



# ATHLETE / MEMBER PROTECTION POLICY

George Pocock Rowing Foundation

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**It is the policy of the George Pocock Rowing Foundation (GPRF) to provide an environment free of any forms of bullying, hazing, harassment (including sexual harassment), emotional misconduct, physical misconduct and sexual misconduct (including child sexual abuse and/or grooming behaviors).**

To accomplish this, this policy is designed to avert, identify, and address at the earliest level, any of the above forms of misconduct, as soon as possible and achieve an appropriate resolution to any allegation of misconduct.

This policy supplements, and does not replace, any applicable state or federal laws and regulations. Complaints under these laws and regulations shall be processed through the procedures established by the appropriate state and/or federal agencies responsible for their enforcement.

It is a violation of this policy for any staff member, volunteer, athlete, member, parent, visitor, guest, or any other party with a relationship with GPRF, to engage in any of the above forms of misconduct.

This policy will be maintained, recorded and published in any comprehensive publication of rules, regulations, procedures and standards of conduct for GPRF and will also be distributed to all staff members and volunteers, including without limitation, coaches, faculty and staff who work with athletes or members at GPRF, as well as to athletes and members in orientation programs.

This policy will be annually reviewed for relevance, utility and necessity by GPRF senior staff and risk managers and updated accordingly. Updates will be published to all parties.

This policy will be reviewed during regularly schedule, required staff training and signed annually by all coaches, staff and volunteers working with youth.

## 1. Introduction

There are a lot of reasons to play sport – at any level. A life-long activity, people often play sport to have fun and spend time with friends. Sport also encourages a healthy lifestyle, builds self-confidence; athletes also do better off the field. They learn goal-setting, teamwork and time management skills. Athletes are less likely to use cigarettes, drugs and alcohol; they have higher graduation rates and are more likely to attend college.

Unfortunately, sport can also be a high-risk environment for misconduct, including child physical and sexual abuse. Here, we identify six primary types of misconduct:

- Bullying
- Harassment
- Hazing
- Emotional Misconduct
- Physical Misconduct
- Sexual Misconduct, including Child Sexual Abuse

Misconduct may damage an athlete's psychological well-being; athletes and members who have been mistreated experience social embarrassment, emotional turmoil, psychological scars, loss of self-esteem and negative impacts on family, friends and the sport. Misconduct often hurts an athlete's competitive performance and may cause him or her to drop out of sport entirely.

## 2. Definitions of Misconduct

Bullying:

- Any intentional electronic, written, verbal or physical act that is unwanted, unwelcomed and uninvited behavior that intends to hurt, threaten or frighten another person or cause damage to their property.
- Any intentional, persistent and repeated pattern of committing or willfully tolerating physical and non-physical behaviors that are intended, or have the reasonable potential, to cause fear, humiliation or physical harm in an attempt to socially exclude, diminish or isolate the targeted athlete(s), as a condition of membership.
- Repeated and/or severe aggressive behavior that is intended or likely to hurt, control or diminish another person emotionally or physically.
- Any act or conduct described as bullying under federal or state law.

- Examples:
  - Physical-Hitting, pushing, punching, beating, biting, striking, kicking, choking, spitting or slapping; throwing objects such as sporting equipment at another person.
  - Verbal-Teasing, ridiculing, taunting, name-calling or intimidating or threatening to cause someone harm.
  - Social, including Cyberbullying-Using rumors or false statements about someone to diminish that person's reputation; using electronic communications, social media or other technology to harass, frighten, intimidate or humiliate someone; socially excluding someone and asking others to do the same.
  - Sexual-Teasing, ridiculing or taunting based on gender, sexual orientation (real or implied), gender traits or behavior, or sexual identification (e.g., taunting someone for being too effeminate), or teasing someone about their looks or behavior as it relates to sexual attractiveness.

Harassment:

- Any intentional electronic, written, verbal or physical act that is unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends the victim and results in a hostile environment for the victim.
- Repeated and/or severe conduct that (a) causes fear, humiliation or annoyance, (b) offends or degrades, (c) creates a hostile environment, or (d) reflects discriminatory bias in an attempt to establish dominance, superiority or power over an individual or group based on age, gender, sexual orientation, gender expression, gender identity, race, ethnicity, culture, religion, national origin, or mental or physical disability; in all cases measured by the totality of the circumstances, including the nature, frequency, intensity, location, context and duration of the behavior.
- Any act or conduct described as harassment under federal or state law.
- Examples
  - Physical-Hitting, pushing, punching, beating, biting, striking, kicking, choking, spitting or slapping; throwing objects such as sporting equipment at another person.
  - Non-physical offenses-making negative or disparaging comments about a person's sexual orientation, gender expression, disability, religion, skin color, or ethnic traits; displaying offensive materials, gestures, or symbols.
  - Discriminatory Harassment-Conduct with the design or effect of establishing dominance, superiority or power over an individual or group based on age, sex, race, color, ethnicity, culture, national

origin, religion, sexual orientation, gender expression, gender identity, or mental or physical disability.

- Stalking-Stalking generally involves a course of conduct which includes two or more acts, involving persistent and frequent unwanted in-person contact, surveillance or unwanted telephone and/or other electronic contact. Stalking behaviors include without limitation: following a person; appearing at a person's home, class, work or practice; frequent phone calls, emails, or text messages; continuing to contact a person after receiving requests to stop; leaving unwanted written messages, objects or gifts; vandalizing a person's property; threatening, intimidating or intrusive behavior; and violating a lawful order preventing contact with a person.

