

United States Polo Association Youth Protection Policy



Date: ____ 2021

Introduction

The United States Polo Association (“USPA”) is committed to the well-being, safety, and protection of all minor amateur athletes in its programs. This Youth Protection Policy (“Policy”), developed by USPA and Praesidium Inc., establishes USPA’s rules and minimum standard to ensure youth protection for amateur youth programs operated by USPA (“USPA Programs” or “Covered Programs”). Specifically, this Policy addresses the minimum screening, training, supervision, and reporting requirements, as well as oversight and compliance with this Policy.

Notably, this Policy is designed to incorporate federal legal requirements imposed by the Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017 (“Safe Sport Act”). The Safe Sport Act, which was enacted in 2018 in response to numerous cases of abuse in youth sports organizations, creates new federal obligations for amateur youth sports organizations that participate in international or interstate competition. Under the Safe Sport Act, such organizations are now required to:

- A. Ensure that adults report suspicions of abuse to appropriate enforcement agencies within 24 hours of learning of facts that give reason to suspect abuse;
- B. Ensure that adults in regular contact with minors complete consistent training on the prevention and reporting of child abuse;
- C. Establish reasonable procedures to limit one-on-one unobservable and uninterruptible interactions between minors and adults; and
- D. Prohibit retaliation.

This Policy is designed to, among other things, help USPA and members ensure that Covered Programs are in compliance with that law. Covered Programs are welcome to institute any supplemental protections to those outlined in this Policy, to the extent that any such supplemental measures are permitted by law and would not interfere with or undermine the protections outlined in this Policy. Any program, activity, or individual that believes that it should be exempt from all or part of this Policy must contact USPA’s Youth Protection Compliance Officer (as defined below) to request an exemption.

Purpose

To the extent that any provision of this Policy overlaps or conflicts with any other USPA policies or rules, this Policy will not supersede or replace any stricter standards set by the USPA, or any local, state, or federal laws that apply to the supervision of and interaction with youth participants. Compliance with this Policy does not eliminate or absolve Covered Programs or Covered Individuals from knowledge or performance of any additional requirements outlined in other federal, state, or local laws, or by USPA. Covered Programs and Covered Individuals remain responsible for knowing and complying with any applicable laws.

This Policy is not a contract, expressed or implied, and does not guarantee employment or participation in a Covered Program for any length of time. Nor does this Policy guarantee any fixed terms and conditions of employment with or participation in a Covered Program.

USPA reserves the right to unilaterally revise, suspend, revoke, terminate, or change any of its policies, in whole or in part, whether described within this Policy or elsewhere, in its sole discretion. This Policy will be periodically updated and any changes in its terms will be reflected in subsequent editions. Every effort will be made to keep you informed of updates to the Policy, however, we cannot guarantee that notice of revisions will be provided.

This edition of the Policy supersedes any previous youth protection policies or other policies previously distributed. Authorized Adults are required to review this Policy in order to fully understand the information contained herein. If an Authorized Adult does not understand any such information, it is the Authorized Adult's responsibility to obtain clarification with the applicable Youth Protection Compliance Officer.

After an Authorized Adult has reviewed the Policy and fully understands its contents, each Authorized Adult is required to review and sign the Acknowledgment form attached as Exhibit 1. The Acknowledgment form should be signed during onboarding, and then annually to account for any updates or changes to the policy. The Acknowledgement form should be returned to the Program Director and submitted to the Youth Compliance Officer, as defined below.

I. Definitions

For the purposes of this Policy, the following terms are defined as follows:

A. Authorized Adult

Individuals, paid or unpaid, who oversee, supervise, chaperone, or otherwise interact with Youth in and for Covered Programs, including but not limited to travel, training, tournament, and/or camp facilities. This includes, but is not limited to, employees, staff, coaches, volunteers, independent contractors, and other third parties such as referees, umpires, and athletic trainers.

B. Youth

Any individual under the age of 18 who is a participant in a Covered Program, as that term is defined in this Policy. For purposes of this Policy, "Youth" also includes individuals under the age of 18 who are employed by, intern with, or volunteer for Covered Programs.

While this definition does not include individuals who reach the age of 18 or older while participating in a Covered Program, the below-described protections should be applied to such individuals unless a specific deviation is approved by either the Program Director or Youth Protection Compliance Officer.

C. Guardian

Any adult who maintains custody and has the legal authority to care for Youth. This definition includes biological parents, legal guardians, or custodians. Guardians exercise the legal rights of Youth until they reach the age of majority.

D. Covered Individual/USPA

“Covered Individuals” include: i) all employees and independent contractors of United States Polo Association; ii) all employees and independent contractors of the USPA Intercollegiate/Interscholastic Program, Middle School League, National Youth Tournament Series, Junior International Events, USPA Umpires LLC, and any other programs/events approved by Program Directors, and each of their respective present and future affiliates (“USPA”); and iii) any other affiliates, volunteers, interns, coaches, referees, umpires, contractors, and visitors who are categorized as Authorized Adults and/or are participating in Covered Programs (as these terms are defined in this Policy).

E. Covered Programs

Any activity, event, tournament, series, academy, or other interaction involving amateur Youth participants that is operated in whole or in part by USPA. This definition includes, but is not limited to, the following amateur events: USPA Intercollegiate/Interscholastic Program, Middle School League, National Youth Tournament Series, Junior International Events, USPA Umpires LLC, Programs/Events approved by Program Liaisons, tournaments, events, leagues, showcases, private training facilities, and camps run by USPA in partnership with local member organizations.

Note that this definition does not include: i) member or league professional/non-amateur activities, tournaments, events, lessons, et al., even if the professionals involved are under the age of 18 years old; or ii) third-party programs that are run and operated by entities other than USPA, though USPA may separately address youth protection standards for any such programs.

