



Penn Athletic Club Rowing Association

Participant Safety Handbook

TABLE OF CONTENTS

Strategies to Recognize, Reduce and Respond to Misconduct in Sport

Strategy 1: Training and Education

Strategy 2: Screening Staff Members, Volunteers and/or Contractors

Applicant Screening

Criminal Background Checks

Strategy 3: Establishing Boundaries

Strategy 4: Managing Training and Competition

Supervision of Athletes and Participants

Physical Contact

Electronic Communications and Social Media

Locker Rooms and Changing Areas

Travel

Strategy 5: Responding to Abuse, Misconduct and Policy Violations

Reporting

Disciplinary Rules and Procedure

Investigation and Adjudication

Strategy 6: Monitoring Your Strategy





Strategy 1: Training & Education

TRAINING AND EDUCATION

Penn Athletic Club Rowing Association's ("Penn AC") policies and procedures require staff members to report abuse, misconduct and violations of its Participant Safety Handbook. Staff members, as referenced throughout this handbook, shall include Penn AC coaches, tenant coaches), administrators, and any other Penn AC employees. Staff members should have a basic understanding of sexual abusers, as well as "grooming," the most common strategy offenders use to seduce their victims. Using a combination of attention, affection and gifts, offenders select a child, win the child's trust (and the trust of the child's parent or guardian), manipulate the child into sexual activity, and keep the child from disclosing abuse.

Accordingly, staff members shall complete an awareness training concerning misconduct in sport before performing services for Penn AC. Misconduct in sport includes:

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

Staff members must successfully complete the training and the quiz after the test.

Staff members will take athlete awareness training every two (2) years, or no more than 30 day(s) before they have contact with athletes. They shall thereafter provide written confirmation of completion of the training to Penn AC.



Strategy 2: Screening Staff Members

APPLICANT SCREENING

Staff members who are in the direct employ of Penn AC must consent to, and pass, a formal applicant screening process before performing services for Penn AC.

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

EDUCATION ABOUT Penn AC's PROTECTION POLICIES

To deter applicants who may be at risk of abusing athletes or participants from applying for positions, Penn AC educates its applicants about its protection policies:

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

WRITTEN APPLICATIONS

Each applicant for a position at Penn AC will complete an application form consisting of personal, identifying information and a general release with applicant's signature.

The written application will:

- **Ask about previous work and volunteer experiences**
- **Ask questions intended to illicit information concerning high-risk behaviors**
- **Provide a written release for contacting personal references and performing a criminal background check, including an indemnification clause**
- **Ask open-ended questions that encourage broad answers**
- **Use disclosure statements to ask applicants about previous criminal arrests or convictions for sexual offenses, violence against youth and other violent criminal offenses or felonies**

PERSONAL INTERVIEW

Appropriate staff will interview applicants whose experience and credentials are considered a fit for available positions. During this interview, Penn AC will ask questions to encourage discussion, clarify responses and expand on the applicant's answers to questions from the written application.

REFERENCES

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

CRIMINAL BACKGROUND CHECK POLICY

All applicants will be asked to undergo a criminal background check that complies with the Fair Credit Reporting Act before providing services for Penn AC. Through this criminal background check, Penn AC will utilize reasonable efforts to ascertain past criminal history of an applicant. The applicant shall complete the following checks before completing any services for Penn AC: (1) a Federal Bureau of Investigation criminal background check; (2) a Commonwealth of Pennsylvania Criminal Background History Check; and (3) a Commonwealth of Pennsylvania Child Abuse Clearance Check.

Full Disclosure

Each applicant has the affirmative duty to disclose his or her criminal history. Failing to disclose or intentionally misrepresenting an arrest plea or conviction history in an application or any other information provided by an applicant during the screening process is grounds for employment, volunteer and/or membership revocation or restriction, regardless of when the offense is discovered.

- If an applicant (1) is arrested, (2) pleads or (3) is convicted of a crime other than a traffic offense during the screening process, the applicant is required to disclose such information immediately.
- In the event a person is serving as a staff member and (1) is arrested, (2) pleads or (3) is convicted after the completion of the screening process, he or she has an affirmative duty to disclose such information immediately to his or her supervisor or Penn AC administrator.
- Any applicant who has been banned by another sport organization, as temporarily or permanently ineligible, must self-disclose this information. A failure to disclose is a basis for disqualification for potential applicants.

FINDINGS

Notice of findings will be provided to:

- (1) The President/Penn AC
- (2) Legal Counsel/Penn AC];
- (3) Director of Programs/Penn AC

Penn AC's criminal background check report will return a "red light" or "green light" score. A green light score means that the background check vendor located no records that would disqualify the

applicant. A green light score, however, is not a certification of safety or permission to bypass/ignore other screening efforts. Other disqualifying factors may exist, and can be revealed through an interview, reference checks and a completed application.

A red light finding means the criminal background check revealed criminal records which suggest the applicant "does not meet the criteria" and is not suitable for organization employment or volunteer assignment.

DISCRETION

If any discretion is exercised in the application of this policy, it shall be exercised in a uniform manner so that substantially similar convictions and circumstances result in substantially similar treatment of applicants.

FREQUENCY OF CRIMINAL BACKGROUND CHECKS

Criminal background checks will be refreshed every 2 years or as otherwise required by law, for staff members who are 18 years of age or older and perform services for Penn AC.

AFFIRMATIVE DUTY TO DISCLOSE

If, during the course of employment or participation in Penn AC's program, a staff member is accused, arrested, indicted or convicted of a criminal offense against a child, the staff member to must notify an immediate supervisor, a Penn AC administrator, Executive Committee member or a member of the Board of Stewards within 24 hours of an accusation, arrest, indictment or conviction for the above criminal offense.

