

SAFEGUARDING

SOCCER HOLDINGS, LLC



SECTION 1: INTRODUCTION

Soccer Holdings, LLC (the “**Club**”) is committed to ensuring that soccer is a safe, positive, and inclusive experience for individuals who regularly engage in soccer activity and attend events throughout our club. We firmly believe that Safeguarding is the responsibility of everyone within the club.

Soccer Holdings, LLC reserves the right, in its sole and absolute discretion at any time, to modify, amend, restate, or supplement this Policy. Soccer Holdings will use its best efforts to provide all employees and players with reasonable advance notice of any such change.

This Policy was created in accordance with the ‘Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017’ otherwise known as the ‘SafeSport Act’. U.S. Center for SafeSport (the “**Center**”) which was established pursuant to the SafeSport Act to assist in the regulation and enforcement of the SafeSport Act.

1.1 THE US CENTER FOR SAFESPORT (THE “CENTER”)

The Center is an independent 501(c)(3) organization that receives funding from the U.S. Federal Government, the USOPC, the 55 National Governing Bodies (“**NGB**”), including the Federation) as well as several third-party individuals and organizations. Pursuant to USOPC Policy, the Center maintains exclusive authority over: (a) actual or suspected sexual misconduct by Federation Adult Participants (and those covered personnel of other NGBs); and (b) misconduct that is reasonably related to an underlying allegation of sexual misconduct by adult participants. Exclusive authority means: (y) only the Center will investigate and manage any related hearing involving sexual misconduct and (z) neither the Federation, the USOPC nor any adult participants will conduct its own investigation or arbitration with respect to possible sexual misconduct. In 2018, the SafeSport Act amended the Ted Stevens Olympic and Amateur Sports Act to codify this jurisdiction, authorizing the Center to “serve as the independent national safe sport organization and...exercise jurisdiction over the corporation, each NGB, and each Paralympic sports organization with regard to safeguarding amateur athletes against abuse, including emotional, physical, and sexual abuse, in sports.” The SafeSport Act further authorizes the Center to:

- A. serve as the independent national safe sport organization and be recognized worldwide as the independent national safe sport organization for the United States;
- B. exercise jurisdiction over the corporation and each national governing body with regard to safeguarding amateur athletes against abuse, including emotional, physical, and sexual abuse, in sports;
- C. maintain an office for education and outreach that shall develop training, oversight practices, policies, and procedures to prevent the abuse, including emotional, physical, and sexual abuse, of amateur athletes participating in amateur athletic activities through national governing bodies;
- D. maintain an office for response and resolution that shall establish mechanisms that allow for the reporting, investigation, and resolution, pursuant to subsection (c), of alleged sexual abuse in violation of the Center's policies and procedures;
- E. ensure that the mechanisms under subparagraph (D) provide fair notice and an opportunity to be heard and protect the privacy and safety of complainants;
- F. maintain an office for compliance and audit;
- G. publish and maintain a publicly accessible internet website that contains a comprehensive list of adults who are barred by the Center; and
- H. ensure that any action taken by the Center against an individual under the jurisdiction of the Center, including an investigation, the imposition of sanctions, and any other disciplinary action, is carried out in a manner than provides procedural due process to the individual...”

Reports may be made to the Center for SafeSport, including on an anonymous basis, by visiting <https://uscenterforsafesport.org/> and selecting the “Report a Concern” link, or by calling (833) 587-7233.

1.2 HOW TO USE THIS POLICY

This Policy provides the safeguarding policies applicable to all Soccer Holdings employees, coaching staff, players, and other associated participants.

1.3 REPORTING CONCERNS

Soccer Holdings champions a culture of compliance, safety, and respect. As a part of this Policy, Soccer Holdings encourages open communication in which all athletes, participants, and employees feel comfortable reporting concerns, whether the concerns involve suspected abuse, other misconduct, or violations of the Minor Athlete Abuse Prevention Policy (“**MAAPP**”). Everyone is encouraged to raise concerns in the manner that is suitable to them.

As explained in further detail below in Sections II.B, II.C, and II.D, there are certain scenarios that *require* reporting to the Center and law enforcement. However, even in scenarios that do not trigger that obligation, we encourage you to use the RealResponse system.

Soccer Holdings partners with RealResponse to provide employees, players, and coaches the opportunity to submit anonymous feedback regarding their experience with the Club. RealResponse works with more than 100 colleges and universities along with USADA, the NFLPA and USA Gymnastics, as well as the NWSL.

RealResponse may be used by employees to anonymously share feedback regarding safety issues, misconduct, or other concerns. The platform may also be used to share positive experiences as well. You can share your anonymous feedback through RealResponse at any time by texting the word "Share" to the number 66595.

If you have any questions, please contact Human Resources.

1.4 COVERED PERSONS

This Policy applies to any individual age eighteen or older (“**Adult**”) who engages in Soccer Holdings and has regular contact (defined below) with any athlete or referee (see note regarding youth referees below), who is under the age of eighteen (“**Minor**”), in connection with Covered Programs.

Regular contact is defined as recurring, repeated or periodic contact between an Adult and Minor, or a person with supervisory or decision-making authority over an Adult who has recurring, repeated or periodic contact with Minors, including but not limited to overseeing, supervising, chaperoning, or otherwise interacting with (“**Regular Contact**”).

1.5 COVERED PROGRAMS/EVENTS

For the purposes of this Policy, a “**Covered Program**” is any sporting event, program, or academy program operated or organized in whole or in significant part by Soccer Holdings. This definition includes but is not limited to, tournaments, leagues, showcases, and camps run by Soccer Holdings. While Soccer Holdings may not have authority or control over non-sanctioned events operated or organized by other Clubs, any act or omission prohibited by this Policy may serve as an independent basis for disciplinary action if it calls into question a Covered Person’s behavior and appropriateness for involvement in the activity.