Any international amateur Youth activities and programs will be managed as Covered Programs for purposes of this Policy; however, if an alternative youth protection policy or provision is determined to be more suitable to the circumstances of the jurisdiction(s), such policy or provision for the applicable program or jurisdiction may be arranged in coordination with and approval by the applicable Youth Protection Compliance Officer. In all cases, all international activities and programs involving amateur minors are expected to comply with any youth protection legal requirements in the applicable jurisdiction(s).

F. Youth Protection Compliance Officer

An employee who serves as a liaison with the Office of the COO in ensuring compliance with this Policy. USPA has its own Youth Protection Compliance Officer. While a Youth Protection Compliance Officer may have other duties, functions, or another formal organizational title, that individual should be identified to relevant personnel at USPA and Covered Programs as the Youth Protection Compliance Officer for purposes of this Policy.

G. Delegate

The primary function of the USPA Delegate (“Delegate”) is to be an important part in the vertical chain of command within the Association. The USPA Board of Governors provides leadership, creates policy as outlined in its Mission Statement. USPA Staff provides professional leadership

and direction to implement all Board-approved policies, budgets and procedures. Delegates are encouraged to liaise between USPA and Member clubs regarding this policy and any other Youth Protection initiatives undertaken by USPA.

A Delegate serves as an important conduit that disseminates Association information to the Members of his or her club and has traditionally overseen member actions to ensure that the club follows the rules, policies and regulations of the Association. The Delegate must also serve as the “voice” that represents club issues and fulfills membership responsibilities to the Association. In essence, how well the Delegate performs the duties and responsibilities of that position has a direct impact on the Association through membership enrollment and player support of the Association.

Each Member Club shall select a Delegate, who is at least 18 years of age and who is not employed by the Association or any of its subsidiaries, according to the Member Club’s own internal rules and procedures, to represent it in its dealings with the Association. Each Delegate shall be a Registered Player Member of the Association and shall be registered with the Member Club that he or she is selected to represent; provided, however, that with respect to any Affiliate Member Club, its Delegate may be an Affiliate Member of such Affiliate Member Club (and need not be a Registered Player Member). Whenever a new Delegate is selected to represent a Member Club, such Member Club shall provide written notice to the Association identifying the selected Delegate. No individual may serve as Delegate for more than one Member Club.

H. Program Director

An individual at the program level designated to ensure registration and compliance with this Policy. The same individual may serve as both the Youth Protection Compliance Officer and Program Director, so long as: i) another individual is identified to participants of that program as an alternative to receive reports of Policy violations; and ii) participation in the program does not impair or restrict the Youth Protection Compliance Officer’s ability to perform his or her Youth Protection Compliance Officer duties.

I. Access

Authorized Adults who have access to Youth are classified in this Policy as having high or low access:

(a) Individuals with High Access to Youth

Authorized Adults with high access to Youth include any individual who:

- is involved with the supervision, guidance, or responsibility for Youth;
- has routine or frequent interaction with Youth;
- works with or around Youth on more than one program;
- works with or around Youth on a program that meets regularly or involves multiple interactions;
- has a role that likely involves unsupervised access to Youth; or
- is a consistent and regular volunteer for programs involving Youth.

Examples of individuals typically with high access include:

- coaches and their assistants;
- camp counselors/staff;
- referees and umpires;
- tournament managers;
- individuals who: i) provide athletic training services; ii) regularly engage in volunteer opportunities that involve Youth; iii) regularly transport Youth; and/or iv) supervise Youth overnight.

(b) Individuals with Low Access to Youth

Authorized Adults with low access to Youth include any full or part-time individual who:

- works with or around Youth for a one-time program (but not programs that meet regularly or involve multiple interactions);
- is always supervised by another adult when interacting with Youth; or
- is not responsible for supervising Youth.

Examples of individuals typically with low access:

- typical food service staff;
- typical maintenance staff;
- individuals who work solely with or around other adults and not Youth; and
- one-time volunteers.

Abuse

“Child Abuse” exists when there is endangerment of a Youth’s physical or mental health due to injury by act or omission. Child Abuse includes the following:

- (a) “Neglect” includes failure, refusal, or inability on the part of a caregiver, for reasons other than poverty, to provide necessary care, food, water, clothing, medical or dental care, or shelter so as to seriously endanger the physical health of the Youth.
- (b) “Physical Abuse” includes physical injury inflicted on a Youth by other than accidental means. Physical injury includes, but is not limited to, lacerations, fractured bones, burns, internal injuries, severe or frequent bruising, or great bodily harm. Conduct qualifying as Physical Abuse may include, but is not limited to, hitting, spanking, shaking, slapping, unnecessary restraint, pushing, or other forceful physical contact.
- (c) “Verbal Abuse” includes language that is degrading or threatening, and may include verbal interactions such as name calling, insults, cursing, derogatory remarks, belittling, or shaming.
- (d) “Sexual Abuse” includes a wide spectrum of interactions with Youth including rape, sexual battery, physical sexual contact, sexually explicit or offensive verbal communication, verbal sexual harassment, voyeurism, sexually oriented conversations, sexual intercourse or sexual touching, sexual exploitation, exposing of genitalia, viewing of sexual activity, or permitting, allowing, or encouraging a Youth to engage

in prostitution.

- (e) “Emotional Abuse” includes conduct that causes harm to a Youth’s psychological or intellectual functioning, which may be exhibited by emotional damage such as severe anxiety, depression, withdrawal, or aggression. Emotional damage may be demonstrated by substantial and observable changes in behavior, emotional response, or learning, which are incompatible with the Youth’s age or stage of development. Examples of Emotional Abuse are shaming, humiliation, and cruelty.

