



Safety Manual

ACKNOWLEDGE RECEIPT

I, _____, acknowledge that I have received a copy of Eagle Mount Bozeman's Safety Manual dated December 10, 2025. I have carefully read its contents and agree to abide by the expectations and policies stated therein.

Signed: _____

Print Name: _____

Date: _____

This Page intentionally left blank

Contents

SECTION ONE: DEFINITIONS	7
Glossary	7
SECTION TWO: GENERAL SAFETY	10
Move United Relationship	10
Staff Policies	10
Participant Policies	10
Volunteer Policies.....	11
Criminal Background Check Disclosure	11
Criminal Background Check Policies & Procedures.....	11
Confidentiality	14
Substance Abuse & Use.....	14
SECTION THREE: PATICIPANT PROTECTION POLICIES	14
Prohibited Conduct	14
Safe Sport Policy & Training.....	16
Abuse Prevention Policies.....	17
Physical Contact with Participants	18
Electronic Communications & Social Media Policy	20
Locker Rooms & Changing Areas	20
Travel & Lodging.....	21
Abuse Reporting Policies.....	23
Disciplinary Rules & Procedures	25
Conclusion	26

Introduction

Safety is everyone's responsibility and cannot be delegated! Eagle Mount Bozeman is committed to provide quality adaptive recreation opportunities for people with disabilities and young people with cancer, and to provide support for families of participants, so that "they shall mount up with wings as eagles."

To achieve this commitment, every Eagle Mount program and activity is approached from the prioritized perspective of "safety, fun, and then learning" and can move between each of these multiple times in the course of one activity. Therefore, health and safety of all participants, volunteers, interns, and staff shall be a principle consideration in the planning, operation and conduct of all Eagle Mount activities and programs.

All employees, interns, and volunteers are expected to establish, follow, and enforce safe practices and procedures while setting personal examples of safe behavior. All must implement program activities in a way that prevents injury to themselves and mitigates or manages risk to participants.

As such, it is the responsibility of each employee to ensure all Eagle Mount Bozeman tasks and activities are conducted in a safe and efficient manner complying with all local, state, and federal safety and health regulations. In addition, employees are responsible for understanding specific programmatic standards and safety concerns for each program and population they work with.

Although this manual addresses many risk management, risk mitigation, and safety policies, it cannot address every possible situation that poses a safety hazard. Adequate prior planning, common sense, and early recognition and termination of unsafe situations or behaviors will help ensure mishaps are kept to a minimum.

It is the responsibility of every individual in the organization to abide by the policies, rules, and intent set forth in the Eagle Mount Safety Manual. Compliance with the established safety rules and regulations is a condition of employment.

The policies in this manual apply to all staff, participants, volunteers, and visitors to the campus, and all programs and activities facilitated by the organization. Employees are required to familiarize with the Eagle Mount Risk Management Plan & Emergency Procedures and are expected to take an active role in maintaining a safe work environment.

SECTION ONE: DEFINITIONS

Glossary

Bullying Behavior

A verbal, physical, or mental act committed with the intent to harass, intimidate, or otherwise cause harm to an individual.

Child Abuse

The CDC defines child abuse and neglect (also referred to generally as child maltreatment) as "any act or series of acts of commission or omission by a parent or other caregiver (e.g., clergy, coach, teacher) that results in harm, potential for harm, or threat of harm to a child." Definitions of abuse as defined by the State of Montana can be found at:

<https://www.childwelfare.gov/resources/definitions-child-abuse-and-neglect-montana/>

Claimant

A person who is alleged to have experienced conduct that constitutes a Handbook violation.

Consent

Consent is (a) informed (knowing), (b) voluntary (freely given), (c) active (not passive). Consent must be demonstrated by clear words or actions, indicating that a person who is legally and functionally competent has indicated permission to engage in mutually agreed-upon sexual activity. Consent to any one form of sexual activity does not automatically imply Consent for any other forms of sexual activity. Previous relationships or prior Consent does not imply Consent to future sexual activity. Once given, Consent can be withdrawn through clear communication. Consent cannot be obtained: (a) by force, (b) by taking advantage of the Incapacitation of another, where the person initiating sexual activity knew or reasonably should have known that the other was Incapacitated, (c) from someone who lacks legal capacity, (d) where a Power Imbalance exists.

