaches should be given access to childcare (p 29)	Other	Summer 2019	WCL does not restrict access to childcare for coaches. Resourcing childcare for all coaches across the country is not a WCL responsibility. WCL has made accommodations (including financial support) for those coaches employed by WCL within certain parameters.
36	Clarify Job Positions Among WCL Staff (p 32)	Other	January 2019	All job postings have detailed job descriptions, which are also included in employment agreements.
39	Develop a Database of Athletes and Coaches (p 33)	Other	February 2023	National database for individuals participating in WCL sanctioned activities. Includes OSIC consent, as well as various SC requested demographic information.
40	Create a harassment policy (p 33)	Policy	June 2021	
42	Create a reporting mechanism for sexual harassment claims and outline the process in the Code of Conduct (p 33)	Policy ITP	June 2021	
43	Investigate all future leaks of sensitive information and sanction those responsible (p 33)	Policy	December 2018	BOD operates under a set of Good Governance Principles and Norms and are subject to the Safe Sport Policy. Any complaints are forwarded to the ITP.





46	Review whether any board members of WCL are in a Conflict of Interest (p 34)	Other	2017 January 2023	Conflict of interest is an agenda item and addressed at every BOD meeting since at least 2015. A BOD orientation manual developed in 2017 also addresses BOD conduct. New COI policy approved.
47	Establish an independent Complaints Person (p 35)	ITP	December 2018 December 2022	WCL has had an independent third party since December 2018. WCL is a signatory to OSIC.
48	Advise athletes of their rights to appeal a decision under the Appeal Policy and to the SDRCC (p 35)	Policy	June 2021	
49	WCL should lobby with the other NSOs to create an ombudsman for sport (p 35)	ITP	Summer 2022	We would consider the creation of OSIC as a step in this direction.
50	Coaches' salaries at the National Centres should be reviewed and a better compensation package should be paid (p 36)	Other	Annual budgeting	While this point has been addressed, this recommendation is irrelevant to safe sport matters and is resource dependent.
51	Athletes should be involved in the implementation of the recommendations made in this report (p 37)	Other	2019-present	Athletes were valuable members of the task force and continue to be included in engagement (eg. athlete town halls during the development of the Safe Sport Policy Manual). WCL is also scheduling more frequent town halls with athletes to solicit athlete feedback on various topics including safe sport.
52	There should be an audit carried out after six months and a second audit after a year to evaluate whether the recommendations in this report have been implemented (p 37)	Other	September 2019 October 2020	



Appendix D: WCL’s Chart “Bennett Report Recommendations – November 2023”



REPORT CONCERNING INDEPENDENT REVIEW OF COACHING CULTURE FOR WRESTLING CANADA LUTTE

SUMMARY OF ACTIVITIES AS OF NOVEMBER 2023

Green – complete | Light Green – evergreen | Yellow – in progress | White – no progress

Recommendation Number	Description	Pillar	Date of Completion	Notes / Next Steps
12	<p>Mandatory training for all coaches who participate internationally, including:</p> <ul style="list-style-type: none"> • How to deal with the modern athlete • Coaching the female athlete (Coaching males and females differently) • Psychological motivation • How to communicate with the modern athlete • How to motivate an athlete: What is the difference between motivating and bullying • Nutrition • Weight cutting • Training about the ways the body and mind can react to stress • Training about how to spot eating disorders and disordered eating • Sexual harassment • Ethics and conduct (representing Canada) (p 19) 	Policy Education/ Training	<p>Evergreen</p> <p>Fall 2023 / Winter 2024</p>	<p>Most topics are addressed in mandatory safe sport training, in current NCCP coach education content and through content delivery with our IST leads (eg. nutrition & weight cutting) and available on protected pages on WCL’s website, and delivered at training camps.</p> <p>WCL IST personnel to continue research and consult with other sports on best practices, in collaboration with OTP.</p> <p>WCL is presently undergoing a Sport Environment Assessment (SEA) led by Abuse-Free Sport to gauge the changes in the environment approximately 5 years from the release of the “Report”.</p> <p>WCL to participate in OTP’s Culture Assessment & Audit Tool (CAAT), anticipated to be repositioned and integrated with the SEA report findings, with a focus on tools and implementation of strategies to continue to improve the culture in the daily environment.</p>