#### Hazing:

- Any intentional abusive or humiliating form of initiation into or affiliation with a group that recklessly or intentionally endangers the mental or physical health of another person.
- Any conduct that subjects another person, whether physically, mentally, emotionally or psychologically, to anything that may endanger, abuse, humiliate, degrade or intimidate the person as a condition of joining or being socially accepted by a group, team or organization.
- Coercing, requiring, forcing or willfully tolerating any humiliating, unwelcome or dangerous activity that serves as a condition for (a) joining a group or (b) being socially accepted by a group's members.
- Any act or conduct described as hazing under federal or state law.
- Purported consent by the person subject to hazing is not a defense, regardless of the person's perceived willingness to cooperate or participate.
- Examples:
  - Contact Acts-Tying, taping or otherwise physically restraining another person; beating, paddling or other forms of physical assault.
  - Non-Contact Acts-Requiring or forcing the consumption of alcohol, illegal drugs or other substances in an effort to elicit a negative physiological response, including participation in binge drinking and drinking games; personal servitude; requiring social actions (e.g., wearing inappropriate or provocative clothing) or public displays (e.g., public nudity) that are illegal or meant to draw ridicule; excessive training requirements demanded of only particular individuals on a team that serve no reasonable or productive

training purpose; sleep deprivation; otherwise unnecessary schedule disruptions; withholding of water and/or food; restrictions on personal hygiene.

- Sexualized Acts-Actual or simulated sexual conduct of any nature.

#### Emotional Misconduct:

- Any intentional use of the emotions and insecurities of a person to manipulate the person that causes harm to the person's health, welfare, or safety.
- A pattern of deliberate, non-contact behavior that has the potential to cause emotional or psychological harm to the person.
- Examples:
  - Verbal Acts-Verbally attacking an athlete personally (e.g., calling them worthless, fat or disgusting); Repeatedly and excessively yelling at participants in a manner that serves no productive training or motivational purpose.
  - Physical Acts-Throwing sport equipment, water bottles or chairs at, or in the presence of, participants; Punching walls, windows or other objects.
  - Acts that deny attention and support-Ignoring an athlete for extended periods of time; Routinely or arbitrarily excluding participants from practice.

#### Physical Misconduct:

- Any contact or non-contact conduct that causes or reasonably threatens to cause physical harm to another person.
- Non-accidental trauma or physical injury caused by contact behaviors, such as punching, beating, kicking, biting, burning or otherwise harming a person.
- Physical abuse may also include non-contact physical misconduct as described in this policy.
- Any non-accidental physical contact under circumstances that cause harm to the person's health, welfare, or safety, or the negligent treatment or maltreatment of a person by a person responsible for or providing care to such injured person.
- Examples
  - Contact Violations-Punching, beating, biting, striking, choking or slapping another; intentionally hitting another with objects, such as

sporting equipment; encouraging or knowingly permitting an athlete to return to team activities prematurely following a serious injury (e.g., a concussion) and without the clearance of a medical professional.

- Non-contact Violations-Isolating a person in a confined space, such as locking an person in a small space; forcing a person to assume a painful stance or position for no athletic purpose; withholding, recommending against, or denying adequate hydration, nutrition, medical attention or sleep; providing alcohol to a person under the U.S. legal drinking age; providing illegal drugs or non-prescribed medications to another.
- Criminal Conduct-Physical misconduct includes any act or conduct described as physical abuse or misconduct under federal or state law (e.g. child abuse, child neglect, assault).

#### Sexual Misconduct:

- Any pattern of sexual advances, requests for sexual favors, or other verbal or physical behaviors of a sexual nature that is sufficiently severe, persistent or pervasive and objectively offensive that it negatively affects the person's health, welfare or safety.
- Any sexual activity with a person where consent is not or cannot be given. This includes sexual contact that is accomplished by deception, manipulation, force or threat of force regardless of whether the person understands the sexual nature of the activity.
- Any touching or non-touching sexual interaction that is (a) nonconsensual or forced, (b) coerced or manipulated, or (c) perpetrated in an aggressive, harassing, exploitative or threatening manner.
- Any sexual interaction between a person and an individual with evaluative, direct or indirect authority over the person.
- Any act or conduct described as sexual abuse or misconduct under federal or state law (e.g. sexual abuse, sexual exploitation, rape).
- Examples:
  - Touching offenses-fondling an athlete's breasts or buttocks; exchange of reward in sport (e.g., team placement, scores, feedback) for sexual favors; genital contact; sexual relations or intimacies between persons in a position of trust, authority and/or evaluative and supervisory control over athletes or other sport participants.

- o Non-touching offenses-a coach discussing his or her sex life with an athlete; a coach asking an athlete about his or her sex life; coach requesting or sending a nude or partial-dress photo to athlete; exposing athletes to pornographic material; sending athletes sexually explicit or suggestive electronic or written messages or photos (e.g. “sexting”); deliberately exposing an athlete to sexual acts; deliberately exposing an athlete to nudity (except in situations where locker rooms and changing areas are shared); sexual harassment; specifically, the sexual solicitation, physical advances, or verbal or nonverbal conduct that is sexual in nature, and (i) is unwelcome, offensive or creates a hostile environment, and the offending individual knows or is told this, or (ii) is sufficiently severe or intense to be harassing to a reasonable person in the context.

### **3. Training and Education:**

Our policies and procedures require staff members and volunteers to report abuse, misconduct and violations of this policy. To do so, staff members (coaches, riggers, admin, support staff at boathouses) and/or volunteers (volunteer coaches, parent chaperones, referees, other volunteers) should have a basic understanding of our policies on bullying, hazing, harassment (including sexual harassment), emotional misconduct, physical misconduct and sexual misconduct (including child sexual abuse and/or grooming behaviors).

#### **“Safesport Certified”**

Accordingly, staff members and volunteers with high access to youth athletes must complete an awareness training (USRowing’s “Safesport Certified Training”) concerning misconduct in sport before performing services for GPRF. Staff members and volunteers will be required to annually update this certification. Staff, volunteers or subcontractors with low access to youth athletes must complete this training if they expect to exceed 8 hours of contact with youth in a calendar year.

