



USGA SAFEGUARDING PROGRAM

Reporting & Responding Policy

Effective September 20, 2024

This Reporting & Responding Policy (“Policy”) governs the process by which the USGA responds to and resolves reports of abuse or misconduct alleged of individuals involved with USGA Teams and the USNDP. Anyone can make a report to the USGA of alleged abuse or misconduct; however, Adult Participants are required to make reports as set forth below. Capitalized terms shall have the same meaning as defined in the Prohibited Conduct list and the Prevention Policies of the USGA Safeguarding Program.

Reports may be made anonymously to the USGA by following the instructions below. There are no direct fees or other costs involved in making a report. No one should investigate suspicions or allegations of abuse or misconduct, or attempt to evaluate the credibility or validity of allegations or information learned prior to reporting.

Reporting can be difficult, and if you need any advice or help in making your report, please contact USGA Safeguarding staff at Safeguarding@usga.org.

A. Mandatory Reporting of Child Abuse, including Sexual Child Abuse

Adult Participants must report Child Abuse, including sexual Child Abuse, within 24 hours; however anyone can report an incident of Child Abuse as set forth below. This requirement begins when an Adult Participant learns of information that give reason to suspect that a child has suffered an incident of Child Abuse or that adult is informed of an allegation of Child Abuse. Reports must be made within 24 hours to *both* (i) law enforcement and (ii) the USGA, as provided below.

Law enforcement and/or state designated agency
<p>Learn more about how and where to report to local law enforcement or designated state agencies by visiting the following sites:</p> <ul style="list-style-type: none"> ▪ How to Report Child Abuse and Neglect ▪ States and Territories Resources
USGA
<ul style="list-style-type: none"> ▪ USGA Safeguarding Reporting Form ▪ Phone: 855-874-2744 <p style="text-align: center;"><i>Reports made to the USGA may be made anonymously</i></p>



Upon receipt, USGA will promptly report and refer suspicions or allegations of Child Abuse to law enforcement for investigation and further handling. Investigations will be conducted solely by appropriate law enforcement. As necessary, USGA may ask clarifying questions of the individual making the report to help provide sufficient information to law enforcement. USGA may also provide further information or resources necessary for law enforcement to investigate reported allegations.

Federal law and various state laws may require individuals to report allegations or suspicions of Child Abuse to law enforcement or to a designated child protection agency. USGA is also responsible for complying with mandatory reporting laws. It is each person's obligation to know and comply with federal and state laws. Reporting such conduct to the USGA does not satisfy an adult's obligation to report to law enforcement or other appropriate authorities/agencies.

If an individual is unsure about reporting, they should seek guidance from the local police department, department of child services or child advocacy center. These authorities will understand the law in their jurisdiction. As best practice, the person reporting should document the date, time, name of the local police department contacted, name of the officer and the officer's badge number as confirmation of their efforts. Child Abuse includes incidents that involved a victim who is a minor at the time of the alleged incident, even if the victim is now an adult.

B. Reporting Sexual Misconduct

Adult Participants must report incidents of Sexual Misconduct to the USGA as provided below. If an incident of Sexual Misconduct involves possible criminal conduct, the Adult Participant should report the matter to appropriate law enforcement. This requirement begins when an Adult Participant learns of information that give reason to suspect an incident of Sexual Misconduct occurred or that adult is informed of an allegation of Sexual Misconduct. Sexual Misconduct may involve an adult or minor; however, if the Sexual Misconduct involves a minor, it should be reported as Child Abuse as set forth in Section A above.



Local law enforcement
<ul style="list-style-type: none">• Report to local law enforcement if Sexual Misconduct involves possible criminal conduct• Report to law enforcement and/or designated state agency if Sexual Misconduct involves a minor. See Section A above for more information about how and where to report.
USGA
<ul style="list-style-type: none">▪ USGA Safeguarding Reporting Form▪ Phone: 855-874-2744 <p><i>Reports made to the USGA may be made anonymously</i></p>

Upon receipt, USGA will promptly report and refer suspicions or allegations of Sexual Misconduct that involve potentially criminal conduct to law enforcement for investigation and further handling. Investigations will be conducted solely by appropriate law enforcement. As necessary, USGA may ask clarifying questions of the individual making the report to help provide sufficient information to law enforcement. USGA may also provide further information or resources necessary for law enforcement to investigate reported allegations.