OTHER POTENTIALLY DISQUALIFYING FACTORS

Even if an applicant passes a criminal background check, other factors may disqualify an applicant. An individual may be disqualified and prohibited from providing services for CLUB if the individual has:

- **Been held liable for civil penalties or damages involving sexual or physical abuse of a minor**
- **Been subject to any court order involving any sexual or physical abuse of a minor, including but not limited to domestic order or protection**
- **A history with another organization (employment, volunteer, etc.) of complaints of sexual or physical abuse of minors**
- **Resigned, been terminated or been asked to resign from a position - paid or unpaid - due to complaint(s) of sexual or physical abuse of minors**
- **A history of other behavior that indicates they may be a danger to participants in Penn AC; or**
- **Not met the job requirements**

REVIEW OF DISQUALIFIERS

Penn AC will review its disqualifiers every two years or as otherwise required or modified by law.



Strategy 3: Establishing Boundaries

ATHLETE PROTECTION POLICY

COMMITMENT TO SAFETY

Overview

In the event that any staff member observes inappropriate behaviors (i.e., policy violations), suspected physical or sexual abuse, or misconduct, the staff member shall immediately report his or her observations to an immediate supervisor, a Penn AC administrator or a member of Penn AC's Participant Safety Committee.

Penn AC is committed to creating a safe and positive environment for athletes' physical, emotional and social development and to ensuring that it promotes an environment free of misconduct.

Staff members should not attempt to evaluate the credibility or validity of child physical or sexual abuse allegations as a condition for reporting to appropriate law enforcement authorities. Instead, it is the responsibility of each staff member to immediately report suspicions or allegations of child physical or sexual abuse to an immediate supervisor, Penn AC administrator or a member of Penn AC's Participant Safety Committee. Complaints and allegations will be addressed under Penn AC's Disciplinary Rules and Procedure.

Application

This Policy applies to

- **Staff members, tenant coaches, tenant volunteers, and any individual who is in the direct employ of Penn AC**
- **Penn AC's athletes and participants**

The above identified individuals shall refrain from all forms of misconduct, which include:

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

PROHIBITED CONDUCT

Child Sexual Abuse

- (1) Any sexual activity with a child where consent is not or cannot be given. 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.

Note concerning peer-to-peer child sexual abuse: Sexual contact between minors also can be abusive. Whether or not a sexual interaction between children constitutes child sexual abuse turns on the existence of an aggressor, the age difference between the children, and/or whether there is an imbalance of power and/or intellectual capabilities.

- (2) Any act or conduct described as child sexual abuse under federal or state law.

There are no exceptions.

Examples

Sexually abusive acts may include sexual penetration, sexual touching or non-contact sexual acts such as verbal acts, sexually suggestive electronic or written communications, exposure or voyeurism.

Emotional Misconduct

- (1) A pattern of deliberate, non-contact behavior that has the potential to cause emotional or psychological harm to an athlete. Non-contact behaviors include:

- a. verbal acts
- b. physical acts
- c. acts that deny attention or support

- (2) Any act or conduct described as emotional abuse or misconduct under federal or state law (e.g. child abuse, child neglect).

Exception

Emotional misconduct does not include professionally-accepted coaching methods of skill enhancement, physical conditioning, team building, discipline or improving athletic performance.

Examples

Examples of emotional misconduct prohibited by this policy include, without limitation:

- (1) Verbal Acts.** A pattern of verbal behaviors that (a) attack an athlete personally (e.g., calling them worthless, fat or disgusting) or (b) repeatedly and excessively yelling at a particular participant or participants in a manner that serves no productive training or motivational purpose.
- (2) Physical Acts.** A pattern of physically aggressive behaviors, such as (a) throwing sport equipment, water bottles or chairs at, or in the presence of, participants; or (b) punching walls, windows or other objects.
- (3) Acts that Deny Attention and Support.** A pattern of (a) ignoring an athlete for extended periods of time or (b) routinely or arbitrarily excluding participants from practice.

Note: Bullying, harassment, and hazing, defined below, often involve some form of emotional misconduct.

Physical Misconduct

- (1) Contact or non-contact conduct that results in, or reasonably threaten to, cause physical harm to an athlete or other sport participants; or**
- (2) Any act or conduct described as physical abuse or misconduct under federal or state law (e.g. child abuse, child neglect, assault).**

Exceptions

Physical misconduct does not include professionally-accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline or improving athlete performance. For example, hitting, punching, and kicking are well-regulated forms of contact in combat sports, but have no place in swimming.

Examples

Examples of physical misconduct prohibited by this Policy include, without limitation:

(1) Contact offenses. Behaviors that include:

- (a) punching, beating, biting, striking, choking or slapping an athlete;**
- (b) intentionally hitting an athlete with objects or sporting equipment;**
- (c) providing alcohol to an athlete under the legal drinking age (under U.S. law);**
- (d) providing illegal drugs or non-prescribed medications to any athlete;**
- (e) encouraging or permitting an athlete to return to play pre-maturely following a serious injury (e.g., a concussion) and without the clearance of a medical professional;**
- (f) prescribing dieting or other weight-control methods (e.g., weigh-ins, caliper tests) without regard for the nutritional well-being and health of athlete.**

(2) Non-contact offenses. Behaviors that include:

- (a) isolating an athlete in a confined space (e.g., locking an athlete in a small space);**
- (b) forcing an athlete to assume a painful stance or position for no athletic purpose (e.g. requiring an athlete to kneel on a harmful surface);**
- (c) withholding, recommending against or denying adequate hydration, nutrition, medical attention or sleep.**

Note: Bullying, harassment and hazing, defined below, often involve some form of physical misconduct.

Sexual Misconduct

- (1) Any touching or non-touching sexual interaction that is (a) nonconsensual or forced, (b) coerced or manipulated, or (c) perpetrated in an aggressive, harassing, exploitative or threatening manner;**
- (2) Any sexual interaction between an athlete and an individual with evaluative, direct or indirect authority. Such relationships involve an imbalance of power and are likely to impair judgment or be exploitative; or**

- (3) **Any act or conduct described as sexual abuse or misconduct under federal or state law (e.g. sexual abuse, sexual exploitation, rape)**

Note: An imbalance of power is always assumed between a coach and an athlete.