1. Force

Force includes (a) the use of physical violence, (b) threats, (c) intimidation, and (d) coercion.

a. Physical violence means that a person is exerting control over another person using physical force. Examples of physical violence include hitting, punching, slapping, kicking, restraining, choking, and brandishing or using any weapon.

b. Threats are words or actions that would compel a reasonable person to engage in unwanted sexual activity. Examples include threats to harm a person physically, to reveal private information to harm a person's reputation, or to cause a person sporting harm.

c. Intimidation is an implied threat that menaces or causes reasonable fear in another person. A person's size, alone, does not constitute intimidation; however, a person's size may be used in a way that constitutes intimidation (e.g., blocking access to an exit).

d. Coercion is the use of an unreasonable amount of pressure to gain intimate and/or sexual access. Coercion is more than an effort to persuade, entice, or attract another person to engage in sexual activity. When a person makes clear their decision not to participate in a form of Sexual Contact or Sexual Intercourse, their decision to stop, or their decision not to go beyond a certain sexual interaction, continued pressure can be coercive. Whether conduct is coercive depends on: (i) the frequency of the application of the pressure, (ii) the intensity of the pressure, (iii) the degree of isolation of the person being pressured, and (iv) the duration of the pressure.

2. Legal Capacity

Minors cannot Consent to conduct of a sexual nature. While the legal age of Consent varies under state and federal law, the legal age of capacity under this Manual is 18. A three-year close-in-age exception will be applied to any policy violation between an adult and a Minor, or between two

Minors, where there is no Power Imbalance. When the assessment of whether a Participant's conduct violates this Policy depends upon another individual being below a certain specified age, ignorance of their actual age is no defense. Neither shall misrepresentation of age by such person, nor a Participant's bona fide belief that such person is over the specified age, be a defense.

3. Incapacitation

Incapacitation means that a person lacks the ability to make informed, rational judgments about whether to engage in sexual activity. A person who is incapacitated is unable, temporarily or permanently, to give Consent because of mental or physical helplessness, sleep, unconsciousness, or lack of awareness that sexual activity is taking place. A person may be incapacitated because of consuming alcohol or other drugs, or due to a temporary or permanent physical or mental health condition. Incapacitation is a state beyond drunkenness or intoxication. A person is not necessarily incapacitated merely because of drinking or using drugs. The impact of alcohol and other drugs varies from person to person and is evaluated under the specific circumstances of a matter. A Respondent's being impaired by alcohol or other drugs is not a defense to any violation of this Policy. The Consent construct can also be applied to other forms of non-sexual conduct, such as hazing or other forms of Physical and/or Emotional Misconduct.

Covered Individual

Covered Individuals are:

Any individual who is seeking to be, currently is, or was at the time of an alleged Safety Manual violation:

- a. A member or license holder of Eagle Mount;
- b. An employee of Eagle Mount;
- c. Within the governance or disciplinary jurisdiction of Eagle Mount;
- d. Authorized, approved, or appointed by Eagle Mount to have regular contact with Minor Athletes; and/or
- e. A Covered Individual, not otherwise listed herein.

For the purpose of evaluating whether an individual is considered a Covered Individual per this provision, the phrase "currently is" includes the date on which the alleged misconduct was reported to Eagle Mount, through resolution, and including the period(s) of any sanctions imposed.

The following individuals are considered "Covered Individuals"

1. Eagle Mount Employees
2. Eagle Mount Volunteers
3. Any other individual authorized, approved, or appointed by Eagle Mount Bozeman having regular contact with participants and/or minors.

Emotional Misconduct

A pattern of deliberate, non-contact behavior that has the potential to cause emotional or psychological harm to a participant. Non-contact behavior includes verbal and physical acts, as well as actions that deny attention or support.

Harassment

Words or behavior that threatens, intimidates, or demeans a person. Harassment is unwanted, uninvited, and unwelcome and causes nuisance, alarm, or substantial emotional distress without any legitimate purpose.

Hazing

Any activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers them, regardless of a person's willingness to participate.

Minor or Child

An individual who is, or is believed by the Respondent to be, under the age of 18.

