



HOWELL SOCCER CLUB, INC.

**Risk Management and Athlete Safety
Program Policies**

HOWELL SOCCER CLUB, INC.

Risk Management and Athlete Safety Program Policies

PURPOSE

Consistent with U.S. Soccer Bylaw 212, Organization Members are required to, among other obligations, 1) comply with applicable law and, in particular, the Ted Stevens Olympic and Amateur Sports Act (the "**Sports Act**"); 2) if the member recruits, trains, fields or funds soccer players, establish a risk management program to promote the safety and protect the welfare of participants; and 3) adopt policies prohibiting sexual abuse. Effective February 14, 2018, Public Law 115-126, the *Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017* (the "**SafeSport Act**"), amends the Sports Act, and requires applicable amateur sports organizations (as such term is defined in the SafeSport Act, 36 U.S.C. § 220530(b)) to:

- Comply with the SafeSport Act's reporting requirements and prohibit retaliation by the applicable amateur sports organization against any individual who makes a report (36 U.S.C. § 220530(a)(1));
- Establish reasonable procedures to limit one-on-one interactions between an amateur athlete who is a minor and an adult (who is not the minor's legal guardian) at a facility under the jurisdiction of the applicable amateur sports organization (36 U.S.C. § 220530(a)(2));
- Offer and provide consistent training to adult members in regular contact with minor amateur athletes and, subject to parental consent, to members who are minors, regarding prevention and reporting of child abuse (36 U.S.C. § 220530(a)(3)); and

The purpose of the Howell Soccer Club Athlete and Participant Safety Policy is to require an Athlete and Participant Safety/Safe Soccer program as part of each Organization Member's risk management program and establish standards for such a program.

INITIAL TRAINING FOR ADULTS: CORE CENTER FOR SAFESPORT TRAINING

Howell Soccer Club is aware of several program options for awareness/prevention training of sexual abuse. Howell Soccer Club supports the SafeSport Act by requiring all persons identified under this policy to take the program provided by the U.S. Center for SafeSport.

To enroll in this program, the you will first need to obtain the proper access code. To do so, you must send an email to safesport@njyouthsoccer.com. You will receive an email autoreply containing the access code.

After obtaining the access code copy or click on this url: <https://www.safesport.org/>. Once on the SafeSport site click on Sign in, click on Register. When prompted, make sure to select US Soccer as your NGB and then enter the access code provided in the email reply. In order to complete your course registration, you will receive an email to confirm your email address. You must respond to this email to activate your account. Set aside up to 90 minutes for the initial training course. Upon completion print out your certificate and keep on file.

IMPORTANT: You must use the legal name and the email address you use when conducting your Howell Soccer Club Adult Registration.

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ANNUAL REFRESHER HOWELL SOCCER CLUB ABUSE PREVENTION TRAINING FOR ADULTS

Howell Soccer Club currently requires all Adults who are required to take the initial U.S. Center for SafeSport course to take the U.S. Center for SafeSport's official refresher course.

Refresher course is required on an annual basis to be completed by December 31 of the year following the year the initial course and subsequent refresher course was taken. Set aside up to 30 minutes to take the refresher course.

Example: If an Adult takes their initial course during 2019 they must complete their annual refresher no later than December 31, 2020. They may take the refresher anytime between January 1 and December 31 of 2020, no need to wait till a year expires

This is important as Howell Soccer Club requires all risk management credential requirements to not expire during the soccer year (September to August). Adults will be able to take their annual refresher courses anytime between January 1 and August 15 in order to be ready to receive their credentials, assuming all other requirements are met, by the end of August.

HOWELL SOCCER CLUB REPORTING PROCEDURES

The Howell Soccer Club Reporting procedures provide a mechanism that allows a complaint to be easily reported for a reasonable suspicion of Sexual or Physical abuse/neglect. New Jersey law states that EVERYONE IS A MANDATORY REPORTER.