Types of Sexual Misconduct

Types of sexual misconduct include:

- (1) **sexual assault,**
- (2) **sexual harassment,**
- (3) **sexual abuse, or**
- (4) **any other sexual intimacies that exploit an athlete. Minors cannot consent to sexual activity with an adult, and all sexual interaction between an adult and a minor is strictly prohibited.**

There are no exceptions.

Examples

Examples of sexual misconduct prohibited under this Policy include, without limitation:

- (1) Touching offenses. Behaviors that include:**
 - (a) fondling an athlete's breasts or buttocks**
 - (b) exchange of reward in sport (e.g., team placement, scores, feedback) for sexual favors**
 - (c) genital contact**
 - (d) sexual relations or intimacies between persons in a position of trust, authority and/or evaluative and supervisory control over athletes or other sport participants.**

Comment

(1) Authority and Trust. Once the unique coach-athlete relationship is established, the authority and trust on the part of the coach over the athlete shall be assumed, regardless of age. Accordingly, sexual interaction or intimacies between a coach and an athlete or other participant are prohibited, regardless of age, both during coaching and during that period following coaching if an imbalance in power could jeopardize effective decision-making.

Imbalance of Power. Factors relevant to determining whether there is an imbalance of power include, but are not limited to: (a) the nature and extent of the coach's supervisory, evaluative or other authority over the athlete being coached; (b) the actual relationship between the parties; (c) the parties' respective roles; (d) the nature and duration of the sexual relations or intimacies; (e) the age of the coach; (f) the age of the athlete or participant; (g) and whether the coach has engaged in a pattern of sexual interaction with other athletes or participants.

(2) Exception. This section does not apply to a pre-existing relationship between two spouses or life partners.

- (2) Non-touching offenses. Behaviors that include:**
 - (a) a coach discussing his or her sex life with an athlete**
 - (b) a coach asking an athlete about his or her sex life**
 - (c) coach requesting or sending a nude or partial-dress photo to athlete**
 - (d) exposing athletes to pornographic material**
 - (e) sending athletes sexually explicit or suggestive electronic or written messages or**

photos (e.g. "sexting")

- (f) deliberately exposing an athlete to sexual acts**
- (g) deliberately exposing an athlete to nudity (except in situations where locker rooms and changing areas are shared)**
- (h) sexual harassment; specifically, the sexual solicitation, physical advances, or verbal or nonverbal conduct that is sexual in nature, and**
 - a. is unwelcome, offensive or creates a hostile environment, and the offending individual knows or is told this**
 - b. is sufficiently severe or intense to be harassing to a reasonable person in the context.**

Bullying

- (1) An 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**
- (2) Any act or conduct described as bullying under federal or state law**

Exceptions

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

For example, bullying does not include verbal admonitions to encourage team members to train harder and to push through a difficult training regimen.

Examples

Examples of bullying prohibited by this Policy include, without limitation:

- (1) Physical behaviors. Behaviors that include (a) hitting, pushing, punching, beating, biting, striking, kicking, choking, or slapping an athlete; (b) throwing at, or hitting an athlete with, objects such as sporting equipment.**
- (2) Verbal and emotional behaviors. Behaviors that include (a) teasing, ridiculing, intimidating; (b) spreading rumors or making false statements; or (c) using electronic communications, social media, or other technology to harass, frighten, intimidate or**

humiliate ("cyber bullying").

Harassment

- (1) A repeated pattern of physical and/or non-physical behaviors that (a) are intended to cause fear, humiliation or annoyance, (b) offend or degrade, (c) create a hostile environment or (d) reflect discriminatory bias in an attempt to establish dominance, superiority or power over an individual athlete or group based on gender, race, ethnicity, culture, religion, sexual orientation, gender expression or mental or physical disability; or**
- (2) Any act or conduct described as harassment under federal or state law**

There are no exceptions.

Examples

Examples of harassment prohibited by this Policy include, without limitation:

- (1) Physical offenses. Behaviors that include (a) hitting, pushing, punching, beating, biting, striking, kicking, choking or slapping an athlete or participant; (b) throwing at or hitting an athlete with objects including sporting equipment.**
- (2) Non-physical offenses. Behaviors that include (a) making negative or disparaging comments about an athlete's sexual orientation, gender expression, disability, religion, skin color, or ethnic traits; (b) displaying offensive materials, gestures, or symbols; (c) withholding or reducing playing time to an athlete based on his or her sexual orientation.**

Hazing

- (1) 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; or**
- (2) Any act or conduct described as hazing under federal or state law**

Exception

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

Examples

Examples of hazing prohibited by this Policy include, without limitation:

- (1) requiring, forcing or otherwise requiring the consumption of alcohol or illegal drugs**
- (2) tying, taping or otherwise physically restraining an athlete**
- (3) sexual simulations or sexual acts of any nature**
- (4) sleep deprivation, otherwise unnecessary schedule disruption or the withholding of water and/or food**
- (5) social actions (e.g. grossly inappropriate or provocative clothing) or public displays (e.g. public nudity) that are illegal or meant to draw ridicule**
- (6) beating, paddling or other forms of physical assault**
- (7) excessive training requirements focused on individuals on a team**

Comment: Activities that fit the definition of hazing are considered to be hazing regardless of an athlete's willingness to cooperate or participate.

WILLFULLY TOLERATING MISCONDUCT

It is a violation of this Athlete Protection Policy if a staff member knows of misconduct, but takes no action to intervene on behalf of the athlete(s) or participant(s).

REPORTING

Although these policies are designed to reduce child sexual abuse and other misconduct, it can still occur. Staff members of Penn AC shall follow the reporting procedures set forth in Penn AC's Reporting Policy. Penn AC does not investigate suspicions or allegations of child physical or sexual abuse, or attempt to evaluate the credibility or validity of such allegations, as a condition of reporting suspicions or allegations to the appropriate law enforcement authorities.

VIOLATIONS

Violations of the Athlete Protection Policy shall be reported to Penn AC's Participant Safety Committee. This committee shall recommend appropriate disciplinary action to Penn AC's Executive Officers. Any decisions by the Executive Officers shall be communicated to the violator and the complainant. Such decisions shall be final.