Participant

A person that engages with Eagle Mount Bozeman and benefits directly from Eagle Mount's mission.

Physician's Approval Form

One time Eagle Mount Bozeman form filled out and signed by a new participant's physician approving the participant for the activities associated with recreation at Eagle Mount. Participants with Down Syndrome, must obtain an annual atlanto-axial (AAI) form

Physical Misconduct

Any behavior done on purpose that causes (or could reasonably cause) physical harm to another person.

Policy

"Policy" means the Safety Policy within this Manual.

Power Imbalance

A Power Imbalance refers to an unequal distribution of power and authority between individuals.

A Power Imbalance is presumed to exist, but may be rebutted, in (a) any Covered Individual-Participant relationship or (b) any other relationship where a Covered Individual has authority or control over another person, is in a position to confer, grant, or deny a benefit or advancement to the person, or is responsible for the physical or psychological well-being of the person.

Once a Covered Individual-Participant relationship is established, a Power Imbalance is presumed to exist throughout the Covered Individual-Participant relationship (regardless of age) and is presumed to continue for Minor Individual Members after the Covered Individual-Participant relationship terminates until the athlete reaches 25 years of age.

A Power Imbalance may also exist between one person and another based on the totality of the circumstances and depends on several factors, any one of which may be sufficient alone, including but not limited to: the nature and extent of any implied or perceived authority or control; the supervisory, evaluative, or other authority over the person; the actual relationship between the parties; the parties' respective roles; the nature and duration of the relationship; the age of the parties involved; whether there is an aggressor; whether there is a significant disparity in age, size, strength, or mental capacity; seniority; ability; public profile; gender identity or expression; sexual orientation; racial or ethnic identity; national origin; level of physical, intellectual, or other disability.

Respondent

A Covered Individual who is alleged to have violated this Manual.

Risk Assessment

Formal assessment of specific activities highlighting potential hazards.

Risk Management

A culture and habit of awareness and mitigation of potential hazards to recreational activities. Includes ongoing training and education of staff to stay prepared and confident.

Sexual Misconduct

Conduct of a sexual nature or conduct based on sex or gender that is nonconsensual or has the effect of threatening, intimidating, or coercing a person.

Staff

A paid employee of Eagle Mount Bozeman.

Third-Party Reporter

Reports brought by individuals other than the Claimant are referred to as "third-party reports" and those bringing them are "third-party reporters."

Volunteer

A person who freely gives of their time and energy in support of Eagle Mount Bozeman's mission.

Ward

An individual, whether an adult or a minor, who has a legal guardian.

SECTION TWO: GENERAL SAFETY

Move United Relationship

Eagle Mount is a member organization of Move United (<https://moveunitedsport.org/>) and is required to have a written and publicly available Participant Protection Policy that meets the minimum standards of Move United.

Eagle Mount may have Participants involved with our organization that are also Individual Members of Move United. It is the responsibility of the individual member to adhere to Eagle Mount's policies as well as those of Move United. Violation of either policy by an individual member may be investigated by Move United and may be grounds for penalties, including but not limited to, removal from the individual member program and prohibition of an individual from participating within Move United and its member organizations' activities and programs.

Staff Policies

Safety is everyone's responsibility and cannot be delegated. Every individual engaged with Eagle Mount Bozeman is expected to set a personal example of safety to staff, volunteers, and participants by:

1. Carrying out their assignments in a manner that prevents injury to themselves and others.
2. Knowing the potential hazards associated with their duties.
3. Following all applicable safety practices and procedures.
4. Performing duties only in areas that they have been properly trained for and are competent in.
5. Managing participants and volunteers only in areas they are competent in.
6. Reporting all hazards and safety concerns to a supervisor/senior staff as soon as possible.
7. Reporting all accidents, injuries, and other safety incidents in accordance with Eagle Mount's policies.

Disciplinary action up to and including termination may be appropriate for failure to comply with or follow required safety procedures/policies.

