Complaints and Disciplinary Policy

Complaints and Disciplinary Process Overview

1 **Submit**		**2** **Screen**		**3** **Route**
4 **Resolve or Hear**		**5** **Decide**		**6** **Appeal**
Safeguarding concern Refer immediately	→	**Protective action** If required	→	**Statutory duties** Take priority

Safeguarding concerns are referred immediately. Disciplinary stages proceed only where safe and appropriate.

Source materials used: Previously approved Policy, Cycling Ireland Constitution Final 2024; Garda Vetting and Access NI information sheet; Sport Ireland disciplinary, grievance and dispute guidance; Sport Dispute Solutions Ireland mediation and arbitration rulebooks; CAS public information; Children First Act 2015; Equal Status Act 2000; Arbitration Act 2010.

1. Document Control

Item	Detail
Policy Title	**Complaints and Disciplinary Policy**
Policy Owner	Cycling Ireland
Responsible Officer	Complaints and Disciplinary Officer, with CEO oversight where applicable
Approval Authority	Board of Cycling Ireland
Draft Version	Final
Board Approval Date	27TH October 2026
Effective Date	28th October 2026
Next Review Date	No later than 12 months after the Effective Date and earlier where required by law, safeguarding guidance, governance requirement, arbitration outcome, or Board direction
Supersedes	Previous Complaints and Disciplinary Rules and Procedures, when adopted
Related Documents	Cycling Ireland Constitution; Safeguarding Policy; Garda Vetting and Access NI guidance; Code of Behaviour; Technical Rules and Regulations; UCI Regulations; SDSI Rules; approved appendices and templates

2. Purpose and Scope

The purpose of this Policy is to provide a fair, transparent, and consistent framework for handling complaints and disciplinary matters within Cycling Ireland.

- It identifies conduct that may give rise to complaint or disciplinary action.
- It sets out the roles of the CDO, Responsible Persons, Hearings Committees, Appeals Committees, and the Board.
- It provides clear steps, timelines, and decision points for receiving, screening, resolving, hearing, and appealing matters.
- It identifies sanctions that may be imposed or recommended.
- It protects the rights of Complainants, Respondents, and other participants.
- It provides record-keeping, reporting, confidentiality, and review arrangements.

This Policy applies to Members, Participants, Clubs, Provincial Associations, committees, sub-committees, teams, Units and any other persons or bodies subject to Cycling Ireland rules by membership, affiliation, participation, appointment, or agreement.

3. General Principles

All complaints and disciplinary matters shall be administered in accordance with natural justice and fair procedures.

- independence and impartiality;
- timely notice of allegations;
- access to relevant material relied upon;
- fair opportunity to respond;
- proportionate decision-making;
- reasoned written decisions;
- clear appeal routes;
- confidentiality, subject to lawful sharing where necessary;
- appropriate safeguarding escalation where children or vulnerable persons may be involved.

4. Definitions

Term	Definition
Board	The Board of Cycling Ireland as defined in the Constitution.
Club	A club affiliated to Cycling Ireland in accordance with the Constitution.
Member	A member of Cycling Ireland as defined in and subject to the Constitution and applicable membership terms.
Participant	Any member or person who participates in Cycling Ireland activities in any capacity, including cyclist, official, coach, manager, support personnel, volunteer, parent/guardian.
Unit	Any team, association, club, committee, sub-committee, Provincial Association, or other grouping within or connected to Cycling Ireland, including parents or guardians acting in respect of members under 18.
Complaint	A written complaint submitted under this Policy alleging breach of Cycling Ireland Constitution, rules, regulations, codes, policies, or procedures.

Disciplinary Matter	A matter arising from a Disciplinary Report, Incident Report, Responsible Person Report, or alleged breach rules/policy that otherwise comes to the attention of the relevant CDO.
Prima Facie	An initial assessment is that there is sufficient information, if accepted, to allow the matter to proceed. It is not a final finding of fact, misconduct, or culpability.
Bullying	Bullying means repeated inappropriate behaviour, whether direct or indirect, verbal, physical, written, electronic or otherwise, by one or more persons against another person or group of persons, which could reasonably be regarded as undermining the dignity, wellbeing, confidence, participation, reputation or sporting experience of that person. For the purposes of this Policy: • Bullying involves a pattern of behaviour rather than an isolated incident. • A single incident will not constitute bullying, although it may constitute misconduct under another provision of this Policy. • Reasonable and legitimate management, supervision, coaching, officiating, selection, performance feedback, rule enforcement, disciplinary action, or governance decision-making conducted in an appropriate manner shall not, of itself, constitute bullying. • A determination that conduct amounts to bullying shall be based on the facts of the case, the nature of the conduct, its frequency, context, impact, and all relevant circumstances.
Complainant/s	The person, Member, Participant, Unit, or body submitting the complaint.
Balance of Probabilities	The standard of proof applied in disciplinary proceedings whereby, having considered all relevant evidence, the decision-making body must be satisfied that it is more likely than not that the alleged conduct occurred. The burden of proof rests with the party making the allegation. Where the evidence is equally balanced, the allegation shall not be upheld.
CDO	A Complaints and Disciplinary Officer (CDO) is the person appointed by Cycling Ireland or CI affiliated body, to receive and manage complaints and disciplinary matters in accordance with its approved policies and procedures.
Respondent/s	The person, Member, Participant, Unit, or body who is the subject of the complaint or disciplinary matter.
Responsible Person	The person with authority over an event, team, competition, course, or activity, including a team manager, commissaire, event organiser or delegate as appropriate.
Safeguarding Officer	A person appointed or recognised under the Cycling Ireland Safeguarding Policy, including the National Safeguarding Officer, Club Safeguarding Officer, Designated Liaison Person, Mandated Person or other authorised safeguarding personnel acting within the remit of that role. A Safeguarding Officer may advise or support safeguarding aspects of a matter but shall not investigate disciplinary allegations or sit as a decision-making member of the Hearings Committee or Appeals Committee in the same case.
Immediate Sanction	A sanction imposed at an event or activity by an authorised Responsible Person where immediate intervention is required for fair competition, safety, order, or welfare.

