



FFCC PARTICIPANT PROTECTION POLICY REQUIREMENTS

INTRODUCTION

WGI Sport of the Arts is committed to building a community where participants can learn together in an atmosphere, free of emotional, physical, and sexual misconduct. FFCC, as a WGI Circuit partner, is partnering with them in this important effort to establish a safe and healthy environment.

The FFCC Board of Directors is adopting steps to address the risk of emotional, physical, and sexual abuse of participants in FFCC and implementing policies to accomplish this goal. As a result, FFCC will require the following:

Prevention Training

FFCC requires training of its own staff, contractors and volunteers to prevent abuse, including emotional, physical, and sexual abuse, of any participant and further mandates that, at a minimum, all groups participating in FFCC *must require training related to the prevention of participant abuse of its adult staff who have regular contact with or authority over participants.*

Prevention Policies

FFCC is developing and implementing policies and procedures for its own staff, contractors and volunteers and will require all teams participating with FFCC to develop and implement policies and procedures to prevent abuse, including emotional, physical, and sexual abuse, of any participant. As part of these policies and procedures, groups participating in FFCC must implement *reasonable procedures to limit one-on-one interactions between a participant who is a minor and an adult (who is not the minor's legal guardian) while participating in group activities without being in an observable and interruptible distance from another adult, except under emergency circumstances.*

The policies and procedures set forth herein have been developed by WGI to assist WGI Circuit Partners and Participating Teams in meeting their obligations to protect participants and develop and implement their own such policies.

EDUCATION & TRAINING

A. Adults Required to Complete Mandatory Training

The following adults associated with a group participating in the FFCC shall complete training concerning participant protection:

- Adult instructional and administrative staff who have regular contact with or authority over with participants

Regular contact is defined as ongoing interactions in which an adult is in a role of direct and active engagement with participants. Some examples of persons who would be considered in regular contact with participants include:

- Instructors and/or designers
- Group management (e.g., directors, managers, board members)
- Guest clinicians
- Volunteers in positions of regular contact (e.g., parent chaperones, drivers, equipment crew)

To satisfy the training requirement, all adults subject to these policies are required to complete the U.S. Center for SafeSport's Core Center for SafeSport Training

- Before regular contact with participants begins; or
- Within the first 45 days of beginning a new role subjecting the adult to this policy

Training other than the Core Center for SafeSport Training does not satisfy this requirement. A Participating Group may provide training in addition to the Core Center for SafeSport Training. However, if a Participating Group provides additional training, it shall not refer to such training as "SafeSport" Training.

A refresher course shall be required (as available) on a bi-annual cycle effective the calendar year following the completion of the Core Center for SafeSport Training for each of the above listed adults in a group participating in the FFCC.

PREVENTION POLICIES

A. Required Policies

All groups participating in the FFCC are required to implement participant protection policies addressing the following areas and in accordance with the SafeSport requirements:

1. One-on-One Interactions, including meetings and individual training sessions (all groups are required to establish reasonable procedures to limit one-on-one interactions).
2. Locker rooms and changing areas
3. Social media and electronic communications
4. Travel

To satisfy these requirements, policies which include the mandatory components identified in the model policies attached hereto are required for implementation by all groups participating in the FFCC.

For Scholastic groups, this abuse prevention training requirement can be fulfilled by existing policies of a school district or educational institution; however, if the school district or educational institution does not have policies for such training, the Participating Group must comply with this FFCC requirement.

B. Model policies

To satisfy these requirements, the FFCC has developed model policies to assist Participating Teams in developing and implementing their own required policies. Participating Teams may choose to implement stricter standards consistent with the implementation guidance below. Stricter standards may include applying the policy to additional constituents and may also include additional restrictions.

C. Implementation

The mandatory components set forth in the model policies set a minimum standard. In implementing the required policies, **a Participating Group may choose to implement a policy that is stricter than the Model Policy**, if it includes or is stricter than the mandatory component.

MODEL POLICIES

POLICIES FOR ONE-ON-ONE INTERACTIONS

The majority of child sexual abuse is perpetrated in isolated, one-on-one situations. By reducing such interactions between minors and adults, programs reduce the risk of child sexual abuse. However, one-on-one time with trusted adults is also healthy and valuable for a minor. Policies concerning one-on-one interactions are intended to protect participants while allowing for these beneficial relationships.

1. ONE-ON-ONE INTERACTIONS

The following is a model one-on-one policy provided to assist Participating Teams in developing their own policies. Any policy developed by a Participating Group must include the Mandatory Components.

