



# ATHLETE SAFETY POLICY

(July 2024)

## Policy Requirements

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## **INTRODUCTION**

The purpose of this Athlete Safety Policy (“Policy”) is to help protect youth athletes from sexual abuse and other prohibited conduct as defined in this Policy, so that the Fellowship of Christian Athletes (“FCA”) may fulfill its mission to lead every coach and athlete into a growing relationship with Jesus Christ and His church. This Policy is designed around the requirements set forth by Public Law 115-126 *Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017* (the “SafeSport Act”), even though the SafeSport Act may not apply to every sport environment applicable to FCA.

FCA has zero-tolerance for abuse and misconduct. All participants in the FCA community must play an active role in creating an environment free from emotional, physical or sexual abuse. In that regard, this Policy is intended to help all participants detect and report abuse, respond to it and prevent future occurrences. This Policy includes six (6) key components: Prohibited Conduct, Mandatory Reporting, Background Screening, Education and Training, Limiting One on-One Interactions (Minor Athlete Abuse Prevention Policies) and Enforcement.

This Policy does not cover other areas of athlete safety such as concussions, illness, or injury, and does not cover details on reporting an incident. That information can be found in FCA’s Risk Management Manual and/or on FCA’s “Report An Incident” feature with the FCA digital compliance platform, as it relates to the prohibited conduct set out in this Policy.

## **ADULT PARTICIPANTS, MINOR ATHLETES AND POLICY EXCEPTIONS**

This Policy uses the term “Adult Participants” to refer to any adult who is 18 years of age or older. This is to whom Policy applies. Adult Participants are required to follow all policies included in FCA’s Athlete Safety Policy.

FCA defines “Adult Participants” as any person that interacts with Minor Athletes in FCA’s programming who is 18 years of age or older, including without limitation:

1. FCA staff and volunteers
3. Coaches, officials and referees
4. Team managers and club administrators
5. Tournament directors
6. Athletic trainers
7. Adult athletes - rostered athletes who are 18 years of age or older and participating on teams with “Minor Athletes” as described below.

Many aspects of this policy are issued to protect Minor Athletes who participate in FCA’s programming.

A Minor Athlete is an amateur athlete under 18 years of age.

Close-in Age Exception is an exception applicable to certain policies when an Adult Participant is a

rostered athlete who is 18 years of age or older and participating on a Team with Minor Athletes and does not have authority over a Minor Athlete *and* is not more than four years older than the Minor Athlete (e.g. a 19-year-old and a 16-year-old). An example is where a 19-year-old is a rostered athlete participating on a team with a 16-year-old athlete.

A Minor Coach is any coach participating in an FCA program who is under 18 years of age.

“In-Program Contact” includes sanctioned events and facilities, but it also applies more broadly to sport-related interactions, and is defined as:

- Any contact (including communications, interactions or activities) between an Adult Participant and Minor Athlete(s) related to participation in sport.

Examples of In-Program Contact include, but are not limited to, competition, practices, camps/clinics, training/instructional sessions, pre/post game meals or outings, team travel, review of game film, team or sport-related relationship building activities, celebrations, award ceremonies, banquets, team or sport-related fundraising or community service, sport education or competition site visits.

This Policy sets out rules, guidelines, and exceptions for Adult Participants and one-on-one interactions with Minor Athletes. There are exceptions for Adult Participant Personal Care Assistants (“PCAs”) working with a Minor Athlete, Dual Relationship situations, and Close-in-Age, as set out in this Policy.

A PCA is an individual who assists a Minor Athlete who requires help with the activities of daily living or in preparation for athletic participation. Examples of such assistance may include, support provided by a guide for blind or visually impaired athlete, or it can include assisting certain Minor Athletes with transfer, dressing, showering, medication administration and using the restroom. When assisting a Minor Athlete, PCAs must be authorized by the athlete’s parent/guardian as set out in this Policy. For a PCA to be considered an Adult Participant, the PCA must have regular contact with additional Minor Athlete(s) besides the Minor Athlete for whom they provide care, or the PCA must be hired by FCA or a member organization. In these circumstances, the following requirements must be met before a PCA exception will be granted:

1. The Minor Athlete’s parent/guardian must provide written consent to FCA or the member organization for the PCA to provide care/work with the Minor Athlete.
2. The PCA must complete the required training as defined in the Education & Training section of this Policy.
3. The PCA must meet all screening requirements of FCA or the member organization.