#### **GPRF Safety Training**

In addition, staff members and volunteers with high access to youth athletes must also complete an internal training module to familiarize them with GPRF policies, abuse recognition and response procedures. This training must be completed prior to having direct contact with youth athletes. This training must also be completed by all staff prior to the start of Spring, Summer and Fall rowing.

#### **Access Levels**

- High Access includes direct instruction or support of youth athletes performed in leadership or supervisory roles.



- Low access includes those with tangential, or indirect contact with youth athletes such as support staff speakers, caterers, food tent volunteers or other vendors.

#### **4. Applicant Screening**

All GPRF staff members must consent to, and pass, a formal applicant screening process before performing services for the GPRF.

All volunteers or subcontractors with high access to youth exceeding 8 hours in a calendar year must also complete a formal applicant screening process before performing services for the GPRF.

Elements of our screening process include, as applicable, successful completion of an application, interview, reference check and background check.

Elements of GPRF's applicant screening process, include:

- Requiring awareness training before placement and/or before working with athletes and members.
- Informing applicants about our policies and procedures relevant to prevention.
- Asking applicants to review and agree to our policies and procedures before proceeding with the process.
- Requiring applicants to sign a document acknowledging review of our policies and procedures.

Appropriate staff members will interview applicants whose experience and credentials are considered a fit for available positions.

References of applicants will be contacted (either by phone or in writing) and asked specific questions regarding the applicant's professional experiences, demeanor and appropriateness for involvement with athletes (including minor athletes) and members.

Each applicant will also provide a signed release, consistent with federal, state and local laws regulating employment practices, that allows references to speak freely about the applicant's qualifications without fear of reprisal and authorizing GPRF to obtain information concerning an applicant's past employment, volunteer experience and information provided by the applicant during the screening process (i.e., written application and personal interview).

#### **5. Overview of the Athlete Protection Policy**

**In the event that any staff member or volunteer observes inappropriate behaviors (i.e., policy violations), suspected physical or sexual abuse, or misconduct, it is the personal responsibility of each staff member and**

**volunteer to immediately report his or her observations to an immediate supervisor, any Director level staff or a member of the GPRF Board of Directors.**

The GPRF is committed to creating a safe and positive environment for the physical, emotional and social development of its athletes and members, and to ensuring that it promotes an environment free of bullying, hazing, harassment (including sexual harassment), emotional misconduct, physical misconduct and sexual misconduct (including child sexual abuse and/or grooming behaviors). GPRF recognizes that the process for training and motivating athletes and members will vary with each individual athlete and/or member and each individual staff member and/or volunteer, but it is nevertheless important for everyone involved in sport to support the use of motivational and training methods that avoid misconduct. In the event that any staff member or volunteer observes inappropriate behaviors (i.e., policy violations), suspected physical or sexual abuse, or misconduct, it is the personal responsibility of each staff member and volunteer to immediately report his or her observations to an immediate supervisor, any Director level staff or any member of the Board of Directors.

This policy applies to GPRF staff members, volunteers (including Stewards and parent chaperones), the GPRF Board and its subcommittees and GPRF athletes and members.

By monitoring the interactions among staff members, volunteers, athletes, and members, GPRF works to prevent, recognize and respond to inappropriate and harmful behaviors as set forth in this policy, while reinforcing appropriate behaviors. GPRF monitors staff members, volunteers, athletes and members for compliance with its policies and procedures.

GPRF utilizes multiple monitoring methods to observe how individuals are interacting, including without limitation (1) formal supervision, including regular evaluations; and (2) informal supervision, including regular and random observation (e.g., roving and checking interactions throughout practices), and (3) maintaining frequent contact with staff members, volunteers, athletes and members who interact off-site.

Staff members and volunteers should be prepared to respond immediately to inappropriate or harmful behavior, including potential risk situations and potential violations.

Staff members and volunteers will redirect inappropriate behaviors to promote positive behaviors, confront inappropriate or harmful behaviors, and report misconduct as required by this policy.

**It is a violation of this policy if a staff member or volunteer knows of misconduct, but takes no action to intervene on behalf of the athlete(s), member(s), staff member, and/or volunteer involved.**

Staff members and volunteers are required to report policy violations, misconduct and physical and sexual abuse consistent with this policy.

Suspicious or allegations of child physical or sexual abuse will be reported to the appropriate law enforcement authorities. GPRF will not attempt to evaluate the credibility or validity of such allegations prior to or as a condition for reporting such suspicions or allegations to appropriate law enforcement authorities.

**Staff members and volunteers should not attempt to evaluate the credibility or validity of child physical or sexual abuse allegations as a condition for reporting to appropriate law enforcement authorities.** Instead, it is the responsibility of each staff member and volunteer to immediately report suspicions or allegations of child physical or sexual abuse to an immediate supervisor, any Director level staff, or a member of the GPRF Board of Directors and/or appropriate law enforcement authorities.

**Prohibited Conduct:**

- Bullying**
- Harassment**
- Hazing**
- Emotional misconduct**
- Physical misconduct, and**
- Sexual misconduct, including child sexual abuse**

**6. Supervision of Athletes and Members**

During training and competition, GPRF strives to create two-deep leadership and minimize one-to-one interactions to create a safe training environment and to protect athletes and members.

Appropriate One-On-One Interactions

Individual Meetings

An individual meeting may be necessary to address an athlete's concerns, training program, or competition schedule. Under these circumstances, staff members and/or volunteers should observe the following guidelines:

- Meet when others are present and where interactions can be easily observed
- When possible, meet in a publicly visible and open area
- If an individual meeting is to take place in an office, the door should remain unlocked and open

- If a closed-door meeting is necessary, staff member and/or volunteer should inform another staff member and/or volunteer and ensure the door remains unlocked

### Individual Training Sessions

An individual training session(s) with an athlete or member may also be desired or necessary. Under these circumstances, written permission of a minor athlete's parents or guardians is required in advance of the individual training session(s), and GPRF encourages parents and guardians to attend the training session(s).