Strategy 4: Managing Training & Competition

SUPERVISION OF ATHLETES AND PARTICIPANTS

During training and competition, Penn AC fosters two-deep leadership and minimizes one-to-one interactions to create a safe training environment and to protect athletes and participants.

APPROPRIATE ONE-ON-ONE INTERACTIONS

Individual Meetings

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

- **Any individual meeting should occur when others are present and where interactions can be easily observed**
- **Where possible, an individual meeting should take place in a publicly visible and open area, such as the corner of a gym or pool deck**
- **If an individual meeting is to take place in an office, the door should remain unlocked and open**
- **If a closed-door meeting is necessary, the coaches and /or staff members must inform another coach and/or staff member and ensure the door remains unlocked**

Individual Training Sessions

An individual training session(s), provided by a PENN AC coach, staff member or full member, with an athlete or participant may also be desired or necessary. All guidelines and policies set forth in this handbook applicable to team training sessions are applicable, in entirety, for any individual training session.

PROHIBITED ONE-ON-ONE INTERACTIONS

Minor athletes and participants will not be left unattended or unsupervised during Penn AC activities and Penn AC coaches and staff members are prohibited from being alone with an individual athlete or participant in any room or building.

PHYSICAL CONTACT WITH ATHLETES

What

This policy describes the purpose and limits of appropriate physical contact between athletes and other relevant participants and identifies the person and/or entity to whom unacceptable forms of physical contact should be reported.

Why

In almost all sports, coaching an athlete requires some amount and type of physical contact. Such contact may be with parts of the body that, in a non-sport context, may be inappropriate (e.g., positioning an athlete's leg or torso, or spotting an athlete to ensure they will not be injured by a fall). Physical contact is also natural and appropriate when celebrating victories and achievement or consoling athletes after a loss or injury.

Physical contact policies provide all organization members with clarity and guidance for contact with athletes. These policies provide athletes with safer training conditions to perform and to receive the benefits of sport.

Elements

- Encourages appropriate physical contact with athletes**
- Describes when it may be appropriate to make physical contact with athletes, including examples**
- Lists criteria for appropriate/inappropriate physical contact**
- Lists prohibited physical contact**
- Lists reportable forms of prohibited physical contact with athletes**
- States that some prohibited physical contact may require a report to the appropriate law enforcement authorities**
- Identifies person and/or entity to whom unacceptable forms of physical contact should be reported**
- States that all members will honor an expressed personal desire for decreased or no physical contact, where such decreased contact is feasible in the relevant training and competition environment**

PHYSICAL CONTACT WITH ATHLETES

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

APPROPRIATE PHYSICAL CONTACT

Penn AC adheres to the following principles and guidelines in regards to physical contact with our athletes:

Common Criteria for Appropriate Physical Contact

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

- the physical contact takes place in public
- there is no potential for, or actual, physical or sexual intimacies during the physical contact
- the physical contact is for the benefit of the athlete, not to meet an emotional or other need of an adult

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
- releasing muscle cramps

Celebration

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

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

Consolation

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

- **embracing a crying athlete**
- **putting an arm around an athlete while verbally engaging them in an effort to calm them down ("side hugs")**
- **lifting a fallen athlete off the playing surface and "dusting them off" to encourage them to continue competition**

PROHIBITED PHYSICAL CONTACT

Prohibited forms of physical contact, which shall be reported immediately under our Reporting Policy include, without limitation:

- **asking or having an athlete sit in the lap of a coach, administrator or staff member**
- **lingering or repeated embraces of athletes that go beyond the criteria set forth for acceptable physical contact**
- **slapping, hitting, punching, kicking or any other physical contact meant to discipline, punish or achieve compliance from an athlete**
- **"cuddling" or maintaining prolonged physical contact during any aspect of training, travel or overnight stay**
- **playful, yet inappropriate contact that is not a part of regular training, (e.g., tickling or "horseplay" wrestling)**

- **continued physical contact that makes an athlete uncomfortable, whether verbally expressed or not**
- **any contact that is contrary to an athlete's and/or participant's previously expressed personal desire for decreased or no physical contact, where such decreased contact is feasible in a competitive training environment.**

VIOLATIONS

Violations of this policy must be reported to an administrator, or member of the Participant Safety Committee and violations will be addressed under our Disciplinary Rules and Procedure. Some forms of physical contact that may constitute child physical or sexual abuse should also reported to appropriate law enforcement authorities.

ELECTRONIC COMMUNICATIONS AND SOCIAL MEDIA POLICY

What

This policy describes acceptable uses of mobile and electronic devices and social media and emphasizes transparent communication, separate from and in addition to any general policies an organization may already have in place.

Why

Effective communication concerning travel, training schedules and administrative issues among administrators, staff, coaches, athletes and their families is critical. However, the use of mobile devices, web-based applications, social media and other forms of electronic communications increases the possibility for improprieties and misunderstandings, and also provides would-be offenders with unsupervised access to an athlete. The improper use of mobile and electronic communications can result in misconduct and adherence to a policy for mobile and electronic communication reduces these risks.

Elements

- States appropriate criteria for mobile and electronic communications between athletes and administrators, coaches, and/or staff**
- States appropriate criteria for use of social media between athletes and administrators, coach and/or staff**

ELECTRONIC COMMUNICATIONS AND SOCIAL MEDIA POLICY

As part of Penn AC's emphasis on athlete safety, all electronic communications between a coach and athlete must be professional in nature and solely for the purpose of communicating information about team activities.

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

FACEBOOK, MYSPACE, BLOGS AND SIMILAR SITES

Coaches may not have athletes of Penn AC's Team join a personal social media page. Athlete members and parents can friend the official Penn AC Team page and coaches can communicate to athlete members through the site. All posts, messages, text, or media of any kind between coach and athlete must be professional in nature and for the purpose of communicating information about team activities or for team-oriented motivational purposes.

TWITTER, INSTANT MESSAGING AND SIMILAR MEDIA

Coaches and athletes may "follow" each other. Coaches cannot "re-tweet" athlete message posts. All posts between coach and athlete must solely be for the purpose of communicating information about team activities.

