

2025



SAFEGUARDING POLICY

for Children, Young People & Vulnerable Adults

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Policy Principles and Definitions

1.1. About Laureus Sport for Good

The Laureus Sport for Good Foundation was founded to fund and promote the use of sport as a tool to tackle social problems worldwide. As a key player in the sport for development field, Laureus Sport for Good funds and supports a global network of community-based sports projects impacting the lives of children and young people. Hence, robust policies and procedures must be in place to ensure that Laureus Sport for Good manages and mitigates risks in relation to the safeguarding and protection of children, young people, and vulnerable adults around the globe.

Laureus Sport for Good recognizes that the welfare and interests of all participants in programs and activities supported and endorsed by Laureus Sport for Good are paramount in all circumstances. As part of this recognition, Laureus Sport for Good has taken the pledge in favor of the International Safeguards for Children in Sport (1):

- We are committed to working towards safer sports for children, young people, and vulnerable adults.
- To support this, we will promote and advocate for safeguards through our networks and commit to embedding them in our work.

Our commitment also stretches to include young people and vulnerable adults.

Laureus Sport for Good's work is focused on children and young people. However, the guidelines cover everyone participating in programs or activities supported or endorsed by Laureus Sport for Good. This Policy is based on the UN Convention on the Rights of the Child 1989, the National Child Protection Legislation in the UK working together to safeguard children (Department for Education, 2018), the Safeguarding Vulnerable Groups Act 2006, the Care Act 2014 and related legislation, as well as wider international best practice, including the International Safeguards for Children in Sport 2016.

Laureus USA's Safeguarding Policy serves as a local adaptation based on Laureus Sport for Good's global policy and global standards.

This Safeguarding Policy provides a set of guiding principles and procedures to ensure that Laureus USA does all it can to protect and empower the children, young people, and vulnerable adults it impacts, wherever they may be.

1) <https://www.sportanddev.org/en/toolkit/child-protection-and-safeguarding/international-safeguards-children-sport>

1.2. Accountability and Application

This Laureus USA Policy applies to in-person and online interactions between children, young people, and vulnerable adults and:

- Employees, staff, board members, and those associated with Laureus USA.
- Athlete Ambassadors of Laureus USA.
- Visitors and Volunteers of Laureus USA.
- Grantees, which includes any organization funded by Laureus USA, whose policy is under development. All grantees must have their own safeguarding policies consistent with this policy and aligned with the International Safeguards for Children in Sport. (For more details, see Section 3.4 of this policy.)

For grantees with their own policy consistent with this policy and the International Safeguards for Children in Sport, sign and return Annex 2.

Anyone to whom this Policy applies must sign and return Annex 1: Commitment to Laureus USA's Safeguarding Policy Form to the Safeguarding Coordinator.

All stakeholders this Policy applies to should have a basic awareness of safeguarding issues, including:

- Being alert to the possibility of abuse and neglect in any shape or form.
- Having enough knowledge to recognize power imbalances, an abusive or potentially abusive event, or a set of circumstances.
- Knowing who in the organization to raise concerns with.
- Being competent to take the appropriate immediate or emergency action.

1.3. Definitions

- 'Safeguarding' refers to the proactive actions we all take to protect all participants, namely children, young people, and vulnerable adults, from harm so they can have safe and effective experiences.
- 'Laureus USA' means Laureus Sport for Good USA.
- A 'child' refers to an individual under the age of 18;

- A 'vulnerable adult' refers to an individual who has the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she/they:
 - Has a learning or physical disability.
 - Has a physical or mental illness, chronic or otherwise, including addiction.
 - Has a reduction in physical or mental capacity.
 - Is in the receipt of any form of healthcare.
 - Is detained in custody.
 - Is under care; is receiving community or social services because of age, health, or disability.
 - Is living in a residential care home; Is unable, for any other reason, to protect himself/herself/themselves against significant harm or exploitation.
 - Exposed to other reasons which put him/her/them at increased risk of harm and abuse.
- A 'young person' refers to someone still in the 'child' bracket (i.e., under 18 years old) but mostly makes their own decisions. The term does not have a legal implication but is being used as a more empowering term for young people under the age of 18 who do not self-identify as children.
- 'Harm, misconduct, child abuse or maltreatment' constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, deliberate neglect or negligent treatment, or commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. (Definitions of all types of harm are included in Annex 5).
- A 'power imbalance' exists when one person holds authority over the other. In sports and athletic spaces, power imbalances can occur among athletes and between athletes and staff, coaches, trainers, volunteers, medical professionals, etc. When a power imbalance is present, consent cannot be freely given.

1.4. Child Safeguarding Principles

- All participants, children, young people, and vulnerable adults have the right to participate, enjoy, and develop through sport and otherwise in a safe and inclusive environment, free from all forms of abuse, violence, neglect, and exploitation.
- All individuals and organizations working with children, young people, and vulnerable adults directly or indirectly, including both service providers and funders, have a responsibility to foster the care and protection of the children, young people, and vulnerable adults and act at all times in the best interests of the child, young person or vulnerable adult.

- Some children, young people, or vulnerable adults are more vulnerable than others to abuse, and organizations working with children, young people, or vulnerable adults need to take steps to assess and address the different levels of risk that children, young people, or vulnerable adults in their programs may face.
- Everyone has the right to be treated with dignity and respect and not be discriminated against based on age, gender, race, ethnicity, ability, sexual orientation, beliefs, religious or political affiliation.

Code of Conduct

All those covered by this Code commit to respecting, promoting, upholding, and protecting, at all times, the child's rights as set out in the UN Convention on the Rights of the Child 1989 and the International Safeguards for Children in Sport 2016. The standards of behavior set by the Code are required of all those covered by this Policy regarding their conduct towards all children and vulnerable young people.

Anyone found to breach the Code will be subject to disciplinary action, up to and including dismissal or termination of employment or other arrangement with Laureus USA.

This Code of Conduct is designed primarily to protect participants, namely children, young people, and vulnerable adults. However, it also serves to protect those covered from false accusations and the reputation of Laureus USA and its partners.

2.1. Acceptable behavior and conduct:

- Treat children, young people, and vulnerable adults with respect regardless of their gender, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation, or other status.
- Be committed to creating a culture of openness and mutual accountability to enable all children, young people, and vulnerable adults protection concerns to be raised and discussed and where abusive behavior can and must be challenged.
- Take steps to educate children, young people, and vulnerable adults, as well as their parents/guardians/carers and support networks, on the policy, inviting their contribution and involvement in communicating it and encouraging them to voice any concerns they have in a safe way.
- Use language or behavior towards children, young people, and vulnerable adults that are at all times appropriate and in no way harassing, abusive, sexual, demeaning, manipulative, or coercive.
- Ensure that interactions between adults and children, young people, and/or vulnerable adults are observable and interruptible. This also applies to online interactions.
- Ask for and receive consent from children, young people, and/or vulnerable adults before any contact. Valid consent must be given, absent any negative consequences or duress. This means the child, young person, or vulnerable adult has been informed what they are consenting to, is consenting voluntarily, and is competent to consent to such interaction. The child, young person, or vulnerable adult may change their mind at any time.

- Ensure that physical contact is always appropriate and does not invade the privacy of the child, young person, and/or vulnerable adult.
- Use positive, non-violent methods to manage a child or other person's behavior.
- Promptly raise any concerns of inappropriate behavior by following proper reporting processes and procedures, as outlined in this policy.
- Comply with any investigation (including interviews) and make available and share any documentation or information necessary to complete the investigation.
- Ensure that anyone engaging with children, young people, and vulnerable adults knows their obligations to comply with this policy.

