



# United States Olympic Committee

## United States Olympic Committee SafeSport Audit of USA Water Polo

October 2017

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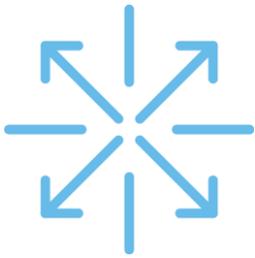
United States Olympic Committee  
USOC SafeSport Audit of USA Water Polo

# United States Olympic Committee SafeSport Audit of USA Water Polo<sup>1</sup>

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<sup>1</sup> To consider the report in its entirety, please refer also to the detailed management response that will appear here [[Governance Documents](#)] within 90 days of the date of this report.



## Executive Summary

### Summary Observations

It shall be the policy of the United States Olympic Committee (USOC) that each National Governing Body (NGBs) adopt a Minimum Standards Policy for Athlete Safety Programs (Athlete Safety Standards) by December 31, 2013<sup>2</sup>.

We noted the following opportunities to enhance the design of USA Water Polo (USAWP) compliance with the Athlete Safety Standards:

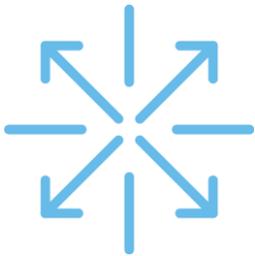
- > **Athlete Safety Standards - Prohibited Conduct** – USA Water Polo has a separate Code of Conduct tailored to athletes, coaches and referees along with a SafeSport policy and SafeSport content on their website. The prohibited conduct is specifically listed in the SafeSport document and on the USA Water Polo SafeSport website; however, the links included both in the SafeSport website content and the SafeSport Policy, which are supposed to reference content from SafeSport.org are broken and do not provide any further information.
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** – Five individual selected for testing (50% of the selected individuals) did not have a criminal background check conducted and did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017).
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements** – USA Water Polo's SafeSport-related documentation and administrative material only specifically requires that coaches and officials complete criminal background checks and education and training requirements. However, documentation provided by USAWP indicates that the "List of individuals who are formally authorized, approved, or appointed to a position of authority over, or have frequent contact with athletes" includes "Coaches, Referees, Club Admin, and Team Training/Doctor." There is nothing in the SafeSport documentation that indicates anyone other than coaches and officials are subject to criminal background checks or education and training requirements.

### Background and Approach

USOC engaged Baker Tilly Virchow Krause (Baker Tilly), to assist the USOC in the completion of SafeSport audits, to assess compliance with SafeSport policies and procedures at the USOC and all of its NGBs and High Performance Management Organizations (HPMOs).

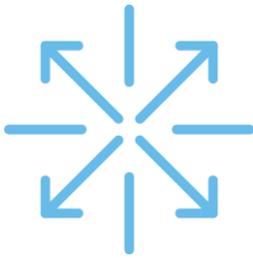
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<sup>2</sup> Effective June 20, 2017 the USOC replaced the Athlete Safety Standards with the NGB Athlete Safety Policy. Due to the timing of this audit, fieldwork was performed in accordance with the Athlete Safety Standards.



Baker Tilly performed a review of USA Water Polo to evaluate compliance with the Athlete Safety Standards. The following activities were performed for this review of USA Water Polo:

- > Developed and executed an audit program that included:
  - Holding a virtual entrance meeting to discuss and document USA Water Polo's SafeSport program and processes.
  - Selecting a sample of ten from the required individuals to ensure a background check was performed and education and training was completed. See **Appendix A** for a list of documents reviewed.
  - Reviewing USA Water Polo's athlete safety policy and determining whether the following was addressed:
    - Required misconduct is prohibited and defined;
    - Reporting procedures are documented; and
    - The grievance process is documented and complies with Athlete Safety Standards.
  - Identifying which individuals are required to undergo a criminal background check and complete education and training.
- > Conducted a virtual exit meeting, if requested, following delivery of the draft report, to discuss audit findings and recommendation(s) with USA Water Polo. See **Appendix B** for a list of individuals interviewed.
- > Identified specific observations and recommendations regarding opportunities to enhance compliance with Athlete Safety Standards. Observations include the following attributes: criteria, condition, cause, effect, and recommendation, as set out in the International Professional Practices Framework (IPPF) Standards and Practice Advisory 2410-1.