1.6 MINOR PLAYERS WHO BECOME ADULT PLAYERS

All athletes turning 18 who still meet the threshold for regular contact or authority must complete the SafeSport Core training and must comply with the prevention policies herein.

SECTION 2: FRAMEWORK POLICIES

2.1 PROHIBITED CONDUCT POLICIES

Soccer Holdings is committed to maintaining a work, training and competition environment that is free from all forms of abuse, misconduct, bullying and hazing. It is a violation of this Policy for any Covered Person to engage in any of the following forms of misconduct prohibited by this Policy.

Disciplinary action will be taken against any individual found to have violated the Prohibited Conduct Policy herein. Appropriate action will also be taken against any subcontractor, supplier, or customer found violating this Policy.

It is significant to note that most of the behaviors listed in the Prohibited Conduct Policy involving Minors are considered criminal offenses. As such, violations of the policies outlined below **must** be reported to law enforcement in addition to the Center.

2.2 CHILD SEXUAL ABUSE

Covered Persons shall not engage in any activity involving a sexual act (“**Sexual Interaction**”) with a Minor. Sexual Interaction includes, but is not limited to: rape; sexual battery; physical sexual contact; molestation; sexually explicit or offensive verbal communication; sexually oriented conversations; verbal sexual harassment; voyeurism; sexual intercourse or sexual touching; sexual exploitation (including creating or disseminating pornographic images); exposing of genitalia; viewing of sexual activity; viewing or disseminating content or imagery of a sexual nature; or permitting, allowing, or encouraging a Minor to engage in prostitution, or other forms of sexual exploitation of children (collectively, “**Sexual Child Abuse**”).

2.3 SEXUAL EXPLOITATION

It is a violation of this Policy for Covered Persons to engage in any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes (“**Sexual Exploitation**”). Sexual Exploitation occurs when an individual purposely or knowingly:

- a. Allows third parties to observe private sexual activity from a hidden location (e.g., closet) or through electronic means (e.g., live streaming of images) without the consent of all parties involved in the sexual activity;
- b. Records or photographs private sexual activity and/or a person’s intimate parts (including genitalia, groin, breasts, or buttocks) without the consent of all parties in the recording or photo;
- c. Engages in voyeurism (e.g., watching private sexual activity or viewing another person’s intimate parts when that person would have a reasonable expectation of privacy), without the consent of all parties being viewed;
- d. Disseminates, shows, or posts images of private sexual activity and/or a person’s intimate parts (including genitalia, groin, breasts, or buttocks) without prior consent of
- e. the person depicted in the images;
- f. Intentionally exposes another person to a sexually transmitted infection or virus without that person’s knowledge; and/or
- g. Engages in prostituting or trafficking another person.

2.4 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.

2.5 EMOTIONAL MISCONDUCT (EMOTIONAL ABUSE)

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).

2.6 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.

2.7 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.

2.8 PHYSICAL MISCONDUCT

Physical misconduct in all forms is prohibited. Physical misconduct is defined as contact or noncontact 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).

2.9 RACIAL, RELIGIOUS, OR NATIONAL ORIGIN HARASSMENT

Racial, religious, or national origin harassment deserves special mention as well and is expressly prohibited by Soccer Holdings. 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 that would make a reasonable person uncomfortable in the work environment or which would interfere with the person's ability to perform the job. Examples of race, religious or national origin harassment may include, but are not limited to:

- 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.

2.10 HARASSMENT

Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based upon a person's protected status. Soccer Holdings will not tolerate harassing conduct that affects tangible job benefits, that unreasonably interferes with an individual's work performance or safety, or that creates an intimidating, hostile, or offensive working environment.

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.

Prohibited conduct can also include jokes, kidding, or teasing about another person's protected status. While harassing conduct is unlawful only if it affects tangible job benefits and/or interferes unreasonably with work performance and creates an abusive or hostile work environment, this Policy forbids harassing conduct even when it does not rise to the level of a violation of law.

2.11 SEXUAL HARASSMENT

Sexual harassment refers to unwelcome sexual advances, requests for sexual favors, and other verbal, written, or physical conduct of a sexual nature that constitutes sexual harassment when:

- submission to such conduct is made either explicitly or implicitly a term or condition of the individual's employment, standing in sport, or participation in events, programs and/or activities; or when submission to or rejection of such conduct is used as the basis for sporting decision affecting the individual;
- submission to or rejection of such conduct by an individual is used as the basis for an employment decision affecting that individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance and creating an intimidating, hostile, or offensive working environment.
- Sexual harassment may involve individuals of the same or different gender. It may also occur between individuals of any employment status.

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.

Soccer Holdings prohibits managers and supervisors from threatening or insinuating, either explicitly or implicitly, that an employee's submission to or rejection of sexual advances will in any way influence any personnel decision regarding that employee's wages, assigned duties, advancement, evaluation, shifts, career development, or any other condition of employment.

2.12 HOSTILE ENVIRONMENT

A "**Hostile Environment**" exists when the conduct is sufficiently severe, persistent, and/or pervasive such that it interferes with, limits, or deprives any individual of the opportunity to participate in any Covered Program or activity. Conduct must be deemed severe, persistent, or pervasive from both a subjective and objective perspective. Whether a Hostile Environment exists depends on the totality of known circumstances, including, but not limited to:

- a. Frequency, nature, and severity of the conduct;
- b. Whether the conduct was physically threatening;
- c. Effect of the conduct on the victim's mental or emotional state;
- d. Whether the conduct was directed at more than one person;
- e. Whether the conduct arose in the context of other discriminatory conduct;
- f. Whether the conduct unreasonably interfered with any person's participation in sports, education or work programs or activities; and
- g. Whether the conduct implicates concerns related to protected speech.