Further, Adult Participants with a dual role or relationship with a minor create an exception to certain rules and guidance set forth within this Policy, so long as the processes and procedures, including without limitation, parent/guardian written consent, is followed. A “Dual Relationship” exception may exist when:

- An Adult Participant has a dual role or relationship with a Minor Athlete. The exception requires written consent of the Minor Athlete’s parent/guardian at least annually.
- Examples of a dual-role relationship can include, but is not limited to:

- Adult Participant who is a parent/guardian of a Minor Athlete.
- Adult Participant who is a grandparent/aunt/uncle of a Minor Athlete.
- Adult Participant who is a family friend of a Minor Athlete.

## **PROHIBITED CONDUCT**

It should be noted that all defined Adult Participants and Minor Athletes of FCA's programming are subject to specific prohibited conduct as outlined below. Prohibited behaviors include: harassment; sexual harassment; racial, religious or national origin harassment; child sex abuse; sexual misconduct; emotional misconduct; physical misconduct; bullying; and hazing. All Adult Participants have an obligation to cooperate in any investigation of a complaint of misconduct, including providing all information concerning the complaint. Failure to do so may be a direct violation of this Policy. Any violation of this FCA Athlete Safety Policy by Adult Participants or Minor Athletes may subject the individual to disciplinary action, and FCA prohibits any retaliation against individuals making good faith reports of misconduct, including potential violations of this policy by Adult Participants for Minor Athletes.

### **Harassment**

Repeated and/or severe conduct that causes fear, humiliation or annoyance; conduct that offends, degrades, creates a hostile environment or reflects discriminatory bias in an attempt to establish dominance; superiority or power over an individual or group based on age, race, ethnicity, culture, religion, national origin, or mental or physical disability; or any act or conduct described as harassment under federal or state law.

### **Sexual Harassment**

Any unwelcome sexual advance, request for sexual favors, or other unwanted conduct of a sexual nature, whether verbal, non-verbal, graphic, physical or otherwise. Sexual harassment can also include harassment related to gender, sexual orientation, gender identity or gender expression, which may include acts of aggression, intimidation or hostility, whether verbal or non-verbal, graphic, physical or otherwise, even if the acts do not involve conduct of a sexual nature.

### **Racial, or National Origin Harassment**

Includes any verbal, written or physical act in which race, or national origin, is used or implied in a manner which makes a reasonable person uncomfortable in the environment. Examples include, but are not limited to: jokes, which include reference to race or national origin; the display of objects or pictures which adversely reflect on a person's race or national origin; or use of pejorative or demeaning language regarding a person's race or national origin.

### **Child Sexual Abuse**

Any sexual activity with a Minor Athlete (under 18 years of age) is prohibited. This includes sexual contact with a child that is accomplished by deception, manipulation, force or threat of force, regardless of the age of the participants, and all sexual interactions between an adult and a child,

regardless of whether there is deception, or the child understands the sexual nature of the activity.

### **Sexual Misconduct**

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

### **Emotional Misconduct**

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

### **Physical Misconduct**

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

### **Bullying**

Intentional, persistent and repeated pattern of committing or willfully tolerating physical and non-physical behaviors that are intended, or have the reasonable potential, to cause fear, humiliation or physical harm in an attempt to socially exclude, diminish or isolate the targeted athlete(s), as a condition of membership are prohibited. Bullying does not include group or team behaviors that (a) are meant to establish normative team behaviors, or (b) promote team cohesion.

### **Hazing**

Coercing, requiring, forcing or willfully tolerating any humiliating, unwelcome or dangerous activity that serves as a condition for (a) joining a group, or (b) being socially accepted by a group's members are prohibited. Hazing does not include group or team activities that (a) are meant to establish normative team behaviors or (b) promote team cohesion.

### **Personal Relationships / Romance**

No Adult Participant shall have a romantic or dating relationship ("Personal Relationship") with a Minor Athlete. No Adult Participant, excluding, for purposes of this section only, rostered athletes who are 18 years of age or older ("Adult Athlete") shall have a Personal Relationship with an Adult Athlete that they coach, supervise, are in a position of authority, or are in a position to influence the playing time of such

Adult Athlete, unless one of the exceptions below applies or the policies and protocols set out immediately below are followed.