2.2. Unacceptable behavior and conduct:

- Sexual activity or romantic involvement with children, young people, and vulnerable adults is prohibited regardless of the age of majority or age of consent locally. A mistaken belief regarding the age of a child is not a defense. Consent is not possible in these settings as a power imbalance is at play.
- Engaging children, young people, and vulnerable adults in any form of sexual activity, including paying for sexual services, i.e., exchange of money, employment, goods, or services, is prohibited.
- Initiating or employing any grooming or predatory, manipulative behavior, including targeting a child, young person, or vulnerable adult, gaining their trust, fulfilling their needs, isolating them, promoting secrecy, engaging in sexual behaviors, and exerting control over them.
- Use of any device to access, view, create, download, or distribute sexual images of children, young people, vulnerable adults, or any other people is prohibited.
- Recording audio/video and taking photos of children, young people, and vulnerable adults without their consent and the consent of their parents/guardians/carers is prohibited.
- Physical neglect, punishment, discipline, or use of physical force of any kind towards children and vulnerable adults is prohibited.
- Having interactions with children, young people, and vulnerable adults that are not observable or interruptible, in person or online.

- The use of children, young people, and vulnerable adults for domestic or other labor is prohibited when it is inappropriate for the person's age or developmental capacity, in breach of local law, interferes with the time available for education and recreational activities, or places him, her or them at significant risk of injury, exploitation or abuse.
- Doing things of a personal nature for a child, young person, or vulnerable adult that they could do for themselves.
- Demonstrating or giving preferential treatment to a particular person, child, young person, or adult to the exclusion of others (for example, promising gifts or enticements).
- Being intoxicated (under the influence of alcohol or drugs) prior to working with children, young people, vulnerable adults, or any other people; providing, giving, selling, or trading substances to children, young people, vulnerable adults, or any other people.
- Acting in ways intended to shame, humiliate, belittle, or degrade children, young people, vulnerable adults or otherwise perpetrate any form of abuse.
- Taking a child, young person, or vulnerable adult alone in a vehicle unless it is essential and with parental and managerial consent.
- Leaving children, young people, and vulnerable adults unsupervised with a visitor to a project.
- Exchanging personal information and contact information with a child, young person, or vulnerable adult.
- Emotionally, physically, and verbally abusing and/or neglecting children, young persons, or vulnerable adults, as well as failing to report reasonable suspicions or observations of any type of harm, abuse, misconduct, or neglect.
- Engaging in, promoting, or contributing to any forms of bullying, hazing, harassment, or discrimination against any persons, children, young persons, or vulnerable adults.
- Behaving, interacting with, or advising children, young people, or vulnerable adults outside the scope of your designated assigned role or duty, as described by your employer.

Please note that this is not an exhaustive list. Additional Definitions of Harm are included in Annex 5. If you feel unsure about a situation or how to respond to it, you must seek guidance from the Safeguarding Officer or Coordinator.

Safeguarding Procedures

3.1. Risk Assessment

Laureus USA will conduct an annual risk assessment of its operations (including on- and offline events), programs, and project activities. Risk mitigation strategies to minimize the risk to children, young people, and vulnerable adults will be incorporated into the operation of Laureus USA and activities that involve children, young people, and vulnerable adults. In addition, employees, trustees, associates, volunteers, contractors, and grantees on project visits will carry out appropriate risk assessments prior to any and all project visits. Annex 7 provides a format for the Risk Assessment. Section 4 provides guidance on online safeguarding.

3.2. Recruitment and selection of employees

Laureus USA acknowledges that creating a safe environment for children, young people, and vulnerable adults starts with the appointment of suitably qualified, skilled, and vetted employees who have the desired competencies and skills to carry out their functions effectively, efficiently, and safely.

Laureus USA's employee recruitment and onboarding processes reflect our commitment to protecting children, young people, and vulnerable adults and preventing abuse. This includes:

- Pre-appointment background checks – Disclosure Barring Checks (or equivalent) checks on new staff.
- Candidates' employment history will be verified, including asking about and investigating gaps between jobs and reasons for leaving previous roles.
- Candidates will have their identity checked and verified against original identification documents such as their passport and photo card license. At the point of application, they will be asked to certify that the information provided as part of their application is correct to the best of their knowledge and belief and sign the declaration.
- Candidates will be asked specific safeguarding-related questions during their interview.
- Candidates should provide two professional references, who will be asked about the candidate's experience working with children, young people, and vulnerable adults, and disclose any concerns they may have about the candidate's suitability to work with such groups.

This will be achieved through ensuring that:

- Relevant child protection and safeguarding training – including a comprehensive induction to organizational child, young person, and vulnerable adult safeguarding policies and procedures within one month of hire by the Safeguarding Coordinator and annual mandated training. Details on the training and the levels of training required for staff and associates are listed in Section 6 of this policy.
- Employees will be asked to confirm that they have reviewed the Safeguarding Policy and agree to abide by it (see Annex 1). This will be part of the annual Performance Management Process.
- Employees will have access to support from the Safeguarding Officer and the Safeguarding Coordinator regarding all aspects of child, young person, and vulnerable adult safeguarding and the implementation of this policy.
- Staff will be informed about the use of technology (such as computers and mobile phones) and understand that they must not use this technology to access, produce, or distribute any information or images that are harmful to children or young people and that may place them in danger or cause them distress. Media information is expanded upon in Annex 4.

3.3. Engaging Contractors

When engaging Contractors to deliver services, responsibility rests with those Contractors to ensure that those providing the service on their behalf understand the obligations and commitments outlined in this Safeguarding Policy. Laureus USA standard form contracts include this obligation. If the Contractor is or may be involved in any activities involving children, young persons, or vulnerable adults, they will ensure that their relevant staff and/or contractors sign the form as set out in Annex 1. The Safeguarding Policy is deemed incorporated into standard-form Contracts.

3.4. Working with Grantees

The Laureus USA requires that all of its Grantees develop and implement their own child, young person, and vulnerable adult safeguarding policies, protocols, and procedures, which clearly set out the procedures, as well as the measures in place for implementation and training, communication of their child, young person and vulnerable adult safeguarding policy and monitoring and review. Grantee's policies and procedures, or their plans to develop these, are a condition of funding and will be monitored during the grant management cycle.

Laureus Sport for Good will endeavor to support grantees in developing and implementing robust child and vulnerable adult safeguarding policies and procedures where possible. Grantees that do not have appropriate child, young person, and vulnerable adult safeguarding policies and procedures in place will be given six months to develop these and the opportunity to allocate a portion of their grant towards this if needed. Grantees whose policies are in development will utilize the Laureus USA safeguarding policy in the interim. It is recommended that grantees utilize the self-audit tool through Laureus Sport for Good and the International Safeguards for Children in Sport, as well as conduct their own annual risk assessments. Grantees can seek outside council support to ensure their safeguarding policies and procedures are in alignment with local legislative requirements. Grantees must demonstrate to Laureus Sport for Good that appropriate child and vulnerable adult safeguarding policies and procedures are in place and that they are being adhered to by staff. Grantees who fail to develop appropriate child and vulnerable adult safeguarding policies and procedures within six months will have their funding suspended until they have appropriate policies and procedures.

Grantees who wish to engage with children, young people, and vulnerable adults online must include a section on online safeguarding in the child, young person, and vulnerable adult safeguarding policy. Please find guidance for online safeguarding in Section 4.

From 2nd January 2023, all new grant contracts must include the condition that the committed payments are conditioned on the grantee taking the pledge to promote and comply with the International Safeguards for Children in Sport. This can currently be done via this website: <https://safeinsport.org/>

3.5. Managing child, young person, and vulnerable adult safeguarding risks during Laureus USA events

Laureus USA will ensure to the best of its ability that children, young people, and vulnerable adults are protected from ill-treatment or abuse during any events it directly delivers that bring children and vulnerable adults into contact with adults.

Specifically:

- Guests (visitors of any form) present will be provided with a copy (online or hard copy) and access to this Laureus USA Safeguarding Policy by Laureus USA. They will be briefed on any additional safeguarding measures as applicable. Laureus USA will make efforts to ensure that guests provide a written commitment to following the Laureus USA Safeguarding Policy through Annex 1. There is an acknowledgment that this may not always be possible. Laureus USA will be responsible for disseminating and displaying this policy and any extra safeguarding measures at events, as well as ensuring that guests do not have any unsupervised time or contact with children, young people, and vulnerable adults.
- Journalists, photographers, and other media personnel must also comply with the guidance outlined in Annex 4.
- An adult will be present and designated as an on-site child protection officer at each Laureus USA event, which includes the presence of children, young people, or vulnerable adults to deal with reported breaches under the Safeguarding Policy. For larger scale events such as a partnership launch, summit, or project visit, where there will be large numbers of children present, the Safeguarding Officer or Coordinator will ensure that a risk assessment is conducted and an appropriate child, young person, and vulnerable adult safeguarding risk mitigation plan is implemented specific to the event.