A Hostile Environment can be created by persistent or pervasive conduct or by a single or isolated incident that is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to prove a Hostile Environment, particularly if the conduct is physical. A single incident of sexual contact, for example, may be sufficiently severe to constitute a Hostile Environment. In contrast, the perceived offensiveness of a single verbal or written expression, standing alone, is typically not sufficient to constitute a Hostile Environment.

2.13 AIDING & ABETTING

Aiding and Abetting is any act taken with the purpose of facilitating, promoting, or encouraging a violation of this Policy. Aiding and Abetting also includes, without limitation, knowingly:

- Allowing any person who has been identified as suspended or otherwise ineligible by the Center, Federation, or Soccer Holdings.
- Allowing any person who has been identified as suspended or otherwise ineligible by the Center, the Federation, or Soccer Holdings to coach or instruct Athletes.
- Allowing any person who has been identified as ineligible by the Center, the Federation or Soccer Holdings to have an ownership interest in a facility, an organization, or its related entities
- Providing any coaching-related advice or service to an athlete who has been identified as suspended or otherwise ineligible by Center, the Federation, or Soccer Holdings.
- Allowing any person to violate the terms of their suspension or any other sanctions imposed by Center, the Federation, or Soccer Holdings.
- Allowing any person who would otherwise be ineligible to participate. For example, knowingly employing an individual with a criminal conviction that would disqualify them from participating.
- Staff violates this section if someone acts on their behalf to engage in Aiding or Abetting.

2.14 POWER IMBALANCE

Considering the foregoing prohibitions, any individual using their status or position to influence the actions of any other individual shall be deemed in violation of this Policy:

This occurs after assessing the totality of circumstances of a given situation and there is found to be a power imbalance between the individuals involved and the individual in such position of power utilizes the power in a way to manipulate, coerce, sanction, or intimidate another individual. Whether someone occupies a position of power depends on several factors, including: the nature and extent of the supervisory, evaluative, or other authority over the person; the actual relationship between the parties; the parties' respective roles; the nature and duration of the relationship; and the age of the people involved, both presently and at the time of the relationship's conception.

Once a coach-player relationship is established, a power imbalance is presumed to exist throughout the coach-player relationship regardless of age. A power imbalance may exist, but is not presumed, where an intimate relationship that did not contain a power imbalance existed before the coach-player relationship (e.g., a relationship between two spouses or life partners that preceded the sport relationship).

2.15 INTENTIONAL EXPOSURE

A Covered Person violates this Policy by intentionally exposing his or her breasts, buttocks, groin, or genitals, or induce another to do so, to another adult where there is a power imbalance, or to a Minor.

2.16 INAPPROPRIATE PHYSICAL CONTACT

A Covered Person violates this Policy by engaging in inappropriate physical contact with another person where there is a power imbalance. Such inappropriate contact includes, but is not limited to, intentionally (a) touching, slapping, or otherwise contacting the buttocks or genitals; (b) excessively touching or hugging; or (c) kissing.

2.17 PROHIBITED CONDUCT BY MINORS

Soccer Holdings does not tolerate abusive, harassing, or discriminatory conduct between players, regardless of their ages. Depending on the facts and applicability of the above prohibitions to Minors, Soccer Holdings may discipline players based on the above Prohibited Conduct. For instance, prohibitions on intimate relationships and electronic communications shall not apply between Minors unless a significant age or power disparity creates cause for concern, or they otherwise involve Prohibited Conduct.

SECTION 3: REPORTING POLICY

3.1 REPORTING SUSPECTED CHILD ABUSE TO LAW ENFORCEMENT

The Protecting Young Victims from Sexual Abuse and SafeSport Authorization Act (“**SafeSport Act**”) of 2017 was signed into law on 14 February 2018. This comprehensive law amends the amends the Victims of Child Abuse Act of 1990, 34 U.S.C. § 20341, et seq., and clarifies who is a mandatory reporter for cases of suspected child abuse. Specifically, the definition of mandatory reporter now includes any “adult who is authorized, by a national governing body, a member of a national governing body. By doing this, the law increases the standard of care and makes it a crime for an individual involved in a national governing body sports organization, to ignore, or not report to law enforcement, any reasonable suspicion of an act of Child Abuse, including sexual abuse, within **24 hours**. Consequently, Soccer Holdings urges all their employees, and all Soccer Holdings participants to understand their reporting obligations under this important federal law. Under the SafeSport Act, the reporting obligation is triggered when a mandatory reporter becomes aware of “facts that give reason to suspect” a child has suffered an incident of Child Abuse. § 20341(a)(2). Under the Act, Child Abuse includes physical or mental injury, sexual abuse or exploitation, or negligent treatment of a child. “**Sexual Abuse**” includes, but is not limited to, the employment, use, persuasion, inducement, enticement, or coercion of a child to engage in, or assist another person to engage in, sexually explicit conduct, or the rape, molestation, prostitution, or other form of sexual exploitation of children or incest with children. “**Mental Injury**” means harm to a child’s psychological or intellectual functioning, which may be exhibited by severe anxiety, depression, withdrawal, or outward aggressive behavior, or a combination of those behaviors, which may be demonstrated by a change in behavior, emotional response, or cognition.

In addition to these requirements, any Soccer Holdings participant or Covered Person must report an incident of child abuse (including, but not limited, to sexual abuse) to law enforcement, the Center, the Federation.

The SafeSport Act also includes qualified immunity for good faith reports. Soccer Holdings urges all mandatory reporters to refrain from judging or evaluating the credibility of such allegations and to leave such assessments to law enforcement.