National CDO	A National Complaints and Disciplinary Officer (CDO) is the person appointed by Cycling Ireland Board or CEO, to receive and manage complaints and disciplinary matters in accordance with its approved policies and procedures.
Interim Measure	A temporary, risk-based, proportionate and reviewable protective or administrative measure pending determination of a matter. It is not a finding of wrongdoing or a disciplinary sanction. The authorised decision-maker shall record reasons, notify the affected person subject to lawful safeguarding restrictions, define its scope and duration, and keep it under regular review. It shall not constitute suspension or expulsion from membership unless determined under the Constitution.
Working Day	Monday to Friday inclusive, excluding public holidays in the relevant jurisdiction.

Confidentiality throughout the complaints and disciplinary process

- All complaints, disciplinary matters, investigations, hearings, appeals, use of AI generated information, mediation processes, Board consideration of sanctions and associated records shall be treated as confidential by all parties involved.
- The duty of confidentiality applies to Complainants, Respondents, witnesses, representatives, Committee members, Board members, staff, volunteers, and any other participant in the process.
- Confidentiality applies to the existence of complaint or disciplinary matters, evidence and submissions received, witness information, hearing proceedings, deliberations, decisions, and sanctions, except to the extent disclosure is authorised or required under this Policy.
- Confidentiality shall not prevent compliance with legal obligations, safeguarding reporting obligations, regulatory or insurance requirements, implementation of a decision or sanction, obtaining professional legal advice, or disclosure authorised by Cycling Ireland for legitimate governance purposes.
- A serious or deliberate breach of confidentiality may itself constitute a disciplinary matter or, if performed by the Complainant(s), a dismissal of the complaint, where appropriate.

5. Matters Excluded or Redirected

The following matters are not normally dealt with as ordinary complaints or disciplinary matters under this Policy:

- child safeguarding concerns, suspected abuse, child welfare concerns, or grooming concerns;
- criminal matters;
- anti-doping matters;
- employment or quasi-employment contractual disputes;
- field-of-play or competition administration decisions, unless the conduct goes beyond competition administration and may amount to misconduct;
- matters governed by a separate statutory, regulatory, or safeguarding process.

Where such a matter arises, the CDO shall redirect the matter to the appropriate policy, statutory authority, regulatory process, or legal framework. Redirection shall be recorded in writing within seven working days of the CDO identifying that the matter falls outside the ordinary complaints route.

6. Safeguarding and Statutory Reporting

Where any complaint, disciplinary matter or information raises a child safeguarding concern, suspected abuse, child welfare issue, relevant work concern or potential criminal matter, the ordinary complaints and disciplinary process shall be paused or

redirected as appropriate.

- Within 3 working days of receipt of a safeguarding concern, the recipient shall refer the concern immediately and without avoidable delay to relevant safeguarding officers. Where there is an immediate risk of harm, the emergency services or relevant statutory authority shall be contacted without delay. The referral shall be formally recorded as soon as practicable and ordinarily within three Working Days; this recording period shall not delay protective or statutory action.
- Within 48 hours of receipt, the CDO shall record that the ordinary complaints process has been paused or redirected pending safeguarding assessment.
- Within seven working days, the CDO, in consultation with safeguarding personnel, shall record whether the matter proceeds under safeguarding procedures only, proceeds under safeguarding and disciplinary procedures in parallel, or resumes under this Policy.
- Where the matter involves Ireland the Children First Act 2015 and Children First National Guidance shall be considered. National Guidance for the Protection and Welfare of Children 2017 (ROI) Children First Act 2015 (ROI)
- Where the matter involves Northern Ireland, the Children (NI) Order 1995 (NI) Co-operating to Safeguard Children and Young People (NI) 2017 guidance shall be considered
- A safeguarding concern shall not be rejected solely because it falls outside the ordinary complaint time limit.
- It should be noted that allegations of breaching the current Cycling Ireland Safeguarding Policies and Procedures (as amended from time to time) are not necessarily suspected child abuse. A breach of the code of conduct can be due to poor practice which should be dealt with pursuant to these Rules and Procedures. If assistance is required in order to determine what is abuse vis-a-vis poor practice, please consult the Club/Provincial/Commission or National Children's Officer. Matters of poor practice are dealt with pursuant to these Rules and Procedures.
- Where a safeguarding poor practice concern is identified, the relevant Safeguarding Officer may engage with the Respondent for safeguarding, educational or preventative purposes and may explain the concern, the expected standards of conduct and any appropriate remedial action. The Safeguarding Officer shall not make a disciplinary finding. Where the concern is acknowledged and proportionate remedial action is agreed, a written record of the engagement and agreed actions may be retained and shared only where necessary with relevant Club, Provincial Association or Cycling Ireland safeguarding personnel, in accordance with the Safeguarding Policy and applicable data protection requirements.
- Where Safeguarding Intervention as highlighted above has been successful then a record of the intervention having been agreed in writing by both parties should be provided to both parties and forwarded to the Appropriate Safeguarding Officer. Having been advised that the matter has been addressed, the Complaints and Disciplinary Officer can decide to close the complaint.
- Where the allegations are disputed the concern cannot be resolved through an appropriate safeguarding intervention, the conduct may constitute a breach of Cycling Ireland rules, policies, codes or procedures, or the seriousness of the matter warrants formal consideration, the CDO may, following consultation with appropriate safeguarding personnel, determine that the matter should proceed under this Policy. The CDO may extend at their discretion the normal complaint submission time limit where satisfied that doing so is reasonable, proportionate and in the interests of fairness, safeguarding or the integrity of the sport. The reasons for the referral and any extension shall be recorded in writing.

Anonymous, third-party, informal or historical information, raising a safeguarding concern may not be rejected solely by the Safeguarding Officer because it does not meet the requirements for a formal Complaint. Any later disciplinary determination remains subject to fair procedures and sufficient reliable evidence. Complaints of a historical nature that have been deemed to be in the best interest of Children or the Sport can only be considered regarding policies and procedures in force at the time of the alleged breach.

A safeguarding threshold decision, risk assessment or protective action is not a disciplinary finding and shall not establish misconduct without a separate fair process under this Policy.