## Detailed Report

The tables below represent opportunities to enhance the design and effectiveness of USAWP's compliance with the Athlete Safety Programs and the Center's Code process.

1. Athlete Safety Standards - Prohibited Conduct	
<b>Criteria</b>	The Athlete Safety Standards requires that each NGB/HPMO shall adopt an athlete safety program that prohibits and defines the following misconduct: Bullying, Hazing, Harassment (including sexual harassment), Emotional Misconduct, Physical Misconduct, and Sexual Misconduct (including child sexual abuse).
<b>Condition</b>	USA Water Polo has a separate Code of Conduct tailored to athletes, coaches and referees along with a SafeSport policy and SafeSport content on their website. The prohibited conduct is specifically listed in the SafeSport document and on the USA Water Polo SafeSport website; however, the links included both in the SafeSport website content and the SafeSport Policy, which are supposed to reference content from SafeSport.org are broken and do not provide any further information.
<b>Cause</b>	USA Water Polo may not have reviewed and updated its SafeSport-related documentation and administrative materials to include all of the requirements in the Athlete Safety Standards.
<b>Effect</b>	<p>USA Water Polo must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding.</p> <p>Additionally, stakeholders (e.g., coaches, staff, officials, volunteers, etc.) may not be aware of the specific requirements of the Athlete Safety Standards and could be out of compliance with the requirements and/or may not aware of the prohibited conduct. Also, athletes may have contact with stakeholders who are not aware of SafeSport misconduct and the potential impact to athletes' well-being.</p>
<b>Recommendation</b>	USA Water Polo must update all applicable SafeSport-related documentation and administrative materials to define and specifically prohibit the six types of prohibited misconduct identified in the Athlete Safety Standards. Further, USA Water Polo should update the links included in their SafeSport documentation to the appropriate type of defined misconduct. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.

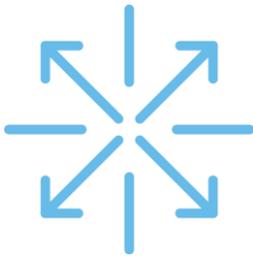


**1. Athlete Safety Standards - Prohibited Conduct**

<b>Management response</b>	<p>We have already responded to the condition and recommendation and have removed and/or replaced the broken links, directing members to the new safesport.org pages where applicable. We will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. Our plan will be submitted to the USOC within the 90-day timeline referenced above.</p>
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**2. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing**

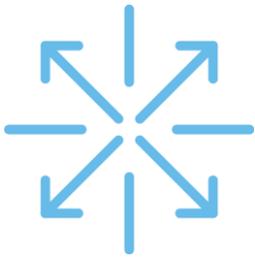
<b>Criteria</b>	<p>The Athlete Safety Standards state each NGB/HPMO shall require criminal background checks and education and training for those individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.</p>
<b>Condition</b>	<p>Five individual selected for testing (50% of the selected individuals) did not have a criminal background check conducted and did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017).</p>
<b>Cause</b>	<p>USA Water Polo may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.</p> <p>Per review of the supporting documentation and based on discussions with USA Water Polo personnel, two individuals selected for testing did not complete background checks or SafeSport training because they are under the age of 18 or within 90-days of their 18th birthday. Of the two selected individuals who are under the age of 18, one is a referee member, but has until 8/28/2017 to have a background check conducted and complete SafeSport training and education requirements. The other is a coach member, but has until 12/7/2017 and will not be required to have a background check conducted and complete SafeSport training until 3/7/2018.</p> <p>Further, based on discussion with USA Water Polo personnel, the three other individuals selected for testing that did not have a background check conducted because they were identified as Club Administrators. USA Water Polo personnel, indicated that their role as an administrator did not require them to have a background check conducted or complete SafeSport training and education requirements.</p>



2. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing	
<b>Effect</b>	<p>Individuals USA Water Polo formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes may not be in compliance with the SafeSport program because they have not completed criminal background checks and/or education and training prior to having contact with athletes. USA Water Polo must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the USOC's Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding. Also, athletes may have contact with individuals who are unaware of SafeSport misconduct and the potential impact to athletes' well-being and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.</p>
<b>Recommendation</b>	<p>USA Water Polo must require that individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes complete criminal background checks and education and training requirements in a timely manner and before they have contact with athletes to provide assurance that they are educated on the requirements of the Athlete Safety Standards. The USA Water Polo must consistently track and verify criminal background checks and education and training requirements are met for all Required Individuals. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>USA Water Polo should review the testing results and require all necessary individuals to complete the necessary requirements (i.e., criminal background check and/or education and training).</p>
<b>Management response</b>	<p>Members that hold current club administrator memberships do not have direct supervisory roles over athletes as our coaches or referees do. However, with their administrative position within clubs, we will review our requirements to ensure compliance. We agree with the conditions and recommendation and will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. Our plan will be submitted to the USOC within the 90-day timeline referenced above.</p>



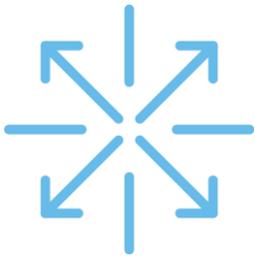
3. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements	
<b>Criteria</b>	The Athlete Safety Standards state each NGB/HPMO shall require criminal background checks and education and training for those individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.
<b>Condition</b>	USA Water Polo's SafeSport-related documentation and administrative material only specifically requires that coaches and officials complete criminal background checks and education and training requirements. However, documentation provided by USAWP indicates that the "List of individuals who are formally authorized, approved, or appointed to a position of authority over, or have frequent contact with athletes" includes "Coaches, Referees, Club Admin, and Team Training/Doctor." There is nothing in the SafeSport documentation that indicates anyone other than coaches and officials are subject to criminal background checks or education and training requirements.
<b>Cause</b>	USA Water Polo may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.
<b>Effect</b>	USA Water Polo may not be in compliance with the Athlete Safety Standards. USA Water Polo's must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding.  Additionally, stakeholders (e.g., coaches, staff, officials, volunteers, etc.) may not know that criminal background checks and education and training requirements apply to them or be informed of SafeSport initiatives and the related misconduct areas. Also, athletes may have contact with individuals who are unaware of SafeSport misconduct and the potential impact to athletes' well-being and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.
<b>Recommendation</b>	USA Water Polo's SafeSport policy must require that individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes complete criminal background checks and education and training requirements in a timely manner and before they have contact with athletes to provide assurance that they are educated on the requirements of the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.



### 3. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements

#### Management response

We agree with the conditions and recommendation and will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. Our plan will be submitted to the USOC within the 90-day timeline referenced above.



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## Report Appendices

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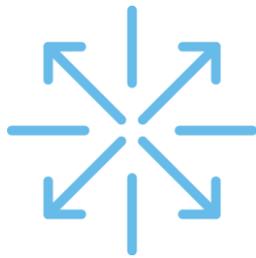


## Appendix A: Documents Reviewed

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We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Population listing of “required individuals”(i.e., covered individuals required to undergo background check and training)
- > USA Water Polo Athlete’s Code of Conduct
- > USA Water Polo Coach’s Code of Conduct
- > Bylaws of the USA Water Polo
- > USA Water Polo Grievance Procedure
- > SafeSport Audit- USAWP



## Appendix B: Personnel Interviewed

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We reviewed the following documents:

- > Stephanie Krogius, Chief Membership & Advancement Officer