Please refer to all applicable codes and statutes for current legal definitions of abuse, which may differ from this Policy’s definitions. For state-specific resources, please see [Child Welfare Gateway](https://www.childwelfare.gov) (<https://www.childwelfare.gov>).

J. Bullying

Verbal or physical conduct that is designed to demean, disgrace, or cause mental or physical harm to another.

K. Hazing

Any “hazing” or “initiations” that: i) may be viewed as derogatory, offensive, or insensitive to individuals based on race, color, ancestry, sex, sexual orientation, gender identity, national origin, age, disability, or religion; ii) involve unwanted physical conduct; iii) involve the destruction, misappropriation, or vandalism of personal property; or iv) are disruptive to the operations of USPA, or a Covered Program.

Examples include engaging in or encouraging others to engage in humiliating, degrading, embarrassing, or taunting Youth; requiring, coercing, or encouraging Youth to participate in an “initiation” ritual that is illegal or places him or her in physical danger; requiring, coercing, or encouraging activity that requires the consumption of alcohol or drugs or poses a risk of bodily harm; and recording audio, video, or photographs of any hazing conduct.

II. Administration

A. Program Registration

Each Program Director must register the Covered Program with the Youth Protection Compliance Officer and complete program registration materials for each Covered Program. The registration materials must collect information including: name of the Covered Program, Program Director, description of the Covered Program, dates of operation, name of all Authorized Adults, location of program operation, the number and location of any overnight stays, age range and estimated number of participants, names of participants, Authorized Adult-to-Youth ratios, training compliance records for Authorized Adults, and background check records for Authorized Adults.

The Program Director must keep records of each category of information and be able to produce them upon request.

B. Screening and Selection

All Covered Programs must adhere to adequate screening and selection criteria for Authorized Adults. All steps must be completed before an Authorized Adult is permitted to interact with Youth in a paid or unpaid position. USPA reserves the right to repeat background screening any time after employment or volunteer services have begun.

No individual may be approved as an Authorized Adult if that individual: i) has a criminal conviction (including a plea of no contest or *nolo contendere*), civil judgment, or finding by a court or credible investigative body that the individual committed any act, however classified, that would constitute Child Abuse under this Policy, including child endangerment, Sexual Abuse, Neglect, or similar offenses; or ii) is listed as a registered sex offender on any state or federal registry. Other determinations of fitness are left to the discretion of the Covered Program, so long as disqualification criteria are approved by the applicable Youth Protection Compliance Officer.

(a) Individuals with High Access to Youth

Screening and selection of Authorized Adults who have high access to Youth will include the following:

1. A standard application designed to screen for Child Abuse, such as the form attached as Appendix B;
2. Signing of this Policy's Acknowledgement by Authorized Adults;
3. A multi-state criminal background check that includes county-level information;
4. A national sex offender registry check;
5. Face-to-face interviews, when possible, using behaviorally-based standardized questions designed to assess for potential risk to abuse; and
6. A minimum of three references, at least one of whom is personal.

(b) Individuals with Low Access to Youth

Screening and selection of individuals who have low access to Youth should include:

1. A standard application designed to screen for Child Abuse;
2. Signing of this Policy's Acknowledgement by Authorized Adults;
3. A national sex offender registry check; and
4. A multi-state criminal background check that includes county-level information.

(c) Previously Approved Authorized Adults

Every Authorized Adult involved in a Covered Program must be screened regardless of previous employment or volunteer experience with a Covered Program. To the extent that prior standard Covered Program forms or background checks have been approved within the past 12 months, any

such form or approval may be applied to other Covered Programs within 12 months from the date of approval.

Regardless of a staff member's access to Youth or prior screening, USPA will conduct the following searches on all existing Authorized Adults, annually:

- A multi-state criminal background check that includes county-level information; and
- A national sex offender registry check.

Authorized Adults who at the time of implementation of these policies do not have access to Youth but subsequently begin working with or around Youth, should complete the items listed above in the high or low access category (whichever is applicable).

C. Training

The Safe Sport Act requires that Authorized Adults in regular contact with Youth must have adequate education and training. All Authorized Adults with high access to Youth must complete USPA-approved Child Abuse prevention, US Center for Safe Sport training certification, continuing education training, and mandatory reporting training courses. Specifically, any such Authorized Adults who will have high access to youth during events operated in conjunction with USPA must complete the U.S. Center for SafeSport training, which is an USPA-approved training. Any alternative training offered to Authorized Adults with high access to Youth to satisfy this annual training requirement must be approved by USPA's Youth Protection Compliance Officer in advance.

No Authorized Adult required to be trained will be allowed to conduct or participate in a Covered Program until the training is complete and relevant documentation is submitted to the Program Director.

D. Enforcement

This Policy will be implemented and strictly enforced by the Office of the COO, as designated herein. Failure to comply will result in corrective action, up to and including suspension, expulsion, dismissal, termination, or any other discipline authorized by the USPA Constitution, By-Laws and Policies.

E. Facility Rentals and Third-Party Relationships

USPA Agreements governing facility rentals, partnership in non-USPA sponsored events such as Member and Third-Party Programs, must include the following items:

1. An agreement to defend, indemnify and hold harmless USPA from and against any and all claims, causes of action, losses, liabilities, damage, or judgments directly or indirectly related to sexual misconduct or Child Abuse. Sample indemnity language is set forth in Exhibit A.
2. An agreement requiring the other party to maintain certain types and amounts of liability insurance to protect the interests of USPA. A copy of the insurance provision to be

included in the agreement is set forth in Exhibit A, which is attached hereto and incorporated by reference herein.