Safeguarding and disciplinary processes may proceed in parallel only where the CDO and National Safeguarding Officer, following any necessary statutory liaison, are satisfied that this is safe, fair and will not prejudice a statutory assessment, criminal investigation or safeguarding response. The decision, reasons and any restrictions on internal enquiries shall be recorded in a Safeguarding and Disciplinary Routing Record.

The CDO shall not investigate or attempt to validate suspected abuse where responsibility rests with a statutory authority. The CDO may conduct disciplinary information gathering only when authorised and when it will not prejudice safeguarding, statutory or criminal processes.

Where an outcome, resignation, removal from a role or protective restriction may create a statutory, vetting, barring or regulatory reporting obligation, the CDO shall notify the National Safeguarding Officer or other authorised officer for documented consideration and action.

Vetting and access principle

Individuals undertaking relevant work or activities with children and/or vulnerable persons must complete the appropriate vetting process before undertaking the role. Persons operating in Northern Ireland may require an AccessNI enhanced check and persons operating in the Republic of Ireland may require Garda eVetting. The relevant process depends on where the activity takes place.

7. Jurisdiction

This Policy applies to complaints and disciplinary matters arising under or connected with:

- Cycling Ireland Constitution;
- Cycling Ireland Safeguarding Policy;
- Cycling Ireland Code of Behaviour;
- Cycling Ireland policies and procedures;
- Cycling Ireland Technical Rules and Regulations;
- Applicable UCI Regulations.

Competition administration and field-of-play decisions remain governed by the applicable Technical Rules and Regulations unless the conduct goes beyond competition administration and may amount to misconduct under this Policy.

8. Offences

A person or body subject to this Policy may be subject to complaint or disciplinary action where they are alleged to have committed an offence or breached any applicable rule, regulation, code, policy, or procedure which will be updated from time to time.

The type of behaviour which may result in disciplinary action includes the following (this is a non-exhaustive list):

A. Breaches of Rules, Codes and Governance Requirements

- breach of Cycling Ireland rules, policies, codes, or procedures;
- breach of applicable UCI Regulations;
- failure to comply with a decision made under this Policy;
- participation in or representation of Cycling Ireland activity without required authority or permission;

- violation of contractual or governance obligations owed to Cycling Ireland.

B. Behavioral Misconduct

- disruptive, aggressive, threatening, or intimidating behaviour;
- fighting;
- coercion;
- offensive behaviour;
- foul language;
- unsporting behaviour;
- disparaging comments;
- conduct bringing Cycling Ireland or cycling into disrepute.

C. Equality, Dignity, Bullying and Harassment

- discrimination, harassment, or bullying;
- conduct damaging the dignity of a person or group;
- inciting hatred or violence;
- Repeated targeted behaviour;
- intimidation, threats, or coercion linked to protected, equality or status-based grounds;
- unwanted or inappropriate conduct that creates a hostile, degrading, humiliating, or offensive environment.

D. Integrity and Fair Competition

- cheating;
- forgery or falsification;
- corruption;
- ineligibility, including age or club affiliation issues;
- knowingly submitting false or misleading evidence;
- failure to comply with a Hearings Committee, Appeals Committee or Board decision.

E. Social Media and Electronic Communications

- distributing offensive content;
- using electronic platforms to insult, mock, taunt, bully, harass, abuse or target others;
- undermining participants, opponents, coaches, commissaires, officials, volunteers or others involved in Cycling Ireland activity.

F. Criminal-Related and Serious Misconduct Matters

- criminal investigation for an indictable offence likely to bring Cycling Ireland, a Club or Provincial Association into disrepute;
- criminal conviction likely to bring Cycling Ireland into disrepute;
  alcohol or substance misuse by members at an event, subject to safeguarding and welfare considerations.

G. Malicious, Frivolous, Vexatious or False Complaints

- knowingly submitting a false, malicious, or misleading complaint, report, statement, or evidence;
- repeated complaints or correspondence found to be frivolous, vexatious, and/or to cause unnecessary distress, inconvenience, or disruption to an individual or body.

A complaint shall not be treated as malicious, frivolous, vexatious, or false merely because it is not upheld.

9. Sanctions

Any sanction or disciplinary measure must be fair, proportionate, within the authority of the decision-maker, based on accepted evidence, informed by mitigating and aggravating factors, and recorded in writing with reasons.

Warnings and Immediate Sanctions

A Commissaire who is appointed may issue warnings or impose Immediate Sanctions on competitors up to and including disqualification at an Event where authorised. Immediate Sanctions may include permission to start being withheld, and/or a fine, time penalty, points deduction, elimination, or disqualification.

Non-Immediate Sanctions

Following a finding that an offence has been committed, a Hearings Committee may impose sanctions including but not limited to an apology, reprimand, verbal warning, written warning, fine, suspension from participation, suspension from coaching, cancellation of results, restriction from attending events or completion of education or training,

A Hearings Committee may recommend suspension or expulsion of an individual or Club found to have brought the sport into disrepute, but cannot itself impose such a sanction, which must be determined by the Board as required by the Cycling Ireland Constitution.

10. Sanction Authority

Authority wording

- A Hearings Committee may recommend suspension or expulsion from membership or affiliation but shall not finally determine suspension or expulsion where the Constitution reserves that authority to the Board.
- Where suspension or expulsion is being considered, the matter shall be referred to the Board with the Hearings Committee for decision, reasons, evidence relied upon and any relevant mitigating or aggravating factors.
- Before any Board determination, the Member shall receive not less than 14 Clear Days' notice of the Board meeting and shall have the right to attend and be heard in their defense.
- The Member shall not be present for the Board deliberation or vote. The Board decision shall be confirmed in writing with reasons and with the applicable appeal route.

Low Offence	**Medium Offence**	**High Offence**
Reprimand	Written Warning	Suspension from: A. Membership/ Affiliation B. Participation in an Event/Team
Fine €25/£22.50	Fine €50/£45	Fine €100/£90 + Written Warning

Decision-maker	**Direct Authority**	**Referral or Recommendation**

Responsible Person	Warnings and Immediate Sanctions where authorised	Further disciplinary review to the CDO or Hearings Committee.
CDO	Procedural management, screening, routing, and case administration	Referral to informal resolution, mediation, or hearing.
Hearings Committee	Determination of breach and non-immediate sanctions within its authority	Recommendation to the Board where suspension or expulsion requires Board determination.
Board	Final determination where the Constitution requires Board authority, including suspension or expulsion from membership or affiliation	May act on a Hearings Committee recommendation, subject to fair process, notice and opportunity to be heard.
Appeals body or SDSI	As provided by the internal appeal or arbitration rules	May uphold, vary, remit, or set aside where authorised.