### Transporting Athletes One-on-One

One-on-one, In-Program travel should be the exception and not the rule.

In a non-emergency setting, In-Program travel exceptions are permitted between a coach and a Minor Athlete when advance written consent is obtained from a parent/guardian and approved by a supervisor. In-Program travel exceptions are only valid for 24 hours. Parent/guardian consent expires at the end of this 24-hour time period and can be withdrawn at any time by the parent/guardian prior to the end of this timeframe.

Even with these documented exceptions, coaches should strive to be accompanied by another adult or at least two minors - in accordance with all interactions needing to be both observable and interruptible.

In the event of an emergency, coaches may transport athletes without receiving written consent, but must contact parent/guardian and supervisor for verbal consent with follow-up documentation and written consent being acquired within 24 hours of the event.

### Physical Contact with Athletes

Appropriate physical contact between athletes and staff members or volunteers can be a productive and inevitable part of sport. Athletes are more likely to acquire advanced physical skills and enjoy their sport participation through appropriate physical contact. However, guidelines for appropriate physical contact reduce the potential for misconduct in sport.

GPRF adheres to the following principles and guidelines in regards to physical contact with our athletes and members:

### Common Criteria for Appropriate Physical Contact

Physical contact with athletes – for safety, consolation and celebration – has multiple criteria in common which make them both safe and appropriate. These include:

- the physical contact takes place in public

- there is no potential for, or actual, physical or sexual intimacies during the physical contact
- the physical contact is for the benefit of the athlete/member, not to meet an emotional or other need of an staff member or volunteer

### Safety

The safety of our athletes and members is paramount and in many instances we make the athletic space safer through appropriate physical contact.

Examples include:

- spotting an athlete so that they will not be injured by a fall or piece of equipment
- positioning an athlete's body so that they more quickly acquire an athletic skill, get a better sense of where their body is in space, or improve their balance and coordination
- making athletes aware that they might be in harm's way because of other athletes practicing around them or because of equipment in use
- releasing muscle cramps

### Celebration

Sports are physical by definition and we recognize participants often express their joy of participation, competition, achievement and victory through physical acts. We encourage these public expressions of celebration, which include:

- greeting gestures such as high-fives, fist bumps, and brief hugs
- congratulatory gestures such as celebratory hugs, "jump-arounds" and pats on the back for any form of athletic or personal accomplishment

### Consolation

It may be appropriate to console an emotionally distressed athlete (e.g., an athlete who has been injured or has just lost a competition). Appropriate consolation includes publicly:

- embracing a crying athlete
- putting an arm around an athlete while verbally engaging them in an effort to calm them down ("side hugs")
- lifting a fallen athlete to encourage them to continue

### PROHIBITED PHYSICAL CONTACT

Prohibited forms of physical contact, which shall be reported immediately under this policy, include, without limitation:

- asking or having an athlete/member sit in the lap of a staff member or volunteer
- lingering or repeated embraces of athletes that go beyond the criteria set forth for acceptable physical contact
- slapping, hitting, punching, kicking or any other physical contact meant to discipline, punish or achieve compliance from an athlete

- “cuddling” or maintaining prolonged physical contact during any aspect of training, travel or overnight stay
- playful, yet inappropriate contact that is not a part of regular training, (e.g., tickling or “horseplay” wrestling)
- continued physical contact that makes an athlete obviously uncomfortable, whether expressed or not
- any contact that is contrary to a previously expressed personal desire for decreased or no physical contact.

## **7. Electronic Communications and Social Media Use**

As part of GPRF’s emphasis on athlete safety, all electronic communications between a staff member/volunteer and athlete/member must be professional in nature and for the purpose of communicating information about team or program activities.

**As with any communication, the content of any electronic communication should be readily available to share with GPRF and the athlete’s/member’s family. At the request of a parent or guardian, any email, electronic text, social media or similar communication to a minor athlete will copy or include the athlete’s parents or guardians.**

### Facebook, Snapchat, Twitter, Blogs, and Similar Sites

Coaches and staff members are not permitted to use social media to communicate directly with youth athletes. All coaches must use only approved channels for communication with athletes - such as Slack channel, email, or iCrew. Staff members and volunteers should not have minor athletes follow their personal social media pages. Minor athletes and their parents may follow the official GPRF program and team pages, and staff members and volunteers can communicate to minor athletes through these sites. All posts, messages, text, or media of any kind between staff members/volunteers and athletes/members must be professional in nature and for the purpose of communicating information about team or program activities.

### Email and Similar Electronic Communications

Staff members, volunteers, athletes and members may use email to communicate. All email content between staff members/volunteers and athletes/members must be professional in nature and for the purpose of communicating information about team or program activities.

### Texting and Similar Electronic Communications

Coaches and staff members are not permitted to use text messaging to communicate directly with youth athletes. All coaches must use only approved

channels for communication with athletes - such as Slack channel, email, or iCrew.

### Electronic Imagery

From time to time, digital photos, videos of practice or competition, and other publicly obtainable images of the athletes/members – individually or in groups – may be taken. These photos and/or videos may be submitted to local, state or national publications, used in GPRF videos, posted on GPRF or GPRF associated websites, or offered to GPRF families seasonally on disc or other electronic form. It is the default policy of GPRF to allow such practices as long as the athletes/members are in public view and such imagery is both appropriate and in the best interest of the athletes/members and GPRF. Imagery must not be contrary to any rules as outlined in this policy.

### Request to Discontinue All Electronic Communications or Imagery

The parents or guardians of a minor athlete may request in writing that their child not be contacted by any form of electronic communication by staff members and/or volunteers.