3. Confirmation that all adults responsible for Youth at Member/Third-Party facilities have cleared some minimal screening (which should include a national criminal background check and national sex offender registry check).
4. Confirmation that adults responsible for Youth at Member/Third-Party facilities have received some minimal Child Abuse prevention training (which should include the identification, prevention, and reporting of Child Abuse, including Sexual Abuse).
5. Defined supervision procedures in place for monitoring program participants (i.e., adult-to-Youth ratios and management of high-risk times and high-risk activities). For joint events, these should clearly delineate supervision responsibilities between the organizations.
6. Reporting incidents or allegations of sexual misconduct (involving adults or Youth) back to USPA.

III. General Interaction Standards for Covered Programs

Authorized Adults should serve as positive role models for Youth and act in a caring, honest, respectful, and responsible manner that is consistent with the mission and guiding principles of USPA. The following provisions detail the boundaries of permissible interactions across all aspects of Covered Programs. The next section will deal more specifically with certain high-risk scenarios within Covered Programs.

For clarification of any provision, or to inquire about behaviors not addressed here, contact your Program Directors or Youth Protection Compliance Officer.

The Code of Conduct or this Policy should be provided to all Authorized Adults, as well as to any Guardian(s) upon request.

A. Code of Conduct for Interactions with Youth

1. Authorized Adults will exhibit the highest ethical best practices and personal integrity.
2. Authorized Adults will provide a professional work environment that is free from physical, psychological, written, or verbal intimidation or harassment.
3. Authorized Adults will not Physically, Sexually, or Emotionally Abuse or Neglect a Youth, including but not limited to the conduct defined in the Child Abuse definition in this Policy.
4. Authorized Adults will share concerns about Child Abuse, Policy violations, or inappropriate behavior as required by this Policy.
5. Authorized Adults will report any suspected Child Abuse of a Youth to the proper authorities.
6. Authorized Adults will accept their personal responsibility to protect Youth from Child Abuse.
7. Youth will be treated with respect at all times.
8. Authorized Adults will maintain appropriate physical and relationship boundaries with Youth.

9. Authorized Adults will adhere to uniform standards of displaying affection as outlined in this Policy.
10. Authorized Adults will avoid affection with Youth that cannot be observed by others.
11. Authorized Adults will not use profanity or tell inappropriate jokes.
12. Authorized Adults will not involve Youth in their personal problems or issues.
13. Authorized Adults will not engage in sexually oriented conversations with Youth, including not discussing their sexual encounters.
14. Authorized Adults will not date or become romantically involved with Youth.
15. Authorized Adults will not use or be under the influence of alcohol or drugs while supervising youth, or at a Covered Program.
16. Authorized Adults will not have sexually oriented materials, including printed or online pornography, on Covered Program property or in the presence of Youth.
17. Authorized Adults will not ask Youth to keep secrets.
18. Authorized Adults will not give money or gifts to Youth, except with permission of the Program Director.
19. Authorized Adults will not stare at or comment on Youths' bodies for any non-instructional reason related directly to the sport of Polo.
20. Authorized Adults will never be nude or inappropriately dressed in the presence of Youth. Authorized Adults must be appropriately dressed at all times.
21. Authorized Adults will comply with the Covered Program's policies regarding interactions with Youth outside of the Covered Program.
22. Authorized Adults will not engage in prohibited or unprofessional electronic communication with Youth.
23. Private living areas or bedrooms of Authorized Adults are not to be used for Covered Programs or by Youth.
24. Authorized Adults are prohibited from working one-on-one with Youth in a private setting that cannot be interrupted.
25. Authorized Adults are to prohibit and ensure that Youth do not engage in the following prohibited activities:
 - a. Hazing
 - b. Bullying
 - c. Derogatory name-calling
 - d. Ridicule or humiliation
 - e. Sexual activity
26. Authorized Adults may not have engaged in or been convicted of a Child Abuse offense, however classified, or be a registered sex offender.
27. Authorized Adults are prohibited from speaking to Youth in a way that is, or could be construed by any reasonable observer, as unduly harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
28. Authorized Adults will adhere to the provisions of this Policy both during and outside of Covered Programs.

B. Physical Contact Guidelines

The below physical contact examples aim to promote a positive, nurturing environment while protecting Youth and Authorized Adults from misunderstandings:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders 	<ul style="list-style-type: none"> • Full-frontal hugs that include contact of intimate body parts • Kisses • Showing affection in isolated areas or while one-on-one • Authorized Adults sleeping in a bed with a Youth (except Guardians with their children) • Lapsitting • Wrestling • Piggyback rides • Tickling • Allowing a Youth to cling to an Authorized Adult’s leg • Any type of massage given by or to a Youth outside of accepted and documented medical treatment • Any form of affection or contact that is unwanted by the Youth or the Authorized Adults • Touching bottom, chest, or genital areas

C. Verbal Interaction Guidelines

Below are some examples of appropriate and inappropriate verbal interactions:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise • Correction 	<ul style="list-style-type: none"> • Name-calling • Discussing sexual encounters • Involving Youth in the personal problems or issues of Authorized Adults • Asking Youth to keep secrets • Cursing • Inappropriate or sexual jokes • Shaming • Belittling

	<ul style="list-style-type: none"> • Derogatory remarks • Harsh language that may frighten, threaten, or humiliate Youth • Derogatory remarks about the Youth or his/her family
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D. Discipline of Youth Guidelines

Authorized Adults will establish age-appropriate expectations and behavioral guidelines for Youth. To the extent that discipline of Youth is warranted, each Covered Program shall apply such discipline in a professional and fair manner, including retaining the option to exclude participants from future Covered Programs.

In all cases, Authorized Adults are prohibited from using physical contact for the behavior management of Youth. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate behaviors by Youth.