Keeping Children, Young People and Vulnerable Adults Safe Online

4.1. Introduction

Laureus USA may have programs for children, young people, and vulnerable adults that involve, require, or rely solely on online engagement, such as video conferencing via social media platforms or telephone engagement. Adults like sports coaches and educators, and other program staff that would normally interact with children face to face may be engaging with children in an online environment.

The online environment can be a positive space that connects and educates children and, for some, can be a social lifeline. However, it can also be a space where children, young people, and vulnerable adults are at risk of harm, and therefore vigilance is required.

4.2. The Principles and Code of Conduct are the Same Online

By complying with the fundamental principles of safeguarding and the appropriate codes of conduct, independent of the nature of the engagement, physical or virtual, online or by phone or other means, we all help keep children, young people, and vulnerable adults safe.

The online code of conduct will continue to include do's and don'ts, such as:

- Use language and behavior towards children, young people, or vulnerable adults that is at all times appropriate and in no way harassing, abusive, sexually provocative, or demeaning, independently of your medium of engagement.
- Ensure that interactions between children, young people, and vulnerable adults are always observable and interruptible. This applies to online contact across any medium.
- Use positive, non-violent methods to manage a child, young person, and vulnerable adults' online and offline behavior; and raise any concerns of inappropriate behavior immediately.
- Only use the programs approved and assigned online platform when communicating.
- Do not do or suggest to do things of a personal nature for a child, Young Person, or vulnerable adult that they could do for themselves.

- Reinforce professional boundaries with children, young people, and vulnerable adults who begin personal communication. Do not give or receive contact information of any kind, e.g., email, phone number, social media handles, etc., with a child, young person, or vulnerable adult.
- Do not socialize with a child, young person, and/or vulnerable adult online in a private or personal context; do not connect, follow, add, or communicate with children under 18 on social media or their personal phone or email address.
- Do not post any personal information, images, or videos of children under 18 on your social media, and always be aware of data protection regulations.
- Be mindful of the collection, storage, and disclosure of children's, young people's, and vulnerable adults' personal information and/or images/content, and comply with the Safeguarding Policy, the online platform's Privacy Policy.
- Do not take or publish screenshots in which children, young people, or vulnerable adults appear.
- Do not expose children, young people, or vulnerable adults to inappropriate material online.
- Do not act in ways intended to shame, humiliate, belittle, or degrade a child, young person, and vulnerable adults, or otherwise perpetrate any form of abuse, Online or Offline.
- Do not engage in any behavior that may constitute grooming.

This list is not exhaustive. Please consult the Safeguarding Officer or Coordinator if you have any questions.

4.3. Specific guidance on the active use of online platforms

It is important for organizations and groups to put safeguarding measures in place if they are communicating with children online. A learning platform is an online community. Different platforms and apps enable different benefits, such as instant messaging, personal profiles, and facilities for hosting and sharing online events. Ensure participants meet the minimum age requirement for any and all platforms. Make sure the children, young people, staff, and volunteers in your online community know how to report incidents and who to talk to if they see or hear anything upsetting or inappropriate. In addition to following safeguarding and child protection policies and procedures, specific safeguarding measures need to be considered when creating an online community.

Key principles and practical safety measures:

- Tell users what to expect when they sign up and give frequent reminders of your content rules.
- Consider implementing safety technology tools such as age assurance technologies to ensure that children, young people, and vulnerable adults are not able to access content aimed at adult audiences.
- Offer easy-to-use reporting mechanisms for children, young people, and vulnerable adults to report inappropriate content. You should also inform users of the action taken as a result of the report and the reasons for this action.
- Consider special default protections for accounts that are opened by under 18s.
- Consider using AI-based reporting to parents and carers about their children under 18's online behavior.
- Encourage parents, carers, children, young people, and vulnerable adults to turn on privacy and security settings on all online accounts.
- Plan and regularly update how you will manage inappropriate content posted on your site. Children, young people, and vulnerable adults may find ways around your moderation processes, so you need to keep them under review. This means checking and reviewing what people are posting to assess whether children may be at risk.
- Be mindful of the collection, storage, and disclosure of children, young people, and vulnerable adults' personal information and comply with the online platform's Privacy Policy.
- Do not take or publish screenshots in which children, young people, or vulnerable adults under care appear.

To moderate effectively, you should:

- Publish clear guidance on what is and is not allowed to be posted
- Establish when posts will be moderated, for instance, whether they are reviewed before or after they go live
- Decide when children, young people, and vulnerable adults will be able to post and submit content
- Familiarize yourself with the language children, young people, and vulnerable adults use so that you understand whether the language may be inappropriate or harmful.

4.4. Guidance

For Program Personnel

- Plan any online contact with safeguarding in mind – think about any risks and mitigations. Be aware of where you are engaging with children, young people, and vulnerable adults. For example, are you, or are they in the bedroom while they are online? What are children, young people, and vulnerable adults wearing, and is it appropriate?
- Be accountable – You should not have one-to-one online contact with children, young people, and vulnerable adults. Engage/communicate with groups of children, young people, and vulnerable adults so that there is accountability for interactions. Where this is not possible, require the children, young people, and/or vulnerable adults to engage with you in an area of their home that is visible to others (e.g., not in their bedroom) and ask the child, young person, and vulnerable adult's parent, guardian, or carer to check in with you and the child, young person and vulnerable adult at the end of the session to talk through what you covered. Always copy parents/guardians/carers into online communications with children.
- Keep professional boundaries – Keep your engagement with children, young people, and vulnerable adults focused on the activities. Never approach children, young people, and vulnerable adults through your personal online channels or attempt to make private contact with them. Politely decline any invitations you receive from children, young people, and vulnerable adults to link up privately online.
- Separate and close off accounts – Use a different account for engaging with children, young people, and vulnerable adults so that you do not have to share personal social media contact details, and there can be no confusion about the nature of the contact with children, young people, and vulnerable adults. Use closed groups that only include the children, young people, and other adult leaders who are involved so that they cannot be open to external individuals who could then access the children and young people separately. Organizations should coordinate the use of separate and closed off accounts with relevant staff.
- Be ready to report – you may become aware of a risk of harm to the child/children, young person/young people, and vulnerable adults you are engaging with. They may tell you about something they are experiencing or worried about, or you may observe something about their home situation that you wouldn't have previously been privy to. Be aware of how to report any concerns, whether the child, young person, or vulnerable adult is in need of immediate medical and police assistance.

- Before you go online, prepare the children, young people, and vulnerable adults as well as their parents/guardians/carers for this different type of engagement. This is not just about getting consent to work with children, young people, and vulnerable adults online; it is also about helping them protect themselves from any potential risk they could be exposed to.
- If you wish to record online sessions, you should only do this with permission of the participants and their parents and/or guardians. Make it clear if recordings will be used for internal and/or external purposes. You should not store the recordings in any way that can be publicly accessed. Ideally, you should not record sessions with children, young people, or adults under care.

For children and young people:

- Keep the same rules of security and safety online that you normally would. Do not share contact details with people you don't know and trust; keep private things private. Only engage with adults in a professional relationship with you (e.g., sports coaches) as part of the professional sessions they deliver – do not invite them or accept them as private 'friends' or contacts on online accounts. Always dress and behave as if this was a face-to-face meeting.
- It is illegal and dangerous to share sexual or inappropriate images of yourself with anyone else, including people we think of as our boy or girlfriend.
- Be kind—the online environment can be a really hurtful place, and particularly while we are all living in challenging circumstances that might make us feel more vulnerable than usual, we need to be kind to each other both online and offline. Do not keep in contact with people who are being unkind online; tell a trusted adult or, if you have access, call your national helpline if you need to talk.

For parents/guardians/carers:

It is important that we know what our children, young people, and vulnerable adults are doing online and who they are connecting with to ensure they are not accessing websites and other information that could be harmful.