MECHANISM FOR REPORTING

The list below outlines the appropriate contacts for reporting when physical, emotional or sexual abuse is suspected. The report should include whatever information may be helpful, such as alleged perpetrator, the names and addresses of the child and his/her parent or other guardian or caretaker, the child's age and nature of the extent of the injury, abuse or mistreatment if known. The person receiving the disclosure of abuse, neglect or mistreatment is required to make a report to using the following guidelines:

- Local Law Enforcement Number: May be posted on club website and given to athletes and parents.
- Division of Child Protection & Permanency (formerly Division of Youth & Family Services): Report if suspicious activity is applicable, 1-877-NJ-ABUSE may be on club website and given to athletes and parents

AFTER receiving guidance and direction from law enforcement and/or the Division of Child Protection & Permanency, consideration should be given to reporting incidents as follows:

- Club Risk Manager Contact Information (every club should have a point person for reporting)
- State Risk Manager: Evan Dabby, evan@njyouthsoccer.org, 609.336.2023
- National Governing Body (NGB)

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US Soccer Integrity Hotline Number: (312) 528-7004

US Soccer: <https://www.ussoccer.com/integrity-hotline>

US Center for SafeSport: <https://www.safesport.org/report-a-concern>

For details on Mandatory Reporting Requirements: Children New Jersey [click here](#).

A report to law enforcement may be made anonymously. There is no fee or cost associated with making a report.

Howell Soccer Club does not tolerate retaliation of any kind. No individual who makes such a good faith report will be subject to retaliation, including harassment, as a result of making a report. The SafeSport Act also includes qualified immunity for good faith reports. Howell Soccer Club urges all mandatory reporters to refrain from judging or evaluating the credibility of such allegations— leave that to law enforcement.

The obligation to report is not always satisfied by making an initial report. A Covered Adult is required to report supplemental information of which he or she becomes aware that may be relevant to a pending investigation.

Importantly, civil or criminal statutes of limitations do not affect or negate the obligation of a Covered Adult to report possible sexual misconduct. Misconduct should be reported, regardless of when it occurred. Failure to promptly report suspected child abuse to law enforcement authorities may constitute a violation of federal law and, in any event, will be deemed a violation of Howell Soccer Club Policy.

Without limiting the foregoing, it is also Howell Soccer Club Policy to report any suspected SafeSport violations to the NJYS State Office. A report can be made to safesport@njyouthsoccer.com. Furthermore, Howell Soccer Club prohibits retaliation against individuals making good faith reports of any suspected SafeSport violations.

HOWELL SOCCER CLUB ENFORCEMENT POLICY

All violations of the Howell Soccer Club Athlete & Participant Policy will be subject to the current Howell Soccer Club Procedures for Disciplinary Actions.

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PROHIBITED CONDUCT POLICY

Howell Soccer Club's Prohibited Conduct Policy is a policy that applies to all Howell Soccer Club Covered Adults and Minor Participants as defined in this Athlete and Participant Safety Program, as well as conduct by any subcontractor, supplier, customer or third party and their employees in their dealings with Howell Soccer Club employees. This policy is applicable to all Howell Soccer Club sanctioned activities and competitions.

Harassment

Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based upon a person's protected status. Howell Soccer Club will not tolerate harassing conduct that creates an intimidating, hostile, or offensive environment during Howell Soccer Club sanctioned activities and competitions. This Prohibited Conduct Policy forbids harassing conduct even when it does not rise to the level of a violation of law.

Among the types of conduct prohibited by this policy are epithets, slurs, negative stereotyping or intimidating acts based on an individual's protected status and the circulation or posting of written or graphic materials that show hostility toward an individual because of his or her protected status.

Sexual Harassment

Sexual harassment deserves special mention. Sexual harassment may involve individuals of the same or different gender. Unwelcome sexual advances, requests for sexual favors, and other verbal, written, or physical conduct of a sexual nature may constitute sexual harassment.

Examples of conduct which may constitute sexual harassment and are prohibited by this Policy include, but are not limited to:

- unnecessary touching, patting, hugging, pinching, or brushing against a person's body;
- staring, ogling, leering, or whistling at a person;
- continued or repeated verbal abuse of a sexual nature;
- sexually explicit statements, sexual flirtations, advances, propositions, subtle pressure for sexual activity, comments, questions, jokes, or anecdotes;
- graphic or degrading comments about a person's clothing, body or sexual activity;
- sexually suggestive objects, cartoons, posters, calendars, or pictures in the workplace;
- suggestive or obscene letters, notes or invitations;
- harassing use of electronic mail, electronic or instant messaging, or telephone communication systems; or
- other physical or verbal conduct of a sexual nature.