Failure to promptly report suspected Child Abuse to law enforcement authorities may constitute a violation of federal law and will also be deemed a violation of this Policy.

The message is clear: if you suspect Child Abuse, report it to law enforcement immediately.

3.2 REPORTING TO THE U.S. CENTER FOR SAFESPORT

In addition to the above obligation to report to law enforcement as detailed above, Covered Persons must also immediately report any suspected incidents of sexual abuse – even if the incidents involve non-minors within 24 hours of becoming aware of the allegation. An allegation means any “good faith claim or assertion” that a potential violation has occurred. Additionally, if the case involves potential claims of child abuse, Participants will be required to report any allegation to their local law enforcement.

3.3 MONITORING & ENFORCEMENT

Soccer Holdings takes all reports of potential violations of this SafeSport Policy seriously and is committed to confidentiality and investigation of allegations. Employees who are being investigated for a potential code violation will have fair notice and an opportunity to be heard prior to any final determination.

Soccer Holdings does not tolerate retaliation of any kind. No individual who makes such a good faith report will be subject to retaliation, including harassment, or any adverse employment consequence, as a result of making a report.

SECTION 4: EMPLOYEE SELECTION

4.1 BACKGROUND SCREENING

Accordingly, and consistent with the goals of the PROTECT Act of 2003 and the SafeSport Act 2017 and the Federation Soccer Framework, Soccer Holdings requires background screening on all Covered Persons, Club representatives or Club participants as defined below who have regular contact with Minors:

- All full and part-time of Soccer Holdings who are to have regular contact with Minors;
- All Club representatives such as, Coaches, Team Managers, Administrators, or other staff members who have regular contact with Minors or who travel;
- All contractors at Soccer Holdings who have regular contact with Minors;
- All medical professionals such as massage therapists, physicians, nutritionists, etc. working directly with Minors.
- Any Soccer Holdings scouts who request for have contact with Minors.
- Adult players who have additional roles as coaches during clinics and camps with Minors.
- All other individuals who Soccer Holdings, in its discretion should be subject to a background check.

4.2 WRITTEN APPLICATION

Those authorized by Soccer Holdings to have regular contact with Minors within, or outside, the scope of covered programs as an employee, contractor, vendor, or volunteer—are to submit a written application. At a minimum, the written application should:

- Ask for personal information, including the applicant’s name, address, phone number, and driver’s license number.
- Ask about previous work and volunteer experiences, particularly regarding any involvement in youth programs.
- Ask questions intended to elicit information concerning high-risk behaviors- for example, whether the applicant ever consumed alcohol or drugs while working with children or mistreated or abused a child.
- Provide written consent for contacting personal references and performing a criminal background check, consistent with the procedures described below, including an indemnification clause.

Moreover, consistent with the sections below, all Covered Persons have an immediate, mandatory self-disclosure obligation to report if they, at any point, have been disqualified or declared by another sport organization or league to be temporarily or permanently ineligible to participate.

4.3 PERSONAL INTERVIEW

Those authorized by Soccer Holdings to have regular contact with Minors within, or outside, the scope of Covered Programs as an employee, contractor, vendor, or volunteer—are to submit to a personal interview by appropriate senior Soccer Holdings leadership. The personal interview is intended to not only elicit whether applicants are a “good fit” for the organization but also screen for potential indicators that the individual may not be suitable from a risk standpoint. The goal here is to ask questions intended to elicit information concerning high-risk behaviors. Soccer Holdings shall use their best judgment to determine whether any potential representative is unfit to have regular contact with Minors based on the information obtained through the personal interview. Soccer Holdings considers posing the following questions to such individuals to screen for risk factors:

- Why do you want this job/position?
- What makes you a good candidate for working with Minors? What would your friends or colleagues say about how you interact with Minors?
- What strategies do you use to respond to challenging behaviors from Minors?
- Is there anyone who might suggest that you not work with Minors? Why or why not?
- What other hobbies or activities do you enjoy?

4.4 REFERENCE CHECKS

References will be sought from potential Soccer Holdings representatives who will have contact with Minors within, or outside, the scope of Covered Programs as an employee, contractor, vendor, or volunteer. Soccer Holdings would recommend that candidates provide names and contact information for three non-familial references who can speak to their character, history, and suitability for having regular contact with Minors. While the best such references come from places where the applicant has worked with Minors, personal and character references serve an important role in assessing any applicant's suitability to have regular contact with Minors.

Moreover, Soccer Holdings may require such individuals to sign a waiver or release that enables the organization to check other references who may not have been listed by the applicant. In considering when and whether to contact such a non-listed reference, Soccer Holdings will carefully match references with an applicant's employment and volunteer history to determine if any notable supervisors or colleagues are missing from the references listed by the applicant.

4.5 MANDATORY SELF-DISCLOSURE

All Covered Persons have a mandatory self-disclosure obligation, which means that if at any point during their association with Soccer Holdings, a Covered Person has been disqualified or declared by another sport organization or league to be temporarily or permanently ineligible, the Covered Person is required to self-disclose this information immediately. Failure to disclose is a basis for discipline/disqualification.

SECTION 5: TRAINING & EDUCATION

The SafeSport Act requires amateur sports organizations to offer consistent training to adult members who are in regular contact with amateur athletes who are Minors, and subject to parental consent, and to members who are Minors, regarding the prevention of child abuse. The “Core SafeSport Training” offered by the Center meets the requirements of this Policy². It consists of three modules: (i) Sexual Misconduct Awareness Education; (ii) Mandatory Reporting, and (iii) Emotional & Physical Misconduct.