27	It should be mandatory that coaches receive training on healthy eating, dieting, weight loss, disordered eating and eating disorders (p 27)	Education / Training	Evergreen	<p>Specific education around nutrition related to wrestling (a weight-cutting sport) is integrated into WCL's NCCP Comp Dev module.</p> <p>Education / training is also being delivered at training camps.</p> <p>WCL IST personnel to continue research and consult with other sports on best practices.</p>
30	Develop and promote a national initiative that promotes healthy attitudes towards food (p 27)	Education / Training	Evergreen	<p>Nutrition lead conducts education sessions at national training camps.</p> <p>WCL to consult with other sports on best practices.</p>
32	Coaches should be given mandatory training on coaching the female athlete (p 29)	Education / Training	Ongoing	<p>Current NCCP coach education content and content delivered with our various IST personnel (eg. nutrition & weight cutting during menstruation, identifying the best weight class) are specific to coaching female athletes.</p>
41	Provide athletes training on the new sexual harassment policy (p 33)	Education / Training	<p>October 2021</p> <p>Ongoing</p> <p>February 2023</p>	<p>WCL included athletes in its mandate for Safe Sport training for all WCL sanctioned activity.</p> <p>Additional athlete training was intended to occur during national team training camps, which have not taken place due to COVID since the summer of 2019.</p> <p>WCL held an information session on Feb 2, 2023 on WCL's new safe sport policy manual.</p> <p>Additional information sessions were scheduled throughout the year and during national team camps.</p>
44	Respond to athletes' and coaches' requests for information in a timely manner (p 34)	Other	Evergreen	<p>Ongoing. WCL is often understaffed which may result at times in delayed response times.</p>



45	Conduct exit interviews with all athletes and employees who leave (p 34)	Other	Evergreen	Not enforceable from an HR perspective. Athletes don't always formally declare their retirement.
1	A prohibition on sexual relationships between national team coaches and athletes (p 12)	Policy	June 2021 November 2022 January 2023	https://wrestling.ca/wp-content/uploads/2022/06/Safe_Sport_Policy_Manual-September-2021.pdf https://wrestling.ca/wp-content/uploads/2023/01/Safe_Sport_Policy_Manual-January-2023-1.pdf
2	A prohibition on sexual relationships between national team coaches and other coaches (p 12)	Policy	June 2021	
3	A prohibition on sexual relationships between national team coaches and WCL staff (p 12)	Policy	June 2021	
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5	A prohibition on sexual relationships between staff and athletes (p 12)	Policy	June 2021	
6	Mandatory Vulnerable Sector Check for all WCL staff and coaches (p 13)	Policy	July 2019	
7	Mandatory Vulnerable Sector Check for all provincial staff and coaches (p 13)	Policy	n/a	n/a as this is PTSO jurisdiction. New membership database will support tracking this information.
8	Creation of a coach and athlete database to ensure they have met the requirements to be licensed, including the completion of a background screen, signature of the coaching Code of Conduct and the identification of coaches who have breached the coaching Code of Conduct (p 13)	Other	July 2019 February 2023	Database work is currently underway in partnership with Interpodia. Work was delayed during COVID. Notwithstanding, this information is being tracked. Database launched
9	Rule of Two policy implemented for athletes under eighteen (p 13)	Policy	June 2021	
10	There should be an annual review of all safety policies (p 13)	Policy	December 2022	Revised policy suite approved Nov / Dec 2022.