EMAIL AND SIMILAR ELECTRONIC COMMUNICATIONS

Athletes and coaches may use email to communicate. All email content between coach and athlete must be professional in nature and solely for the purpose of communicating information about team activities.

TEXTING AND SIMILAR ELECTRONIC COMMUNICATIONS

Texting is allowed between coaches and athletes. All texts between coach and athlete must be professional and solely for the purpose of communicating information about team activities.

ELECTRONIC IMAGERY

From time to time, digital photos, videos of practice or competition, and other publicly obtainable images of the athlete – individually or in groups – may be taken. These photos and/or videos may be submitted to local, state or national publications, used in club videos, posted on club or club associated websites, or offered to the club families seasonally on disc or other electronic form. It is the default policy of Penn AC to allow such practices as long as the athlete or athletes are in public view and such imagery is both appropriate and in the best interest of the athlete and the club. Imagery must not be contrary to any rules as outlined in Penn AC’s Participant Safety Handbook. COACHES, STAFF, ATHLETES AND/OR PARTICIPANTS SHALL NOT USE ANY RECORDING CAPABILITY DEVICE (I.E.: CELL PHONE, MOBILE RECORDING DEVICE) TO RECORD ANY VIDEO OR STILL IMAGE OR AUDIO RECORDING WHILE IN ANY LOCKER ROOM OR CHANGING AREA.

REQUEST TO DISCONTINUE ALL ELECTRONIC COMMUNICATIONS OR IMAGERY

The parents or guardians of an athlete may request in writing that their child not be contacted by any form of electronic communication by coaches (photography or videography).

MISCONDUCT

Social media and electronic communications can also be used to commit misconduct (e.g., emotional, sexual, bullying, harassment, and hazing). Such communications by coaches, staff, volunteers, administrators, officials, parents or athletes will not be tolerated and are considered violations of our Participant Safety Handbook.

VIOLATIONS

Violations of PENN AC’s Electronic Communications and Social Media Policy must be reported to your immediate supervisor, a Penn AC administrator or a member of Penn AC’s Participant Safety Committee for evaluation. This committee shall recommend appropriate disciplinary action to Penn AC’s Executive Officers. Any decisions by the Executive Officers shall be communicated to the violator and the complainant. Such decisions shall be final.

LOCKER ROOMS AND CHANGING AREAS

What

This policy describes how locker rooms and changing areas are structured (e.g., limited to athletes or open to the general public) and states limits on the use of electronic media devices in such areas.

Why

Athletes (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. Athlete-to-athlete problems, such as child sexual abuse and bullying, harassment, and hazing, often occur 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.

Elements

- Describes appropriate physical facilities for training and home competition**
- Describes locker room and changing area monitoring procedures**
- Identifies accepted uses of cell phone or other mobile devices in locker rooms or changing areas**
- Identifies any prohibited conduct in the locker room or changing areas (may refer to any activities that violate the Athlete Protection Policy)**

LOCKER ROOMS AND CHANGING AREAS—for Penn AC

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

FACILITIES

The following is a description of our practice and competition facilities to allow athletes and their families to plan their use:

We practice at:

Penn Athletic Club Rowing Association 12 Boathouse Row Philadelphia, PA 19130

This location has: A changing area that is dedicated to our athletes and teams.

When we travel for competition the facilities may differ from location to location. We will work with the host team to provide as much information about the locker room and changing areas as early as possible, and post that information as soon as it's available.

MONITORING

Penn AC has predictable and limited use of locker rooms and changing areas (e.g., immediately before and following practices and competitions). This allows for direct and regular monitoring of locker room areas.

Penn AC also has staggered practices, with different groups arriving and departing throughout the day. Constantly monitor locker rooms and changing areas is not feasible over this extended course of time. We make occasional sweeps of these areas. Staff members conduct these sweeps, with women checking on female-designated areas, and men checking on male-designated areas.

Coaches and staff 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, we will check on the athlete's whereabouts.

We 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 the coach or administrator know about this in advance.

MIXED-GENDER TEAMS

If the team consists of both male and female athlete, both female and male privacy rights must be given consideration and appropriate arrangements made. When competing at off-site venues, i.e., away from the Penn AC boathouse, the club will have its male and female athletes dress/undress in separate locker rooms and then convene in a single dressing room, if necessary, before the competition. Once competition is finished, the athletes may come to one locker room and then the male and female players proceed to their separate dressing rooms to undress and shower (separately), if available. If separate locker rooms are not available, then the athletes will take turns using the locker room to change.

TRAVEL

What

This policy directs how minor athletes will be supervised during travel to and from practice and competitions and, where practical for the sport, provides two-deep leadership and minimizes one-to-one interactions.

Why

Athletes are most vulnerable to misconduct during travel, particularly overnight stays. This includes a high risk of athlete-to-athlete misconduct. During travel, athletes are often away from their families and support networks, and the setting – new changing areas, locker rooms, workout facilities, automobiles and hotel rooms – is less structured and less familiar.

Travel policies guide travel practices for training and competition. Adherence to travel policies helps to reduce the opportunities for misconduct.

Elements

- Identifies the responsibilities of coaches, staff, chaperones, parents and athletes for local and team travel**
- Identifies methods to minimize one-on-one time during individual travel**
- Sets standards for:**
 - **Mixed-gender travel**
 - **Mixed-age travel**
 - **Local travel (travel that the organization does not plan or supervise)**
 - **Team travel (travel the organizations plans and supervises, including overnight travel)**
 -
- Describes notification process for team travel**
- For travel that an organization does not supervise or plan, states that**
 - **staff member and/or volunteer should not drive alone with unrelated athlete; and**
 - **the organization is not responsible for designating travel arrangements**

TRAVEL

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

LOCAL AND TEAM TRAVEL

We distinguish between travel to training, practice and local competition ("local travel"), and team travel involving a coordinated overnight stay ("team travel").