- People who seek children, young people, and vulnerable adults out online are likely to look for ways of exploiting the current situation and may increase their online activities, so now is a good time to remind our children, young people, and vulnerable adults about what to be aware of and the need to keep privacy settings firm.

- Set boundaries – Although children, young people, and vulnerable adults may need to be online more for schoolwork and social contact, set boundaries. Also, be aware of age restrictions for sites and programs.
- Check in – Introduce yourself to the provider of services and programs. Require that adults copy parents/guardians/carers into online communications with children and also to have another adult present in online groups for accountability, so feel free to ask the lead adult what they have put in place to make sure children are safe in the online groups they are running. It is against policy to allow online contact between one child and one adult in a private space where no one else can hear the discussion, so report this practice if you see it happening.
- Report any concerns – If you are worried about the interactions between any adults or children, young people, young people, and vulnerable adults online, especially if you think they may be at risk from someone seeking to sexually exploit them online, make a report!

Responding to Disclosures and Reporting Procedures

5.1 Responding to Disclosures

Laureus USA is committed to swiftly acting upon and investigating disclosures of child, young person, and vulnerable adult safeguarding concerns. The welfare of the individual is of paramount consideration at all times.

If a child, young person, or vulnerable adult discloses that he/she/they or someone they know is being abused, Laureus USA representatives must listen to the individual and accept what is being said; allow the individual to speak freely, ask only open questions to establish the basic facts or nature of the complaint. It is not the responsibility of the employee to decide whether or not abuse has taken place, as well as the type of abuse, or to take on any punitive or disciplinary action; it is their responsibility to report this to the Safeguarding Officer or Coordinator.

They should reassure the individual that they have done the right thing by disclosing what is happening to them. However, total confidentiality should not be promised, as information must be shared if the individual is at risk. The Safeguarding Officer or Coordinator will advise on the process if a disclosure is made as set out below.

5.2 Reporting Expectations

Laureus USA is committed to responding appropriately, effectively, and fairly to all allegations and suspicions of abuse, both current and historical, through reporting mechanisms that are simple, clear, fair, and accessible to all stakeholders, including children, young people, and vulnerable adults.

It is mandatory for all persons to whom this policy applies and covered grantees to report concerns, suspicions, allegations, and incidents that indicate actual or potential abuse of children, young people, or vulnerable adults and/or any other breaches of this Safeguarding Policy, through the relevant reporting mechanisms set out in this Safeguarding Policy. All grantees are required to answer the formal reporting questions on safeguarding incidents and address any safeguarding incidents in conversations with their grant manager.

All those subject to complaints will be treated fairly and consistent with the principles of natural justice (i.e. rule against bias and the right to a fair hearing). Investigations will be led by the Laureus USA incident team (see flow chart on next page) and will be guided by external professional expertise and support when required. To the extent practical, Laureus USA will

strive to maintain confidentiality to protect the affected individual(s) subject to its goal of engaging in a thorough investigation. Laureus USA may, however, be required to disclose the allegations or result of the investigation to the relevant authorities.

If a report of abuse is made or concerns are raised, even if the situation is ultimately found to be untrue, no retaliatory action will be taken against the person making the report. Please see the Laureus USA Whistleblower Policy for more information. If, however, the report is found to be malicious, the accused employee will be offered support, and Human Resources will decide on the course of action relating to disciplinary and suspension procedures.

5.3 Reporting Procedures

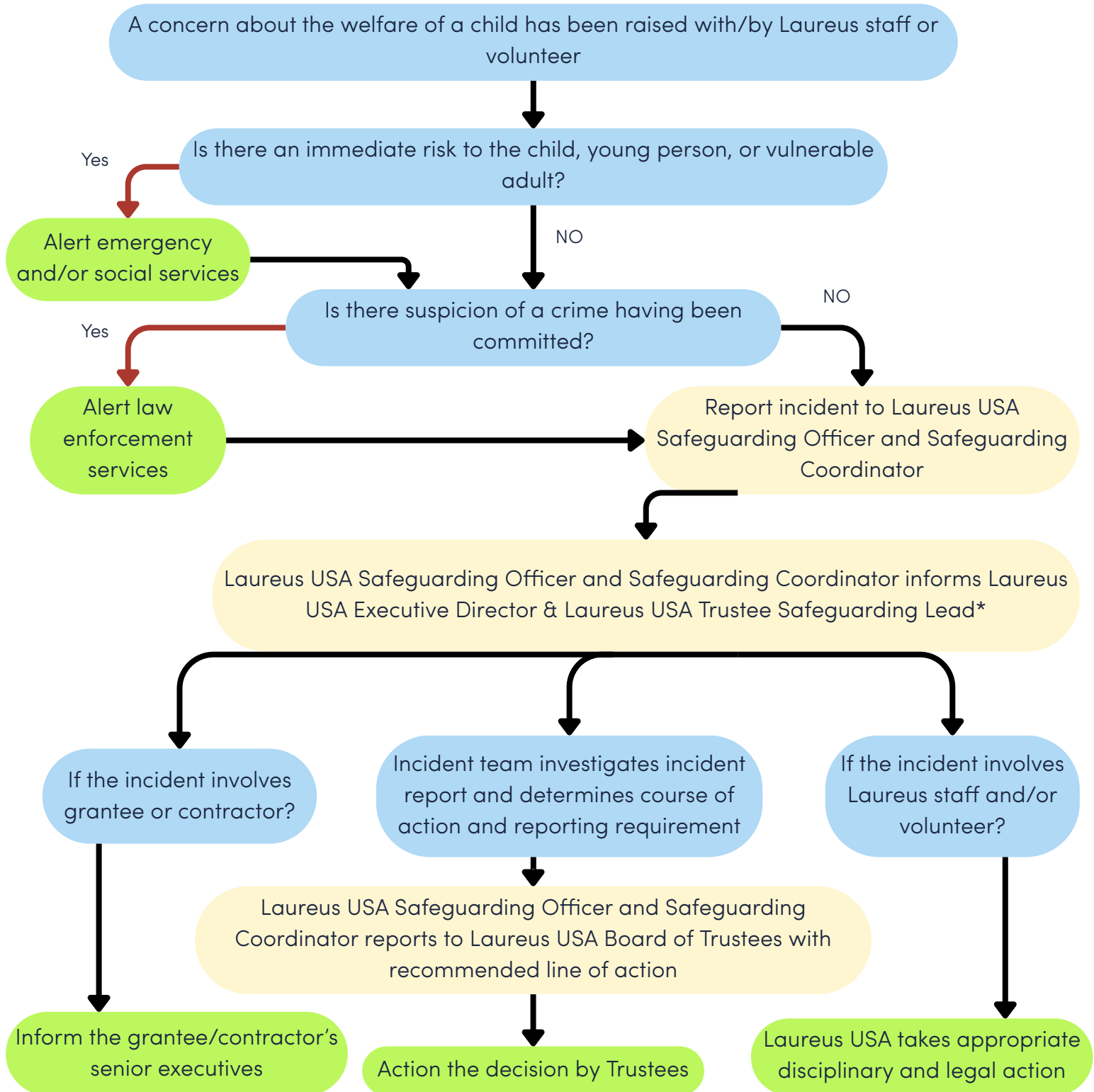
All those covered by the Safeguarding Policy for children, young people, and vulnerable adults should immediately report any concerns, suspicions, incidents, disclosures made to them, and allegations of actual or potential child abuse or any breach of the Safeguarding Policy for children and vulnerable adults. Remember, when in doubt, make a report!