Below are some examples of appropriate and inappropriate discipline practices:

<i>Appropriate Discipline Practices</i>	<i>Inappropriate Discipline Practices</i>
<ul style="list-style-type: none"> • Develop team rules and be consistent in enforcement • Remain calm but firm • Remind Youth of appropriate actions • Address the behavior, not the character of the Youth • Loss of privileges • Game or activity restrictions, such as not starting or sitting out of a game 	<ul style="list-style-type: none"> • Hitting • Spanking • Shaking • Slapping • Using extreme or unreasonable (in length or type) physical exercise as a consequence • Withholding food, water, light, or medical care • Name-calling • Shoving or pulling hair or ears • Biting • Pinching • Shaming • Derogatory remarks • Ostracizing • Mechanical tape or rope restraints • Punishment for toileting accidents • Angry yelling directed at Youth

E. One-on-One Interaction

In accordance with the requirement of the Safe Sport Act, Covered Programs must establish reasonable procedures to limit one-on-one unobservable or uninterruptible interactions between Authorized Adults and Youth.

Any one-on-one uninterruptible interactions must be reported to the Program Director in advance, or, if unexpected, reported to the Program Director promptly after the interaction.

In those situations where one-on-one interactions are approved, Authorized Adults should observe the following additional guidelines to manage the risk of Child Abuse or false allegations of Child Abuse:

Additional Guidelines for One-on-One Interactions

- When meeting one-on-one with a Youth, always do so in a public place where you are in full view of others. One-on-one interactions may only occur at an observable and interruptible distance from another adult.
- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes, as described above.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other Authorized Adults that you are alone with a Youth and ask them to randomly drop in.
- Document and immediately report any unusual incidents, including disclosures of Child Abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

F. Outside Contact

Contact outside of regularly scheduled activities (“Outside Contact”) presents increased risk of Child Abuse or Policy violations. The provisions of this Policy apply to all interactions between an Authorized Adult and Youth, regardless of whether those interactions occur within the confines of a Covered Program.

Any Outside Contact between an Authorized Adult and Youth must be reported to the Program Director in advance, or if unexpected, reported by the Authorized Adult to the Program Director promptly after the interaction, unless the Authorized Adult and Youth: i) are in a familial relationship; ii) encounter each other and remain entirely in the presence of the Youth’s Guardian during the encounter; or iii) encounter each other in passing while in a public setting, such as a grocery store, church, or similar environment, during which they are at all times in the visible presence of other adults and engage in only limited contact, such as an exchange of pleasantries.

If an Authorized Adult expects repeated or regular Outside Contact with Youth due to circumstances outside of the Covered Program—such as where they are neighbors, the Authorized

Adult works at the Youth's school, or the Authorized Adult is the parent of a Youth's close friend—such circumstances must be discussed in advance with the Program Director.

When engaging in Outside Contact, ensure that the following steps are followed:

- Program Directors should identify for Authorized Adults what types of Outside Contact are appropriate and inappropriate, beyond the examples listed below.
- Ensure that Authorized Adults have the written (including email) permission of the Guardian(s) to engage in Outside Contact with the Youth, and, if possible, Guardian(s) have executed a release-of-liability statement.
- Such Outside Contacts should only take place in an observable and interruptible distance from other Authorized Adults or Guardians.

Below are some examples of appropriate and inappropriate Outside Contacts:

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none"> • Familial relationships, passing neighborhood or school interactions • Outside interactions that occur entirely in the presence of a Youth's Guardian • Encounters in a public setting, in which Youth are in and adults engage in limited interaction in view of others • Taking groups of Youth on an outing, with notice to Guardians • Attending sporting activities with a group of Youth, with notice to Guardians • Attending functions at a Youth's home, with Guardian(s) present • Home visits, with Guardian(s) present 	<ul style="list-style-type: none"> • Taking one Youth on an outing without the written permission of the Guardian(s) • Visiting one Youth in the Youth's home, without a Guardian present • Entertaining one Youth in the home of an Authorized Adult • A lone Youth spending the night with an Authorized Adult

G. Electronic Communication

In electronic communications, Authorized Adults are to maintain the same bounds of professional communication outlined in this Policy.

All electronic communication between Authorized Adults and Youth must be transparent. No private one-on-one electronic communications between an individual Authorized Adult and an individual Youth are permitted, including but not limited to text, email, instant messages, and communications through social networking websites such as Facebook, Instagram, Snapchat, and WhatsApp. In all such communications, another Authorized Adult or Guardian must be cc'ed or otherwise included on the message. To the extent that a Youth reaches out to an individual Authorized Adult for such a communication, the Authorized Adult must either add another Authorized Adult or Guardian to the communication, or promptly inform the Youth that the Authorized Adult is not permitted to continue the communication in that manner.

The following are examples of appropriate and inappropriate electronic communication:

<i>Appropriate Electronic Communication</i>	<i>Inappropriate Electronic Communication</i>
<ul style="list-style-type: none"> • Sending and replying to emails and text messages from Youth ONLY when copying in another Authorized Adult or the Youth's Guardian(s) • Communicating through "organization group pages" on Facebook or other approved public forums, and posting photos of participants only on official USPA social media platforms. • For any material, posts, or other information that does not conform to this Policy, Authorized Adults use only "Private" profiles or other methods that Youth cannot access 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments • Sexually oriented conversations • Private messages between Authorized Adults and Youth • Posting pictures of youth participants on Authorized Adults' personal social media sites is prohibited. • Posting inappropriate comments on pictures

Program Directors are encouraged to provide this information to your participant's Guardian(s) so that they know what is appropriate and inappropriate from your Authorized Adults. If a participant's Parent or Guardian would like to opt out of any electronic communication from or on behalf of USPA staff or Authorized Adults on behalf of their child, they must indicate this in writing and this must be kept in the participant's records.

H. Gift Giving

Due the role of gifts, particularly secretive gifts, in Child Abuse, any proposed gift or benefit (outside of game-related awards) must be disclosed to the Program Director and the Guardian(s) of the gift recipient(s). In considering any such gifts, Authorized Adults should consider providing gifts to groups of Youth (i.e. an entire team), rather than individuals.