### Misconduct

Social media and electronic communications can also be used to commit misconduct (e.g., emotional, sexual, bullying, harassment, and hazing). Such communications by staff members, volunteers, athletes, members, parents or any other party with a relationship with GPRF will not be tolerated and are considered violations of this policy.

## **8. Locker rooms and Changing Areas**

The following guidelines are designed to maintain personal privacy as well as to reduce the risk of misconduct in locker rooms and changing areas.

GPRF has staggered practices, with different groups arriving and departing throughout the day. It is therefore not practical to constantly monitor locker rooms and changing areas over this extended course of time. While we do not post staff members inside or at the doors of the locker rooms and changing areas, we do make occasional sweeps of these areas. Staff members conduct these sweeps, with women checking on female-designated areas, and men checking on male-designated areas.

### Use of Cell Phones and Other Mobile Recording Devices

Cell phones and other mobile devices with recording capabilities, including voice recording, still cameras and video cameras increase the risk for different forms of misconduct in locker rooms and changing areas. As a result, **THERE WILL BE NO USE OF A DEVICE'S RECORDING CAPABILITIES IN THE LOCKER ROOMS OR CHANGING AREAS.** Any such use is a violation of this policy.

## 9. Travel

Travel will be a standard aspect of GPRF competitive teams and GPRF has established policies to guide our travel, minimize one-on-one interactions, and reduce the risk of misconduct. Adherence to these travel guidelines will increase athlete/member safety and improve the competitive experience while keeping travel a fun and enjoyable experience.

### Local Travel to/from Regattas or Team Events

One-on-one, In-Program travel should be the exception and not the rule.

In a non-emergency setting, In-Program travel exceptions are permitted between a coach and a Minor Athlete when advance written consent is obtained from a parent/guardian and approved by a supervisor. In-Program travel exceptions are only valid for 24 hours. Parent/guardian consent expires at the end of this 24-hour time period and can be withdrawn at any time by the parent/guardian prior to the end of this timeframe.

Even with these documented exceptions, coaches should strive to be accompanied by another adult or at least two minors - in accordance with all interactions needing to be both observable and interruptible.

In the event of an emergency, coaches may transport athletes without receiving written consent, but must contact parent/guardian and supervisor for verbal consent with follow-up documentation and written consent being acquired within 24 hours of the event.

### Team Travel

Team travel is overnight travel that occurs when GPRF sponsors, coordinates or arranges for travel so that our programs can compete locally, regionally, nationally or internationally. Because of the greater distances, coaches, volunteers and chaperones will often travel with minor athletes. However, no staff member, or volunteer will engage in team travel without the proper safety requirements in place, including valid drivers' licenses, proper insurance, well-maintained vehicles and compliance with all state laws.

The GPRF makes efforts to provide adequate supervision to its minor athletes through staff members, volunteers and other adult chaperones. Minor athletes



will share rooms, often with multiple minor athletes assigned per room depending on accommodations. The GPRF will also notify hotel management should any special arrangements be warranted. For instance, we will ask hotels to block pay per view channels and we will request an additional large room or suite so that our minor athletes may socialize as a group. Team meetings will not occur in hotel rooms. If necessary, we will reserve a separate space for adults and minor athletes to socialize.

We encourage family members who wish to stay in the team hotel to do so. If family members do not stay in the team hotel, we encourage all minor athletes to call parents and guardians regularly and allow for any unscheduled calls by either the minor athlete or parent/guardian.

When only one minor athlete and one staff member/volunteer travel to a competition, the minor athlete must have his or her parents' or legal guardian's written permission in advance to travel alone with the staff members/volunteer.

#### Travel Notification

GPRF will provide reasonable advance notice before team travel for minor athletes. Notice will include the dates, location and duration of competition. Travel notice will also include designated team accommodations for overnight stays as well as an onsite staff contact. This individual will also serve as the point of contact to help with travel details.

For minor athlete travel, GPRF will share specific travel itineraries when they become available. These will include a more detailed, hour-by-hour itinerary as well as contact information for team travel chaperones.

#### Mixed-Gender and Mixed-Age Travel

GPRF is made up of male and female athletes across various ages. Minor athletes will only share a room with other minor athletes of the same sex and age group. Minor athletes will also be grouped by age and sex for the purposes of assigning an appropriate chaperone. We will make every effort to provide these groups at least one chaperone of the same sex. However, we rely on parents to serve as chaperones and may be limited in providing this match.

Regardless of gender, a staff member/volunteer shall not share a hotel room or other sleeping arrangement with a minor athlete (unless the coach is the parent, guardian, sibling or spouse of that particular athlete).

#### Chaperone Responsibilities

Parent chaperones accompany team travel for minor athletes to ensure that the athletes, staff members and volunteers adhere to GPRF policy guidelines. If a

chaperone has not undergone a criminal background check and GPRF's awareness training, the chaperone will not be permitted to have any one-on-one interactions with minor athletes. If a chaperone has undergone a criminal background check and awareness training, he or she may have appropriate one-on-one interactions as outlined in this policy. If a chaperone will be operating a private car for team travel, a copy of the chaperone's valid driver's license is required. Chaperones will monitor the activities of all staff members, volunteers and athletes during team travel.

Specifically, chaperones will:

- a) familiarize themselves with all travel itineraries and schedules before team travel
- b) monitor for adherences to GPRF policies during team travel
- c) encourage minor athletes to participate in regular, at least daily, scheduled communications with their parents/guardians
- d) help athletes be on time for all team commitments (as possible)
- e) assist staff members and volunteers with team travel logistical needs (as possible)
- f) monitor athletes for adherence to curfew restrictions set based on age and competition schedule as listed in travel itinerary
- g) ensure athletes comply with hotel room restrictions based on gender or age bracket requirements
- h) not use drugs or alcohol in the presence of minors or be under the influence of alcohol or drugs while performing their chaperone duties
- i) make certain that athletes are not alone in a hotel room with any adult apart from a parent/guardian; this includes coaches, staff and chaperones
- j) immediately report any concerns about sexual and physical abuse, misconduct or policy violations to a GPRF staff member, any Director-level staff or a member of the GPRF Board of Directors.