- FIRST, Where the risk of harm to the child, young person, or vulnerable adult is high or if there is a medical emergency or if a crime has been committed or suspected, then the employee should immediately contact the designated child Safeguarding Officer or Coordinator and immediately report the matter to the emergency services and/or to local law enforcement.
- SECOND, After immediate risk and safety has been addressed and assessed, follow local mandated reporting laws and requirements. This information is different across various jurisdictions. To confirm if you are a mandated reporter and access information on how to make a mandated report, please visit this organization list provided by [childwelfare.gov](https://www.childwelfare.gov). You may also call the Childhelp National Child Abuse Hotline at 800.444.4453 for more information on local reporting procedures and processes. You must follow local guidelines and legislation regarding timeliness and standards.
- THIRD, EITHER...
 - If the incident or alleged incident takes place during an event in which Laureus USA is involved, then the report should be made to the onsite Laureus Staff and notified to the Safeguarding Officer or Coordinator immediately by filling out the Annex 3 – FORM: Safeguarding Incident Reporting Form and emailing it to safeguardingUSA@laureus.com and filling out the subject line as “Strictly Confidential – Addressee only.”

- If the incident does not happen during a Laureus Sport for Good event, notify the Safeguarding Officer or Coordinator immediately but no later than within 12 hours by filling out the Annex 3 – FORM: Safeguarding Incident Reporting Form and emailing it to safeguardingUSA@laureus.com and filling out the subject line as “Strictly Confidential – Addressee only.” This would apply to grantees whose policy is under development and temporarily using this Laureus USA Safeguarding Policy.

For a visual representation of the reporting process, please refer to the Reporting Flowchart on the next page.

Laureus USA Reporting Flow Chart



*The incident team is made up of the Laureus USA Safeguarding Coordinator and Officer, the Laureus USA Executive Director, and the Laureus USA Trustee Safeguarding Lead. Consultation, when appropriate, may also include the Global Safeguarding Officer and the USA Safeguarding Partner

5.4. Reporting Processes

The process for reporting and processing disclosures or suspected breaches of this Safeguarding Policy is as follows:

- Any breaches of this Policy and the Code of Conduct within will be subject to disciplinary proceedings with Laureus USA.
- The Safeguarding Officer and the Safeguarding Coordinators have access to the safeguardingUSA@laureus.com email account. The email address must be reviewed every business day. The incident reporting email address may not be left unattended for more than 48 hours at any given point. The email review will be managed on a rotation basis, and each of the safeguarding staff will be responsible for reviewing it every third week. Suppose the responsibility to review coincides with annual leave or other reasons for not being able to access the email address. In that case, the person affected will communicate with the Safeguarding Officer, who will assume the review or allocate it to the other Safeguarding Coordinator. As described above, please contact appropriate emergency personnel and local authorities for a swift response to emergency situations, as this email is not monitored constantly.
- A person may also make a report anonymously to safeguardingUSA@laureus.com. This reporting option should be made public to all attendees of events by the Safeguarding Officer, Coordinator, and/or the Laureus USA event representative. This anonymous tip email address is and should be publicly available and easy to access on Laureus's website. For all persons to which this policy applies, in order to ensure your compliance with this policy as a reporter, you must make a report under your name.
- No correspondence should ever be sent via fax or using channels of communication where information can be freely intercepted by others, such as a generic email address that is accessible to all.
- The Safeguarding Officer will investigate the incident on a confidential basis and will work with the incident team, to take appropriate action. The Safeguarding Officer may include other persons as deemed necessary for their advice or expertise.
- The Safeguarding Officer will undertake a thorough investigation if the matter is a breach of this Policy.
- The investigation should be complete within two weeks of the initial notification with feedback to the relevant parties with clear next steps or such shorter period as may be required due to the nature and seriousness of the breach.

5.4 The investigation process will include:

- The police, local law enforcement, and local social services agencies as appropriate, needed, and necessary for crimes, mandated reports, etc. For any questions or confusion on this, please contact the Safeguarding Officer or Coordinator. When in doubt, report.
- Where the incident concerns a Contractor, the case may need to be notified to the Contractor organization (CEO/HR/Compliance) and followed up in due course.
- Where the incident concerns a Laureus USA employee, trustee, associate, volunteers, contractors, the Safeguarding Officer, the relevant CEO/Chair, Compliance Officer, and HR Manager will together decide on the appropriate course of action, which may include disciplinary and dismissal proceedings. If the matter has resulted in a formal police investigation, the Safeguarding Officer and the investigation team will work alongside the police until resolution.

On completion of the investigation, the Safeguarding Officer will:

- Report the allegation, investigation, and findings to the relevant Board of Trustees.
- Facilitate the legally required reporting of safeguarding incidents following applicable federal and state legislation.
- Make any necessary recommendations to amend the Safeguarding Policy and any procedures to mitigate the risk of the situation reoccurring. This will include feedback and input from local social care services and law enforcement.
- The report on the issue will be completed and stored securely and confidentially by the company secretary and Human Resources if relevant. The Report will be shared on a “need-to-know basis” only, maintaining confidentiality and privacy.

Training, Monitoring and Review

6.1. Awareness raising and training

Laureus USA will ensure that all employees, trustees, associates, volunteers, and contractors working directly or indirectly with children, young people, or vulnerable adults receive appropriate training or briefing on the Safeguarding Policy. The Safeguarding Coordinator or employee assigned to this role will conduct this annually. The following trainings are required per role:

Role	Training	How Often
USA Safeguarding Coordinator	Effective Safeguarding (Course 3) from the International Safeguards for Children in Sport	Once every 2 years; on interim year, the Coordinator should either take Course 1 or US SafeSport Core/Refresher
	Safeguarding for Partners training	Annually
	Review and Signing of Safeguarding Policy	Annually
Program Staff and Grants Managers	Safeguarding Essentials (Course 1) from the International Safeguards for Children in Sport and either Safeguarding for Partners training or SafeSport Core Course/Refresher	Annually
	Review and Signing of Safeguarding Policy	Annually
All Other Staff	Safeguarding Essentials (Course 1) from the International Safeguards for Children in Sport	Annually
	Review and Signing of Safeguarding Policy	Annually
Board, Ambassadors, Volunteers, Contractors & Associates	Review and Signing of Safeguarding Policy	Annually

Additionally, all parties will attend an all-hands safeguarding refresher training conducted by USA Laureus Staff in conjunction with #WeRideTogether, Laureus USA's Safeguarding Partner.

All employees, trustees, associates, volunteers, and contractors will be required to confirm in writing that they have understood and are committed to the Policy in the form set out in Annex 1. It is the responsibility of all Staff to ensure this commitment annually.

6.2. Monitoring and Review

Laureus USA will ensure that the implementation of this Safeguarding Policy is subject to regular monitoring. The Policy will be reviewed annually and/or whenever legislative changes or guidance are issued that may impact it. Appropriate changes will be recommended to the Laureus USA Board of Trustees for approval.

The Safeguarding Officer will record and monitor all child, young person, or vulnerable adult safeguarding concerns and report them to the relevant Board of Trustees at Board Meetings.

Laureus USA is committed to reporting and safeguarding incidents following applicable federal and state legislation.

Laureus USA will include a section on Safeguarding children, young people, and vulnerable adults on its website and in its annual public impact reporting. This section will maintain confidentiality yet provide transparency, accountability, and insight into the number of safeguarding incidents, practices and procedures relevant to their handling, and outcomes.

Annex 1

Commitment to Laureus USA's Safeguarding Policy Form

I confirm that I have received a copy of the Laureus USA Safeguarding Policy, including its Code of Conduct and all Annexes, which I have read and understood.

I understand that I have a responsibility and duty of care to report any concerns I may have with regard to children and vulnerable adults participating in activities hosted or funded by Laureus USA to the appropriate Laureus USA employee or directly to the Safeguarding Officer or Coordinator.

I agree to abide by the Code of Conduct and good practice and will work with Laureus USA to uphold the best interests of the child, young person, and vulnerable adult.

I understand that a breach of this policy may result in the suspension of my involvement in Laureus USA and activities hosted and funded by Laureus USA, pending the outcome of a safeguarding investigation.

I will contact the Safeguarding Officer or Coordinator if I have any questions or concerns about this form or the contents of this policy or procedure.

Name:

Signature:

Organization:

Position:.....

Date:

Laureus USA Safeguarding Officer:
Peter Feldman
peter.feldman@laureus.com
+1 347.673.3614

Laureus USA Safeguarding Coordinator:
Mariana Niekamp
mariana.niekamp@laureus.com
+1 872 324 8473

Annex 2

Grantees' Safeguarding Policy Agreement Form

I confirm that I have received a copy of the Laureus USA Safeguarding Policy, including its Code of Conduct and all Annexes, which I have read and understood.