5.1 TRAINING REQUIREMENTS

All adult-covered persons who have regular contact with Minor Athletes must successfully complete the required SafeSport training every year in order to participate with Soccer Holdings. For the avoidance of doubt, Soccer Holdings requires the following persons to complete the Core SafeSport Training prior to the commencement of their association with Soccer Holdings, or within 45 days of being hired, appointed, or retained, but in any event before commencing contact with Minors:

- Individuals who will have regular contact with Minors
- Soccer Holdings representatives (coaches, Club technical staff and administrators, physicians, massage therapists and other medical staff including first aiders)
- Contractors and vendors with access to Minors (security and other medical personnel not employed directly by Soccer Holdings)
- Adult game officials
- Adult players- recognizing that there may be Minors in the team, and that players may have additional roles such as clinic appearances and camps provided by Soccer Holdings
- Chaperones, volunteers, and other individuals who have access to Minors.

In connection with the annual registration process, all Covered Persons affiliated with Soccer Holdings who will have regular contact with Minors will have to certify that they have completed the required SafeSport training. Training provides participants the necessary tools, vocabulary, and information to safeguarding Soccer Holdings, minimize the opportunities for child physical or sexual abuse and other types of misconduct, and respond to concerns more effectively. Once a participant has successfully taken all three “Core Training” modules (including Sexual Misconduct Awareness Education, Mandatory Reporting, and Emotional & Physical Misconduct), they have met the “SafeSport Trained” requirement. The training runs in a 4-year cycle as follows:

- Year 1: SafeSport Trained – U.S. Soccer Federation
- Year 2: Refresher 1
- Year 3: Refresher 2
- Year 4: Refresher 3
- Year 5: SafeSport Trained – U.S. Soccer Federation (again)

This Policy requires adult participants to complete the Center’s Core SafeSport Training (i.e., the Center’s online training or the Center’s approved in-person training), and as applicable, follow-up refresher course training, with any new Adult Participants to receive initial training:

- Before regular contact with Minors begins; or
- Within 45 days of a new role within Soccer Holdings

SECTION 6: PREVENTION POLICIES

6.1 LIMITING ONE-ON-ONE INTERACTIONS BETWEEN ADULTS & MINORS

Soccer is a team sport. Although appropriate physical contact and one-on-one interaction between Minor Athletes and Coaches/trainers, etc. may be conducive to improving physical skills, Soccer Holdings believes prudent limitations on one-on-one interactions can reduce the potential for abuse and misconduct without negatively impacting player development or unnecessarily limiting one-on-one time with trusted adults.

Part II of the U.S. Center for SafeSport’s Minor Athlete Abuse Prevention Policies (“MAAPP”) requires Soccer Holdings to implement the following policies which cover one-on-one interactions, meetings and training sessions, athletic training modalities, massages and rubdowns, locker rooms and changing areas, electronic communications, transportation, and lodging.

Requests to Discontinue. Parents/legal guardians may request in writing that their minor child not be contacted through electronic communication by the organization or by covered persons. Soccer Holdings will abide by any such request, absent emergency circumstances.

6.2 AVOIDING GIFTS

Individuals who groom children will often provide special gifts or privileges, as one strategy to gain the child’s trust and fill a need in their life, in advance of sexually abusing the child. Accordingly, Soccer Holdings discourages all adult Soccer Holdings participants, including employees and volunteers, from giving gifts or granting special privileges to athletes and prohibits any such gift or privilege when not available to the entire team.

6.3 APPROPRIATE PHYSICAL CONTACT

Physical contact with athletes – for safety, consolation, and celebration – has multiple criteria in common which make it both safe and appropriate. These criteria include the physical contact takes place in public there is no potential for, or actual, sexual contact during the physical contact · the physical contact is for the benefit of the athlete, not to meet an emotional or other need of an adult.

6.3.1 SAFETY

The safety of our athletes 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.

6.3.2 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 “side hugs”, and
- congratulatory gestures such as celebratory hugs, “jump-arounds” and pats on the back for any form of athletic or personal accomplishment. NOTE: this does not include “butt-pats” or “chest bumps.” This outdated means of celebration makes many athletes uncomfortable and is best replaced with a high-five or a fist bump.

6.3.3 CONSOLATION

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

- Embracing a crying player, but only in a public place or circumstance.
- Putting an arm around a player while verbally engaging them in an effort to calm them down (“side hugs”).
- Lifting a fallen player off the playing surface and “dusting them off” to encourage them to continue competition.

6.4 SUPERVISION

No Minor should be left alone at a training session or at any other time until they are picked up by their parent, older sibling, or other designated adult. It is recommended that the last adult in addition to the coach or athletic trainer wait at the site until the Minor is picked up.

6.5 MEETINGS

Meetings between adult participants and minors at Soccer Holdings facilities may only occur if another adult is present. Such meetings must 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 must remain unlocked and open. If available, it will occur in an office that has windows, with the windows, blinds, and/or curtains remaining open during the meeting.

If a mental health care professional meets with minors at Soccer Holdings facilities, a closed-door meeting may be permitted to protect patient privacy—provided that (i) the door remains unlocked, (ii) another adult is present at the facility, (iii) the other adult is advised that a closed-door meeting is occurring, and (iv) written consent of the parent/legal guardian of the minor is obtained by the mental health care professional consistent with applicable laws and ethical standards, with a copy provided to Soccer Holdings.

At no time during these one-on-one meetings should a minor be denied access to their cell phone or other personal device.

An individual meeting may be necessary to address a player’s concerns, training program, or competition schedule. Under these circumstances, Covered Persons are to observe the following guidelines when dealing with a Minor Player.