Racial, Religious, or National Origin Harassment

Racial, religious, or national origin harassment deserves special mention as well, and is expressly prohibited by Howell Soccer Club. Racial, religious, or national origin harassment includes any verbal, written, or physical act in which race, religion, or national origin is used or implied in a manner which would make a reasonable person uncomfortable in the environment within Howell Soccer Club sanctioned activities and competitions. Examples of race, religious or national origin harassment may include, but are not limited to:

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- jokes, which include reference to race, religion, or national origin;
- the display or use of objects or pictures which adversely reflect on a person's race, religion, or national origin; or
- use of pejorative or demeaning language regarding a person's race, religion, or national origin.

Child Sexual Abuse

Any sexual activity with a child is prohibited. This includes sexual contact with a child that is accomplished by deception, manipulation, force or threat of force, regardless of the age of the participants, and all sexual interactions between an adult and a child, regardless of whether there is deception, or the child understands the sexual nature of the activity.

Sexual Misconduct

Any sexual interaction between an athlete and an individual with evaluative, direct or indirect authority is prohibited. Such relationships involve an imbalance of power and are likely to impair judgment or be exploitative. This section does not apply to a pre-existing relationship between two spouses or life partners.

Emotional Misconduct

Emotional misconduct in all forms is prohibited. Emotional misconduct is a pattern of deliberate, non-contact behavior that has the potential to cause emotional or psychological harm to another person. Non-contact behaviors include verbal acts, physical acts, or acts that deny attention or support; or any act or conduct described as emotional abuse or misconduct under federal or state law (e.g. child abuse, child neglect). Emotional misconduct does not include professionally-accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline or improving athletic performance.

Physical Misconduct

Physical misconduct in all forms is prohibited. Physical misconduct is defined as contact or non-contact conduct that results in, or reasonably threatens to, cause physical harm to another person; or any act or conduct described as physical abuse or misconduct under federal or state law (e.g. child abuse, child neglect, assault). Physical misconduct does not include professionally accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline or improving athletic performance. For example, hitting and punching are well-regulated forms of contact in combat sports but have no place in soccer.

Bullying

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 are prohibited. Bullying does not include group or team behaviors that (a) are meant to establish normative team behaviors, or (b) promote team cohesion.

Hazing

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 are prohibited. Hazing does not include group or team activities that (a) are meant to establish normative team behaviors or (b) promote team cohesion.

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All Covered Adults are responsible to help ensure that we avoid misconduct.

All Covered Adults have an obligation to cooperate in any investigation of a complaint of misconduct, including providing any and all information concerning the complaint. Failure to do so may be a violation of this Policy.

Any violation of this Prohibited Conduct Policy by Covered Adults or Minor Participants may subject the individual(s) to disciplinary action. Howell Soccer Club prohibits retaliation against individuals making good faith reports of misconduct, including potential violations of this Prohibited Conduct Policy by Covered Adults or Minor Participants.

Howell Soccer Club is committed to maintaining an environment within its sanctioned activities and competitions that is free from all forms of discrimination, including harassment, on the basis of any legally protected status. Protected status includes race, color, age, religion, marital status, sex, ancestry, national origin, citizenship, veteran's status, pregnancy, disability, sexual orientation, protected activity, or any other characteristic protected by federal, state or local law. The policy also prohibits harassment on the basis of the protected status of an individual's relatives, friends or associates.

Howell Soccer Club is also committed to maintaining an environment within its sanctioned activities and competitions that is free from all forms of sexual abuse, sexual misconduct, emotional misconduct, physical misconduct, bullying and hazing.