In the event law enforcement does not deem the reported Sexual Misconduct criminal, the reported case will be handled by USGA in accordance with this Policy.

C. Reporting Other Types of Prohibited Conduct

Adult Participants must report other types of Prohibited Conduct to the USGA and may report other types of misconduct to the USGA. This requirement begins when an Adult Participant learns of information that give reason to suspect an incident of Prohibited Conduct or other misconduct occurred or that adult is informed of an allegation of Prohibited Conduct or other misconduct occurred. This includes any of the following:

- Physical and Emotional Misconduct
- Criminal Charges and Dispositions
- Violations of the Prevention Policies or other Safeguarding Policies
- Misconduct relating to USGA Safeguarding Program processes
- Misconduct Relating to Reporting
- Aiding and Abetting



- Retaliation
- Other inappropriate conduct

USGA	
▪ USGA Safeguarding Reporting Form	
▪ Phone: 855-874-2744	
<i>Reports made to the USGA may be made anonymously</i>	

If the reported allegations involve a USNDP State Program, USGA will conduct an assessment to determine whether USGA or the organization operating a State Program has jurisdiction over the reported allegations. This may depend on the severity of the reported allegations. The types of allegations that may fall within the jurisdiction of the State Program are set forth below in Section F. If the USGA determines that allegations fall within jurisdiction of the State Program, USGA may refer the reported allegations to the State Program for further handling.

If an incident of misconduct involves possible criminal conduct, the Adult Participant should report the matter to appropriate law enforcement.

D. Prohibition on Retaliation

USGA expressly prohibits all forms of retaliation before, during, and after the reporting, investigative and conclusion of resolving an abuse or misconduct allegation. Retaliation is a category of Prohibited Conduct and thus deemed a violation of the USGA Safeguarding Program.

E. Failure to Report

An Adult Participant who fails to make a report pursuant to this Policy may be subject to disciplinary action by the USGA and/or law enforcement (as applicable). Specifically, an Adult Participant who fails to report actual or suspected Sexual Misconduct or Child Abuse to the USGA and, when appropriate, to law enforcement may be subject to disciplinary action by USGA and may also be subject to federal or state penalties.



F. Response and Resolution of Reported Allegations

USGA Safeguarding staff administers and enforces this Reporting & Responding Policy and seeks to resolve reported allegations fairly and efficiently. A report of alleged abuse or misconduct to the USGA begins a process that includes assessment, determination of jurisdiction, investigation (if the report meets relevant criteria), issuance of finding, and determination of sanction if appropriate.

Claimant is a person(s) alleges to have experienced conduct that constitutes a USGA Safeguarding Program violation. Respondent is the person(s) alleged to have violated the USGA Safeguarding Program. Third-party reporters are persons other than a Claimant who reported the alleged violation.

Making a report can be a difficult and emotional process. USGA ensures that all reports are handle with the appropriate attention and care, and USGA shall handle reports confidentially in accordance with the provisions set forth in Section I of this Policy.

1. Determination of Jurisdiction

USGA will conduct an initial assessment of the reported allegations and determine whether law enforcement, the USGA, or a particular USNDP State Program organization has jurisdiction over the matter pursuant to this Policy.

Upon receipt of complete information related to a report, USGA will inform an identified reporting party of its jurisdictional determination regarding their report, communicating that the matter either is being referred to appropriate law enforcement, being addressed by USGA directly, or being referred to the State Program organization that has jurisdiction over the matter.

a. Law Enforcement Jurisdiction

Pursuant to applicable state and federal laws, law enforcement must be notified of suspicions of child abuse. Accordingly, USGA will immediately notify law enforcement of any report it receives involving suspicion of child abuse. In addition, pursuant to this Policy, USGA will notify law enforcement of any report it receives that may involve criminal conduct, including, but not limited to, reported allegations of Sexual Misconduct that may involve criminal conduct. Law enforcement shall have exclusive jurisdiction over the following types of allegations that are reported to the USGA:

- Child Abuse
- Sexual Misconduct that involves possible criminal conduct
- Other misconduct that involves possible criminal conduct



USGA will cooperate, to the extent permitted by law, with any investigation by law enforcement involving the above allegations. USGA reserves the right to implement temporary measures against any individual who is subject to an ongoing investigation by law enforcement, including, but not limited to, suspension of an individual from any USGA sanctioned program, event or activity, whether or not such program, event or activity is subject to or falls within the scope of the USGA Safeguarding Program.