## **10. Misconduct and Policy Violations**

**In the event that any staff member or volunteer observes inappropriate behaviors (i.e., policy violations), suspected physical or sexual abuse, or misconduct, it is the personal responsibility of each staff member and volunteer to immediately report his or her observations to an immediate supervisor, any Director level staff or a member of the GPRF Board of Directors.**

**As a matter of policy, GPRF does not investigate suspicions or allegations of child physical or sexual abuse or attempt to evaluate the credibility or validity of such allegations as a condition for reporting to the appropriate law enforcement authorities.**

**If you have any concerns that an interaction involving a minor may constitute sexual abuse, report it to the appropriate law enforcement**

**authorities AND your immediate supervisor, any Director-level staff or member of the GPRF Board of Directors.**

### Willfully Tolerating Misconduct

It is a violation of this policy if a staff member and/or volunteer knows of misconduct, but takes no action to report it and/or intervene on behalf of the athlete(s), member(s), staff member(s), and/or volunteer(s).

### Reporting Policy

Although these policies are designed to reduce child sexual abuse and other misconduct, it can still occur. Staff members and volunteers shall follow the reporting procedures set forth in this policy.

Any person who believes he or she has been a victim of misconduct by a GPRF staff member, volunteer, athlete or members, should promptly report the facts of the incident(s) and the name of the individual involved to a GPRF staff member, to the Director of Rowing Operations or to a member of the GPRF Management Committee. All staff members and volunteers, upon personal knowledge of an incident of misconduct, are obligated to report it within three (3) days to an immediate supervisor, coach, any Director-level staff or a member of the GPRF Board of Directors. Failure to do so is a violation of this policy.

Athletes or members who feel aggrieved because of unwelcome conduct that may constitute misconduct are not required to inform the person engaging in such conduct that the conduct is unwanted, offensive and must stop, but are encouraged to do so.

An aggrieved athlete or member is not required to complain to his or her coach if that coach is the individual who is harassing the athlete or member. An individual making a report may bring an advocate to assist him or her.

If any staff member or volunteer receives an allegation or observes misconduct or other inappropriate behavior, that is not reportable to the appropriate law enforcement authorities, it is the responsibility of each staff member and/or volunteer to report their observations to their immediate supervisor, coach, Director-level staff, or a member of the GPRF Board of Directors.

Staff members and volunteers may report to any of the above persons with whom they are comfortable sharing their concerns.

### How to Report

GPRF will take a report of misconduct in the way that is most comfortable for the person initiating a report including an anonymous, in-person, verbal or written

report. Regardless of how you choose to report, it is helpful to GPRF for individuals to provide, at a minimum, (1) the name of the complainant(s); (2) the type of misconduct alleged and (3) the name(s) of the individual(s) alleged to have committed the misconduct.

## Reporting Form

Individuals reporting any misconduct may complete an Incident Report Form. An Incident Report Form is not the only way to report misconduct.

## Confidentiality

To the extent permitted by law, and as appropriate, GPRF will keep confidential the complainant's name on request, not make public the names of potential victims, the accused perpetrator or the people who made a report of misconduct. An allegation of misconduct and the results of any investigation shall be kept confidential to the extent reasonably possible under the investigation process and subject to applicable law.

Witnesses and those interviewed shall be informed of the confidential nature of the issues and the investigation.

## Anonymous Reporting

GPRF recognizes it can be difficult for an athlete, member, friend or family member to report an allegation of misconduct and strives to remove as many barriers to reporting as possible. Anonymous reports may be made without the formality of completing an Incident Report Form:

- by completing the report without including their name
- by expressing concerns verbally to a staff member, the Director of Rowing Operations or a member of the GPRF Management Committee.
- through email, texts or notes left for a staff member, the Director of Rowing Operations or a member of the GPRF Management Committee

However, anonymous reporting may make it more difficult for GPRF to investigate or properly address allegations.

All suspicions of child physical or sexual abuse will be reported to the appropriate law enforcement authorities.

## “Whistleblower” Protection

Regardless of outcome, GPRF will support the complainant(s) and his or her right to express concerns in good faith. GPRF will not encourage, allow or tolerate attempts from any individual to retaliate, punish, allow or in any way

harm any individual(s) who reports a concern in good faith. Such actions against a complainant will be considered a violation of this policy and grounds for disciplinary action.

### Bad-Faith Allegations

A report of abuse, misconduct or policy violations that is malicious, frivolous or made in bad faith is prohibited. Such reports will be considered a violation of this policy and grounds for disciplinary action. Depending on the nature of the allegation, a person making a malicious, frivolous or bad-faith report may also be subject to civil or criminal proceedings.

### Investigation Guidelines

All investigations of allegations of misconduct shall be handled promptly, in a serious, sensitive, and confidential manner.

1. The Director-level staff and/or the GPRF Board of Directors shall inform the athlete, member, staff member, volunteer or other person accused of misconduct of the allegation and that they will be given an opportunity to respond.
2. All parties, specifically including complainants, and witnesses, will be promptly and fully informed of their rights pursuant to this policy, including the fact that complainant and witnesses will not be retaliated against and the confidential nature of the allegation and investigation.
3. A written report of the investigation findings shall be filed with the GPRF Board of Directors and, when applicable, an appropriate law enforcement authority as soon as practicable after the incident was reported. A copy of the findings shall be mailed to the person who reported the misconduct and the person accused.