11. Mitigating and Aggravating Factors

A Hearings Committee shall consider mitigating and aggravating factors after deciding culpability and before deciding sanctions. Relevant factors may include:

- age and vulnerability;
- cooperation with the process;
- prior warnings or previous findings;
- repeat offending;
- apology or remedial action;
- remorse;
- seriousness and impact of conduct;
- impact on affected parties;
- impact of sanction on the Respondent;
- deliberate, repeated or planned conduct;
- power imbalance;
- involvement of children or vulnerable persons;
- any other relevant factor.

12. Roles and Decision-Making Bodies

Role or Body	Function
CDO	Receives, acknowledges, screens and processes complaints and disciplinary matters. Determines validity and prima facie status. Gathers information. Manages supplementary exchange. Refers appropriate matters to informal resolution, mediation or hearing. Prepare hearing papers. Maintain records and reports to the Board.
Chair of National Panel	Receives appeals from no-prima-facie determinations. Coordinates hearing and appeal panel members. Maintains records of panel participation.
Responsible Person	May impose Immediate Sanctions at an Event where authorised and prepares a Disciplinary Report where further action may be required.
Hearings Committee	Hears and determines referred complaints and disciplinary matters. Decides evidence, breach, reasons and sanction or recommendations.
Board	Approves the Policy, receives governance-level reporting, appoints or approves national structures where required, and makes determinations where the Constitution requires Board authority.

13. Governance of the CDO, National Panel and Hearings Committees

The following governance requirements apply to the administration and determination of matters under this Policy:

National appointments	The Board shall appoint one or more national Complaints and Disciplinary Officers and shall appoint and approve the National Hearings Panel annually.
Hearings Committee selection	At national level, the Chair of the National Panel shall select a Hearings Committee from the National Hearings Panel. At Club or Provincial level, the relevant Club or Provincial Chairperson shall select the Hearings Committee from the applicable panel. A National Panel member may serve at Club or Provincial level only with the prior approval of the Chair of the National Panel.
Quorum	A quorum of three or five members shall be required for a Hearings Committee to conduct a hearing and determine a matter.
Decision-making	A Hearings Committee shall decide matters by simple majority. The majority decision shall be the decision of the Committee and no separate minority or dissenting decision shall be issued.
CDO conflicts	An appointed CDO with an actual, or potential conflict of interest shall stand aside from the role of CDO, The CEO or the CEOs designate, or the relevant Club or Provincial Chairperson, shall appoint a replacement CDO. Where a conflicted CDO does not stand aside, the relevant appointing authority may remove that CDO from the matter and appoint a replacement.
Hearings Committee conflicts	A person selected for a Hearings Committee who has an actual, potential or perceived conflict of interest shall stand aside. An alternate member shall be

	appointed by the person authorised under this section to select the Committee.
Chairperson	Once constituted, the Hearings Committee shall appoint one of its members as Chairperson by agreement by the Hearings Committee.
Safeguarding Officer	A Safeguarding Officer may advise or support the safeguarding aspects of a matter but shall not sit as a decision-making member of the Hearings Committee in the same case. A person involved in safeguarding assessment, protective decision or statutory liaison shall not determine the same disciplinary matter or appeal.
Panel replacement and additional expertise	Where a replacement or additional National Panel member is required because of conflict, availability or required expertise, the request shall originate from the Chair of the National Panel to the Executive. Any proposed addition to the National Panel shall require the agreement of the CEO, the President and the Chair of the National Panel. Case allocation shall preserve independence, impartiality and appropriate expertise.

14. Bullying, Harassment and Continuing Conduct

Where a complaint alleges bullying, harassment, victimisation, intimidation, coercive conduct, or other repeated behaviour occurring over a period of time, the CDO may treat the allegations as a continuing course of conduct rather than as a series of separate incidents.

A complaint relating to a continuing course of conduct should be submitted within fourteen (14) working days of the most recent alleged incident forming part of that course of conduct.

In determining whether a complaint relating to continuing conduct should proceed, the CDO may consider:

- the nature and seriousness of the allegations.
- whether the conduct is alleged to be ongoing.
- the date of the most recent alleged incident.
- the reasons for any delay in reporting.
- whether informal resolution was attempted.
- the availability, reliability, and quality of the evidence.
- the extent to which the allegations can be fairly investigated.
- any actual prejudice to the Complainant or Respondent.
- safeguarding, welfare, or integrity considerations; and
- the interests of fairness, proportionality, and natural justice.

The CDO may permit evidence falling outside the normal complaint time limit to be included where satisfied that they form part of the same alleged pattern of conduct and that their inclusion is necessary for a fair understanding of the matter.

Historic events may be considered as background context where relevant. However, a Hearings Committee shall determine only those allegations that are capable of being fairly investigated and adjudicated upon having regard to the availability of evidence, the reliability of witness recollection and the rights of all parties.

The passage of time alone shall not prevent consideration of a complaint. Equally, acceptance of a complaint for investigation shall not be taken as acceptance that all historic allegations will be determined as individual disciplinary charges.

15. Commencing a Complaint

A complaint is commenced when a Complainant submits a written complaint to the relevant CDO. The approved Complaint Form should normally be used unless another written format is permitted for accessibility, reasonable accommodation.

- Complainant details;
- nature of complaint;
- date, time and location;
- Respondent details, where known;
- rule allegedly breached, where known;
- sufficient information to identify the alleged breach;
- supporting documents;
- outcome sought, where relevant;
- applicable fee, unless waived.

A complaint should normally be submitted within twenty-one working days of the incident or matter complained of. The CDO may extend this period where reasonable and fair. Safeguarding concerns are not excluded solely because they are outside the ordinary complaint time limit.

For the avoidance of doubt, there is no internal time limit for reporting a safeguarding concern. The twenty-one-day period does not apply to safeguarding receipt, assessment or statutory referral. Any later disciplinary adjudication remains subject to fairness and the availability and reliability of evidence.