Participant Policies

1. All participants must meet Eagle Mount Bozeman's Eligibility Guidelines and individual program Essential Eligibility Criteria to participate.
2. All participants must submit an Eagle Mount Bozeman Physician Approval Form upon enrollment to establish eligibility and collect pertinent medical information.
3. All participants must submit an annual application. Applications are reviewed by staff to ensure there are no changes in medical history or status that warrant a physician's release.
4. All participants must sign the following forms annually, in conjunction with their application submission:
 - a. Eagle Mount Bozeman Assumption of Risk
 - b. Move United Release & Waiver of Liability
 - c. Eagle Mount Bozeman Media Release Agreement
 - d. Move United Media Release Agreement
 - e. For participants with Down Syndrome, and annual AAI Form

Volunteer Policies

1. Sixteen (16) is the minimum age requirement for a volunteer supporting the adaptive sport and/or recreation activities of chapters participating in the Move United Group Insurance Program, which Eagle Mount is a part of.
2. Eighteen (18) is the minimum age requirement for volunteer instructors leading the adaptive sport/and or recreation activities of chapters participating in the Move United Group Insurance Program.
3. Younger volunteers can support other activities that are age and skill level appropriate as long as they are properly trained, well supervised and protected from endangerment.
4. All volunteers must submit an annual application. Applications are reviewed by staff to ensure no changes in medical history or medical status that warrant a physician's release.
5. All volunteers must sign the following forms annually, in conjunction with their application submission:
 - a. Eagle Mount Bozeman Assumption of Risk
 - b. Move United Release & Waiver of Liability
 - c. Eagle Mount Bozeman Media Release Agreement
 - d. Move United Media Release Agreement
6. All volunteers must pass a criminal background check every three years, in accordance with Eagle Mount Bozeman's criminal background check policy.
7. All volunteers must complete an Eagle Mount Bozeman volunteer orientation prior to engaging in programming or interacting with participants.
8. All volunteers must complete program specific training prior to delivering programming.

Criminal Background Check Disclosure

Covered Individuals are required to disclose their criminal history to engage with Eagle Mount Bozeman. Failing to disclose or intentionally misrepresent criminal history or any other information provided during the screening process is grounds for termination or removal from Eagle Mount Bozeman activity, regardless of when the offense is discovered. Furthermore:

1. If an applicant is arrested, indicted, charged, has pending charges, pleads guilty or no contest, or is convicted of a crime during the screening process, the applicant is required to disclose such information immediately.
2. Individuals serving in covered roles who are arrested, indicted, charged, has pending charges, pleads guilty or no contest, or is convicted after the completion of the screening process, must disclose such information immediately to their supervisor.
3. Any applicant who has been banned by another sport organization, including, without limitation, the U.S. Center for SafeSport or a national governing body, is temporarily or permanently ineligible, must self-disclose this information. Failure to disclose is a basis for disqualification of applicants and/or other penalty or restriction.

Criminal Background Check Policies & Procedures

Background Check Process: All Covered Individuals, as defined above, are required to undergo a criminal background check that complies with the Fair Credit Reporting Act before providing services for

Eagle Mount. Through this criminal background check, Eagle Mount will utilize reasonable efforts to ascertain past criminal history of an applicant.

The Criminal Background Check Consent and Waiver Release form must be submitted, and the applicant cleared by the third-party provider before they may perform services for Eagle Mount Bozeman and/or have contact with Eagle Mount participants.

Findings: Notice of criminal background check findings will be provided to the designated staff contact at Eagle Mount that administers applications. Eagle Mount's criminal background check report will return a "red light" or "green light" score.

Green light & Red light Scores: A **green light** score means that the background check vendor located no records that would disqualify the applicant. A **red light** finding means the criminal background check revealed criminal records that indicate the applicant "does not meet the criteria" and is not suitable for organization employment, volunteer assignment, or other participation with Eagle Mount.