*Prior Relationships.* An Adult Participant who has had a previous Personal Relationship with an Adult Athlete will not be involved in decisions relating to the Adult Athlete's playing time, or participation in any sports environment.

*Policy Protocols and Consequences.* All Adult Participants engaged in a Personal Relationship with an Adult Athlete are required to notify the League or Club Director, and the League and Club Director should then notify the EVP of Leagues or EVP of Clubs. The EVP of Leagues or EVP of Clubs should then notify the Legal and Compliance Department.

Adult Participants in violation of this Policy may be subject to termination or disqualification of their status as an Adult Participant.

Additionally, Adult Participants involved in a Personal Relationship with an Adult Athlete covered by this Policy may be asked to sign a document acknowledging that their relationship is entirely consensual and free from coercion and harassment.

If the relationship is covered by this Policy and is between an Adult Participant and Adult Athlete participating on the same sports club, the Adult Participant may be subject to removal from their position or assigned to a new club team. If a conflict of interest arises because of a Personal Relationship, at the discretion of FCA, in addition to or instead of removing the Adult Participant from their position or reassigning such Adult Participant, one of the individuals involved in the relationship may be subject to transfer to a new club, reassignment to a new club, or removed from participant in the FCA Sports environment, altogether.

### **Professionalism**

Adult Participants and Adult Athletes are expected to conduct themselves in a professional manner at all times. Sports environment dating or romantic relationships must not interfere with any employee's professionalism, including treating others with respect and refraining from behavior that may make others feel uncomfortable (for example, overt physical displays of affection and using sexual language). In particular, Adult Participants are expected to set a high standard of professional conduct and in any social setting at events sponsored by FCA. For this reason, Adult Participants are prohibited from social interaction with Adult Athletes that is or might be perceived as inappropriate (for example, unwanted flirting, touching, or other behavior that may be regarded as sexual harassment).

## **MANDATORY REPORTING**

All Adult Participants of FCA are mandatory reporters of any known or suspected child abuse. All reports must be made to the appropriate law enforcement authorities within 24 hours; the abuse does not need to be confirmed. Adult Participants should never seek to conduct their own investigations.

FCA does not tolerate retaliation of any kind. Any Adult Participant or Minor Athlete who makes a good faith report will not be subject to retaliation, including harassment, as a result of making a report. The SafeSport Act of 2017 also includes qualified immunity for good faith reports. The obligation to report is not always satisfied by making an initial report, and an Adult Participant is required to report supplemental information of which he/she becomes aware that may be relevant in a pending investigation.

As FCA is now required to have a mechanism for all individuals (adults and minors) to report abuse (not just abuse in sexual nature as abuse can be defined as any of the prohibited behaviors outlined above under Prohibited Conduct), all are encouraged to utilize the "Report An Incident" feature with the FCA digital compliance platform. Regardless of the method for reporting any known or suspected child abuse, all Adult Participants of FCA are also required to report the information to FCA.

## **BACKGROUND CHECKS**

FCA's Background Check Policy is in place to set forth requirements pertaining to appropriate background screening. This Background Check Policy does not apply to individuals under 18 years of age. All Adult Participants shall be known collectively as "Adult Applicant" for the purposes of this Background Check Policy.

Any athlete, referee, coach, or otherwise, who is under 18 years of age and who is participating in FCA sanctioned activities and competitions, will be known as a "Minor Athlete" for the purposes of this Background Check Policy.

Every Adult Applicant is required to apply for a background check every two (2) years by using the FCA digital compliance platform prior to contact with minors.

A comprehensive background check, including a national search, national sex offender search (50 states plus U.S. territories) and 7-year county of residence criminal record and/or state criminal record repository search will be conducted on every Adult Applicant submitted every two (2) seasonal years. In addition, all Adult Applicants should be vetted against FCA's suspension database, and the SafeSport Centralized Disciplinary Database. The complete FCA Background Check Policy is available upon request.