### Suspicious or Allegations of Child Physical or Sexual Abuse - Reporting to Law Enforcement and/or Child Protective Services

In some cases, an unofficial independent investigation can harm youth and/or interfere with the investigative process of law enforcement authorities where child physical or sexual abuse is alleged. GPRF, its staff members and/or volunteers will not attempt to evaluate the credibility or validity of child physical or sexual abuse as a condition for reporting to appropriate law enforcement authorities. As necessary, however, GPRF may ask clarifying questions of the minor or person making the report to adequately report the suspicion or allegation to law enforcement authorities.

### Immediate Suspension or Termination

When an allegation of child physical or sexual abuse is made against a staff member, volunteer, athlete or member, GPRF may immediately remove that individual from contact with any minors in the program until the allegation has been investigated by the appropriate law enforcement authorities. As necessary,

GPRF may suspend or change the assignment of a staff member and/or volunteer.

The accused individual may be offered a hearing depending on the circumstances of the case. A hearing will not necessarily affect GPRF's ability to immediately suspend or terminate the accused individual from employment or performing services for GPRF.

A staff member or volunteer's failure to report misconduct to a supervisor, a Director-level staff or a member of the GPRF Board of Directors is a violation of this policy and grounds for termination of a staff member and/or dismissal of a volunteer.

GPRF may also investigate allegations of child physical or sexual abuse that are reportable, if such investigation does not interfere with any ongoing investigation or prosecution by law enforcement authorities for such abuse. Such allegations may include:

- Emotional abuse.
- Abuse reported outside the relevant statutes of limitation.
- Allegations of abuse that were reported to authorities, but: (a) legal authorities did not press criminal charges; (b) criminal charges were filed, but not pursued to trial; or (c) the alleged offender was acquitted at trial.

#### Notification

Following GPRF's notice of a credible suspicion or allegation that results in the removal of a staff member or volunteer, GPRF may consider the circumstances in which it will notify parents of minor athletes with whom the accused individual may have had contact. In the GPRF's discretion, as appropriate, and after consultation with counsel, GPRF may notify its staff members, volunteers, parents, athletes and/or members of any allegation of child physical or sexual abuse or other misconduct that (1) law enforcement authorities are actively investigating; or (2) that GPRF is investigating internally. Advising others of a credible suspicion or allegation may lead to additional reports of child physical or sexual abuse or other misconduct.

### **11. Disciplinary Rules and Procedures**

While GPRF endeavors to provide support and guidance to its staff members, volunteers, athletes and members on a day-to-day basis, it is also important for GPRF to have a formal procedure for disciplinary action to address alleged violations of its policies.

These disciplinary rules and procedures will be used to address the allegations against GPRF staff members, volunteers, athletes and members of violations of this policy.

When an allegation of misconduct is supported by the investigation and disciplinary action is necessary, the Executive Director and/or the GPRF Board of Directors will determine what course of action is appropriate.

Staff members and volunteers who violate this policy may be subject to discipline up to and including discharge. Such disciplinary action shall be in accordance with applicable policies, laws, and/or agreements. On receipt of an allegation of child abuse or other serious misconduct (e.g., physical and sexual abuse as defined in this policy), GPRF may immediately suspend or terminate the accused individual if determined necessary to ensure the safety of its staff members, volunteers, athletes and members.

Athletes and members who violate this policy may be subject to discipline up to and including expulsion from GPRF. Such disciplinary action shall be in accordance with state law.

Sanctions for violations of this policy will be proportionate and reasonable under the circumstances. In addition to day-to-day guidance, GPRF may take the following disciplinary actions, without limitation:

- Inform the individual's direct-line supervisor or, in the case of a minor athlete, the athlete's parent or guardian.
- Provide the individual with guidance, redirection and instruction.
- Temporary suspension from participation in GPRF team or program activities.
- File an Incident Report Form.
- Issue a verbal warning.
- Issue a written warning.
- Implement a limited access agreement (e.g., limiting an individual's access to GPRF, its staff members, volunteers, athletes and/or members).
- Provide informed supervision, where at least one staff member is informed of the allegation and is instructed to vigilantly supervise the accused individual in his or her interactions with staff members, volunteers, athletes or members of GPRF.
- Engage in restorative practices, i.e., creation of a respectful and safe dialogue when a misunderstanding or harm has occurred.
- Suspend or terminate relationship with GPRF (e.g. employment, participation or membership).

## Disciplinary Rules

GPRF recognizes that there are varying levels of misconduct. For example, physical and sexual misconduct are serious violations that may result in immediate dismissal. In contrast, a minor athlete who tells a single sexually risqué joke constitutes less serious misconduct and depending on the

circumstances, might be dealt with more appropriately through dialogue and a verbal warning. In all cases, GPRF's disciplinary procedures and actions will be proportionate, reasonable and applied fairly and equally.

### Disciplinary Procedure

On receipt of an allegation, GPRF will determine, in its discretion, the appropriate steps to address the conduct based on several factors, including (i) the age of the complainant or victim, (ii) the age of the accused and (iii) the nature, scope, and extent of the allegations. GPRF will address allegations against a staff member under its employment policies and procedures, including this policy. GPRF's disciplinary response will depend on the nature and seriousness of the incident. If the accused individual is a minor, GPRF will contact his or her parents or guardians.

### Investigation and Adjudication for Resolving Reports of Misconduct

GPRF utilizes this investigation and adjudication procedure to resolve those allegations that it determines require a hearing. A hearing will not necessarily affect GPRF's ability to immediately suspend or terminate an accused individual.

On receipt of:

- an allegation of misconduct, as defined in this policy, that does not involve child physical or sexual abuse (which will be reported to the appropriate law enforcement authorities); and
- an adverse employment, participation or membership determination by GPRF for such misconduct

GPRF shall determine the appropriate steps to address the conduct based on several factors, including (i) the age of the complainant or victim, (ii) the age of the accused and (iii) the nature, scope and extent of the allegations.