Local Travel

Local travel occurs when Penn AC does not sponsor, coordinate, or arrange for travel. For local travel, athletes or their parents/guardians (for minor athletes) are responsible for making all travel arrangements. In these instances it is the responsibility of the athlete or their parents/guardians (for minor athletes) to ensure the person transporting the athlete maintains all safety and legal requirements, including, but not limited to, a valid driver's license, proper insurance, well maintained vehicle, and compliance with all state laws.

In an effort to minimize one-on-one interactions, Penn AC staff members and/or coaches should not drive alone with an unrelated athlete and should only drive with at least two other athletes or another adult at all times, unless otherwise agreed to in writing by the athlete's parent or guardian in advance of travel. In any case where a staff member is involved in the athlete's local travel, a parental release is required in advance. Efforts must be made to ensure that staff are not alone with an athlete or participant, by, e.g., picking the athletes up in groups.

We also recommend completing a shared travel declaration form signed by the parents/guardians of any minor athlete who is being transported as part of such a carpool arrangement.

Team Travel

Team travel is overnight travel that occurs when Penn AC sponsors, coordinates or arranges

for travel so that our teams can compete locally, regionally, nationally or internationally. Because of the greater distances, coaches and staff will often travel with the athletes. However, no coach or staff member will engage in team travel without the proper safety requirements in place, including valid drivers' licenses, proper insurance, well-maintained vehicles and compliance with all state laws.

Penn AC makes efforts to provide adequate supervision through coaches and other adult chaperones.

For team travel, hotels and air travel will be booked in advance by Penn AC. Athletes will share rooms, with 2-4 athletes assigned per room depending on accommodations. Penn AC will also notify hotel management should any special arrangements be warranted. For instance, we will ask hotels to block pay per view channels and we will request an additional large room or suite so that our members and athletes may socialize as a group. Meetings do not occur in hotel rooms, and we will reserve a separate space for adults and athletes to socialize.

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

TRAVEL NOTIFICATION

When possible, Penn AC will provide reasonable advance notice before team travel. Notice will include the dates, location and duration of competition. Travel notice will also include designated team hotels for overnight stays as well as a contact person within Penn AC. This individual will be the point of contact to confirm your intention to travel and to help with travel details.

Penn AC will post specific travel itineraries when they become available. These will include a more detailed, hour-by-hour itinerary as well as contact information for team travel chaperones.

MIXED-GENDER AND MIXED-AGE TRAVEL

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

Regardless of gender, a coach shall not share a hotel room or other sleeping arrangement with an athlete (unless the coach is the parent, guardian, sibling or spouse of that particular athlete). Where an adult is registered both as a coach and an athlete member of CLUB, and is functioning primarily as a coach, he or she may share sleeping arrangements with another registered coach.

COACH AND STAFF RESPONSIBILITIES

During team travel, coaches and staff members will help athletes, fellow coaches and staff members adhere to policy guidelines, including, without limitation, the Travel Policy, Locker Rooms and Changing Areas Policy and Reporting Policy.

If a coach or staff member transports an athlete or other organization member in their private car for team travel, a copy of the coach's or staff member's valid driver's license is required.

When not practicing, training, competing, or preparing for competition, coaches and staff will monitor the activities of athletes, fellow coaches and staff during team travel. Coaches and staff will:

- a. 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**
- b. familiarize themselves with all travel itineraries and schedules before the initiation of team travel**
- c. conform to, and monitor for others' adherence, the Athlete Protection Policy and all policies during team travel**

- d. **encourage minor athletes to participate in regular, at least daily, scheduled communications with their parents/guardians**
- e. **help athletes be on time for all team commitments (as possible)**
- f. **assist with team travel logistical needs (as possible)**
- g. **support chaperones and/or participate in the monitoring of athletes for adherence to curfew restrictions set based on age and competition schedule as listed in travel itinerary**
- h. **ensure athletes are complying with hotel room restrictions based on gender or age bracket requirements**
- i. **make certain that athletes are not alone in a hotel room with any adult apart from a family member; this includes coaches, staff and chaperones**
- j. **not use drugs or alcohol in the presence of minors or be under the influence of alcohol or drugs while performing their coaching duties**
- k. **immediately report any concerns about physical or sexual abuse, misconduct, or policy violations**
- l. **notify parents before taking any disciplinary action against a minor athlete if the athlete is traveling without his or her parents.**

If a chaperone has not undergone a criminal background check and CLUB's Penn AC's awareness training, the chaperone will not be permitted to have any one-on-one interactions with athletes or other youth participants. If a chaperone has undergone a criminal background check and awareness training, he or she may have appropriate one-on-one interactions as outlined in CLUB's Penn AC's Participant Safety Handbook.

If a chaperone will be operating a private car for team travel, a copy of the chaperone's valid driver's license is required.

Chaperones will monitor the activities of all coaches, staff members, volunteers and athletes during team travel. Specifically, chaperones will:

- a. **familiarize themselves with all travel itineraries and schedules before team travel**
- b. **monitor for adherences to club policies during team travel**
- c. **encourage minor athletes to participate in regular, at least daily, scheduled communications with their parents/guardians**

- d. **help athletes be on time for all team commitments (as possible)**
- e. **assist coaches, staff and other volunteers with team travel logistical needs (as possible)**
- f. **monitor athletes for adherence to curfew restrictions set based on age and competition schedule as listed in travel itinerary**
- g. **ensure athletes comply with hotel room restrictions based on gender or age bracket requirements**
- h. **not use drugs or alcohol in the presence of minors or be under the influence of alcohol or drugs while performing their chaperone duties**
- i. **make certain that athletes are not alone in a hotel room with any adult apart from a family member; this includes coaches, staff and chaperones**
- j. **immediately report any concerns about sexual and physical abuse, misconduct or policy violations to a Penn AC administrator or a member of Penn AC's Participant Safety Committee.**



**Strategy 5:
Responding to Abuse, Misconduct, & Policy
Violations**

REPORTING POLICY

Every Penn AC coach and/or staff member must report:

- (1) violations of the Participant Safety Handbook,**
- (2) misconduct as defined in CLUB's Athlete Protection Policy, and**
- (3) suspicions or allegations of child physical or sexual abuse.**

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

Reporting Child Physical or Sexual Abuse

Coaches and/or staff members are required to report suspicions or allegations of child sexual abuse by a colleague or co-worker, to any of the following individuals:

- (1) their immediate supervisor,**
- (2) a Penn AC administrator,**
- (3) a member of Penn AC's Participant Safety Committee and/or,**
- (4) where applicable, appropriate law enforcement authorities.**

Grooming

Because sexual abusers "groom" children for abuse – the process used by offenders to select a child, to win the child's trust (and the trust of the child's parent or guardian), to manipulate the child into sexual activity and to keep the child from disclosing abuse – it is possible that a coach and/or staff member may witness behavior intended to groom a child for sexual abuse. All questions or concerns related to inappropriate, suspicious or suspected grooming behavior should be directed to an immediate supervisor, a Penn AC administrator or a member of the Penn AC Participant Safety Committee.

