



WHISTLEBLOWER and ANTI-RETALIATION POLICY

PURPOSE

This Whistleblower and Anti-Retaliation Policy is intended to support a strong culture of integrity and ethical conduct at U.S. Figure Skating by encouraging, valuing, and protecting good faith reporting by athletes, coaches, directors, employees, contractors, committee members, hearing panel members, members, and volunteers (“Covered Individuals”) of U.S. Figure Skating to report any applicable law or policy or any potential ethics issue.

The freedom to speak up means being able to raise concerns in whatever way is most comfortable and effective and feeling free to cooperate in investigations that follow. It also means that U.S. Figure Skating has zero tolerance for retaliation of any kind against people who speak up in good faith.

VIOLATIONS COVERED BY THIS POLICY

Alleged violations covered under this policy include, but are not limited to, the following:

- Any applicable state and/or federal laws, rules, and regulations.
- Any U.S. Figure Skating bylaws, policies, and procedures
- USOPC and/or U.S. Center for SafeSport bylaws and policies.
- Ted Stevens Olympic and Amateur Sport Act
- U.S. Figure Skating Code of Conduct / Principles of Ethical Behavior
- Accounting or financial practices (e.g., fraud)

If a Covered Individual is unsure about whether a matter might be a policy violation or is unsure about their reporting responsibility, they should start by reviewing the particular policy involved. The [SkateSafe policy](#) and [U.S. Figure Skating Official Rulebook](#), as well as other policies can be found on www.usfigureskating.org.

Covered Individuals are mandatory reporters with regards to some violations. Specifically, all Covered Individuals should be familiar with the U.S. Figure Skating SkateSafe Policy and reporting requirements outlined in the [SkateSafe Handbook](#).

Nothing in this Policy changes or replaces and mandatory reporting obligations under the [Code for the U.S. Center for SafeSport](#). Questions can be directed to the U.S. Figure Skating Legal / SkateSafe Department at: skatesafe@usfigureskating.org

RETALIATION / REPORTING

No Covered Individual shall suffer harassment, intimidation, adverse employment or livelihood consequences or any other form of retaliation for making a good faith report of a violation to U.S. Figure Skating, the USOPC, the U.S. Center for SafeSport, law enforcement or other governmental or administrative body; or by participating in an investigation by U.S. Figure Skating, the USOPC, the U.S. Center for SafeSport, any court, law enforcement or other governmental or administrative body. Retaliation also includes Retaliatory Conduct as described in GR 1.05 of the Official U.S. Figure Skating Rulebook.

In addition, in accordance with §220501(b)(11) of The Ted Stevens Olympic and Amateur Sport Act, U.S. Figure Skating also recognizes the following definition of retaliation:

Retaliation means any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including removal from a training facility, reduced coaching or training, reduced meals or housing, and removal from competition, carried out against a protected individual as a result of any communication, including the filing of a formal complaint, by the protected individual or a parent or legal guardian of the protected individual, relating to the allegation of physical abuse, sexual harassment, or emotional abuse, with—

- a) *The Center;*
- b) *A coach, trainer, manager, administrator, or official associated with the corporation;*
- c) *the Attorney General;*
- d) *the Equal Employment Opportunity Commission; or*
- e) *Congress*

REPORTING PROCEDURE

Covered Individuals have a responsibility to report, in good faith, retaliation / retaliatory conduct to U.S. Figure Skating's Ethics, Grievance or SkateSafe Committees, through the online form provided on the [SkateSafe web site](#), or by email: skatesafe@usfigureskating.org

Complaints of retaliation that fall under the exclusive jurisdiction of the U.S. Center for SafeSport should be directed to the Center. If the Ethics, Grievance or SkateSafe Committees receive a complaint that may fall under the jurisdiction of the U.S. Center for SafeSport, the complaint must be sent to the U.S. Figure Skating SkateSafe Department, who will confirm whether the Center has exclusive jurisdiction, and if so, will make a report with the Center.

ACTING IN GOOD FAITH

A report that is malicious, frivolous or made in bad-faith is prohibited. Such reports will be considered a violation of U.S. Figure Skating's SkateSafe Policy and groups for disciplinary action. See the [U.S. Figure Skating SkateSafe Handbook](#).

INVESTIGATION

For instances that are not within the justification of the U.S. Center for SafeSport, the Ethics Committee, SkateSafe and/or Grievance Committee will review and investigate reports of retaliation, in accordance with the procedures outlined in ECR 2.00 – 6.01 and GCR 2.02 – 10.00 of the [Official U.S. Figure Skating Rulebook](#), as applicable.

U.S. Figure Skating General Counsel and/or the SkateSafe Department is responsible for coordinating among the appropriate committees to ensure concerns are directed to the most appropriate party.

CONFIDENTIALITY

All such reports will be treated as confidentially as possible, given that there may need to be some disclosure to conduct the investigation.

POLICY OWNER

GENERAL COUNSEL