POLICY TO LIMIT ONE-ON-ONE INTERACTIONS

The majority of child sexual abuse is perpetrated in isolated, one-on-one situations. By reducing such interactions between children and adults, the risk of child sexual abuse is reduced. However, one-on-one time with trusted adults is also healthy and valuable for a child. Howell Soccer Club's Policy to Limit One-on-One Interactions Between Adults and Minors ("Policy to Limit One-on-One Interactions") protects children while allowing for these beneficial relationships. These policies are intended to limit one-on-one interactions between Minor Participants and any Covered Adult who is not their legal guardian during Howell Soccer Club sanctioned activities and competitions.

Topics detailed within this policy include:

- One-on-One Interactions, including meetings and individual training sessions
- Massages and rubdowns
- Locker rooms, rest rooms, and changing areas
- Social media and electronic communications
- Local travel
- Team travel

A Minor Participant that reaches the age of majority may not be subject to this policy in their capacity as an athlete, and when interacting with Minor Participants who are aged 16 or older. The Policy to Limit One-on-One Interactions is in effect when this now age of majority athlete interacts with Minor Participants aged 15 or younger. Should a Minor Participant reach the age of

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majority and then obtain a position that presents a potential power imbalance, such as becoming a coach, the individual is subject to the Policy to Limit One-on-One Interactions.

One-on-One Interactions

Mandatory Components

- a) Application: This policy applies to all Covered Adults.
- b) Observable and interruptible
 - One-on-one interactions between a Minor Participant and a Covered Adult (who is not the minor's legal guardian) during Howell Soccer Club sanctioned activities and competitions are permitted, if they occur at an observable and interruptible distance by another adult.
 - Isolated, one-on-one interactions between a Minor Participant and a Covered Adult (who is not the minor's legal guardian) during Howell Soccer Club sanctioned activities and competitions are prohibited, except under emergency circumstances.
- c) Meetings
 - Meetings between a Covered Adult and a Minor Participant during Howell Soccer Club sanctioned activities and competitions should only occur if another adult is present, except under emergency circumstances. Such meetings should occur where interactions can be easily observed and at an interruptible distance from another adult.
 - If a one-on-one meeting takes place in an office, the door to the office should remain unlocked and open. If available, it should occur in an office that (if available) has windows, with the windows, blinds, and/or curtains remaining open during the meeting.
- d) Meetings with mental health care professionals: If a mental health care professional meets with a Minor Participant during Howell Soccer Club sanctioned activities and competitions, a closed-door meeting may be permitted to protect patient privacy – provided that (1) the door remains unlocked, (2) another adult is present at the Howell Soccer Club sanctioned activity or competition, (3) the other adult is advised that a closed-door meeting is occurring, and (4) written legal guardian consent is obtained by the mental health care professional, with a copy provided to Howell Soccer Club.
- e) Individual training session: Individual training sessions between Covered Adults and Minor Participants are permitted during Howell Soccer Club sanctioned activities and competitions if the training session is observable and interruptible by another adult. The Covered Adult should obtain the written permission of the Minor Participant's legal guardian in advance of the individual training session. Parents, guardians, and other caretakers should be allowed to observe the training session. Permission for individual training sessions should be obtained at least every six months.

Recommended Components

- a) Monitoring: When one-on-one interactions between Covered Adults and Minor Participants occur during Howell Soccer Club sanctioned activities and competitions, adults should monitor these interactions. Monitoring includes: knowing that the one-on-one interaction is occurring, the approximate planned duration of the interaction, and randomly dropping in on the one-on-one.
- b) Out-of-program contacts: Covered Adults are prohibited from interacting one-on-one with unrelated Minor Participants in settings outside of the program (including, but not limited

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to, one's home, restaurants, and individual transportation), unless parent/legal guardian consent is provided for each out-of-program contact. Such arrangements are nonetheless strongly discouraged.