Red lights are any disposition or resolution of a criminal proceeding, other than an adjudication of not guilty, including, but not limited to an adjudication of guilt or admission to a criminal violation, a plea to the charge or a lesser included offense, a plea of no contest, any plea analogous to an Alford¹ or Kennedy² plea, the disposition of the proceeding through a diversionary program, deferred adjudication, deferred prosecution, disposition of supervision, conditional dismissal, juvenile delinquency adjudication, or similar arrangement, or any pending criminal charge(s) or warrant(s) for arrest, for the following crimes:

Automatic red lights (automatic disqualification)

Any felony involving:

1. Violence against a person
2. Violent crimes involving weapons (including armed robbery and aggravated assault with a weapon)
3. Animal abuse or animal neglect

Any felony or misdemeanor involving:

1. All sexual crimes
2. Drug use or possession (including the use of drug paraphernalia), within the previous three years
3. Other drug related crimes including drug distribution, intent to distribute, manufacturing, trafficking, or sale within the previous seven years
4. Child endangerment, neglect or abuse
5. Neglect or abuse of an elderly or disabled individual

Potential red lights (potential disqualification)

¹ Alford plea: A guilty plea entered by a criminal defendant who does not admit guilt but nevertheless pleads guilty as part of a plea bargain.

² Kennedy plea: A plea in criminal court in which the defendant does not admit guilt, but concedes that the state has sufficient evidence to obtain a conviction.

When assessing whether conduct constitutes a red light, Eagle Mount may rely upon the original charges, amended charges, and those to which a plea was entered.

1. Other felonies not included in automatic red lights, above.
2. Crimes involving vehicular bodily harm
3. Other misdemeanors for:
 - a. Drug-related crimes not covered in automatic red lights, above
 - b. Violence against a person (including crimes involving firearms)
 - c. Prostitution, indecent exposure, or public indecency
 - d. Stalking or harassment
 - e. Destruction of property, including arson, vandalism, and criminal mischief
 - f. Animal abuse or neglect

Other potentially disqualifying factors

1. Even if an individual passes a criminal background check, other factors may disqualify the individual, including:
 - a. Been held liable for civil penalties or damages involving sexual or physical abuse or misconduct
 - b. Been subject to any court order involving any sexual or physical abuse or misconduct, including, but not limited to, a domestic order or protection
 - c. A history with another organization (employment, volunteer, etc.) of complaints of sexual or physical abuse or misconduct
 - d. Resigned, been terminated or been asked to resign from a position – paid or unpaid – due to complaint(s) of sexual or physical abuse or misconduct
 - e. A history of other behavior that indicates they may be a danger to participants, or
 - f. Not met the job requirements

Disqualification

Individuals disqualified based on the results of their criminal background check are excluded from participation in any Eagle Mount sanctioned events and/or activities, and any offer of employment or participation with Eagle Mount may be rescinded. If the individual is currently participating with Eagle Mount, that individual may be, among other things, terminated, suspended, or banned from participation.

Appeal to Criminal Background Check

Eagle Mount is required by the policy to accept the findings of the approved criminal background check vendor. Any disqualified individual has the right to dispute the accuracy of the findings of the criminal background check directly with the organization's approved vendor. A disqualified individual may not appeal the disqualification or the results of the findings of the criminal background check vendor to Eagle Mount directly.

Frequency of Criminal Background Checks

Criminal background checks will be refreshed every year, or as otherwise required by law, for Covered Individuals who are 18 years of age or older and perform services for Eagle Mount.

Confidentiality

Consistent with Eagle Mount's value of honoring and respecting every individual, it is imperative that all employees, volunteers, and participants handle all sensitive information, both verbal and written, including medical histories and diagnoses, with the greatest possible security and confidentiality.

Such information shall be kept confidential and shall not be disclosed, used, copied, or removed from Eagle Mount staff oversight. This obligation to maintain the confidentiality applies both during and after your employment/service with Eagle Mount.

Substance Abuse & Use

Eagle Mount is committed to providing a safe and productive workplace for its staff, volunteers, participants, and guests. In keeping with this commitment, the following rules regarding alcohol and drugs of abuse have been established for all staff members, regardless of rank or position, including both regular and seasonal employees. The rules apply during working hours to all employees while they are on company premises or elsewhere on company business. Employees who violate these policies are subject to disciplinary action, up to termination. Employees who believe these policies are being violated should report it to the Executive Director immediately.

1. The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse is strictly prohibited.
2. Using, selling, purchasing, transferring, manufacturing, or storing an illegal drug or drug paraphernalia, or attempting to or assisting another to do so, while in the course of employment.
3. Tobacco use is prohibited at any workstation or around participants or volunteers.
4. Smoking is not allowed in any building or near any public entrance and may take place only in designated smoking areas.
5. Tobacco may not be used in any Eagle Mount vehicle.
6. Employees and volunteers are never to consume alcohol when in the presence or in a position of responsibility for program participants.
7. Occasionally, during certain activities or fundraisers, alcohol may be served. In these circumstances, employees are expected to conduct themselves in a manner that does not endanger themselves, others, or the reputation of Eagle Mount. Failure to observe the requirements of this policy may result in disciplinary action, up to termination.