## **EDUCATION & TRAINING**

The following Adult Participants must complete the FCA Abuse Prevention Training through the FCA digital compliance platform:

- Adult Participants who have regular contact with any amateur athlete(s) who is a minor, which includes without limitation, adult athletes that are rostered athletes who are 18 years

of age or older and participating on teams with Minor Athletes.

- Adult Participants who have authority over any amateur athlete(s) who is a minor.
- Adult Participants who are employees or board members of FCA or its direct and indirect members.
- Minors who are participating as coaches (Minor Coaches).
- Adult Participants must complete this training before regular contact with an amateur athlete(s) who is a minor begins.

For purposes of this section a “minor” is anyone under the age of 18.

## **Parent Training**

FCA strongly encourages all parents/guardians of Minor Athletes to review the FCA Safe Sport Policies.

## **REQUIRED POLICIES FOR ONE-ON-ONE INTERACTIONS**

FCA recognizes that youth-adult relationships can be healthy and valuable for development. Policies on one-on-one interactions protect children while allowing for these beneficial relationships. As child sexual abuse is often perpetrated in isolated, one-on-one situations, it is critical that organizations limit such interactions between youth and adults and implement programs that reduce the risk of sexual abuse.

Except for the exceptions set out below, Adult Participants must avoid one-on-one interactions with Minor Athletes.

### **ONE-ON-ONE INTERACTIONS**

#### *Observable and Interruptible*

All one-on-one In-Program Contact between an Adult Participant and a Minor Athlete must be observable and interruptible, at least by another unrelated Adult Participant or unrelated Minor Athlete at least 5 years of age or older, except in emergency circumstances (“Observable and Interruptible”). The exceptions below may apply to specific situations, and if the exceptions apply, they are listed in this Policy. These exceptions also apply to all one-on-one In-Program Contact not specifically addressed in other sections of this Policy:

- When a Dual Relationship exists;
- If a Minor Athlete needs an Adult Participant Personal Care Assistant (PCA), and:
  - (1) the Minor Athlete’s parent/guardian has provided written consent to FCA for the Adult Participant PCA to work with the Minor Athlete.
  - (2) the Adult Participant PCA has complied with the Education & Training Policy.
  - (3) the Adult Participant PCA has complied with FCA’s screening policy.
- In other circumstances specifically addressed in this Policy that allow for certain one-on-one interactions if FCA receives parent/guardian consent.

### **MEETINGS AND TRAINING SESSIONS**

#### *Observable and Interruptible*



Adult Participants must follow the one-on-one interaction policy in all meetings and training sessions where Minor Athlete(s) are present.

### ***Individual Training Sessions***

One-on-one, In-Program, individual training sessions must be Observable and Interruptible except if:

- A Dual Relationship exists; or
- If a Minor Athlete needs an Adult Participant Personal Care Assistant (PCA), and:
  - (1) the Minor Athlete's parent/guardian has provided written consent to FCA for the Adult Participant PCA to work with the Minor Athlete.
  - (2) the Adult Participant PCA has complied with the Education & Training Policy.
  - (3) the Adult Participant PCA has complied with FCA's screening policy.

The Adult Participant providing the individual training session must receive advance, written consent from the Minor Athlete's parent/guardian at least annually, which can be withdrawn at any time; and parents/guardians must be allowed to observe the individual training session.

It is also recommended that if a permitted meeting or training session takes place between an Adult Participant and a Minor Athlete at a facility partially or fully under FCA's jurisdiction, another Adult Participant will monitor each meeting or training session. Monitoring includes reviewing the parent/guardian consent form, knowing that the meeting or training session is occurring, knowing the approximate planned duration of the meeting or training session, and dropping in on the meeting or training session.

### ***Meetings with Licensed Mental Health Care Professionals and Health Care Providers (Other Than Athletic Trainers)***

If a licensed mental health care professional or licensed health care provider meets one-on-one with a Minor Athlete at a sanctioned event or a facility, which is partially or fully under FCA's jurisdiction, the meeting must be Observable and Interruptible except:

- If the door remains unlocked;
- Another adult is present at the facility and notified that a meeting is occurring, although the Minor Athlete's identity needs not be disclosed;
- FCA is notified that the provider will be meeting with a Minor Athlete; and
- The provider obtains parent/guardian consent consistent with applicable laws and ethical standards, which can be withdrawn at any time.