Peer-to-Peer Sexual Abuse

Approximately 1/3 of all child sexual abuse occurs at the hands of other children and the obligation to report extends to peer-to-peer child sexual abuse. Whether or not a sexual interaction between children constitutes child sexual abuse turns on the existence of an aggressor, the age difference between the children, and/or whether there is an imbalance of power or intellectual capabilities. If you have any concerns that an interaction between children may constitute sexual abuse, immediately report it to the appropriate law

enforcement authorities and a Penn AC supervisor, a Penn AC administrator or a member of Penn AC's Participant Safety Committee.

Reporting Misconduct and Policy Violations

If any coach and/or staff member receives an allegation or observes misconduct or other inappropriate behavior, such as grooming, that is not reportable to the appropriate law enforcement authorities, it is the responsibility of each coach and/or staff member to report their observations to any of the following individuals:

- (1) their immediate supervisor,**
- (2) a Penn AC administrator or**
- (3) a member of Penn AC's Participant Safety Committee.**

Penn AC also encourages member parents and athletes to communicate violations of Penn AC's Participant Safety Handbook and/or allegations and suspicions of child physical and sexual abuse to a Penn AC administrator or member of Penn AC's Participant Safety Committee. Where applicable, parents may also report to the appropriate law enforcement authorities.

REPORTING PROCEDURE

To Whom to Report

Coaches and staff members may report to any supervisor or Penn AC administrator or member of its Participant Safety Committee.

A coach and/or staff member may, and in many cases must, report any allegation of child physical or sexual abuse to relevant law enforcement authorities.

How to Report

Penn AC will take a report in the way that is most comfortable for the person initiating a report including an anonymous, in-person, verbal or written report. Regardless of how you choose to report, it is helpful to Penn AC for individuals to provide, at a minimum, (1) the name of the complainant(s); (2) the type of misconduct alleged and the name(s) of the individual(s) alleged to have committed the misconduct.

Reporting Form

Individuals reporting a written account of child physical or sexual abuse or other misconduct shall including the following information:

- 1) the name(s) of the complainant(s)**
- 2) the type of misconduct alleged**
- 3) the name(s) of the individual(s) alleged to have committed the misconduct**
- 4) the approximate dates the misconduct was committed**
- 5) the names of other individuals who might have information regarding the alleged misconduct**
- 6) a summary statement of the reasons to believe that misconduct has occurred**

Penn AC will withhold the complainant's name on request, to the extent permitted by law.

CONFIDENTIALITY, ANONYMOUS REPORTING AND BAD-FAITH ALLEGATIONS

Confidentiality

To the extent permitted by law, and as appropriate, Penn AC will keep confidential the complainant's name on request, not make public the names of potential victims, the accused perpetrator or the people who made a report of child physical and sexual abuse to the authorities.



Anonymous Reporting

Penn AC recognizes it can be difficult for an athlete, teammate, friend or family member to report an allegation of misconduct and strives to remove as many barriers to reporting as possible. Anonymous reports may be submitted:

- by completing a written report without including their name**
- by expressing concerns verbally to a Penn AC administrator or a member of Penn AC's Participant Safety Committee**
- through email, texts or notes left for a Penn AC administrator or a member of Penn AC's Participant Safety Committee.**

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

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

“Whistleblower” Protection

Regardless of outcome, PENN AC will support the complainant(s) and his or her right to express concerns in good faith. PENN AC will not allow or tolerate attempts from any individual to retaliate, punish, allow or in any way harm any individual(s) who reports a concern in good faith. Such actions against a complainant will be considered a violation of our Participant Safety Handbook and are grounds for disciplinary action.

Bad-Faith Allegations

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

HOW REPORTS ARE HANDLED

Suspicious or Allegations of Child Physical or Sexual Abuse

An independent investigation can harm youth and/or interfere with the legal investigative process. PENN AC, its coaches and/or staff members do not evaluate the credibility or validity of child physical or sexual abuse as a condition for reporting to appropriate law enforcement authorities. As necessary, however, PENN AC may ask a few clarifying questions of the minor or person making the report to adequately report the suspicion or allegation to law enforcement authorities.

Immediate Suspension or Termination

When an allegation of child physical or sexual abuse is made against a coach, staff member, athlete, and/or participant, PENN AC may immediately remove that individual from contact with any children in the program until the allegation has been investigated by an official agency. As necessary, PENN AC may suspend or change the assignment of a coach and/or staff member.

In those cases where the Ted Stevens Act may apply, the accused individual will be offered a hearing. A hearing under the Ted Stevens Act will not necessarily affect PENN AC's ability to immediately suspend or terminate the accused individual from employment or performing services for organization.

A coach or staff member's failure to report to a supervisor, a PENN AC administrator or member of the Participant Safety Committee is a violation of this policy and grounds for termination of a coach and/or staff member.



Misconduct and Policy Violations

PENN AC addresses internally alleged policy violations and misconduct – bullying, harassment, hazing, emotional, physical and sexual – that are not reportable under relevant state or federal law. Coaches and/or staff members must report policy violations and misconduct to an immediate supervisor, PENN AC administrator or member of PENN AC's Participant Safety Committee.