11	There should be an independent review of the allegations made by the two anonymous parties to OTP, the Minister of Sport and WCL (p 13)	ITP	May 2023	<p>The independent investigator (E.Durant) completed the first phase of the investigation and was undertaking a more complete investigation into specific allegations raised during the first phase.</p> <p>The complainants subject to the 2nd phase investigation raised concerns with WCL about receiving the reports following the investigation. WCL committed to sharing the results, noting that some information might need to be redacted for confidentiality. The investigator made numerous attempts to engage with the complainants. Notwithstanding WCL's commitment for transparency in the process, the complainants failed to participate. As a result, the investigation is now concluded.</p> <p>Upon review of both reports, WCL's Management Team determined that neither report will be published, as there are still ongoing matters that relate to the information contained.</p> <p>The Phase 1 Report was sent in full to all the complainants. The Phase 2 Report was sent in full only to those complainants subject to the 2nd phase.</p> <p>To maintain confidentiality, redacted versions were also shared with Sport Canada and OSIC, as part of WCL's accountability and reporting requirements.</p>
13	There should be no physical contact between coaches and athletes (p 20)	Policy	June 2021	
14	Verbal abuse, including swearing, yelling, using pejorative language (slut, lazy, fat, useless) should be prohibited by the Code of Conduct (p 20)	Policy Education / Training	June 2021	



15	Coaches should not be pushing their athletes physically until they vomit or are on the mat in tears from exhaustion (p 20)	Policy / Education / Training	June 2021	
16	Coaches and staff need to be reminded that they are there for the athletes and not the other way around (p 20)	Other	August 2022	Updated language in WCL strategic plan supports this. For example, we use the term “Athletes & other Participants” when we wish to highlight “athlete-centric”.
17	There needs to be more opportunities for new and young coaches (p 20)	Policy	April 2022	Updated coach selection policy.
18	There needs to be the development and promotion of more women coaches (p 20) Same as recommendation 33.	Other	2019-2022	Through Sport Canada’s Gender Equity funding, WCL offset the cost of female coaches undergoing coach education training for the last two years. WCL has also secured grants for female coach education through United World Wrestling. Other activities under “Women of Wrestling” project were either postponed or unable to be completed due to COVID.
19	Protocol around contacting athletes (p 20)	Policy / Education / Training	June 2021	
20	Discontinue the practice of “Birthday Beats” (p 20)	Other	June 2021	This has never been a practice of WCL, however, this is emphasized in training and education and policy.
21	Prohibit drinking between coaches and athletes (p 22)	Policy	June 2021	
22	Develop a policy concerning alcohol consumption (p 22)	Policy	June 2021	
23	Develop a policy on cannabis for coaches and staff members (p 23)	Policy	June 2021	
24	There should be mandatory education for all coaches and athletes around concussions (p 25)	Policy / Education / Training	October 2018	
25	If an athlete is funded by WCL then they should use WCL’s medical treatment for concussions and other major injuries (p 25)	Education / Training	October 2018	Concussion Protocol: https://wrestling.ca/wp-



				content/uploads/2020/05/Concussion Protocol v2.pdf . Information is also available in Athlete Handbook and Athlete Agreements. Treatment of athletes is resource dependent.
26	There needs to be a formalized written medical clearance before an athlete can go back to practice or competition (p 25)	Policy	October 2018	Currently in place for athletes at national / international level training / competition (see Concussion Protocol Medical Clearance Letter).
28	Athletes need to be given more resources for healthy eating (p 27)	Education / Training	June 2018	Resources available on WCL's website on a protected Athlete page and being delivered at national team training camps.
29	The nutritionist needs to be doing more to work with the athletes outside of Calgary (p 27)	Education / Training	Summer 2022	There is a new national nutrition lead based in Saskatoon. The scope and reach of work are resource dependent.
31	It should be added into the Code of Conduct that coaches should not be asking athletes to cut weight (p 27)	Policy	June 2021	
33	There needs to be the development and promotion of more women coaches (p 29)	Other	2019-2022	See #18.
34	WCL should conduct a study of how women's monthly cycles impact their weight and weight class (p 29)	Education / Training	November 2019	This is already in existence and was delivered to our HP Coaches previously. WCL recorded a webinar "Determining Appropriate Weight Classes for Wrestlers" that is available on WCL's coach protected webpage.
35	Coaches should be given access to childcare (p 29)	Other	Summer 2019	WCL does not restrict access to childcare for coaches. Resourcing childcare for all coaches across the country is not a WCL responsibility. WCL has made accommodations (including financial support) for