## **ATHLETIC TRAINING MODALITIES, MESSAGES AND RUBDOWNS**

### ***Athletic Training Modality, Massage or Rubdown***

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 below);
- Be performed with the Minor Athlete fully or partially clothed, ensuring that the breasts, buttocks, groin and genitals are always clothed and covered; and
- Allow parents/guardians in the room as observers, except for competition or training venues that limit credentialing.

## **Consent**

Consent must be obtained at least annually from the Minor Athlete's parent/guardian before providing any athletic training modalities, massages or rubdowns. Minor Athletes or their parents/guardians can withdraw consent at any time.

The person providing the modality, massage or rubdown should narrate the steps in the massage, rubdown, or athletic training modality before taking them, and seek assent of the Minor Athlete throughout the process.

When possible, techniques should be used to reduce physical touch of Minor Athletes.

Coaches should not massage Minor Athletes.

## **LOCKER ROOMS AND CHANGING AREAS**

### ***Observable and Interruptible***

Adult Participants must ensure that all In-Program Contact with Minor Athlete(s) in a locker room, changing area or similar space where Minor Athlete(s) are present is Observable and Interruptible, except if:

- A Dual Relationship exists; or
- If a Minor Athlete needs an Adult Participant Personal Care Assistant (PCA), and:
  - (1) the Minor Athlete's parent/guardian has provided written consent to FCA for the Adult Participant PCA to work with the Minor Athlete.
  - (2) the Adult Participant PCA has complied with the Education & Training Policy.
  - (3) the Adult Participant PCA has complied with FCA's screening policy.

### ***Conduct in Locker Rooms, Changing Areas and Similar Spaces***

No Adult Participant or Minor Athlete can use the photographic or recording capabilities of any device in locker rooms, changing areas or any other area designated as a place for changing clothes or undressing.

Additionally,

- Adult Participants must not change clothes in front of a Minor Athlete, unless the Close-in-Age Exception applies, and any interaction is Observable and Interruptible.
- Adult Participants should not behave in a manner or use restroom facilities that intentionally exposes their breasts, buttocks, groins or genitals to a Minor Athlete.
- Adult Participants must not shower with Minor Athletes, unless the Close-in-Age Exception applies, and such interaction is Observable and Interruptible.

Parents/guardians may request in writing that their Minor Athlete(s) not change or shower with Adult Participant(s) during In-Program Contact. FCA and the Adult Participant(s) shall abide by this request.

### ***Media and Championship Celebrations in Locker Rooms***

FCA may permit recording or photography in locker rooms for the purpose of highlighting a sport or athletic accomplishment if:

- Parent/legal guardian consent has been obtained;

- FCA approves the specific instance of recording or photography and two or more Adult Participants are present; and
- Everyone is fully clothed.

### ***Personal Care Assistants (PCAs)***

Adult Participant PCAs are permitted to be with and assist Minor Athlete(s) in locker rooms, changing areas and similar spaces where other Minor Athletes are present, if they meet the requirements above.

### ***Availability and Monitoring of Locker Rooms, Changing Areas and Similar Spaces***

FCA will provide a private or semi-private place for Minor Athletes who need to change clothes or undress at sanctioned events or facilities partially or fully under FCA's jurisdiction.

FCA will monitor the use of locker rooms, changing areas and similar spaces to ensure compliance with these policies at sanctioned events or facilities partially or fully under FCA's jurisdiction.

## **ELECTRONIC COMMUNICATIONS**

### ***Open and Transparent***

All one-on-one electronic communications between an Adult Participant and a Minor Athlete must be Open and Transparent 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 (PCA), and:
  - (1) the Minor Athlete's parent/guardian has provided written consent to FCA for the Adult Participant PCA to work with the Minor Athlete.
  - (2) the Adult Participant PCA has complied with the Education & Training Policy.
  - (3) the Adult Participant PCA has complied with FCA's screening policy.

Open and Transparent means that the Adult Participant copies or includes the Minor Athlete's parent/guardian, another adult family member of the Minor Athlete, or another Adult Participant on such electronic communications.

If a Minor Athlete communicates with the Adult Participant first, the Adult Participant must follow this policy if the Adult Participant responds.