PENN AC may also investigate allegations of child physical or sexual abuse that are reportable, if such investigation does not interfere with any ongoing criminal investigation or prosecution for abuse. Such allegations may include:

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

NOTIFICATION

Following PENN AC's notice of a credible allegation that results in the removal of an employee, coach or staff member, PENN AC may consider the circumstances in which it will notify other parents of athletes with whom the accused individual may have had contact. At PENN AC's discretion, as appropriate, and after consultation with counsel, PENN AC may

notify its coaches, staff members, parents, and/or athletes of any allegation of child physical or sexual abuse or other criminal behavior that (1) law enforcement authorities are actively investigating; or (2) that PENN AC is investigating internally. Advising others of an allegation may lead to additional reports of child physical or sexual abuse and other misconduct.

DISCIPLINARY RULES AND PROCEDURE

What

This establishes an organization's plan for responding to alleged violations of child physical or sexual abuse and other misconduct and sets forth the organization's commitment to a fair and transparent process.

Why

Prepares an organization and its participants to know, in advance of a report, how it will handle alleged violations of its Participant Safety Handbook.

Elements

- Describes procedure for investigating allegations, where appropriate**
- Sets forth procedures for resolving allegations**
- Identifies procedural safeguards**
- Identifies possible sanctions for violations of the athlete protection policy**

DISCIPLINARY RULES AND PROCEDURE

While PENN AC endeavors to provide support and guidance to participants on a day-to-day basis, it is also important for PENN AC to have a formal procedure for disciplinary action to address alleged violations of its policies and other inappropriate behaviors, which is consistent with PENN AC's Bylaws.

APPLICATION

This Policy is used to address the following allegations against coaches, staff members, athletes, and/or participants:

- **Violations of PENN AC's policies; and/or**
- **Child abuse (emotional, physical or sexual) that does not involve an ongoing legal investigation or criminal prosecution.**

PENN AC will not investigate an allegation of child physical or sexual abuse if it undermines or interferes with a pending legal investigation or criminal prosecution.

DISCIPLINARY RULES

PENN AC recognizes that there are varying levels of misconduct. For example, physical and sexual misconduct are serious violations that may result in immediate dismissal. By contrast, a youth participant who tells a single sexually risqué joke constitutes less serious misconduct and, depending on the circumstances, may be dealt through dialogue and a verbal warning. In all cases, PENN AC's disciplinary procedures and actions will be proportionate, reasonable and applied fairly and equally.

DISCIPLINARY PROCEDURE

On receipt of an allegation, PENN AC will determine at its discretion the appropriate steps to address the conduct based on several factors, including (i) the age of the complainant or victim, (ii) the age of the accused and (iii) the nature, scope, and extent of the allegations.

PENN AC will address allegations against a coach and/or staff member under its Bylaws.

PENN AC's disciplinary response will depend on the nature and seriousness of the incident. Penn AC reserves the right to issue immediate summary dismissal of a coach and/or staff member if credible allegations of misconduct are raised. If the accused individual is a minor, PENN AC will contact his or her parents or guardians and require immediate removal of that individual from the club's programs/boathouse.

DISCIPLINARY ACTION

Sanctions for violations of the Participant Safety Handbook will be proportionate and reasonable under the circumstances. In addition to day-to-day guidance, the PENN AC reserves the right to take any/all of the following disciplinary actions:

- **Inform the individual's direct-line supervisor or, in the case of a youth participant, the youth's parent or guardian**
- **Provide the individual with guidance, redirection and instruction**
- **Temporary suspension from competition**
- **File a formal incident report**
- **Issue a verbal warning**
- **Issue a written and/or final written warning**
- **Implement a limited access agreement (e.g., limiting an individual's access to certain buildings or to youth)**
- **Provide informed supervision, where at least one staff member is informed of the allegation and is instructed to vigilantly supervise the accused participant or stakeholder in his or her interactions with the program and/or organization**
- **Engage in restorative practices, i.e., creation of a respectful and safe dialogue when a misunderstanding or harm has occurred**
- **Suspend or terminate employment or membership**

ONGOING EMPLOYMENT AND/OR PARTICIPATION

On receipt of a credible and specific allegation of child abuse or other serious misconduct (e.g., physical and sexual abuse as defined in our Athlete Protection Policy), PENN AC may immediately suspend or terminate the accused individual to ensure participant safety.

COMPLAINANT PROTECTION

Regardless of outcome, PENN AC will support the complainant(s) and his or her right to express concerns in good faith. PENN AC will not tolerate attempts to retaliate, punish or in any way harm any individual(s) who report(s) a concern in good faith. Such actions will be grounds for disciplinary action.

BAD-FAITH ALLEGATIONS

Any individual who alleges misconduct under the Participant Safety Handbook that, upon review, is determined to be malicious, frivolous or made in bad faith will be a violation of our Participant Safety Handbook. Bad-faith allegations may also be subject to criminal or civil proceedings.



Strategy 6: Monitoring Your Strategy

MONITORING YOUR STRATEGY

By monitoring the interactions among coaches, staff members, athletes, and others, PENN AC works to prevent, recognize and respond to inappropriate and harmful behaviors as set forth in our Participant Safety Handbook, while reinforcing appropriate behaviors.

MONITORING COMPLIANCE WITH POLICIES AND PROCEDURES

PENN AC monitors for compliance with its policies and procedures, including without limitation its Awareness Training, Travel, Locker Room and Changing Areas, and Physical Contact Policies.

MONITORING METHODS

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

RESPONDING TO INTERACTIONS

While PENN AC has a formal reporting policy, coaches and staff members should be prepared to respond immediately to inappropriate or harmful behavior, potential risk situations and potential boundary violations.

Coaches and staff members will redirect inappropriate behaviors to promote positive behaviors, confront inappropriate or harmful behaviors, and report behaviors if necessary.

REPORTING

Coaches and staff members and volunteers are required to report policy violations, misconduct and physical and sexual abuse consistent with PENN AC's Reporting Policy. PENN AC does not investigate suspicions or allegations of child physical or sexual abuse or attempt to evaluate the credibility or validity of such

allegations as a condition for reporting to appropriate law enforcement authorities.