I understand that I have a responsibility and duty of care to report any concerns I may have with regard to children and vulnerable adults participating in activities hosted or funded by Laureus USA to the appropriate Laureus USA employee or directly to the Safeguarding Officer or Coordinator.

As a grantee, I commit to following the Laureus USA Safeguarding Policy when the Grantee Safeguarding Policy is under revision.

As a grantee, I commit to developing and updating the Grantee Safeguarding Policy consistent with the Laureus USA Safeguarding Policy and aligned with the International Safeguards for Children in Sport within 6 months. I understand that the Grantees Safeguarding Policy will be verified at the start of every grant term and monitored throughout by Laureus USA.

I understand that a breach of this policy may result in the suspension of Grantee involvement in Laureus USA and activities hosted and funded by Laureus USA, pending the outcome of a safeguarding investigation.

I will contact the Safeguarding Officer or Coordinator if I have any questions or concerns about this form or the contents of this policy or procedure.

Name:

Signature:

Organization:

Position:.....

Date:

Laureus USA Safeguarding Officer:
Peter Feldman
peter.feldman@laureus.com
+1 347.673.3614

Laureus USA Safeguarding Coordinator:
Mariana Niekamp
mariana.niekamp@laureus.com
+1 872 324 8473

Annex 3

Child, Young Person, and Vulnerable Adult Safeguarding Incident Reporting Form

All information provided in this incident report is confidential. You should refrain from providing any personally identifiable information about the child, young person, vulnerable adult or person(s) suspected/alleged to have harmed or put a child, young person, vulnerable adult at risk, when completing this form. To the extent any personal information is collected, it will be handled in accordance with applicable data privacy laws, including but not limited to relevant state law(s), the Children's Online Privacy Protection Act (COPPA), and organizational safeguarding policies.

Access to the information disclosed in this report is strictly limited to authorized personnel responsible for investigating and managing safeguarding incidents. Information may be shared with external authorities (e.g., child protective services, law enforcement) only when required by law or necessary to protect the safety and well-being of the child, young person, or vulnerable adult involved. Information may not be used or shared for any purposes other than investigating and managing safeguarding incidents.

All parties involved are required to maintain confidentiality and are prohibited from disclosing any details of the incident to unauthorized individuals. Any breach of confidentiality may result in disciplinary action and/or legal consequences.

By submitting this form, you acknowledge and agree to the confidentiality terms outlined above.

Please return this form to the Safeguarding Officer or Coordinator at safeguardingUSA@laureus.com. If you complied with filling out this report per Laureus USA policy, please include your name and contact information in this report.

Case No: [Location ID / Year / No]: (For official use only)

Details of the individual logging the concern:

Name:.....

Gender: Age:

Address:.....

Telephone:.....

Mobile.....

Email:

Position/relationship to Laureus USA:

.....

Partner organization name:

.....

Your relationship to the child / young person/ vulnerable adult:

.....

To the best of your knowledge, are the parents / legal guardians aware of the incident(s) that has/have taken place? Yes ☐ No ☐

Details of your concern:

- The nature of alleged abuse (e.g. physical/emotional/sexual)
- The physical and emotional state of the child / young person / vulnerable adult (describe any cuts, bruises, behavior/mood changes).
- Did you speak directly to the child/young person / vulnerable adult? Did the child/young person / vulnerable adult report or disclose the abuse? If so, what was said? (Use the exact words of the child/young person).
- If the child, young person, or vulnerable adult did not report the incident, what made the referrer suspicious?
- Did others witness what happened? Yes or No?

Details of person(s) suspected/alleged to have harmed or put a child / young person / vulnerable adult at risk:

Name:

.....

Gender: Age:

Ethnicity:

Address:

.....

Language(s) spoken:

.....

Relationship to victim:

.....

Relationship to victim:

.....

Relationship to Laureus USA / Partner:

.....

Current Safety of the child / young person / vulnerable adult:

Include any immediate safety concerns (e.g., access of alleged perpetrator to the individual, are they displaying behavior that is a cause for concern, or do they have a history of self-harm?):

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Has any emergency, medical, or other immediate support been provided? If so, what, when, and by whom? What else do you believe is required (medically or otherwise)?

.....

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Who else is aware of this incident (e.g. national authorities, internally within the organization, externally, friends, family members, etc.):

.....
.....
.....
.....
.....
.....

Actions taken to date (e.g. referral to police, social services, etc.):

.....
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.....
.....
.....
.....

Declaration:

I hereby declare that the above statement is true to the best of my knowledge and belief. I understand that if it is found that I have withheld information or knowingly included any false or misleading information above, disciplinary procedures will automatically follow.

Full name:

.....

Signature:

.....

Date & time of report being made:

.....

Please keep all details of this report confidential. The Laureus USA Child Safeguarding Officer will advise you on the next steps, if any.

Annex 4

Event Release Form and Media Policy

Event Form

Laureus USA aims to provide a safe and enjoyable experience for every child, young person, and adult under care. To help us do this, please note the following:

- We recognize the need to ensure the welfare and safety of all children, young people, and adults under care. We have a Safeguarding Policy that details welfare and safety initiatives, the Code of Conduct and Reporting Procedures.
- Laureus USA and Laureus Sport for Good produce a range of communications resources to share the impact of our work. This may be shared via our own channels as well as via the Laureus World Sports Awards, Laureus National Foundations and our global partners and supporters (collectively, “affiliates”). Your story/image/project may feature on social media, in national or regional media or emails to our supporters, internal and external reports and fundraising materials or films.
- We have a Media Policy that sets out how photographs and videos of children and other people involved in our activities should be taken and shared. This Media Policy is available from the Laureus USA program staff.
- We will take all steps to ensure images of children, young people and at-risk adults are used solely for the purposes they are intended. If you become aware that these images are being used inappropriately, or aware of a safeguarding incident or concern, you should inform the Laureus Safeguarding Officer and/or email safeguardingUSA@laureus.com.

Child/Young Person/Adult under Care: please read the following consent form and discuss it with your parents/guardians, then fill in the form if you are happy to do so.

Parents/Guardians: please read and discuss this consent form with your child or young person/adult who cannot provide their own legal consent (e.g. if they are under 18 years old or under care), and then, if you are happy to do so, fill it in, ask the child/young person/adult under care to fill it in and then return it to the Laureus group leader.

I, _____, for myself and, in the case of a child under the age of 18 (the "Minor"), for myself and/or the Minor in my capacity as the Minor's parent/guardian, agree as follows:

- I am age 18 or older.
- This Release shall be binding upon the Minor and me, and our respective successors, heirs, assigns, executors, administrators, spouse and next of kin.
- I knowingly and expressly accept sole responsibility for all of the hazards and risks to me, the Minor and my property, both known and unknown, associated with or related to my and/or the Minor's participation in any program where the Material is taken (the "Program") and for any and all injury, disability, death, loss, or damage or injury that I and/or the Minor, as applicable, may cause to myself or others howsoever caused or arising and whether by negligence of the Released Entities (defined below) or otherwise.
- I release, waive and forever discharge any and all liability and claims of damages or causes of action, including but not limited to, death, personal injury or loss or damage to property, which I and/or the Minor, as applicable, may have or which may hereinafter accrue to me and/or the Minor, as applicable, as a result of my voluntary participation in the Program against Laureus and/or any of its affiliates, any sponsor, promoter or partner of the Program, and any of their respective related entities, subsidiaries and affiliates (collectively, "Released Entities"), and for each such Released Entity, its respective parents, subsidiaries, affiliates, sponsors, advertisers, officers, directors, owners, governors, officials, volunteers, employees, agents, representatives, successors, and assignees (collectively, and together with the Released Entities, the "Releasees"), whether caused by the acts, omissions or negligence of any Releasee or by any other person or entity to the fullest extent permitted by law.
- I hereby consent to the recording of statements, photographs, and/or audio or video recordings taken of the Minor and/or me, as applicable, at Laureus USA events by Laureus or any of its affiliates and their respective agents, contractors or employees (collectively, the "Material").
- All Material may be used, edited, published or distributed by Laureus and/or its affiliates for commercial and/or other purposes as determined by Laureus anywhere in the world in its sole discretion. Neither the Minor nor I shall have any right to control the use or publication by Laureus or its affiliates of the Material.
- All Material taken of the Minor or me by Laureus or its affiliates shall be the sole property of Laureus and its affiliates. Neither the Minor nor I shall receive any compensation in connection with the use of the Material for promotional, commercial, **37** or other purposes.