Equality and statutory rights

Where a complaint may involve rights under equality legislation or another statutory process, the CDO shall not treat this Policy as replacing or limiting statutory rights. If Equal Status notification requirements may arise, the Complainant should be advised that statutory time limits may apply independently of this Policy.

16. Use of Artificial Intelligence in Complaints

Cycling Ireland recognises that Artificial Intelligence tools may be used by individuals to assist with drafting, editing, formatting, summarising or organising written complaints. Such use is not prohibited, provided it is transparent, responsible, factually accurate, and compliant with applicable data protection law.

- **Declaration of AI use:** Where a Complainant uses Artificial Intelligence, including any generative AI tool, to assist in preparing a Complaint or any supporting material, that use must be declared in the Complaint at the time it is first submitted.
- **Responsibility for content:** The Complainant remains personally responsible for the content, accuracy, and completeness of the Complaint, regardless of whether AI has assisted in its preparation. The use of AI does not reduce or alter the Complainant's obligation to ensure that all statements, allegations, dates, quotations, summaries, and supporting materials are accurate, capable of verification and not misleading.
- **No upload of third-party personal data:** A Complainant must not enter, upload, copy, paste, disclose or otherwise provide to any AI system personal data or confidential information relating to another person unless the Complainant has a lawful basis for doing so under applicable data protection legislation and has any consent, authorisation or other legal permission required.
- **Protected and sensitive information:** For the avoidance of doubt, this restriction includes, but is not limited to, personal data, special category personal data, medical information, safeguarding information, disciplinary records, witness statements, contact details, membership information, employment or volunteer information, screenshots, correspondence, photographs, recordings, or any other information obtained through membership, employment, volunteering, participation or involvement in Cycling Ireland activities.

- **Breach of policy and data protection obligations:** The unauthorised disclosure of another person's personal data or confidential information to an AI tool may constitute a breach of this Policy, a breach of confidentiality, a breach of applicable data protection law, misconduct and grounds for separate disciplinary action.
- **Action by Cycling Ireland:** Cycling Ireland may reject, pause, return for amendment, seek clarification of, disregard or investigate a Complaint or supporting material where the required AI declaration has not been provided, where AI-generated content appears inaccurate, fabricated, misleading or incapable of verification, or where there is evidence that personal data or confidential information has been disclosed to an AI system without lawful authority. Cycling Ireland may use an appropriately approved technical tool only to support an initial human review of whether information may have been disclosed improperly. No technical or AI output shall determine that a data breach has occurred or, by itself, result in rejection of a Complaint. Any suspected breach shall be assessed by an authorised person under applicable data protection procedures, with reasons recorded and fair notice given where appropriate.

Required AI Declaration

Where AI has been used, the Complainant must include the following declaration:

"I confirm that Artificial Intelligence (AI) tools were used to assist in the preparation of this Complaint. I acknowledge that I remain responsible for the content, accuracy, and completeness of the Complaint, that I have personally reviewed and verified all statements made within it, and that the Complaint reflects my own account, evidence and understanding. I further confirm that I have not entered, uploaded, disclosed or otherwise provided personal data or confidential information relating to any other person into an AI system unless I had a lawful basis and authority to do so."

17. Commencing a Disciplinary Matter

A disciplinary matter may commence where a Responsible Person submits a report, an Official, Commissaire or authorised person submits a report, an alleged breach otherwise comes to the CDO's attention, or Cycling Ireland, a Club or Provincial Association refers a matter.

Where an Immediate Sanction has been imposed and further disciplinary review may be required, the Responsible Person should prepare and submit a Disciplinary Report within three working days of the incident or as soon as reasonably practicable thereafter.

A Disciplinary Report should include the reporting person, date and time, Member or Participant, club or team, event or location, description, rule allegedly breached, warning or Immediate Sanction, affected parties, supporting documents, signature, and date.

18. Initial Screening and Prima Facie Determination

1. Within five Working Days of receipt, the CDO shall acknowledge receipt of the complaint.
2. Within twenty-one working days of receipt of a complaint or report submitted appropriately, the CDO shall decide whether the matter falls within this Policy and whether a prima facie case exists.
3. Where no prima facie case exists, the CDO shall notify the Complainant or reporting person and record reasons internally.
4. A party may appeal a no-prima-facie determination to the Chair of the National Panel within seven working days of notification. A prima facie determination is an interlocutory case-management decision and is not separately appealable. Any alleged procedural unfairness or material error may be raised in an appeal against the final decision, where applicable.

5. Where allegations of bullying, harassment are made, the CDO will require the Complainant to provide a summary chronology identifying the approximate dates, locations, persons involved and nature of the alleged conduct. The purpose of the chronology is to identify the alleged pattern of behaviour and the matters capable of fair investigation.

19. Information Gathering and Supplementary Exchange

1. Where a prima facie case exists, on behalf of the Hearings panel, the CDO may gather information, seek clarification, request documents, obtain witness statements, and prepare a case file.
2. Information requests should be issued within fourteen Working days of the panel having received the complaint.
3. A party receiving an information request shall normally have fourteen Working Days to respond.
4. A single supplementary exchange may be permitted where required for fairness. The deadline for supplementary material shall normally be seven Working Days.
5. Late material should only be accepted where it was not reasonably available earlier, is material to the issues, and can be admitted without unfairness.
6. One written extension of up to 14 working days may be granted by the CDO where complexity, availability of witnesses, safeguarding or fairness requires it.

20. Informal Resolution

Where a complaint has passed screening and prima facie assessment, the CDO may consider informal resolution where appropriate, fair, and both parties agree.

- Informal resolution should commence within seven working days of the completion of initial information gathering.
- Informal resolution should normally conclude within 14 working days.
- One extension of up to 14 working days may be granted by the CDO where justified and recorded.
- Informal resolution shall not be used where there are safeguarding concerns, suspected abuse, criminal matters, serious misconduct, coercion, power imbalance, intimidation, threats, urgent protective concerns or where a party does not wish to engage.