b. USGA Jurisdiction

USGA will respond to and resolve reported Safeeguarding Program allegations that involve the following:

- i. Any allegations of misconduct involving a USGA Team (excluding those that fall within the jurisdiction of law enforcement).
- ii. Any allegations of misconduct involving the USNDP, including National Teams and USNDP Grants (excluding those that fall within the jurisdiction of a State Program organization).
- iii. Allegations of misconduct involving a USNDP State Program where the reported misconduct is severe, as determined by USGA in its reasonable discretion. Severity will depend on the frequency, intensity, number of reported incidents, or reasonable possibility of escalation. Alleged misconduct may include:
 - Sexual Misconduct
 - Criminal Charges and Dispositions
 - Physical or Emotional Misconduct
 - Violations of Safeguarding Program, including Prevention Policies

c. State Program Jurisdiction

USGA will receive and refer Safeguarding Program allegations involving a USNDP State Program to the organization operating such State Program for further handling where the reported misconduct is not deemed severe, as determined by USGA in its reasonable discretion. Alleged misconduct may include:

- Physical or Emotional Misconduct that is not deemed severe (e.g., verbal attacks, peer-to-peer bullying)
- Violations of Safeguarding Program, including Prevention Policies, that are not deemed severe



Each State Program organization, or its State Committee, will respond to and resolve such reported allegations of abuse and misconduct and shall notify USGA of their resolutions as set forth in Section D(v) below.

2. USGA Resolution Process

- a. Preliminary Investigation. When the USGA receives notice of a matter within its jurisdiction, it will undertake a preliminary inquiry to determine whether or not there is reason to believe a Safeguarding Policy violation has occurred. If, after the preliminary inquiry, the USGA concludes there is reason to believe a Safeguarding Policy violation has occurred, it will initiate proceedings, which may include an investigation and informal or formal resolution. If the USGA deems that there is insufficient information to determine if there is reason to believe a Safeguarding Policy violation has occurred, it may administratively close the matter, with the option to reopen it if more information is presented in the future. USGA maintains an internal, confidential system for tracking all reported allegations.
- b. Temporary Measures
 - i. At any point before a matter is final, temporary measures may be appropriate to ensure the safety or well-being of any of the parties. Temporary measures may include, but are not limited to, altering training schedules, providing chaperones, implementing contact limitations between the parties, and suspensions.
 - ii. If temporary measures impact an individual involved with a State Program, USGA will provide the organization operating the State Program with notice of any such temporary measures or safety plans, and the State Program organization will help implement any temporary measure and safety plans within their geographical area.
 - iii. While USGA does not investigate allegations of abuse or misconduct that fall within the jurisdiction of law enforcement or an organization operating a State Program, USGA reserves the right to implement temporary measures against any individual who is subject to an ongoing investigation by law enforcement or by a State Program, including, but not limited to, suspension of an individual from any USGA sanctioned program, event or activity, whether or not such program, event or activity is subject to or falls within the scope of the USGA Safeguarding Program. USGA will immediately notify such person that they are ineligible to participate in any USGA event, activity or program until further notice.



c. Investigation and Determination.

- i. USGA may investigate allegations of abuse or misconduct within its jurisdiction. The timing, scope and processes of the investigation will be based on the particular circumstances of the matter.
- ii. USGA may use a third party investigator to conduct or assist with any investigation. Such third party investigatory will be required to maintain the confidentiality of such matters, subject to applicable law.
- iii. USGA will notify the claimant that it is conducting an investigation and update the claimant on the status of the investigation and its resolution, as appropriate.
- iv. During its investigation, USGA may seek to interview the respondent and advise them of the nature of the allegations, interview witnesses, collect evidence or other information relevant to the investigation.
- v. For cases that are investigated by the USGA, USGA will make a final determination based on all relevant information obtained as to whether abuse or misconduct occurred in violation of the USGA Safeguarding Program and issue appropriate sanctions, as deemed appropriate in the USGA's sole discretion. USGA will provide written notice of its determination ("Notice of Decision") to the claimant, the respondent, and, if applicable, the organization operating a relevant USNDP State Program.
- vi. USGA may close an investigation prior to final resolution if the USGA could not conduct or complete an investigation because there was insufficient information, the matter did not warrant final resolution, or USGA determines there is no reason to believe that there has been a USGA Safeguarding Program violation.
- vii. Sanctions may include, but are not limited to, suspension, removal, or termination from the USNDP or USGA Team, additional training or education, or other consequences as appropriate. comprised