MESSAGES AND RUBDOWNS

Mandatory components

- a) Application: This policy applies to all Covered Adults.
- b) Licensed, certified professional
 - Any massage or rubdown performed by a Covered Adult on a Minor Participant during Howell Soccer Club sanctioned activities and competitions is prohibited unless such Covered Adult is a licensed massage therapist.
 - Any massage or rubdown performed during Howell Soccer Club sanctioned activities and competitions by a licensed professional should be conducted in open and interruptible locations. Any massage of a Minor Participant should be done with at least one other adult present and should never be done with only the Minor Participant and licensed massage therapist in the room.
 - Even if a coach is a licensed massage therapist, the coach should not perform a rubdown or massage of a Minor Participant under any circumstances.

Recommended components

- a) Written consent: Written consent by a legal guardian should be provided before providing each massage or rubdown on a Minor Participant. Parents should be permitted to be in the room as an observer.

LOCKER ROOMS, REST ROOMS AND CHANGING AREAS

Mandatory Components

- a) Application: This policy applies to all Covered Adults.
- b) Use of recording devices: Use of any device's (including a cell phone's) recording capabilities, including voice recording, still cameras, and video cameras in locker rooms, rest rooms, changing areas, or similar spaces during Howell Soccer Club sanctioned activities and competitions is prohibited. Exceptions may be made for media and championship celebrations, provided that such exceptions are approved by Howell Soccer Club and two or more adults are present.
- c) Undress: Under no circumstances should an unrelated Covered Adult during Howell Soccer Club sanctioned activities and competitions be undressed (disrobed or partial or full nudity where private body parts are exposed) in front of Minor Participants.
- d) Isolated one-on-one interactions
 - At no time are unrelated Covered Adults permitted to be alone with a Minor Participant in a locker room, rest room, or changing area during Howell Soccer Club sanctioned activities and competitions, except under emergency circumstances.
 - If any Howell Soccer Club sanctioned activities and competitions require the use of a facility that has access to a single set of such facilities, the Howell Soccer Club,

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where applicable, and/or Howell Soccer Club member organizations, where applicable, should designate times for use by Covered Adults, if any.

- e) Monitoring: The Howell Soccer Club, where applicable, and/or Howell Soccer Club member organizations, where applicable, regularly and randomly monitor the use of locker rooms, rest rooms, and changing areas at facilities at which Howell Soccer Club sanctioned activities and competitions are taking place to ensure compliance with these policies.
- f) Non-exclusive facility: If the Howell Soccer Club and/or Howell Soccer Club member organizations use a facility for Howell Soccer Club sanctioned activities and competitions and that facility is used by multiple constituents, Covered Adults are nonetheless required to adhere to the rules set forth here.

Recommended Components

- a) To minimize the risk of bullying and hazing, the Howell Soccer Club, where applicable, and/or Howell Soccer Club member organizations, where applicable, use locker room monitors to ensure that minors are not left unattended in locker rooms, rest rooms, and changing areas.
- b) Adults make every effort to recognize when an athlete goes to the locker room or changing area during practice and competition and, if they do not return in a timely fashion, the Howell Soccer Club, where applicable, and/or Howell Soccer Club member organizations, where applicable, should check on the athlete's whereabouts.
- c) The Howell Soccer Club and Howell Soccer Club member organizations discourage parents from entering locker rooms and changing areas unless it is truly necessary. In those instances, it should only be a same-sex parent. If this is necessary, parents should let a coach or administrator know about this in advance.

SOCIAL MEDIA & ELECTRONIC COMMUNICATIONS

Mandatory components

- a) Application: This policy applies to all Covered Adults
- b) Content: All electronic communication originating from Covered Adults to Minor Participants should be professional in nature.
- c) Open and transparent
 - If a Covered Adult needs to communicate directly with a Minor Participant via electronic communications, another Covered Adult or the minor's legal guardian should be copied.
 - If a Minor Participant communicates to the Covered Adult privately first, the Covered Adult should respond to the Minor Participant with a copy to another Covered Adult or the minor's legal guardian.
 - A Covered Adult communicating electronically to the entire team should copy another Covered Adult.
 - Minor Participants may "friend" the Howell Soccer Club or Howell Soccer Club member organizations' official page(s).
- d) Prohibited electronic communications
 - Covered Adults are not permitted to communicate privately via electronic communications with Minor Participants, except under emergency circumstances.