21. Mediation

Final mediation safeguards

- Mediation shall be entirely consensual and shall not proceed unless all parties agree in writing.
- A refusal to participate in mediation shall not be treated as misconduct, lack of cooperation, or an aggravating factor.
- Mediation shall not be used to determine or resolve a safeguarding concern, allegation of abuse or grooming, or any matter involving an ongoing welfare risk. A separate non-disciplinary issue may be considered for mediation only following safeguarding assessment confirming that mediation is safe, voluntary, appropriate and will not replace or impede safeguarding action.
- Where independent mediation does not resolve the matter, the parties may proceed to the next appropriate step under this Policy without prejudice.
- Information disclosed solely for the purpose of mediation shall be confidential and without prejudice and shall not be used in a later hearing unless it is independently available, or the parties agree otherwise in writing.

Mediation is a confidential dispute resolution process. It is not a disciplinary hearing and does not decide culpability or impose sanctions.

- The CDO may recommend mediation where the process can be conducted safely and fairly.
- Mediation shall not be used where safeguarding, welfare, criminal, coercive or serious misconduct concerns make it unsuitable.
- Where mediation is agreed, the independent mediator should be appointed within seven working days of agreement.
- The Mediation Agreement should be signed within seven working days of mediator appointment, consistent with SDSI mediation rules where SDSI mediation is used.
- The first mediation session should take place within fourteen working days of the mediator being appointed, unless the mediator, CDO and parties agree otherwise.
- Where mediation is unsuccessful, either party may request referral to a Hearings Committee within fourteen working days of the mediation session ending.

22. Referral to Hearings Committee

Final hearing procedural timetable

Step	Final timeline
Complaint acknowledged	Within five Working Days of receipt, unless acknowledgement would prejudice safeguarding, statutory reporting, or urgent protective action.
Prima facie determination	Within twenty-one working days of receipt of a valid complaint or report.
Information gathering	Normally completed within thirty-five working days of the panel having received the prima facie decision.
Informal resolution	Normally completed within twenty eight working days.
Hearing referral notice	Within seven working days of the decision to refer to hearing.
Hearing notice	Issued with not less than twenty-one working days' notice of the hearing.
Hearing documentation	Issued not less than twenty-one working days before the hearing.
Response submissions	Submitted not less than fourteen working days before the hearing.
Hearing decision	Issued within seven working days after the hearing unless an extension is notified.
Appeal filing	Within fourteen working days from receipt of the decision unless this Policy or the applicable external rule states otherwise.

Extension control

- Any extension must be recorded in writing, notified to the parties, state the reason for the extension, and identify the revised deadline.
- An extension should be limited to the shortest period, reasonably necessary and should not be used to create avoidable delay.
- Where safeguarding, statutory reporting, criminal investigation, witness availability, or procedural fairness requires a longer period; the reason shall be recorded on the case file.

23. Hearings Procedure

Private hearing requirement

- All hearings shall be conducted in private unless the Hearings Committee decides there are exceptional reasons to adopt a different arrangement and records those reasons in writing.
- Only those persons required for the fair and proper conduct of the hearing should attend, including parties, permitted representatives or support persons, witnesses while giving evidence, relevant safeguarding personnel where appropriate, an approved legal assessor where appointed, and necessary administrative support.
- Witnesses should not normally be present for evidence given by other witnesses unless the Hearings Committee determines that fairness or safeguarding requires otherwise.

The Hearings Committee shall conduct the hearing fairly, impartially, and proportionately. The hearing notice shall include:

- allegations and alleged rule breaches;
- committee composition;
- conflict declarations;
- documents and evidence relied upon;
- submission deadlines;
- party rights, including accompaniment and support arrangements;
- possible sanctions or recommendations;
- hearing date, time and venue or video link;
- consequences of non-attendance;
- reasonable accommodation arrangements;
- appeal route and decision timeline.

Hearing Committee members should be confirmed at least fourteen working days before the hearing. Any conflict-of-interest objection should be raised within five working days of notification of committee composition. Hearings should normally be completed in one sitting. Any adjournment and the reasons for it shall be recorded in writing.

The parties shall have a fair opportunity to present their position, respond to allegations, submit evidence, call witnesses where permitted, and make submissions. A person under 18 shall be accompanied by a parent or guardian unless exceptional safeguarding reasons require a different arrangement.

24. Evidence, Non-Attendance, and Standard of Proof

Final burden of proof wording

- The burden of proving an alleged breach shall remain with the Complainant, Reporting Person.
- The Respondent shall not be required to prove innocence.
- A Responsible Person Report, Official Report, Incident Report may constitute evidence but shall not create a presumption that an alleged breach occurred.
- The standard of proof shall be the balance of probabilities.

The Hearings Committee may determine procedure, accept evidence in appropriate formats, and decide relevance, reliability, and weight. It is not bound by formal court evidence rules but must act fairly.

For non-attendance, the Hearings Committee may proceed, adjourn, or dismiss depending on reasonable notice, reasonable cause, safeguarding, prejudice, and overall fairness. A Respondent who has received reasonable notice but fails to attend without reasonable cause may have the matter determined in their absence based on the information before the Committee. In the case of a Complaint, in the event of the non-attendance, without reasonable notice reasonable cause (considered by the

Committee to be a justifiable reason for non-attendance) of a Complainant at a Hearing, the Complaint against the Respondent may be taken no further

25. Decisions and Sanctions Implementation

A written decision shall include:

- matter title;
- hearing date, time, and location;
- committee members;
- parties present or absent;
- allegations and rules alleged breached;
- evidence considered;
- procedural issues;
- findings of fact;
- decision on breach;
- reasons;
- mitigating and aggravating factors;
- sanction imposed or recommended;
- effective date;
- implementation requirements;
- appeal route and deadline.

The written decision should normally issue within seven working days of the hearing. For urgent competition or participation matters, the decision should issue within three working days where practicable. Where complexity, evidence, safeguarding, or fairness requires more time, the Chair may extend the decision period by up to 14 working days and shall notify the parties of the extension and reason.

Where the Hearings Committee recommends suspension or expulsion from membership or affiliation, implementation shall not occur until the Board has made the required constitutional determination, unless an interim protective measure is separately and lawfully imposed.