6.5.1 INTERACTIONS SHOULD BE OBSERVABLE & INTERRUPTIBLE

All one-on-one In-Program Contact between an adult participant and a minor athlete must be observable and interruptible, except:

- When a Dual Relationship exists; or
- When the Close-in-Age Exception applies; or
- If a minor athlete needs an Adult Participant Personal Care Assistant, and:
 - the minor athlete’s parent/guardian has provided written consent to Soccer Holdings for the Adult Participant Personal Care Assistant to work with the minor athlete; and
 - the Adult Participant Personal Care Assistant has complied with the Education & Training Policy; and
 - the Adult Participant Personal Care Assistant has complied with the Clubs’ screening policy; or
- In other circumstances specifically addressed in this Policy that allow for certain one-on-one interactions if Soccer Holdings receives parent/ guardian consent.

6.5.2 INTERACTIONS ARE MONITORED

When one-on-one interactions between Soccer Holdings and Minor Athletes occur at the Soccer Holdings facilities or sanctioned events that are partially or fully under the Federation's jurisdiction, other covered persons will 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.

6.6 INDIVIDUAL TRAINING SESSIONS

An In-Program individual training session with a minor athlete (meaning not team training, but training involving one athlete and one coach) may be necessary to further player development. Under these circumstances, the individual training session should be observable and interruptible by others. Additionally, written parent/guardian permission is required in advance of the individual training session(s) and must be documented at least annually. Parents/guardians are welcome to attend the individual training. Parents, guardians, and other caretakers must be allowed to observe individual training sessions.

6.7 OUT-OF-PROGRAM CONTACTS

Covered persons are prohibited from interacting one-on-one with minor players, to whom they are not related, in private settings outside of the program (including, but not limited to, one's home and individual transportation), unless parent/legal guardian consent is provided for each out of program contact. Such arrangements are nonetheless strongly discouraged.

6.8 MESSAGE AND OTHER ATHLETIC TRAINING INTERACTIONS REQUIREMENTS

All In-Program athletic training modalities, massages, or rubdowns of a minor athlete must:

- Be observable and interruptible.
- Have another Adult Participant physically present for the athletic training modality, massage, or rubdown.
- Have documented consent as explained in subsection 2 below (entitled "Consent").
- Be performed with the Minor Athlete fully or partially clothed, ensuring that the breasts, buttocks, groin, or genitals are always covered.
- Allow parents/guardians in the room as an observer, except for competition or training venues that limit credentialing.
- The provider should narrate the steps in the massage, rubdown, or athletic training modality before taking them, seeking assent of the Minor Athlete throughout the process.
- When possible, techniques should be used to reduce physical touch of Minor Athletes.
- Only licensed providers should administer a massage, rubdown, or athletic training modality.
- Coaches, regardless of whether they are licensed massage therapists, should not massage Minor Athletes

It is recommended that Parents/guardians are offered the U.S. Center for SafeSport education and training on child abuse prevention before providing consent for their Minor Athlete to receive an athletic training modality, massage, or rubdown.

6.8.1. CONSENT

Providers of athletic training modalities, massages, and rubdowns *must* obtain consent at least annually from Minor Athletes' parents/guardians before providing any athletic training modalities, massages, or rubdowns. Minor Athletes or their parents/guardians can withdraw consent at any time.

SECTION 7: ELECTRONIC COMMUNICATIONS & SOCIAL MEDIA

7.1 COMMUNICATION GUIDELINES

Electronic communications are an ever-changing aspect of the way we communicate today. The specific rules below may reference certain forms of electronic communication, and the specific application of principles may change with regard to a given app, platform, or method of communication, but regardless of the means, **the following principles apply across all manner of electronic communication and should be used to guide adult behavior when communicating with Minor Players.**

7.2 CONTENT MUST BE PROFESSIONAL IN NATURE

All electronic communications between a coach/team personnel and a Minor Athlete must be professional in nature (i.e., soccer related) and for the purpose of communicating information about team activities or team-oriented communication (i.e., motivation, instruction).

Communication or conversation regarding illegal or age-inappropriate topics (drugs, alcohol use, sexually explicit language or imagery, or discussion of adult personal life, social activities, relationship, or family issues) is not permitted.

7.3 COMMUNICATION MUST BE OPEN AND TRANSPARENT

The content of any electronic communication must generally be group-based and should always be readily available to share with the player's family and Soccer Holdings.

Administrators, coaches, staff, and/or volunteers are strictly prohibited from using Snap Chat, Instagram, Facebook (or any similar app or app functionality that automatically deletes the content of a communication) to communicate with minor players.

If a covered person needs to communicate directly with a minor via electronic communications, **another covered person or the minor's parent/legal guardian must be copied.**

If a minor communicates to the covered person privately first, the covered person must respond to the minor, copying another covered person or the minor's parent/legal guardian.

A covered person communicating electronically to the entire team will copy another covered person.

Consider using group-focused platforms under Soccer Holdings administrative control (e.g., but not limited to, Teamwork, Slack, etc.).

7.4 KEEP IMAGERY PUBLIC

In posting imagery, Adults are expected to be sensitive to the status of minors. This means any imagery posted to a team website or social media should be soccer-related, not private (e.g., taken in public view), and age-appropriate.

Under no circumstances should imagery depict any conduct that would violate any aspect of this Policy.

Requests of parents/guardians of minor athletes to remove imagery in which their child is recognizable and individually featured will be honored to the extent practicable. Where photos are team photos, generally no child is individually featured, but the request will nonetheless be considered in good faith.

7.5 PROHIBITED ELECTRONIC COMMUNICATION – DIRECT MESSAGING

Covered persons are not permitted to communicate privately via electronic communications (meaning directly message one individual versus a group message) with minors.

Covered persons are not permitted to “private message,” “instant message,” “direct message,” or send photos to a minor privately, regardless of what platform is used.