- On behalf of the Minor and/or myself, as applicable, I hereby release, waive and discharge any claims of any kind or nature arising out of or relating to the use of the Material against Laureus or any person or firm authorized by Laureus to publish said materials ("Publisher"). Such release, waiver and discharge shall also extend to all affiliated companies, shareholders, directors, officers, employees, contractors, agents and assigns of Laureus and any Publisher.
- I HAVE READ THIS DOCUMENT AND I UNDERSTAND THAT I GIVE UP SUBSTANTIAL RIGHTS ON BEHALF OF THE MINOR AND MYSELF (INCLUDING RIGHTS RELATING TO PUBLICITY AND PRIVACY WITH RESPECT TO THE COMMERCIAL USE OF THE MATERIAL) AND I SIGN THIS RELEASE FREELY AND VOLUNTARILY.

Printed Name of Minor (under 18):

Printed Name of Parent/Guardian:

Signature of Parent/Guardian:

Date: -----

OR

Printed Name of Individual (18 or over):

Signature of Individual:

Date: -----

If you have questions, concerns, or changes to these forms after submission, please contact the Safeguarding Officer.

Laureus USA Safeguarding Officer:

Peter Feldman

peter.feldman@laureus.com

+1 347.673.3614

Laureus USA Safeguarding Coordinator:

Mariana Niekamp

mariana.niekamp@laureus.com

+1 872 324 8473

Media Policy

Journalists, photographers, and other media personnel must also comply with the guidance outlined in this Media Policy and are responsible for acquiring consent from participants via the Event Release Form. When visiting a Laureus program or event involving children, young people, and vulnerable adults, you must:

- Prior to the visit, have committed to the Safeguarding Policy by signing Annex 1.

1. Introduction

Laureus uses sport's inspirational power to tackle social problems and improve the lives of children and young people worldwide. Given the substantial focus our programs have on children and young people, this policy and code of conduct are in place to ensure that all the relevant people within Laureus USA manage and mitigate risks related to the safeguarding and protection of children, young people, and vulnerable adults around the globe while delivering Laureus USA media and communications activity.

This document focuses on the media and communications approach as part of and in addition to the Safeguarding Policy.

Laureus USA will ensure that all images of children, young people, and vulnerable adults it uses for internal or external communication, in whatever format, are appropriate and do not exacerbate risks to them. Specifically, Laureus USA will ensure that:

- If photographic or video content is going to be captured during a Laureus USA event, all children, young people, or vulnerable adults attending and, when so required, their parents/guardians/careers will be informed beforehand that their consent to being featured in such content is required and allowed to opt out of participating. Participants or their parents/guardians/careers must sign the form below. OR. Partner organizations will need to sign a release stating that young people present at the event have consented to be featured in photographic or video content.
- No content specifically portraying children, young people, and vulnerable adults will be used unless Laureus USA is confident that informed consent has been provided.
- Images or content refers to all images in whatever format they are taken, including photos and videos.
- Inappropriate images of children, young people, or vulnerable adults (e.g. that could be deemed to be sexual or to portray nudity) will never be used.

- Images of children, young people, or vulnerable adults that portray them in a demeaning or disrespectful light will never be used. The image(s) should preserve the dignity of the children, young people, and vulnerable adults, as well as be respectful and truthful reflections of the immediate and wider context.
- Images of children, young people, or vulnerable adults will not be accompanied by personal identification information such as name and place of abode, where this could make the individual easily identifiable and traceable.
- The use of images of children, young people, or vulnerable adults where the individual has already suffered abuse will not be used unless additional protections such as the use of their voice only, pseudonym used, location never revealed, the individual does not appear in any visual footage unless there are absolute exceptional circumstances.
- Only cameras or other recording devices belonging to Laureus USA or Laureus USA staff members or contractors acting on behalf of Laureus USA should be used to capture content. No one at a program visit or event should take or publish photos and recordings of children, young people, and adults under care.
- All images of children, young people, and adults under care will be stored securely to ensure compliance with Laureus USA's Safeguarding Policy and data protection law. This means that all hard copies will be kept in a locked drawer, and electronic images will be kept in a protected folder with restricted access. Images of children, young people, and adults under care will never be stored on unencrypted portable equipment such as laptops, memory sticks, and mobile phones.
- Images should be used to celebrate the achievements of children, young people, and vulnerable adults, Laureus USA, and our partners, and you should not record photos/videos and messages that potentially stereotype, sensationalize, or discriminate against people, situations, or places.
- Images of Academy Members, Ambassadors, and other guests should be shot in a way that places them on an equal footing with the children, young people, and vulnerable adults involved in the program event. As a general rule, remember that the "stars" are the children, young people, vulnerable adults, and other program participants, not the Academy Members and Ambassadors.

If you have any doubt about compliance with the above code of conduct or usage principles, consult the Safeguarding Officer or Coordinator.

Violation of the code of conduct and usage principles may result in Laureus USA disciplinary action.

Annex 5

Definitions of Harm

Definitions of 'harm' to children, young persons, and vulnerable adults may vary depending on the context and culture. Abuse may be perpetrated interpersonally by a known person of any age or relation, a stranger, an institution, organization, system, or online. Often, types of harm, abuse, and misconduct overlap.

The following definitions can be used as a guide but not an exhaustive list. These definitions can provide information for risk assessments and developing preventative measures and behavioral expectations. All participants, children, young persons, and vulnerable adults deserve to be treated with care and respect and have the opportunity to enjoy programming and interactions in safe environments free from any and all types of harm.

Physical abuse: refers to intentional or unintentional physical actions that cause or threaten to cause harm to the person. This does not include accidental injury or well-regulated sport-sanctioned conduct acceptable in certain sports. In the sport, physical abuse can look like this:

- **Contact:** punching, hitting, poisoning, drowning, burning, shaking, beating, biting, striking, strangling, slapping, stabbing, pulling hair/ears, grabbing, pushing, cutting, paddling, scarring, whipping, branding, hitting with objects/sports equipment, rough corrections of position
- **Non-contact:** forcing a person to play while injured or return to sport without medical clearance, fabricating symptoms of injury on behalf of the athlete, deliberating inducing sickness, confining and isolating a person in a small space, forcing a person to assume a painful position for no legitimate reason, providing any illicit substance including drugs, alcohol, or non-prescribed medication to an athlete

Sexual abuse: conduct or threatened conduct that is forced and/or coerced and is sexual in nature that the person does not fully understand, cannot consent to, or has no choice to consent to. In sports, this may look like this:

- **Indecent exposure:** exposing or requesting child sexual abuse material or pornographic material, forcing an athlete to look at or produce sexual images or activities, and encouraging an athlete to behave in a sexually inappropriate way
- **Non-consensual contact:** masturbation, kissing, rubbing, and touching with an object or body part (clothed or unclothed) of an athlete's genitals, breasts, or buttocks
- **Non-consensual intercourse:** oral sex, any penetration with an object or body part
- **Grooming:** a tactic where someone methodically builds a trusting relationship with a child, young person, or vulnerable adult, their family, and community to manipulate, coerce, or force the child, young person, or vulnerable adult to engage in sexual activities or other activities of an inappropriate nature.