26. Appeals, SDSI Arbitration and CAS Verification

Final appeal structure and grounds

- No person shall have more than one internal appeal under this Policy.
- An appeal shall not be a full rehearing of the original matter.
- The permitted grounds of appeal are procedural unfairness, material error of fact, material error of law or rule interpretation, new evidence that could not reasonably have been available at the time of the original decision, or a sanction that is plainly disproportionate.
- Where an appeal succeeds on the permitted grounds of appeal, the Appeal Body may uphold, vary, or set aside the decision, substitute an alternative sanction where authorised, or remit the matter for rehearing before a differently constituted body.
- Where SDSI appeal arbitration is available, it shall only be used after internal dispute resolution mechanisms required by the Constitution, this Policy or applicable Regulations have been exhausted.

Confidentiality during appeals and arbitration

- The confidentiality obligations in this Policy continue throughout any appeal, review, SDSI mediation, SDSI arbitration or other external dispute resolution process.
- Appeal papers, submissions, hearing bundles, arbitral materials, and decisions shall be shared only with persons who require access for the fair administration of the process, legal advice, safeguarding, governance oversight, implementation, or compliance.
- Nothing in this clause prevents disclosure required by law, safeguarding obligations, SDSI rules, arbitral direction, regulatory requirement, insurance requirement, or implementation of a valid decision.

Original Decision	Appeal or Review Route (only one route of appeal)	Time Limit
No-prima-facie determination	Chair of National Panel	Seven working days from notification
Club Hearings Committee	Provincial appeal route	14 working days from receipt of decision
Provincial Hearings Committee	National appeal route	14 working days from receipt of decision
National Hearings Committee or final internal appeal	SDSI appeal arbitration, where permitted by the Constitution, this Policy and SDSI rules	14 working days from receipt of final internal decision, unless the applicable SDSI rules or approved appeal notice state otherwise
Board suspension or expulsion determination	Appeal route under the Disciplinary Regulations and, after exhaustion of internal routes, SDSI where permitted.	14 working days from receipt of the Board decision unless the applicable rules state otherwise
SDSI award	Further appeal only where legally available and expressly permitted by Cycling Ireland rules, SDSI rules and/or CAS rules	Legal verification required before adoption of any CAS clause

Where external arbitration is available, the relevant dispute shall be referred to Sport Dispute Solutions Ireland in accordance with the Constitution, this Policy, the Arbitration Act 2010 and the applicable SDSI Arbitration Rules. SDSI arbitration applies where an agreement, submission, regulation, contract, later arbitration agreement, or appeal provision provides in writing for arbitration, hearing or resolution under SDSI rules or by SDSI.

For SDSI arbitration, the seat shall be Dublin, Ireland and the SDSI Arbitration Rules shall apply. The standard of proof shall be the balance of probabilities unless otherwise specified in the relevant contract, constitution, regulation, or statute of the sporting body. Parties may be assisted by legal advisors or another person of their choice, notified in writing to SDSI.

The parties must exhaust available internal dispute resolution mechanisms before referral to external arbitration where the Constitution or applicable rules require exhaustion of internal remedies.

SDSI/CAS legal verification note

Sport Ireland guidance states that an appeal against an SDSI arbitration award may only be made where the rules of the sporting organisation provide for an appeal to the Court of Arbitration for Sport in Lausanne. CAS is an independent international sports arbitration body. Cycling Ireland should obtain legal verification before adopting any clause that creates, excludes, or limits a CAS route after SDSI, including the correct appeal deadline and whether CAS jurisdiction is intended for domestic Cycling Ireland disciplinary matters.

27. Records, Registers and Board Reporting

Final data retention wording

- Complaints and disciplinary records shall normally be retained for seven years following final closure of the matter.
- Safeguarding records may be retained for longer periods where required by safeguarding obligations, statutory obligations, insurance requirements, or risk management considerations.
- Records relating to suspensions, exclusions, restrictions, safeguarding restrictions, or lifetime sanctions may be retained for the duration of the sanction and for a reasonable period thereafter.
- Access to records shall be restricted to persons with a legitimate governance, safeguarding, disciplinary, legal, insurance, regulatory or administrative purpose.
- Where Board reporting is required, a summary report shall be anonymised or aggregated unless identifying information is necessary for legal, safeguarding, disciplinary, governance, implementation, insurance, or regulatory reasons.

The CDO shall maintain records of complaints, disciplinary matters, prima facie determinations, CDO decisions, hearing decisions, appeal decisions, sanctions, and implementation actions. Administrative records should be updated within five Working Days of each procedural step.

Safeguarding records and disciplinary records shall be appropriately separated. Any transfer between authorised officeholders shall be documented, and retention shall follow the approved Cycling Ireland Records Retention Schedule and applicable safeguarding and data protection requirements.

28. Confidentiality and Data Protection

Specific confidentiality controls

- Each person involved in a process under this Policy must maintain confidentiality before, during and after the process concludes.
- Parties and witnesses should be reminded at the outset that information received through the process must not be circulated, published, posted online, or discussed outside the process except where permitted by this Policy.
- Documents, evidence, reports, hearing bundles, and decisions shall be stored securely and shared only on a need-to-know basis as defined by the Children's Act.
- Where a decision or sanction must be implemented, Cycling Ireland may disclose the minimum information necessary to relevant clubs, Provincial Associations, officials, safeguarding personnel, insurers, regulators, or other persons with a legitimate need to know.
- Confidentiality does not prevent a person from obtaining legal advice, making a protected disclosure where applicable, making a statutory report, cooperating with a statutory authority, or complying with safeguarding obligations.

All records and information under this Policy shall be handled confidentially and in accordance with applicable data protection requirements. Information shall be shared only where necessary for administration of the Policy, fair procedures, safeguarding, legal obligations, implementing decisions, appeals or arbitration, governance oversight, insurance, or regulatory requirements.

All parties are reminded that, at all stages of the Complaints and Disciplinary process, including any appeal, all participants are required to respect the privacy of all others involved and treat all aspects relating to the investigation with total confidentiality.

The Complainant(s) and Respondent(s) are required to observe confidentiality in regard to the subject of the investigation and in regard to any material that engages with the investigation process. The Complainant(s) and Respondent(s) shall not discuss this subject matter, or share any documents relevant to the investigation, with any third parties unless required by law or an

order of the Court, or to their immediate family members or legal advisors, who shall likewise be bound by the same requirement for confidentiality.