Gifts subject to this provision include anything of value from the individual Authorized Adult, including but not limited to objects, money, payment, favor, discount, entertainment, hospitality, loan, services, meals, travel expenses, or other items of value outside of the standard provisions of the Covered Program.

I. Youth-to-Youth Activities

Most serious incidents of Youth-to-Youth Child Abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. The following interactions are prohibited and Authorized Adults are obligated to prevent them:

<i>Prohibited Youth-to-Youth Interactions</i>
<ul style="list-style-type: none"> • Hazing • Bullying • Derogatory name-calling • Singling out one Youth for different treatment • Ridicule or humiliation • Sexual activity during a Covered Program

In order to adequately respond to and track incidents within the program, all sexual activity during a Covered Program between Youths and sexualized behaviors of Youths must be consistently documented.

IV. Interaction Standards for Specific High-Risk Activities

While the above interaction requirements apply in all scenarios, certain aspects of Covered Programs are particularly challenging from a Youth protection standpoint. Standards for some such activities are detailed below. Any questions about these standards or other activities not covered should be directed to the Program Director.

In reviewing these standards, certain concepts repeat, which are worth highlighting below:

- *“rule of three”* – ensure that there are always at least three participants—specifically, at least two Authorized Adults are required to accompany a single Youth, or at least two Youth must be present with a single non-Guardian Authorized Adult. This rule does not apply to or limit interaction between a Youth and the Youth’s Guardian.
- *“zone monitoring”* – ensure that Authorized Adults are assigned specific areas to supervise, with for example, one Authorized Adult in each corner of the area, one or more Authorized Adults posted near the exits, etc.
- *“ratio of Authorized Adults to Youth”* – ensure that there are enough Authorized Adults to supervise the volume of Youth present. For example, generally, a minimum ratio for Authorized Adults to Youth at a typical event would be 1:6 for 7-8 year olds, 1:8 for 9-14 year olds, and 1:10 for 15-18 year olds.

A. Bathroom & Locker Room Activities

If possible, staff and volunteers should use staff/adult-only bathrooms.

Monitoring Bathrooms

- In some settings, group bathroom breaks are not always feasible. In these circumstances, Youth should ask permission before using the bathrooms, so that Authorized Adults know who is going to the restroom and when.

- Authorized Adults should randomly and periodically monitor bathrooms to ensure that Youth are not lingering there. It is important that Authorized Adults periodically check restrooms so that Youth know that an Authorized Adult could walk in at any time.

Public Bathrooms

- When using public bathrooms, Youth should utilize the “rule of three” and when possible, Authorized Adults should monitor outside the bathroom.
- Authorized Adults should check the bathroom prior to the Youth going in to ensure that other adults are not using the bathroom. If possible, Authorized Adults should wait until other adults are no longer in the bathroom and then begin to send Youth in small groups.
- If it is not possible to wait for other adults to leave the bathroom, Authorized Adults should stand at the doorway and verbally check-in with the Youth to ensure that they are not lingering and to inform other adults that the Youth are being supervised.

Showering

- Authorized Adults and Youth must shower at different times. Create schedules that will permit supervision of the Youth while Authorized Adults shower.
- While Youth change clothes and shower, at least one Authorized Adult should stand in the bathroom or locker room doorway and within earshot of the Youth.
- Ensure that only one Youth is in each shower.
- Where possible, consider ensuring shower curtains do not go all the way to the floor, so that Authorized Adults can easily see how many Youth are in each shower stall from the doorway.

Recording Devices

Use of any recording devices, including cell phones, tablets, and cameras is strictly prohibited in all bathrooms and locker rooms.

B. Transition Times and Free Times

- Designate certain areas as off-limits during these times by setting specific and narrow geographic boundaries.
- Depending on the age of Youth, ensure that Authorized Adults are assigned specific areas to supervise during transition times and free times. This “zone monitoring” ensures that all accessible areas are monitored. Assign more Authorized Adults to high-risk areas and activities (i.e., parking lots, playgrounds, isolated areas, etc.).
- Create specific bathroom procedures during transition times and free times. Then, designate which bathrooms will be available to Youth. Authorized Adults should be posted at (or responsible for spot-checking) each available bathroom to actively monitor the Youth.
- Require Authorized Adults to conduct periodic sweeps of the entire activity area. If Youth are lingering outside of the planned activity area, the Authorized Adult should encourage these Youth to return to the designated areas.
- Require the presence of a senior staff member during transition and free times (including before and after the Covered Program).

C. Evening Events and Activities

- Apply the same procedures used to monitor transition and free times, as listed above.
- Ensure that Authorized Adults are assigned to supervise specific areas during the activity, in addition to the transition times.
- Conduct head counts at random intervals throughout the activity. At some point during night games, each Authorized Adult should formally ascertain that all Youth are present.
- During some activities, consider stopping the game to make sure that all Youth are present.
- Create roll sheets that Authorized Adults must turn in at the end of the night.
- Require the presence of an Authorized Adult during night games.

D. Transporting Youth

Private Vehicles: Group transportation is preferred to private vehicles. When it is necessary to transport Youth in private vehicles, Authorized Adults must adhere to the following:

- Administrators/Supervisors are notified.
- The “rule of three” is used when transporting Youth.
- Obtain written permission from a Guardian for transportation.
- Youth are transported directly to their destination. No unauthorized stops are made, though supervisor authorization may be granted by Guardian(s) for necessary stops, including meals.
- Authorized Adults document beginning and ending time and mileage, the names of Youth and Authorized Adults who are involved in transportation, purpose of the transportation, and destination.
- Authorized Adults avoid unnecessary physical contact with Youth while in vehicles.
- Authorized Adults do not engage in prohibited verbal interactions with Youth.