A. Mandatory Components

1. Participating Group policies must include components a through d.

a. This policy shall apply to:

1. Adult instructional and administrative staff who have regular contact with or authority over with participants
2. Adult participants who have regular contact with participants who are minors (Collectively "Applicable Adult" for the purposes of this policy.)

b. Observable and interruptible

- One-on-one interactions between a minor participant and an Applicable Adult (who is not the minor's legal guardian) are permitted if they occur at an observable and interruptible distance by another adult.
- One-on-one interactions between minor participants and an Applicable Adult (who is not the minor's legal guardian) which are not observable and interruptible are prohibited, except under emergency circumstances.

c. Meetings

- Meetings between Applicable Adults and minor participants may only occur if another adult is present, except under emergency circumstances. Such meetings must occur where interactions can be easily observed and at an interruptible distance from another adult.
- If a one-on-one meeting takes place in an office, the door to the office must remain unlocked and open. If available, it will occur in an office that has windows, with the windows, blinds, and/or curtains remaining open during the meeting.

d. Individual Training Sessions

- Individual training sessions between Applicable Adults and minor participants are permitted if the training session is observable and interruptible by another adult. It is the responsibility of the Applicable Adult to obtain the written permission of the minor's legal guardian in advance of the individual training session if the individual training session is not observable and interruptible by another adult. Permission for individual training sessions must be obtained at least every six months. Parents, guardians, and other caretakers must be allowed to observe the training session.

2. LOCKER ROOMS AND CHANGING AREAS

The following is a model locker room and changing area policy provided to assist Participating Teams in developing their own policies. Any policy developed by a Participating Group must include the Mandatory Components.

A. Mandatory Components

1. Participating Group policies must include components “a” through “f”.

a. This policy shall apply to:

1. Adult instructional and administrative staff who have regular contact with or authority over with participants
2. Adult participants who have regular contact with participants who are minors. (Collectively "Applicable Adult" for the purposes of this policy.)

b. Shared facility

If a Participating Group uses a facility not fully under its jurisdiction (for, e.g., rehearsal or competition or similar events) and the facility is used by multiple constituents, Applicable Adults are nonetheless required to adhere to the rules set herein.

c. Use of recording devices

Use of any device’s (including a cell phone's) recording capabilities, including voice recording, still cameras and video cameras in locker rooms, changing areas, or similar spaces at a facility under the Participating Teams jurisdiction is prohibited.

d. Undress

Under no circumstances shall an Applicable Adult at a facility under the Participating Teams jurisdiction expose his or her breasts, buttocks, groin, or genitals to a minor participant.

e. One-on-one interactions

- Except for participants in the same group, at no time are unrelated Applicable Adults permitted to be alone with a minor participant in a locker room or changing area when at a facility under the partial or full jurisdiction of the Participating Group, except under emergency circumstances.
- If the Participating Group is using a facility that only has a single locker room or changing area, the group will designate separate times for use by Applicable Adults, if any.

f. Monitoring

The Participating Group should regularly and randomly monitor the use of locker rooms and changing areas under their jurisdiction to ensure compliance with these policies.

3. SOCIAL MEDIA & ELECTRONIC COMMUNICATIONS

The following is a model social media & electronic communications policy, provided to assist Participating Teams in developing their own policies. Any policy developed by a Participating Group must include the Mandatory Components.

A. Mandatory Components

1. Participating Group policies must include components a through d.

a. This Policy shall apply to:

1. Adult instructional and administrative staff who have regular contact with or authority over with participants
2. Adult participants who have regular contact with participants who are minors (Collectively "Applicable Adult" for the purposes of this policy.)

b. Content

All electronic communication originating from Applicable Adults to minor participants must be professional in nature.

c. Open and transparent

- Absent emergency circumstances, if an Applicable Adult with authority over minor participants needs to communicate directly to a minor participant via electronic communications (including social media), another Applicable Adult or the minor's legal guardian will be copied.
- If a minor participant communicates to the Applicable Adult (with authority over the minor participant) privately first, said Applicable Adult should respond to the minor participant with a copy to another Applicable Adult or the minor's legal guardian.
- When an Applicable Adult with authority over minor participants communicates electronically to the entire group, said Applicable Adult will copy another adult.
- Minor participants may "friend" the organization's official page.

d. Requests to discontinue

Legal guardians may request in writing that their minor participant not be contacted through any form of electronic communication by the group or by the Applicable Adults subject to this policy. The group will abide by any such request that their minor participant not be contacted via electronic communication, absent emergency circumstances.

4. TRAVEL

The following is a model travel policy; provided to assist Participating Teams in developing their own policies. Any policy developed by a Participating Team must include the Mandatory Components.