- Inappropriate relationships: a form of abuse that can be misunderstood by an athlete as consensual when the relationship involves an imbalance of power; consent is impossible as the athlete's options are limited due to force, coercion, or manipulation

Exploitation: Exploitation is an abuse of power when a person is harmed or treated unfairly for gain or benefit. In sports, this can look like this:

- Financial abuse: financial control over a person (withholding, limiting access, stealing, or lying about funds), forced labor without fair compensation
- Sexual exploitation: forcing sexual activity for profit, recording, distributing, allowing others to watch sexual activity, exposure to disease
- Trafficking: transporting persons for economic gain and/or forced labor or sexual acts, withholding documentation and paperwork

Neglect: actions or the absence of actions that fail to provide care, supervision, affection, protection, and support for a person's basic needs, health, safety, and well-being and that are likely to result in serious impairment of the person's holistic development. In sports, neglect can present in a variety of ways:

- Physical neglect: failure to provide for physical needs, safety requirements, inadequate supervision during training, competition, and travel, allowing bullying or hazing
- Emotional neglect: withholding attention, failing to provide psychological support and well-being, or ignoring the athlete's emotional needs
- Medical neglect: failing to provide a person with needed medical attention, disregarding medical directions pertaining to time to heal from illness or injury, forcing a person to play/perform while injured, improperly treating injuries
- General neglect: maternal during pregnancy, failure to provide a person with appropriate food and water, shelter, using inadequate and unsafe equipment, and/or the ill-treatment of a person with disabilities, failure to report abuse
- Improper training and overtraining: forcing a person to train in a way that is dangerous to their body, not allowing enough recovery time between strenuous sessions

Psychological or Emotional abuse: acts and behaviors, most often repeated and persistent, that interfere with and negatively impact an athlete's positive emotional and social development and self-worth. In sports, this can happen online and in person and can look like this:

- Verbal acts: name-calling, body-shaming, ridiculing, humiliating, bullying, threatening, discriminating, mocking, spreading rumors, quick oscillation between praise and criticism, promoting disordered eating
- Physical acts: ignoring, isolating, segregating, denying coaching and guidance, punching/throwing things around the athlete
- Stalking: monitoring, observing, excessively messaging
- Tactics: manipulation, gaslighting, controlling an athlete's social interactions, domination, guilt-tripping, mind games, silent treatment, possessiveness, frightening

Hazing: actions or practices that intend to or likely subject an athlete to harmful circumstances and/or activities as a condition to join or be socially accepted by a group, team, or organization. Hazing behaviors can be described as follows:

- Intimidation: deception, assignment of demerits, silence period with threats for violation, social isolation, demeaning names, expecting certain items to always be in one's possession
- Harassment: verbal abuse, threats or implied threats, forced nudity, forcing to wear embarrassing attire, degrading or humiliating skits, sleep deprivation, sexual simulations
- Violence: forced substance consumption, physical assault, branding, forced ingestion of vile substances, water intoxication, kidnapping, sexual assault

Discrimination: the prejudicial treatment of persons or groups based on attributes or protected categories. Simply put, it is treating some persons differently than others because of certain characteristics they have. Protected characteristics may include age, race, gender, ethnicity, religion, ability, marital status, pregnancy status, sexual orientation, genetic and health conditions. When discrimination occurs, athletes are negatively impacted by unfair decisions, practices, and policies.

Harassment: unwelcome conduct that causes fear, humiliation, annoyance, offends, degrades, or reflects a discriminatory bias that creates a hostile environment. In sports, this can look like this:

- Verbal: threatening, ridiculing, using slurs and offensive language or jokes, insults
- Physical: touching, intimidation, or assault
- Sexual: unwanted advances, making sexual requests, communication, and conduct of a sexual nature
- Visual: displaying or forcing someone to look at offensive content
- Superiority: attempting to assert dominance against a person or group based on discriminatory characteristics
- Conditional: submission to, objection to, or rejection of such harassment as a term for employment, standing participation in, or sports-related decisions

Bullying: Conduct that intends to or does hurt, control, or diminish another athlete, often someone who may be viewed as vulnerable. Bullying characteristically is repetitive and intentional and leverages an imbalance of power between parties. Bullying behavior tactics can include and involve previously described elements of verbal, emotional, physical, financial, and sexual abuse, discrimination, and/or harassment.

Stigma as abuse: Less known and discussed is how stigma, the societal or interpersonal disapproval or mark of disgrace towards a particular quality or circumstance, can be a form of abuse. Stigma can be associated with mental health, survivorship, domestic violence, disabilities, abuse, incarceration, and substance use. In sports, stigma can result in the shame, discrediting, negative perception, and mistreatment of an athlete. This means that the athlete may be treated differently due to stigma from others and may manifest as a lack of opportunity, a barrier to seeking help and resources, and dismissal of their experiences.

Annex 6

Role and Responsibilities of the Safeguarding Officer and Safeguarding Coordinator(s)

1. The purpose of the Role is to:

- Take the lead in ensuring appropriate arrangements for safeguarding children, young people, and vulnerable adults at Laureus USA
- Promote the safety and welfare of children, young people, and vulnerable adults in programs and activities supported, endorsed, and hosted by or on behalf of Laureus USA at all times.

2. Duties and Responsibilities

2.1. Take a lead role in developing and reviewing Laureus USA's safeguarding policy and procedures.

2.2. Take a lead role in implementing Laureus USA's safeguarding policy and procedures, ensuring that all safeguarding issues concerning children, young people, and vulnerable adults who take part in programs and activities supported, endorsed, or hosted by or on behalf of Laureus USA are responded to appropriately.

2.3. Make sure that everyone working or volunteering with or on behalf of Laureus USA, including the employees, trustees, associates, volunteers, contractors, and grantees, understands the safeguarding policy and procedures and knows what to do if they have concerns about a child's welfare.

2.4. Make sure children, young people, and vulnerable adults who are involved in Laureus USA related activities and their parents, guardians, and carers know who they can talk to if they have a welfare concern and understand what action the organization will take in response.

2.5. Receive and record information from anyone who has concerns about a child, young person, or vulnerable adult who participates in programs and activities supported, endorsed, or hosted by or on behalf of Laureus USA.

2.6. Take the lead on responding to information that may constitute a safeguarding concern, including a concern that an adult involved with Laureus USA may present a risk to children or young people.

This includes:

- Assessing and clarifying the information.
- Making referrals to statutory organizations as appropriate.

- Consulting with and informing the relevant members of the organization's management and safeguarding team.
- Following the organization's safeguarding policy and procedures.
- Liaising with, passing information to, and receiving information from statutory child protection agencies such as the local authority child protection services and the police.
- This includes making formal referrals to agencies when necessary.

2.7. Store and retain child protection records according to legal requirements and the organization's safeguarding and child protection policy and procedures.

2.8. Work closely with the safeguarding team, including the Safeguarding Coordinator, to ensure they are updated with safeguarding issues and are fully informed of any concerns about organizational safeguarding practice.

2.9. The Safeguarding Officer and Coordinator report quarterly to the Board of Trustees on safeguarding issues to ensure that safeguarding is seen as an ongoing priority and that safeguarding requirements are being followed at all levels of the organization.

2.10. Be familiar with the International Safeguards for Children in Sport Framework, which applies to children, young people, and vulnerable adults in sports.

2.11. Be familiar with issues relating to the protection and abuse of children, young people, and vulnerable adults, and keep up to date with new developments in this area.

2.12. Attend at minimum annual continuing education and training in issues relevant to safeguarding and share knowledge from those pieces of training with everyone who works or volunteers with or for children, young people, and vulnerable adults at Laureus USA.

2.13. Network with other agencies committed to strengthening the safeguarding of children, young people, and vulnerable adults in the Sport for Development sector. Additionally, seek out and receive input and feedback from all stakeholders, especially children, young people, and vulnerable adults, on Laureus USA's safeguarding policies, procedures, and practices.

2.14. Attend team meetings, supervision sessions, and management meetings as arranged.

2.15. Carry out any other reasonable duties. Appointment to this role is subject to satisfactory vetting and barring checks.

2.16. The Safeguarding Officer performs the lead function and reports all safeguarding issues to the Board of Trustees.

Annex 7

Risk Assessment

Risk no.	Risk	Severity Risk rating High, Medium or Low	Controls already in place	Likelihood of Occurrence	Prevention - What can be done to mitigate these risks?	Responsible	Deadline

For assistance or support in conducting a Risk Assessment, you can contact the Safeguarding Officer or Coordinator.

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This Safeguarding Policy was created in conjunction with [#WeRideTogether](#).