Bus or Van:

- Determine the ratio of Authorized Adults necessary to adequately supervise the Youth.
- The driver may not be assigned as a supervisor for the Youth.
- Authorized Adults should be randomly seated throughout the bus for easier supervision of Youth, with at least one Authorized Adult in the front of the bus and one in the far rear. Authorized Adults should sit in the aisle or in an outside seat so they can supervise Youth on the bus.
- Youth should be seated by grade, gender (if possible), and behaviors.
- Authorized Adults shall not share blankets with Youth or sleep in the same seat with a Youth.
- Take a head count or roll call before loading and after unloading vehicles.

Public Transportation:

- Determine the ratio of Authorized Adults necessary to adequately supervise the Youth.
- Youth should remain in one area of the bus, if possible.
- Authorized Adults who are assigned to a group should remain with that group on the bus.
- Take a head count or call roll immediately after entering and leaving the bus.

E. Day Trips, Field Trips, Professional Sporting Events, or Other Outings

- Obtain written prior approval from a Program Director.
- Obtain written prior permission from the Youth's Guardian(s).
- Determine the ratio of Authorized Adults necessary to adequately supervise the Youth.
- Require that Youth are monitored at all times, either by being visible to a supervisor or aware of supervising structure.
- While supervising or assisting private activities, such as dressing or showering Youth, follow the above-described bathroom protocols and the "rule of three."
- Set boundaries at the location. Tell the Youth where they may and may not go. Then either post Authorized Adults around the boundaries or have them check in at regular intervals, including entrance and exit points.
- Assign remaining Authorized Adults to monitor specific areas, including bathrooms. Authorized Adults should also be assigned to actively supervise the Youth.
- Youth should check in at meeting points at least once every hour.
- Youth have the Program Director's cell phone number for emergencies and the Program Director has the Youth's cell phone numbers.
- Authorized Adults are on duty at all times. There is no time off on a trip. Authorized Adults are required to be active supervisors of the Youth and not passive observers.

F. Overnight Trips and Events

Supervision:

- Determine Authorized Adult-to-Youth ratios for all overnights and events.
- During non-sleep times, the above protocols for Day Trips apply, including receiving advanced approvals and that Authorized Adults are on duty at all times, regardless of the duration of the trip.
- Youth must be supervised by an Authorized Adult at all times that they are not in their rooms. The Program Director may designate limited times and areas in which Youth may walk around unaccompanied by an Authorized Adult, but the Youth must still be supervised, specifically with respect to ensuring:
 - Physical boundaries are clearly defined;
 - Youth check in at meeting points at a minimum of one hour intervals with no one dismissed until all have checked in safely;
 - Youth must stay within areas accessible to the general public
- Designated Authorized Adults are to be on duty in the halls or cabins at night until after lights out and all rooms are quiet.
- Night security is to be accessible at all times. Authorized Adults may retire only after night security is on duty. Night security may not be released until relieved by Authorized Adults.
- Authorized Adults are to regularly check rooms until after lights out.

Sleeping Arrangements:

- Overnight stays at private homes in connection with a Covered Program are prohibited, including Airbnbs or VRBOs. Overnight stays may only occur in hotels, dorms, cabins, or other group rooms.

- Authorized Adults are prohibited from changing clothes in the presence of Youth, and all above bathroom, showering, and other protocols apply.
- In group rooms, supervising Authorized Adults should be placed in bunks to maximize supervision around the cabin.
- For overnight stays in hotel rooms:
 - Assign Youth to rooms based on sex and age.
 - Authorized Adults do not share rooms with Youth, unless the Authorized Adult is the Youth's Guardian.
 - Youth are instructed to change clothes in bathrooms.
 - Where possible, participants in Covered Programs who are 18 years old or over will not room with Youth.

Notify parents and Guardians of the procedure for determining sleeping arrangements for overnight stays.

V. **Responding and Reporting**

A. **Responding**

In the event that a Covered Individual witnesses suspicious or inappropriate behaviors or Policy violations from an Authorized Adult, the Covered Individual is instructed to do the following:

<i>Guidelines for Authorized Adults' Response to Suspicious or Inappropriate Behaviors and/or Policy Violations</i>
<ul style="list-style-type: none"> • Interrupt the behavior, if physically safe to do so. • If Child Abuse or another Policy violation is disclosed to you, assure the individual disclosing that he or she was correct to tell you. • Protect the alleged victim from intimidation, retribution, or further Child Abuse. • Immediately report the behavior as described in this Policy. • If you are not comfortable making the report directly, make it anonymously. But keep in mind that anonymous reports can be much harder to investigate, and Youth are better served if you provide your name when making a report. • If the report is about a person designated to receive such reports, contact the next level of management. • Document the incident, disclosure, or circumstances causing your suspicion of Child Abuse. • Document your report, including when, how reported, and to whom you reported it, but do not conduct an investigation.

B. **Reporting**

Internal reporting refers to reports made to USPA, Members, or Covered Programs. External reporting refers to reports made to law enforcement or other governmental agencies or entities outside of USPA and its Members. All Covered Individuals – including Authorized Adults, Program Directors, and Youth Protection Compliance Officers – must be made aware of their reporting responsibilities under this Policy and applicable law.

Failure of a Covered Individual to make an internal or external report under this Policy may result in disciplinary actions up to and including suspension, expulsion or termination, in addition to civil and criminal penalties available by law.

Internal Reporting:

Every Covered Individual must notify the appropriate contact of violations of this Policy, as follows:

Any violations of this Policy other than Child Abuse (“Other Policy Violations”) must be reported to the Program Director, or if the Program Director is not available or appropriate for the situation, to the USPA Youth Protection Compliance Officer.