				those coaches employed by WCL within certain parameters.
36	Clarify Job Positions Among WCL Staff (p 32)	Other	January 2019	All job postings have detailed job descriptions, which are also included in employment agreements.
37	Have a More Professional Board of Directors Composed and Increased Gender Parity Among Board Members (p 32)	Other	September 2019 June 2023 November 2023	Bylaws reflect language around gender parity targets. New bylaws in alignment with the Canadian Sport Governance Code approved by the Board. The bylaws include language promoting diversity, independence, and gender parity. Following an open call and nomination process by the newly formed Nomination Committee, a new skills-based Board with gender parity (at least 40%) is elected.
38	Bring in more women to serve on the Board of Directors (p 33)	Other	September 2019 June 2023 November 2023	Bylaws reflect language around gender parity targets. New bylaws in alignment with the Canadian Sport Governance Code approved by the Board. The bylaws include language promoting diversity, independence, and gender parity. Following an open call and nomination process by the newly formed Nomination Committee, a new skills-based Board with gender parity (at least 40%) is elected.
39	Develop a Database of Athletes and Coaches (p 33)	Other	February 2023	National database for individuals participating in WCL sanctioned activities. Includes OSIC consent, as well as various SC requested demographic information.



40	Create a harassment policy (p 33)	Policy	June 2021	
42	Create a reporting mechanism for sexual harassment claims and outline the process in the Code of Conduct (p 33)	Policy ITP	June 2021	
43	Investigate all future leaks of sensitive information and sanction those responsible (p 33)	Policy	December 2018	BOD operates under a set of Good Governance Principles and Norms and are subject to the Safe Sport Policy. Any complaints are forwarded to the ITP.
46	Review whether any board members of WCL are in a Conflict of Interest (p 34)	Other	2017 January 2023	Conflict of interest is an agenda item and addressed at every BOD meeting since at least 2015. A BOD orientation manual developed in 2017 also addresses BOD conduct. New COI policy approved.
47	Establish an independent Complaints Person (p 35)	ITP	December 2018 December 2022	WCL has had an independent third party since December 2018. WCL is a signatory to OSIC.
48	Advise athletes of their rights to appeal a decision under the Appeal Policy and to the SDRCC (p 35)	Policy	June 2021	
49	WCL should lobby with the other NSOs to create an ombudsman for sport (p 35)	ITP	Summer 2022	We would consider the creation of OSIC as a step in this direction.
50	Coaches' salaries at the National Centres should be reviewed and a better compensation package should be paid (p 36)	Other	Annual budgeting	While this point has been addressed, this recommendation is irrelevant to safe sport matters and is resource dependent.
51	Athletes should be involved in the implementation of the recommendations made in this report (p 37)	Other	2019-present	Athletes were valuable members of the task force and continue to be included in engagement (eg. athlete town halls during the development of the Safe Sport Policy Manual).



				WCL is also scheduling more frequent town halls with athletes to solicit athlete feedback on various topics including safe sport.
52	There should be an audit carried out after six months and a second audit after a year to evaluate whether the recommendations in this report have been implemented (p 37)	Other	September 2019 October 2020	



Appendix E: UCCMS Excerpts

5.9 Subjecting a Participant to the Risk of Maltreatment

- 5.9.1 *Sport administrators or other sport decision-makers in positions of authority who place Participants in situations that they know or ought to have known make the Participant vulnerable to Maltreatment are subjecting a Participant to the risk of Maltreatment.*
- 5.9.2 *Subjecting a Participant to the risk of Maltreatment includes, without limitation: instructing an athlete and coach to share a hotel room when traveling, knowingly hiring a Participant who has a past history of Prohibited Behaviour and who is under a sanction of temporary or permanent ineligibility pursuant to a UCCMS enforcement process, assigning guides and other support personnel to a para-athlete when the guide or support personnel has a past history of Prohibited Behaviour and is under a sanction of temporary or permanent ineligibility pursuant to a UCCMS enforcement process, or assigning a guide or support personnel to a para-athlete in the absence of consultation with the para-athlete.*