Covered persons are not permitted to maintain social media connections with minors; such adults are not permitted to accept new personal page requests on social media platforms from minors; and existing social media connections with minors shall be discontinued (and, where necessary, the reason for discontinuing should be explained to the Minor). Instead, players and parents can “friend” the official organization’s team page, and coaches can communicate with Players through the site or through similar group-focused methods of communication.

Players and coaches employed by Soccer Holdings may use email to communicate **provided** that the coach is using only their official Club email account and further provided that all email content between coach and player otherwise complies with this Policy. **When communicating with a minor through email, another covered person or the minor’s parent/legal guardian must be copied.**

7.6 REQUESTS TO DISCONTINUE

Parents/legal guardians may request in writing that their minor child not be contacted through electronic communication by the organization or by covered persons. Soccer Holdings will abide by any such request, absent emergency circumstances.

7.7 SOCIAL MEDIA

Social Media includes Facebook, Instagram, LinkedIn, texting, WhatsApp, GroupMe, TikTok and Similar Apps.

1. **Keep personal pages personal.** Administrators, coaches, staff, and/or volunteers may not invite or allow minor athletes to join a personal social media page unless the Dual Relationship Exception applies. Athletes should be reminded that initiating a “friend” request to administrators/coaches/ staff/volunteers is not permitted.
 - Administrators, coaches, staff, and/or volunteers are encouraged to set their social media pages to private settings.
 - Similarly, those who work with Minor Athletes are reminded that they set an example for Minor Athletes. If a page is not private, U.S. Soccer expects administrators, coaches, staff, and/or volunteers who work with Minor Athletes to refrain from posting inappropriate, off-color content or content that would violate the Prohibited Conduct Policy or otherwise commenting on posts that would.
2. **Choose Apps that support group-based communication.** Apps such as Team Works™ and GroupMe™ often provide a helpful way to communicate, but again, individual messages should be avoided.
3. **Respect reasonable “soccer” hours:** Real-time electronic communications (e.g., texting via SMS, apps, etc.) between coaches and athletes on a group basis is generally allowed between **8 am - 8 pm** unless there is a specific safety or soccer-related need to communicate.

SECTION 8: LOCKER ROOM & TRAINING AREAS

Players (especially minors) are particularly vulnerable in locker rooms and changing areas due to various stages of dress/undress and because athletes are less supervised than at many other times. The risk of athlete-to-athlete problems, such as child sexual abuse and bullying, harassment, and hazing, is present when coaches or staff members are not monitoring athletes. This is especially true in locker rooms. Adherence to a locker room and changing areas policy enhances privacy and reduces the likelihood of misconduct. The following guidelines are designed to maintain personal privacy as well as to reduce the risk of misconduct in locker rooms and changing areas.

8.1 USE OF CELL PHONE OR ELECTRONIC DEVICE IS PROHIBITED

Cell phones and other devices with recording capabilities, including voice recording, still cameras, and video cameras, increase the risk of different forms of misconduct in locker rooms and changing areas. As a result, the **USE OF A DEVICE'S PHOTOGRAPHIC OR RECORDING CAPABILITIES IN THE LOCKER ROOMS, RESTROOMS, CHANGING AREAS, OR SIMILAR SPACES IS PROHIBITED**. Exceptions may be made for media and championship celebrations, provided everyone is fully clothed, parent/legal guardian consent is provided, and such exceptions are approved by the Club and two or more Adults are present during all recording.

8.2 ISOLATED ONE-ON-ONE INTERACTIONS/MONITORING

At no time are unrelated adults permitted to be alone with a minor in a locker room, restroom, or changing area during In-Program Contact except when:

- A Dual relationship Exists; or the close-in-age Exception Applies; or
- A Minor athlete needs an Adult Participant Personal Care Assistant ("**PCA**"), and:
- The Minor Athlete's parent/guardian has provided written consent to U.S. Soccer for the Adult Participant PCA to work with the Minor Athlete; and
- The Adult Participant PCA has complied with U.S. Soccer's education and training policy; and
- The Adult Participant PCA has complied with U.S. Soccer's screening policy. Soccer Holdings must provide a private or semi-private place for minor athletes to change clothes and/or undress at
- If Soccer Holdings is using a facility that has access to a single set of facilities, times must be designated for use by each respective group (e.g., adults, minors, etc.)

Locker rooms, restrooms, and changing areas should be regularly and randomly monitored. The Club should make every effort to recognize when a minor athlete goes to the locker room or changing area during practice and competition, and if the minor does not return in a timely fashion, Soccer Holdings will check on the minor's whereabouts.

Soccer Holdings discourages parents from entering the locker rooms and changing areas unless it is truly necessary. In these instances, it should be a same-sex parent and Soccer Holdings has given permission.

SECTION 9: TRANSPORTATION

Soccer Holdings generally does not arrange for local travel for individual players from home to training/practice/competition and should generally avoid taking responsibility for coordinating local travel.

It is the responsibility of the parents/legal guardians to ensure that the person transporting the minor player maintains the proper safety and legal requirements, including, but not limited to a valid driver's license, automobile liability insurance, a vehicle in safe working order, and compliance with applicable state laws.

Covered persons who are not also acting as a parent/legal guardian shall not ride in a vehicle alone with an unrelated Minor, absent a medical emergency. Covered persons not also acting as a parent/legal guardian may only drive with Minors in groups of two or more or with another adult unless otherwise agreed to in writing by the minor's parent/legal guardian (which consent may be withdrawn at any time).

In any case where a staff member and/or volunteer is involved in a minor's local travel, a parental release is required in advance. Parents/legal guardians are advised to consult the Center's Parental Toolkit (<https://www.usef.org/forms-pubs/9gSPTAMFn2g/parent-complete-toolkit>) concerning Child Abuse prevention before providing consent for their Minor to travel alone with an unrelated Adult.