Such steps may include, without limitation:

- The collection of additional information from the individual in question, other individuals with potential knowledge or evidence of the incident or the accused individual.
- Formal investigation and hearing.
- Retention of legal counsel or investigation services to investigate and/or make a recommendation as to whether a violation of this policy has occurred and/or a recommendation as to the appropriate sanction.

Where serious allegations of misconduct are at issue (e.g., physical and sexual misconduct), GPRF may elect in its discretion to undertake a full investigation and hearing before determining the appropriate disciplinary action. This investigation and/or hearing will in no way interfere with an ongoing criminal investigation or prosecution by the appropriate law enforcement authorities.



## Suspension before Final Resolution

If the reported allegation indicates that an individual's continued employment, participation or membership poses a risk of continued harm, GPRF may suspend the accused individual pending final resolution of the allegation to minimize danger to staff members, volunteers, athletes or members. In such instances, GPRF will provide the suspended individual with notice and offer her/him an opportunity to contest the suspension.

For the purposes of this policy, a suspension from sport involvement shall mean that for the duration of the period of suspension, the accused individual may not participate in any capacity or in any role in the business, events, activities, operations or use of GPRF.

Any suspension before final resolution may be appealed to the GPRF Board of Directors at the written request of the accused individual within 14 days of the suspension.

## Investigation

As appropriate, and at its discretion, GPRF may institute a formal investigation and hearing procedure to address serious allegations of misconduct. However, GPRF anticipates that an investigation and hearing will be undertaken to address only the most serious allegations and patterns of behavior that warrant significant sanctions. Accordingly, GPRF anticipates that this disciplinary procedure will be used rarely.

If an investigation is conducted, the complainant, victim and accused individual shall have the right to:

- a) Receive written notice of the report or complaint, including a statement of allegations (but potentially excluding the identity of the parties involved, as otherwise allowed by law).
- b) Present relevant information to the investigator(s).
- c) Be represented by legal counsel, at his or her own expense.

## Procedural Safeguards

In every case where a hearing is warranted pursuant to this policy, an adjudication shall be conducted that shall in all cases comply with this policy. However, deviations in one or more of the procedural safeguards are permitted, provided the following conditions are satisfied:

- a) The individual is informed of the allegations and evidence brought against him or her.

- b) The individual is given a reasonable opportunity to respond to the allegations brought forward.
- c) The individual may be represented by legal counsel at his or her expense.
- d) The Review Panel member(s) who make the determination are free of conflicts of interests.
- e) There is a right to an appeal of the Review Panel's decision

## Notice

The accused individual will be notified of a specific date and time to ensure that he or she is available for any hearing. Unless the Review Panel requires the accused individual to attend the hearing in person, the individual may appear by telephone conference call. The accused individual has the right to be represented by legal counsel at the hearing, provided that the counsel's participation may be subject to the reasonable hearing rules related to the conduct of the hearing.

## Timing

The Review Panel shall have the authority to set timelines and other rules regarding the proceeding and the conduct of the hearing, as it deems necessary.

## Evidence

At the hearing, the accused individual will be allowed to present any reasonable evidence or argument that he or she wishes the Review Panel to consider. The Review Panel may require or permit any evidence, including documentary evidence, such as the written report of any investigator or other fact-finder, before the hearing.

If the complainant/alleged victim(s) is a minor, the investigator's or other fact-finder's report may substitute for the minor witness's direct testimony, provided that the accused had an opportunity to present and respond to relevant information collected during the investigation and before the report was transmitted to the Review Panel.

The Review Panel may proceed in the accused individual's absence if it cannot locate the accused individual or if the accused individual declines to attend the hearing.

## Findings and Sanctions

The Review Panel has the discretion to impose sanctions on the accused individual.

The Panel will communicate its finding to the accused individual.

Any sanctions imposed by the Review Panel against the accused individual must be proportionate and reasonable, relative to the conduct that is found to have occurred. The decision regarding the appropriate sanction shall be up to the Review Panel. In imposing a sanction, the Review Panel shall consider:

- a) The legitimate interest of GPRF in providing a safe environment for its staff members, volunteers, athletes and members.
- b) The seriousness of the offense or act.
- c) The age of the accused individual and alleged victim when the offense or act occurred.
- d) Any information produced by the accused individual, or produced on behalf of the accused individual, in regard to the accused individual's rehabilitation and good conduct.
- e) The effect on GPRF's reputation.
- f) Whether the accused individual poses an ongoing concern for the safety of GPRF's staff members, volunteers, athletes and members.
- g) Any other information, which in the determination of the Review Panel, bears on the appropriate sanction

Sanctions may range from a warning, a reprimand, suspension termination and expulsion from GPRF.

For the purposes of this policy, a suspension from sport involvement shall mean that the individual may not participate in any capacity or in any role in the business, events, activities, operations or use of GPRF for the duration of the period of suspension.

### Confidentiality

The conduct of the hearing will be private. If the Panel determines that the accused individual has violated this policy, it may publish its decision or a brief summary of its decision, unless prohibited by applicable law. However, if the accused individual appeals the decision of the Review Panel, the Review Panel's decision will not be disclosed until an appellate decision has been made.

If the Review Panel determines the accused individual did not violate this policy, the Review Panel will publish its decision or a summary only at the individual's written request.

### Appeal

If the accused individual disagrees with the finding or any sanction of the Review Panel and wishes to appeal, he or she may file an appeal with the GPRF Board of Directors within 14 days of the Review Panel's finding. If the accused individual timely files an appeal, the GPRF Board of Directors will address the

merits of the Review Panel's decision de novo. A decision rendered by the GPRF Board of Directors shall be final and binding on all parties.