Only platforms that allow for Open and Transparent communication may be used to communicate with Minor Athletes. For example, email and text messages offer Open and Transparent communication since other people can easily be added to a conversation, as opposed to private direct messages on social media platforms.

### ***Team Communication***

When an Adult Participant communicates electronically to the entire team or any number of Minor Athletes on the team, the Adult Participant must copy or include another Adult Participant or the Minor Athletes' parents/guardians.

### ***Content***

All electronic communication originating from an Adult Participant(s) to a Minor Athlete(s) must be professional in nature unless an aforementioned exception exists.

### ***Requests to Discontinue***

Parents/guardians may request in writing that FCA or an Adult Participant subject to this policy not contact their Minor Athlete through any form of electronic communication. FCA and the Adult Participant must abide by any request to discontinue, absent emergency circumstances.

## **TRANSPORTATION**

### ***Transportation***

An Adult Participant cannot transport a Minor Athlete one-on-one during In-Program travel, except if:

- A Dual Relationship exists; or
- If a Minor Athlete needs an Adult Participant Personal Care Assistant (PCA), and:
  - (1) the Minor Athlete's parent/guardian has provided written consent to FCA for the Adult Participant PCA to work with the Minor Athlete.
  - (2) the Adult Participant PCA has complied with the Education & Training Policy.
  - (3) the Adult Participant PCA has complied with FCA's screening policy.
  - (4) The Adult Participant has advance, written consent to transport the Minor Athlete one-on-one obtained at least annually from the Minor Athlete's parent/guardian.

Minor Athlete(s) or their parents/guardians can withdraw consent at any time.

An Adult Participant meets the In-Program transportation requirements if the Adult Participant is accompanied by another Adult Participant or at least two (2) Minor Athletes above the age of 5; and written consent of such Minor Athlete's parent/guardian is given.

Written consent from a Minor Athlete's parent/guardian is required for all transportation sanctioned by FCA at least annually.

## **LODGING**

### ***Hotel Rooms and Other Sleeping Arrangements***

All In-Program Contact at a hotel or lodging site between an Adult Participant and a Minor Athlete must be Observable and Interruptible, and an Adult Participant cannot share a hotel room or otherwise sleep in the same room with a Minor Athlete(s), except if:

- A Dual Relationship exists, and the Minor Athlete's parent/guardian has provided FCA with advance, written consent for the lodging arrangement; or
- If a Minor Athlete needs an Adult Participant Personal Care Assistant (PCA), and:
  - (1) the Minor Athlete's parent/guardian has provided written consent to FCA for the Adult Participant PCA to work with the Minor Athlete.
  - (2) the Adult Participant PCA has complied with the Education & Training Policy.
  - (3) the Adult Participant PCA has complied with FCA's screening policy.
- The Close-in-Age Exception applies due to an Adult Participant participating on the same team

as a Minor Athletes, and the Minor Athlete's parent/guardian has provided FCA with advance, written consent of the lodging arrangement.

Written consent from a Minor Athlete's parent/guardian must be obtained for all In-Program lodging at least annually.

#### ***Monitoring or Room Checks During In-Program Travel***

If FCA or the team performs room checks during In-Program lodging, the one-on-one interaction policy must be followed and at least two (2) adults must be present for the room checks.

#### ***Additional Requirements for Lodging Authorized or Funded by FCA***

Adult Participants traveling with FCA must agree to and sign the Lodging section of this Policy at least annually.

Adult Participants that travel overnight with Minor Athlete(s) are assumed to have authority over Minor Athlete(s) and thus must comply with the Education & Training section of this Policy.

## **ENFORCEMENT**

FCA's rules on enforcement of this Policy are set forth to establish procedures for monitoring and enforcing compliance with FCA's Athlete Safety Policy, as well as to establish an appropriate grievance process to address allegations of misconduct following the report or complaint of misconduct.

FCA takes all reports of potential violations of this Policy seriously and is committed to confidentiality and investigation of allegations.

FCA reserves the right to, either directly or through a contracted third-party service provider, survey, audit, require certifications of compliance with, or otherwise review compliance with this Policy. The decision of FCA shall be final and binding on all parties.

**Updated August 7, 2024**