We encourage parents/legal guardians to pick up their Minor first and drop off their Minor last in any shared or carpool travel arrangement.

SECTION 10: LODGING

Team travel is travel that requires overnight stays away from home and occurs when any Soccer Holdings or team sponsors, coordinate or arrange for travel so that teams can compete locally, regionally, or nationally. Because of the potential for greater distances, coaches, staff, volunteers, and chaperones will often travel with the Players. Detailed travel plans should be provided to parents/legal guardians before any overnight travel. Written Parental/Guardian consent must be recorded prior to any travel.

10.1 COVERED PERSON REQUIREMENTS

Covered Persons who travel with the team (whether Coach, ATC, Game Official, staff member, or volunteer/parent) must successfully pass a criminal background check and other screening requirements in compliance with Soccer Holdings' screening policies and complete the Core SafeSport Training.

10.2 TRAVEL ARRANGEMENTS

For team travel, hotels, bus, and air travel will typically be booked in advance by Soccer Holdings. It is reasonable for players to share rooms, with 2 Players assigned per room. Soccer Holdings should also notify hotel management should any special arrangements be warranted. Depending on the size of the group, Soccer Holdings may request an additional large room or suite so that its members and players may socialize as a group. Meetings shall not occur in individual hotel rooms, and Soccer Holdings will reserve a separate space for adults and players to socialize and/or to support appropriate athletic training appointments.

10.3 HOTEL ROOMS

Adults shall not share a hotel room or other sleeping arrangement with a minor (unless the covered persons/individual is the parent/legal guardian, sibling, or is otherwise related to the minor player and the parent/legal guardian has provided written consent prior to the lodging arrangement). Soccer Holdings shall make every reasonable effort to avoid assigning players to the same room who: (i) are not related and are more than two years apart in age (unless authorized in writing by the younger player's parent/legal guardian); or (ii) have a known history of misconduct either with or against one another. In addition, no adult should enter the hotel room or other sleeping arrangements of a minor unless necessary for the safety of the minor (e.g., in the event of emergency). Team meetings should never be conducted in a hotel room used for sleeping.

Parents/legal guardians who wish to stay in the team hotel are permitted and encouraged to do so.

10.4 MEETINGS/SUPERVISION

Meetings will be conducted consistent with the policy for one-on-one interactions—i.e., any such meeting shall be observable and interruptible.

As stated above, meetings may not be conducted in a hotel room used for sleeping. In the event that it is not possible, due to resources or availability, to reserve separate space to conduct meetings or allow for social interactions, then meetings may be conducted in rooms used for sleeping with adherence to strict protocols regarding the time of day, number of individuals, and documentation of attendees, so long as the door to the room remains ajar, and/or with additional adults present, with at least one of those adults being the same gender as the player(s) when no other options are available. At no time and under no circumstances may these meetings/interactions be between one adult and one unrelated minor.

10.5 COACH & STAFF RESPONSIBILITIES

During team travel, coaches and staff members will help athletes, fellow coaches, and staff members adhere to policy guidelines in this Handbook. When not practicing, training, competing, or preparing for competition, coaches and staff will monitor the safety and activities of athletes, fellow coaches, and staff during team travel.

Coaches and staff will:

- prepare athletes for team travel and make athletes aware of all expectations. Supplemental information will be given to parents/guardians of athletes who are considered inexperienced travelers, new or relatively new to team travel, or who are under the age of 14 to familiarize themselves with all travel itineraries and schedules before the initiation of team travel.
- conform to, and monitor others' adherence, to all policies during team travel.
- encourage minor athletes to participate in regular, at least daily, scheduled communications with their parents/guardians.
- ensure athletes are not alone in a hotel room with any adult apart from a family member; this includes coaches, staff, and chaperones.
- not use drugs or alcohol in the presence of minors or be under the influence of alcohol or drugs while performing their coaching/staff duties (this applies 24/7 throughout a camp or travel trip)
- immediately report any concerns about physical or sexual abuse, misconduct, or policy violations to Soccer Holdings, the Federation, and the appropriate authorities.

SOCCER HOLDINGS, LLC

SafeSport Training for Staff and Players:

Staff should enroll in the “SafeSport Trained- U.S. Soccer” course. All Players born in or prior to 2005 must complete the “Abuse Prevention for Adult Athletes- U.S. Soccer” course through SafeSport.

Training instructions:

The code below is the U.S. Soccer Federation’s national governing body access code allowing all USL members to complete training at no charge to the member. This access code is for Club staff use only, so please don’t post it on your website or other public domain, as it’s to be used only by the League members.

If you are completing training **for the first time:**

1. Use this link: <https://safesporttrained.org?KeyName=JJFAQsQPWNRj01edWcPr>
2. Complete information on “Sign Up” page.
3. If prompted, log in to the new account you just created.
4. Click on “Menu” and select “Catalog.”
5. Click the enroll button for “SafeSport Trained – U.S. Soccer Federation” to complete the course.
6. If an enrollment key is requested, please use: **JJFAQsQPWNRj01edWcPr**

If you already have an account and **have taken training before:**

1. Use this link: <https://safesporttrained.org/#/dashboard>
2. If an enrollment key is requested, please use: **JJFAQsQPWNRj01edWcPr**

Instructions for downloading a certificate of completion are as follows:

1. Please select the “Menu” icon at the top right of your page.
2. Select “Transcript”.
3. Once the transcript page displays, locate the most current completion for the course under the “Certificates” section.
4. Send completed certificate to Lauren Kaatz at lkaatz@loucity.com





CLUB RESOURCES



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