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- Covered Adults are not permitted to “private message,” “instant message,” “direct message”, or send photos via Snapchat or Instagram to a Minor Participant privately.
 - Covered Adults are not permitted to maintain social media connections with Minor Participants; such Covered Adults are not permitted to accept new personal page requests on social media platforms from Minor Participants and existing social media connections with Minor Participants should be discontinued.
- e) Requests to discontinue: Legal guardians may request in writing that their child, a Minor Participant, not be contacted through any form of electronic communication by the Howell Soccer Club, Howell Soccer Club member organizations, or by specific Covered Adult(s). The respective organization(s) and/or Covered Adult(s) should abide by any such request that their child, a Minor Participant, not be contacted via electronic communication, absent emergency circumstances.

Recommended components

- a) Hours: Electronic communications should only be sent between the hours of 8:00 a.m. and 8:00 p.m.
- b) Monitoring
- The Howell Soccer Club, where applicable, and/or Howell Soccer Club member organizations, where applicable, should monitor their respective social media pages and remove any posts that violate the organization’s policies and practices for appropriate behavior.
 - The Howell Soccer Club, where applicable, and/or Howell Soccer Club member organizations, where applicable, should inform the legal guardian of a Minor Participant of any prohibited posts, as well as the organization’s administrator(s).

LOCAL TRAVEL

Local travel consists of travel to training, practice, and competition that occurs locally and does not include coordinated overnight stay(s).

Mandatory Components

- a) Application: This policy applies to all Covered Adults
- b) Transportation
- The Howell Soccer Club and/or Howell Soccer Club member organizations do not arrange for local travel
 - Covered Adults who are not also acting as a legal guardian, should not ride in a vehicle alone with an unrelated Minor Participant, absent emergency circumstances, and may only drive with at least two other Minor Participants or another adult at all times, unless otherwise agreed to in writing by the Minor Participant’s parent/legal guardian in advance of each local travel.

Recommended Components

- a) Shared or Carpool Travel Arrangement: Howell Soccer Club encourages parents/legal guardians to pick up their child, a Minor Participant, first and drop off their child, a Minor Participant, last in any shared or carpool travel arrangement.

Team Travel

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Team travel is travel to a competition or other team activity that the Howell Soccer Club and/or Howell Soccer Club member organization(s) plan and supervise.

Mandatory Components

- a) Application: This policy applies to all Covered Adults.
- b) Team/competition travel: When only one Covered Adult and one Minor Participant travel to a competition, the Minor Participant should have his/her legal guardian's written permission in advance and for each competition to travel alone with the Covered Adult.
- c) Hotel rooms: Covered Adults should not share a hotel room or other sleeping arrangement with a Minor Participant (unless the Covered Adult is the legal guardian, sibling, or is otherwise related to the Minor Participant).
- d) Meetings
 - Meetings should be conducted consistent with the Howell Soccer Club's policy for one-on-one interactions – i.e., any such meeting should be observable and interruptible.
 - Meetings should not be conducted in a hotel room.

Recommended Components

- a) Team travel policies should be signed and agreed to by all Minor Participants, parents, and Covered Adults traveling with the Howell Soccer Club and/or Howell Soccer Club member organization(s).
- b) Covered Adults who travel with the Howell Soccer Club and/or Howell Soccer Club member organizations should successfully pass a criminal background check and other screening requirements consistent with the organization's policies.
- c) During team travel, when doing room checks, attending team meetings and/or other activities, two-deep leadership and observable and interruptible environments should be maintained.

POLICY ON MONITORING AND ENFORCEMENT

Howell Soccer Club's Policy on Monitoring and Enforcement is set forth to establish procedures for monitoring and enforcing the Howell Soccer Club Athlete and Participant Safety Program, as well as to establish an appropriate grievance process to address allegations of misconduct following the report or complaint of misconduct.

Howell Soccer Club takes all reports of potential violations of this Athlete and Participant Safety Program seriously, and is committed to confidentiality and investigation of allegations. The Howell Soccer Club Risk Management (RM) Committee and/or Howell Soccer Club Legal Counsel may conduct or manage investigations.