5.10 Aiding and Abetting

- 5.10.1 *Aiding and Abetting is any act or communication taken with the purpose of directly assisting, furthering, facilitating, promoting, or encouraging the commission of Maltreatment or other Prohibited Behaviour by or against a Participant.*
- 5.10.2 *Aiding and Abetting also includes, without limitation: knowingly allowing any person who is suspended or is otherwise ineligible to participate in an Adopting Organization's activities; providing any coaching-related advice or service to an athlete who is suspended or is otherwise ineligible; and allowing any person to violate the terms of their suspension or any other sanctions imposed.*

5.11 Failure to Report

- 5.11.1 *Failure to Report possible Maltreatment or other Prohibited Behaviour:*
- a) *It is a violation for any adult Participant who knew or ought to have known of a Participant's Prohibited Behaviour toward another person to fail to Report such conduct. For clarity, a Participant is not obligated to Report an instance of Prohibited Behaviour to which they were personally subject.*
 - b) *Where information regarding a Participant's Prohibited Behaviour toward another adult is made known to an adult Participant through an explicitly confidential Disclosure, the adult Participant shall not be required to Report the information obtained through that Disclosure. Nevertheless, if an adult Participant knew or ought to have known of the Participant's Prohibited Behaviour for reasons other than the explicitly confidential Disclosure, it remains a violation for them to fail to Report such conduct.*
 - c) *The person making the Report does not need to determine whether a violation took place: instead, the responsibility lies in Reporting the objective behaviour.*

Early intervention is required to prevent escalation, hence the obligation on all adult Participants to Report.

- d) *The Reporting Obligation is ongoing and is not satisfied simply by making an initial Report. The Reporting Obligation includes Reporting, on a timely basis, any and all relevant information of which an adult Participant becomes aware.*
- e) *It is a violation for any adult Participant to fail to fulfill any applicable legal Duty to Report.*

5.12 Intentionally Reporting a False Allegation

5.12.1 *It is a violation to Report a knowingly false allegation, or influence another to Report a knowingly false allegation, that a Participant engaged in Prohibited Behaviour. An allegation is false if the events Reported did not occur, and the person making the Report knows at the time of Reporting that the events did not occur.*

5.12.2 *A false allegation is different from an unsubstantiated allegation; an unsubstantiated allegation means there is insufficient supporting evidence to determine whether an allegation is true or false. Absent demonstrable bad faith, an unsubstantiated allegation alone is not a violation of the UCCMS.*

5.13 Interference with or Manipulation of Process

5.13.1 *It is a violation of the UCCMS for a Participant to directly or indirectly interfere with or manipulate an investigation or disciplinary review process by:*

- a) *knowingly destroying, falsifying, distorting, concealing, or misrepresenting information, with the intent to interfere with or influence the resolution process or the implementation of an outcome;*
- b) *attempting to discourage or prevent a person's proper participation in or use of the processes;*
- c) *harassing or intimidating any person involved in the processes before, during, and/or following any proceedings;*
- d) *failing to comply with any temporary or provisional measure or final sanction;*
- e) *influencing or attempting to influence another person to interfere with or manipulate the process; or*
- f) *distributing or otherwise publicizing materials a Participant gains access to during a UCCMS investigation or hearing, except as required by law or as expressly permitted.*

5.13.2 *All Participants are expected to act in good faith throughout any investigation or disciplinary review process, and the sole purpose of Section 5.13 is to provide a means to discipline those who do not. In recognition that a victim/survivor, of sexual abuse in particular, may conceal information out of embarrassment, shame or to protect the perpetrator, absent demonstrable bad faith, minimizing or concealing in such circumstances is not a UCCMS violation.*

5.14 Retaliation

- 5.14.1 *It is considered retaliation for a Participant to take an adverse action against any person for making a good faith Report of possible Prohibited Behaviour or for participating in any UCCMS enforcement process.*
- 5.14.2 *Retaliation includes threatening, intimidating, harassing, coercing, negatively interfering with sport participation, or any other conduct that would discourage a reasonable person from engaging or participating in an investigation or disciplinary review process related to behaviour prohibited by the UCCMS. Retaliation after the conclusion of these processes is also prohibited, even where there is a finding that no Prohibited Behaviour occurred. Retaliation does not include good-faith actions lawfully pursued in response to a Report of possible Prohibited Behaviour.*