SECTION THREE: PARTICIPANT PROTECTION POLICIES

Prohibited Conduct

Eagle Mount is committed to creating a safe and positive environment for participant's physical, emotional, and social development, and to ensuring that it promotes an environment free of misconduct. Eagle Mount recognizes that the process for coaching participants will vary, but it is nevertheless important for everyone involved in sport to support the use of motivational and training methods that avoid misconduct. The privilege of engaging with Eagle Mount may be limited, conditioned, suspended, terminated, or denied if a Covered Individual's conduct is or was inconsistent the Sport Protection Policies.

It is a violation for a covered individual to engage in or tolerate: (1) Prohibited Conduct, as outlined in this Policy; (2) any conduct that would violate any current or previous U.S. Center for SafeSport (the "Center"), Eagle Mount, or member organization standards analogous to Prohibited Conduct that existed at the time of the alleged conduct; or (3) any conduct that would violate community standards analogous to Prohibited Conduct that existed at the time of the alleged conduct, including then applicable criminal and/or civil laws.

This Participant Protection Policy applies to all Covered Individuals associated with Eagle Mount as discussed below.

Prohibited Conduct includes:

Aiding and Abetting: Aiding and Abetting is any act taken with the purpose of facilitating, promoting, or encouraging the commission of Prohibited Conduct by a covered individual. Aiding and Abetting also includes, without limitation, knowingly allowing any person who has been identified as suspended or otherwise ineligible by Eagle Mount to be in any way associated with or employed by an organization affiliated with or holding itself out as affiliated with Eagle Mount;

Bullying Behavior: Making threats, spreading rumors, attacking someone physically or verbally, and/or excluding someone from a group on purpose. These include:

1. Ridiculing, taunting, name-calling or intimidating or threatening to cause someone harm.
2. Social, including cyberbullying

Child Abuse:

"Any recent act or failure to act on the part of a parent or caretaker which results in death, serious physical or emotional harm, sexual abuse or exploitation"; or

"An act or failure to act which presents an imminent risk of serious harm."

This definition of child abuse and neglect refers to parents and other caregivers. A "child" under this definition means a person who is younger than age 18 or who is not an emancipated minor.

It is a violation of this policy to engage in Child Abuse.

Criminal Charges or Dispositions

Emotional Misconduct: A pattern of deliberate, non-contact behavior that has the potential to cause emotional or psychological harm to an athlete. Non-contact behavior includes verbal and physical acts, as well as actions that deny attention or support. These include:

1. Verbal Acts
2. Physical Acts
3. Acts that Deny Attention or Support
4. Criminal Conduct
5. Stalking
6. Exclusion

Harassment: Repeated and/or severe conduct that (a) causes fear, humiliation or annoyance, (b) offends or degrades, (c) creates a hostile environment (as defined above), or (d) reflects discriminatory bias in an attempt to establish dominance, superiority or power over an individual or group based on age, race, ethnicity, culture, religion, national origin, or mental or physical disability; or (e) any act or conduct described as harassment under federal or state law. Whether conduct is harassing depends on

the totality of the circumstances, including the nature, frequency, intensity, location, context, and duration of the behavior. Conduct may not rise to the level of Harassment if it is merely rude (inadvertently saying or doing something hurtful), mean (purposefully saying or doing something hurtful, but not as part of a pattern of behavior), or arising from conflict or struggle between persons who perceive they have incompatible views and/or positions. Harassment does not include professionally accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline, or improved Participant performance.