Audio, video, or any other electronic recordings of investigation meetings under this procedure are not permitted. Any party to the investigation who does not comply with this requirement may be subject to disciplinary action.

Witnesses and/or persons accompanying the Complainant(s) or Respondent(s) at investigation meetings are also required to adhere to the above standards of privacy and confidentiality.

29. Policy Review

This Policy shall be reviewed no later than 12 months after the Effective Date and sooner where required by legislative change, governance requirements, constitutional change, safeguarding developments, data protection requirements, significant appeal or arbitration outcomes, operational learning, or Board direction.

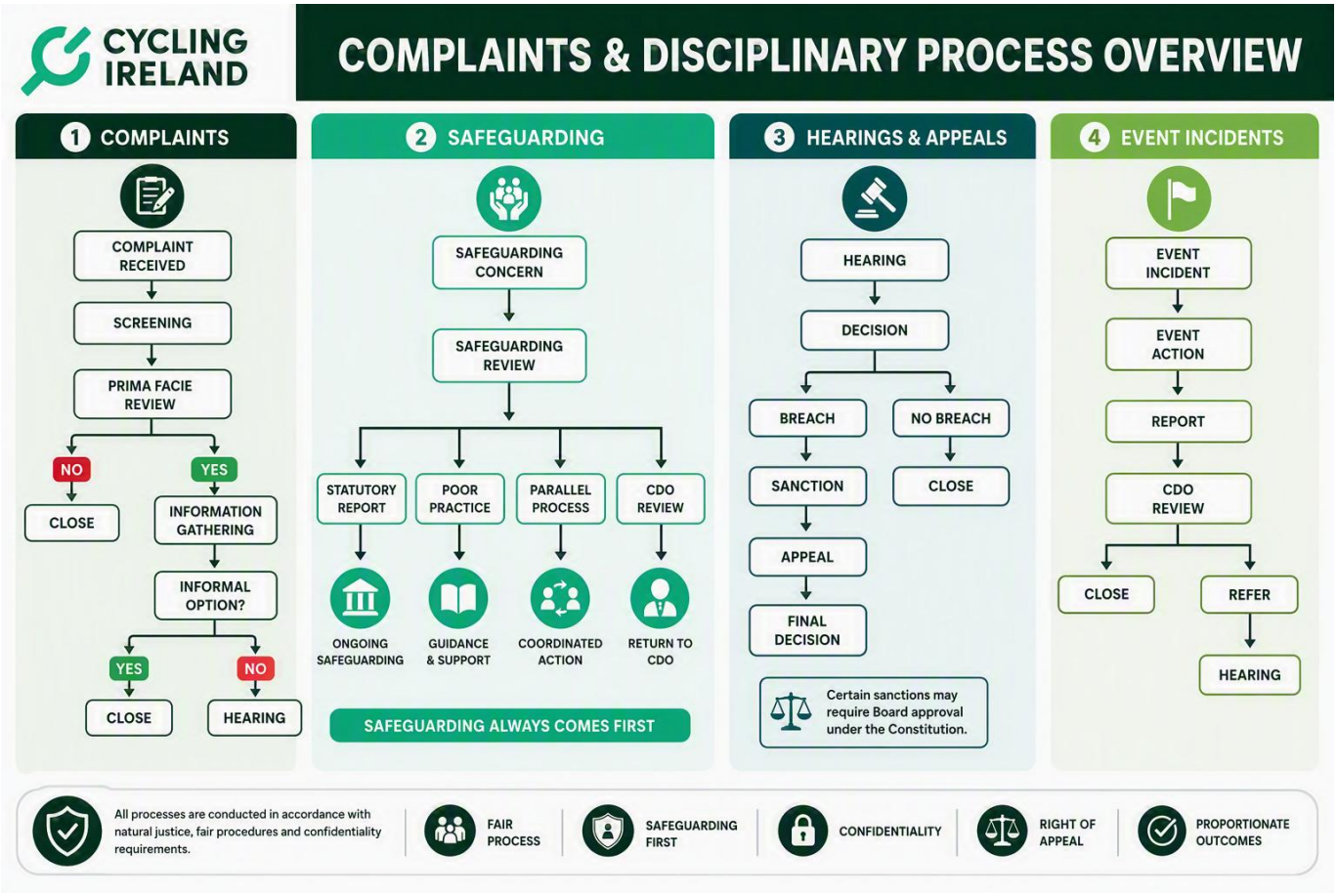
Any substantive amendment to this Policy shall be approved by the Board unless authority is delegated under the Constitution or another approved governance instrument.

30. Appendix Register

Appendix	Document	Status
1	Complaint Form	Available via CI website
2	Responsible Person / Official Disciplinary Report	Internal Document
3	Confirmation of Immediate Sanction	Internal Document
4	CDO Notification Letter to Respondent	Internal Document
5	Chairperson Hearing Notification Letter	Internal Document
6	Club Decision Notice	Internal Document
7	Cycling Ireland Decision Notice	Internal Document
8	Request to Move to Formal Mediation	Internal Document
9	Request to Move to Hearings Committee	Internal Document
10	Presenting a Complaint - Help Notes	Internal Document
11	FAQ	Internal Document
12	CDO Investigation Report Form	Internal Document
13	Request to Challenge Immediate Sanction	Internal Document
14	Appeal Notice Form	Internal Document
15	Safeguarding and Disciplinary Routing Record	Internal Document
16	Safeguarding Handover and Post-Outcome Notification Record	Internal Document

No appendix, form, template, FAQ, or guidance note shall override the master Policy unless expressly approved as an amendment by the Board.

Close-Out Clause

This Policy shall be read together with the Cycling Ireland Constitution and all related Cycling Ireland policies, procedures, rules, and regulations. Where a matter is not expressly provided for in this Policy, the relevant decision-maker shall act in a manner that is fair, proportionate, consistent with natural justice, and compatible with the Cycling Ireland Constitution and applicable law.

Where there is a conflict between this Policy and the Constitution, the Constitution shall prevail unless and until amended in accordance with its terms. Where external statutory reporting or safeguarding obligations apply, those obligations shall take precedence over ordinary complaint handling timelines.