Any suspicion that a Covered Individual or Youth committed an act of Child Abuse, or that a Covered Individual failed to report Child Abuse, as defined in this Policy, must be immediately reported to USPA’s Youth Protection Compliance Officer or COO.

If needed, anonymous reports may be made directly to <https://signnow.com/s/l57qQMNv>, but please keep in mind that anonymous reports are hard to investigate and that a direct report is advised. The hotline information is: <https://signnow.com/s/l57qQMNv>.

The internal reporting requirements are for purposes of this Policy and do not absolve Covered Individuals from any reporting obligations that they have under state or federal law, as described below. In other words, internal reporting is not a substitute for external reporting.

External Reporting:

As required by mandated reporting laws, including the Safe Sport Act, Authorized Adults must report any suspected Child Abuse of a Youth—whether on or off program property or whether perpetrated by staff, volunteers, or others, including other Youth—to local authorities.

Reports may be made confidentially and anonymously. Various laws provide that a person who mistakenly reports suspected Child Abuse is immune from civil or criminal liability as long as the report was made in good faith.

The Safe Sport Act specifically requires any Authorized Adult who “learns of facts that give reason to suspect that a child has suffered an incident of child abuse” to report the suspicion to the appropriate entity within 24 hours of learning such facts. Further, Authorized Adults interacting with Youth affiliated with USPA must also report such suspicions to the U.S. Center for SafeSport (<https://safesport.org/report-a-concern>). For state-specific information on local reporting requirements, including the entity to which one should make report and any supplemental local reporting requirements, refer to the [Child Welfare Gateway](https://www.childwelfare.gov/topics/systemwide/sgm/) (<https://www.childwelfare.gov/topics/systemwide/sgm/>).

VI. Investigation and Resolution

Any violation of this Policy can lead to discipline, up to and including suspension, expulsion or termination and prohibition on future involvement with Covered Programs.

A. Child Abuse

Investigation and resolution of Child Abuse matters covered by this Policy will be conducted by USPA's Youth Protection Compliance Officer or CEO.

B. Other Policy Violations

1. Acts by Authorized Adults:

As noted above, Authorized Adults are required to report any Other Policy Violations to the Program Director USPA Youth Protection Compliance Officer. The person receiving the report should respond accordingly, using the below guidelines:

<i>Guidelines for Covered Programs' Responses to Other Policy Violations</i>
<ul style="list-style-type: none">• Discuss the violation with Covered Program administration and determine the appropriate administrator to respond to the concern.• Determine the appropriate response based on the report.• Review the file of the Authorized Adult to determine if similar complaints were reported.• Document the report on the appropriate form.• Gather information about the violation, as appropriate, including potentially speaking with witnesses and the accused Authorized Adult. If there is any indication of law enforcement involvement, notify the USPA Youth Protection Compliance Officer. before speaking with the reported individual or any other potential witnesses, to avoid interfering with law enforcement.• If at any point in gathering information about a report, a concern arises about possible Child Abuse, cease any investigation and promptly contact: i) USPA's Youth Protection Compliance Officer or CEO; and ii) the appropriate government authorities.• If appropriate, notify Guardian(s).• Advise the person who reported the behavior that the report is being taken seriously.• Determine the immediate needs of the victim.• Determine whether the incident triggers any disclosure or reporting requirement.

Based on the information gathered, the following steps may be taken:

- a. Determine whether to remove the Authorized Adult's access to the Covered Program or Youth during the pendency of any internal assessment or investigation.
- b. If a determination is made that the accused Authorized Adult violated the Policy, evaluate appropriate disciplinary action against the accused Authorized Adult, up to

and including termination and prohibition on future involvement with Covered Programs.

- c. Increase monitoring or supervision of the Authorized Adult or Covered Program.

If Policy violations with Youths are confirmed, the Authorized Adult may be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the progressive disciplinary process outlined below.

- d. Determine if system changes are necessary, such as: i) increased supervision; ii) revised policies or procedures; and iii) additional training.

2. Youth-to-Youth Conduct

If in connection with a Covered Program, an Authorized Adult sees a Youth exhibit sexualized behaviors, is informed of Youth-to-Youth sexual activity, or suspects Youth-to-Youth sexual activity, the Authorized Adult shall do the following:

- Interrupt the behavior and separate the Youths. Do not investigate.
- Report the behavior to the Program Director or Youth Protection Compliance Officer, who should report it to the COO. If needed, anonymous reports may be made directly to USPA's Youth Protection Compliance Office hotline (please see Section V(B) for reporting information), but please keep in mind that anonymous reports are hard to investigate and that a direct report is advised.
- If at any point in gathering information about a report of Youth-to-Youth sexual activity, a concern arises about possible Child Abuse, cease any investigation and promptly contact: i) Office/department responsible for investigations ; and ii) the appropriate government authorities.

The Program Director or Youth Protection Compliance Officer should discuss with the COO whether to notify the Guardian(s) and/or authorities.

The Program Director and Youth Protection Compliance Officer shall determine what can be done to prevent a recurrence, such as:

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.
- Develop a written corrective action or follow-up plan in response to the incident.
- Alert others in the organization (to the extent permitted).

VII. Anti-Retaliation

Retaliation against an individual for reporting Child Abuse or any Other Policy Violation, or for participating in an investigation of such reports, is strictly forbidden.

Acts of retaliation should be reported to a Program Director and will be promptly investigated and addressed, including potentially by discipline up to and including dismissal or termination.

Appendix - Policy Acknowledgement Form

**Authorized Adult
Acknowledgement**

I have received a copy, read, and voluntarily agree to comply with USPA's Youth Protection Policy. I understand that failure to comply with this Policy may result in removal from my Program.

Please Print

Name

Position

Program

Signature

Date