In order to monitor and enforce the Howell Soccer Club Athlete and Participant Safety Program, Howell Soccer Club reserves the right to, either directly or through a contracted third-party service provider, survey, audit, require certifications of compliance with, or otherwise review compliance with this policy by direct member organizations and/or those organizations that are indirectly affiliated with Howell Soccer Club via membership or participation with any Howell Soccer Club direct member organization. Any Howell Soccer Club direct member organizations, and/or those organizations that are indirectly affiliated with Howell Soccer Club via membership or participation

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with any Howell Soccer Club direct member organization, that fail to maintain compliance with this policy will be subject to review by the Howell Soccer Club Board of Directors. This failure to maintain compliance with this policy may constitute a violation of the Howell Soccer Club Bylaws Article III Section 5.

The grievance process for potential policy violations will be materially free of bias and conflicts of interest. Additionally, the grievance process will include the opportunity for review by disinterested and unbiased fact finders, and a right to appeal pursuant to Howell Soccer Club and/or U.S. Soccer Bylaws, Rules, and Policies.

Should the Howell Soccer Club RM committee and/or Howell Soccer Club Legal Counsel deem that an alleged violation of any provision of the Howell Soccer Club Athlete and Participant Safety Program is supported, the Covered Adult who is alleged to have violated the Howell Soccer Club Athlete and Participant Safety Program will receive written notification in the form of an adverse action letter. An adverse action letter may include a temporary or permanent disqualification, a suspension, a removal from future assignments, or other remedial action (e.g. probation) that impacts participation. Notwithstanding the foregoing, Howell Soccer Club reserves the right to require additional training (e.g., SafeSport-certified training) on the part of any participant at any time.

The Covered Adult has the right to an appeal hearing before the Howell Soccer Club Board of Directors. The adverse action letter from the Howell Soccer Club RM Committee will include instructions on how to appeal the decision made by the Howell Soccer Club RM Committee. The Covered Adult has ten (10) calendar days from the receipt of the adverse action letter to submit an appeal in writing to the Howell Soccer Club State Office.

Once the adverse action letter from the RM Committee is received by the Covered Adult, that individual must submit a written notice of appeal to the Howell Soccer Club Board of Directors addressed to the Howell Soccer Club State Office. The written notice of appeal must be received by the Howell Soccer Club State Office within ten (10) calendar days from the receipt of the adverse action letter. The individual forfeits all rights to appeal if a written request of appeal is not received by the Howell Soccer Club State Office within the allotted time period.

The appeal hearing date will be established at the discretion of Howell Soccer Club Board of Directors. No members of the Howell Soccer Club Board of Directors, except the Howell Soccer Club President, who serves as an ex-officio member, will serve on the Howell Soccer Club Risk Management Committee. The Covered Adult may send materials to the Howell Soccer Club State Office to be reviewed by the Howell Soccer Club Board of Directors before his or her hearing date. All materials must be received 5 (five) business days before his or her hearing date. All Howell Soccer Club Board of Directors present at the meeting may vote. A vote will be taken by the Howell Soccer Club Board of Directors in a private session and the decision will be relayed in written form to the individual no later than 10 business days from the date of the meeting.

The Howell Soccer Club Board of Directors shall have the authority to determine if the individual should be permitted to participate further in Howell Soccer Club sanctioned activities and competitions, despite the individual's receipt of an adverse action letter. The Howell Soccer Club Board of Directors determines the terms of reinstatements and disqualifications, where applicable.

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As stated in the Background Screening Policy of the Howell Soccer Club Athlete and Participant Safety Program, U.S. Soccer Policy 601-10 does not provide for the appeal of risk management policy disqualifications to the USSF Appeals Committee, for those disqualifications pertaining to the Background Screening Policy.

The decision of the Howell Soccer Club Board of Directors shall be final and binding on all parties. Pursuant to U.S. Soccer Bylaw 704, the individual has the right to appeal a final decision rendered by Howell Soccer Club's process for violations of the Howell Soccer Club Athlete and Participant Safety Policy, excluding those decisions rendered pertaining to the Background Screening Policy of the Howell Soccer Club Athlete and Participant Safety Program.