3. Appeals

Claimants and respondents have the right to request an appeal and challenge the USGA's Notice of Decision or the handling of any reported claim. Either the claimants or respondents ("Appellants") may request a review hearing with the USGA Safeguarding Appeals Committee ("Appeals Committee"). To request an appeal, the Appellant must send an email



to Safeguarding@usga.org within thirty (30) days from receipt of the Notice of Decision. Appeals not requested within thirty (30) days are barred. The Appeals Committee shall consist of three (3) members from the Executive Committee comprised of the following: one (1) Executive Committee member who is or was a practicing attorney or has a legal professional background, preferably with investigative experience; one (1) Executive Committee member from the U.S. National Development Special Committee; and one (1) Executive Committee member with elite amateur or professional playing experience. To the extent there are no Executive Committee members with the requisite experience or background, the President shall appoint any current Executive Member, in its sole discretion. The President shall select one of the Appeals Committee members to serve as the Chair of the committee. The parties to the appeal shall be the Appellant and the USGA, and no other person or entity shall have standing to challenge the Notice of Decision issued by the USGA or participate in any appeal. The Appeals Committee shall be the exclusive forum for challenges to Notice of Decisions issued by the USGA. The Appellant has the burden of demonstrating that the Notice of Decision of the USGA was not reasonably supported by sufficient evidence. The Notice of Decision shall be upheld if the Appellant cannot meet such burden of proof. During the hearing, the Appeals Committee shall consider such witness testimony and/or other evidence that the Appeals Committee determines, in its discretion, is relevant and appropriate. The Chair of the Appeals Committee shall oversee implementation of the rules of procedure for the Appeals Committee established by the USGA Governance Committee and USGA Chief Legal Officer. The Appeals Committee may seek advice or counsel from experts or licensed professionals with background or experience in subject matters relevant to the underlying issues of the reported case. The Appeal Committee shall issue a final written decision, which shall be final and binding on both the Appellant and the USGA.

G. Bad Faith Allegations

Any individual who alleges misconduct under the Safeguarding Program that, upon review, is determined to be malicious, frivolous or made in bad faith, will be deemed in violation of the Safeguarding Program, and may be subject to criminal or civil action and USGA sanctions.

H. State Program Reporting

The organization operating any USNDP State Program shall provide reporting to USGA on the status and resolution of all Safeguarding Program cases that fall within the jurisdiction of the State Program involving USNDP State Teams, in accordance with the following:



- a) The State Committee's Safeguarding Director, or their designee, shall be responsible for reporting on the status of any open cases, including case status and disposition, to the USGA's Safeguarding Lead Investigator on a regular and recurring basis, and at minimum (i) on quarterly basis, and (ii) upon resolution of any matter.
- b) USGA shall maintain the tracking of all reported cases, including those within law enforcement's jurisdiction, the USGA's jurisdiction and within each State Program's jurisdiction. Such tracking will be maintained by the USGA's Safeguarding Team and shall reflect how allegations were responded to and their respective outcomes. USGA shall keep all case information confidential, subject to the confidentiality provisions set forth in Section I of this Policy.

I. Confidentiality

To the extent permitted by law, USGA will keep confidential the names of the persons involved, including the victim or claimant, respondent, third-party reported, and witnesses, the nature of the underlying allegations or information reported or learned during an investigation. Notwithstanding the foregoing, USGA may be required to disclose such information in the following circumstances:

- USGA may disclose such information to parties involved in the investigation, including the victim or claimant, respondent, third-party reported, and witnesses, third party investigators, USGA staff or personnel, persons involved with the State Program, and others with a need to know, only as necessary in order to properly and sufficiently assess and investigate the matter being reported;
- USGA may disclose the outcome of the matter to persons or organizations with a need to know to ensure the resolution is properly communicated and understood or effectuated;
- USGA may be required to disclose such information to law enforcement in accordance with relevant state or federal law, or other mandatory reporting requirements imposed by law enforcement; and
- USGA reserves the right to disclose such information in order to publicly correct any misrepresentation related to these reporting and resolution procedures or outcomes.