A. Mandatory Components

I. Participating Group policies must include components “a” through “e”.

a. This policy shall apply to:

1. Adult instructional and administrative staff who have regular contact with or authority over with participants.

2. Adult participants who have regular contact with participants who are minors. (Collectively "Applicable Adult" for the purposes of this policy.)

b. Transportation

Applicable Adults who are not also acting as a legal guardian, shall not ride in a vehicle alone with an unrelated minor participant, absent emergency circumstances, and they must have at least two minor participants or another adult at all times, unless otherwise agreed to in writing by the minor participant's parent/legal guardian in advance.

c. Hotel rooms

Applicable Adults shall not share a hotel room or other sleeping arrangement with a minor participant (unless the Applicable Adult is the legal guardian, sibling, or is otherwise related to the minor participant). However, a parent/legal guardian may consent to such an arrangement in advance and in writing. Furthermore, A parent/legal guardian may consent in advance and in writing to the minor participant sharing a hotel room or other sleeping arrangement with an adult participant.

d. Meetings

Meetings shall be conducted consistent with the group's policy for one-on-one interactions (i.e., any such meeting shall be observable and interruptible.)

POLICY STATEMENT

At FFCC, protection from all forms of abuse is central to our mission for all participants. We strive to create an environment where all participants of our community are aware of options for reporting about instances of suspected misconduct, how to seek assistance and support, and how to pursue action for their own protection and that of everyone in the FFCC community.

In order to provide a trusted, respectful, and inclusive environment where the participants we serve and those who work within the organization feel safe, heard, equipped, and empowered to speak up for themselves and others and to take robust and visible action, as appropriate, to eradicate sexual exploitation and abuse, we are committed to the following core principles:

1. Ensure that participants are at the heart of everything we do when fighting abuse;
2. Equip and empower all within our organization to prevent, identify, and respond to misconduct;
3. Uphold organizational accountability in tackling misconduct.

PREVENTION AND AWARENESS TRAINING

- Any team participating in FFCC events must submit a complete list of adults in any instructional or administrative role having regular contact with or authority over participants no later than December 15 or within 45 days of beginning a new role with an organization requiring this accountability.
- All adult instructional and administrative staff of all Participating teams who have regular contact with or authority over participants must complete abuse prevention training as prescribed by FFCC. All adults subject to this policy must complete the U.S. Center for SafeSport's Core Center for SafeSport Training before regular contact with participants begins or within the first 45 days of beginning a new role with an organization requiring this accountability.
- All Participating Teams shall keep on file a certificate of completion of prescribed training courses for adults subject to this policy and provide this documentation to FFCC upon demand or through regular and random audits.

NATIONAL CRIMINAL BACKGROUND CHECKS

- FFCC requires all Participating Teams to obtain a national criminal history background check (or some satisfactory equivalent for your school district) for all adult instructional and administrative staff who have regular contact with or authority over participants.
- Such background checks shall be performed at the direction of the Participating Team's director but in no event less than every two years.
- For Scholastic teams, this background check requirement can be fulfilled by existing policies of a school district or educational institution; however, if the school district or educational institution does not have policies for such background checks, the Participating Team must comply with this FFCC requirement.

- All Participating Teams shall keep, on file, records of required national criminal background checks for adults subject to this policy and provide this documentation to FFCC upon demand or through regular and random audits.

INTERNAL PARTICIPANT PROTECTION POLICIES FOR TEAMS

- Participating Teams in any Independent Class are required to follow the Participant Protection Policies (PPP) as outlined by FFCC. These teams shall also maintain effective internal policies and procedures for the protection and safety of its participants, including without limitation the ability of any individual to report suspected misconduct to the leadership of the Participating Team without reprisal.
- Participating Teams in any Scholastic Class shall follow the policies and procedures for the protection and safety of its participants as prescribed by their school district or educational institution; however, if the school district or educational institution does not have established protection policies, the Participating Group must comply with FFCC requirements for Independent teams.
- Participating Teams shall disseminate FFCC's Participant Protection Policies (PPP) to all its leaders, staff, and participants, and shall ensure that its leaders and staff adhere to these policies. This includes signed acknowledgement of receipt of these policies to be kept on file and available on demand or through regular and random audits.

COMPLIANCE GUIDELINES

- In order to ensure that these Participant Protection Policies, developed to protect participants, as put forth by FFCC are implemented, it is important that all Participating Teams understand these policies and incorporate them into practice.
- All Participating Teams shall keep on file certificates of completion of prescribed training courses and required national criminal background checks (or some other satisfactory equivalent for your school system) for any adult subject to this policy and provide documentation upon demand by WGI or through regular and random audits.
- For any Participating Group not in compliance with these policies, the privilege of participation in events may be limited, conditioned, suspended, terminated, or denied at any time. This action may be taken towards an individual or the entire group if it is inconsistent with these policies or in the best interest of our activity and those who participate in it.