Definitions for terms included in Program

For the purposes of Howell Soccer Club's Athlete and Participant Safety Program, we recognize the following definitions for terms used:

- a) **Adult Applicant:** For the purposes of the Background Screening Policy within Howell Soccer Club's Athlete and Participant Safety Program, an Adult Applicant includes any individual aged 18 or older who is a coach, assistant coach, team manager, assistant team manager, team trainer, team official, Howell Soccer Club employee, Howell Soccer Club board member, Howell Soccer Club committee member, Howell Soccer Club independent contractor, Club or League President, Club or League Delegate, Club or League Official, Club or League Representative, Club or League Administrator, Club or League Volunteer, or referee, or any other individual aged 18 or older seeking affiliation with Howell Soccer Club or Howell Soccer Club affiliated member organizations, who has regular contact with or authority over an amateur athlete who is a minor.
- b) **U.S. Center for SafeSport:** The U.S. Center for SafeSport is an independent 501(c)(3) authorized pursuant to the SafeSport Act, with jurisdiction over the USOC and NGBs with regard to safeguarding amateur athletes against abuse, including emotional, physical and sexual abuse, in sports, and which has been further tasked with certain duties in the areas of education and outreach, policy development, and response and resolution.
- c) **Core SafeSport Training:** The U.S. Center for SafeSport's online training, which consists of three modules: (1) Sexual Misconduct Awareness Education; (2) Mandatory Reporting, and (3) Emotional & Physical Misconduct, or the U.S. Center for SafeSport's in person PPT approved training.
- d) **Covered Adults:** This policy uses the term "Covered Adults" to refer to those adults (aged 18 and older) to whom these policies apply. Covered Adults are required to follow all policies included in Howell Soccer Club's Athlete and Participant Safety Program. Covered Adults include adult individuals (aged 18 and over) who are authorized directly by Howell Soccer Club or indirectly by a club/league that is directly affiliated with Howell Soccer Club to have regular contact with or authority over an amateur athlete who is a minor. Examples of Covered Adults include but are not limited to:
 - Howell Soccer Club board members;
 - Howell Soccer Club committee members;
 - Howell Soccer Club employees and independent contractors;
 - Club and League Presidents, Club and League Delegates, Club and League Representatives, Club and League Administrators, and Club and League Volunteers;
 - Coaches, Assistant Coaches, Team Managers, Assistant Team Managers, Team Officials, and Team Trainers; and

HOWELL SOCCER CLUB, INC.

Risk Management and Athlete Safety Program Policies

- Referees*
 - *While Referees, Referee Coaches, Referee Mentors, Referee Assignors, and other Referee Program-Affiliated Personnel are expected to adhere to these policies due to referee involvement in Howell Soccer Club sanctioned activities and competitions, it is understood that these individuals are also subject to any policies set forth by the Michigan Referee Committee and/or U.S. Soccer Policy.
- e) **Minor Participants:** Any participant, whether athlete, referee, or otherwise, who is under the lesser of (1) the age of 18; or (2) the age of majority in the applicable state, and who is participating in Howell Soccer Club sanctioned activities and competitions.
- f) **National Governing Body (NGB):** A U.S. Olympic National Governing Body, Pan American Sport Organization, or Paralympic Sport Organization recognized by the United States Olympic Committee pursuant to the Ted Stevens Olympic and Amateur Sports Act, 36 U.S.C. §§ 220501-220529. U.S. Soccer is a National Governing Body.
- Routine and/or regular contact with an amateur athlete who is a minor: Recurring, repeated or periodic contact between an adult and a minor.
 - Authority over those adults who have routine and/or regular contact with an amateur athlete who is a minor: Supervisory or decision-making authority over an adult who has recurring, repeated, or periodic contact with minors.
- g) **SafeSport Refresher Course:** The U.S. Center for SafeSport’s online training course(s) designed for those who have completed the initial “Core SafeSport Training” or the Center’s in person PPT approved training designated as “refresher” courses.
- h) **The SafeSport Act:** Public Law 115-126, the Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017.
- i) **USOC:** The United States Olympic Committee.