Hazing: Any activity that is condition upon recruitment, admission, affiliation, or continued participation in a group that humiliates, degrades, abuses, or endangers someone, regardless of consent or a person's willingness to participate. These include:

1. Contact and Non-contact acts
2. Sexualized acts
3. Criminal acts
4. Exclusion

Misconduct Related to Reporting

1. Failure to Report
2. Intentionally Filing a False Allegation
3. Retaliation

Physical Misconduct: Any behavior done on purpose that causes (or could reasonably cause) physical harm to another person. These include:

1. Contact and Non-contact acts
2. Non-contact violations
3. Criminal Conduct
4. Exclusion

Sexual Misconduct: Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. These include:

1. Sexual or Gender-related Harassment
2. Non-consensual Sexual Contact (or attempts to commit the same)
3. Non-consensual Sexual Intercourse (or attempts to commit the same)
4. Sexual Exploitation
5. Bullying or hazing, or other inappropriate conduct of a sexual nature.

Violations: Violations of the Sport Protection Policy shall be reported pursuant Eagle Mount's Reporting Policy and will be addressed under its Disciplinary Rules and Procedure.

Other Inappropriate Conduct

1. Intimate Relationship
2. Exposing a Minor to Imagery
3. Intentional Exposure of Private Areas
4. Inappropriate Physical Contact

Safe Sport Policy & Training

Eagle Mount requires mandatory reporting of abuse, misconduct and violations of the Code of Conduct

and Safe Sport Policy by Covered Individuals. Reports should be made as soon as possible to the immediate supervisor and/or Executive Director.

To facilitate reporting, Covered Individuals should have a basic understanding of sexual abuse, as well as “grooming,” the most common strategy offenders use to seduce their victims. Using a combination of attention, affection and gifts, offenders select a victim, win the victim’s trust (and the trust of the victim’s parent or guardian), manipulate the victim into sexual activity, and keep the victim from disclosing abuse.

Accordingly, all Eagle Mount employees shall complete awareness training concerning misconduct in sport before performing services for Eagle Mount. The training is provided through the Center on SafeSport.

Covered Individuals must successfully complete the training and quiz after the test in order to be eligible to participate with Eagle Mount. Covered Individuals are required to take awareness training, or a refresher course, as applicable, every year.

Eagle Mount has partnered with the Center on SafeSport to provide training through safesporttrained.org.

Abuse Prevention Policies

Supervision of Participants: Eagle Mount strives to create two-deep leadership and minimize one-on-one interactions to create a safe environment and to protect participants. Two-deep leadership means a minimum of two adult Covered Individuals, or one Covered Individual and the parent/guardian of the relevant participant, are present when working with a participant. Covered Individuals are required to abide by these Participant Abuse Prevention Policies at all Eagle Mount controlled activities and events, and facilities under Eagle Mount’s control.

Appropriate One-on-One Interactions: One-on-one interactions between a minor/ward participant and a Covered Individual (who is not the participant’s parent or guardian) are permitted only if they occur at an observable and interruptible distance by another adult, as described in “Individual Care or Support Session,” or in emergency circumstances.

Monitoring: When one-on-one interactions between Covered Individuals and minor/ward participants occur at Eagle Mount events, other Covered Individuals will monitor these interactions. Monitoring includes: knowing that the one-on-one interaction is occurring, the approximate planned duration of the interaction, and randomly dropping in on the one-on-one.

Out-of-program contacts: Covered Individuals are prohibited from interacting one-on-one with unrelated minor/ward participants in settings outside of the Eagle Mount programs that are not observable and interruptible (including, but not limited to, one’s home and individual transportation), unless parent/legal guardian consent is provided for each out-of-program contact. **Nonetheless, such arrangements are strongly discouraged.**

Individual Meetings: An individual meeting may be necessary to address a participant’s concerns, training program or schedule. Under these circumstances, Covered Individuals are to observe the following guidelines.

1. Any individual meeting should occur when others are present and where interactions are at an observable and interruptible distance by another adult.
2. Where possible, an individual meeting should take place in a publicly visible and open area, such as the corner of a field of play or preparation area.
3. If an individual meeting is to take place in an office, the door should remain unlocked and open, and any windows must be uncovered.

Individual Training Sessions: An individual training session(s) with a minor/ward participant may also be desired or necessary. Under these circumstances, written permission of a minor/ward participant's parent or guardian is required in advance of the individual training session(s), and Eagle Mount encourages parents and guardians to attend the training session. Individual training sessions should be observable and interruptible by another adult at all times.

Individual Care or Support Sessions: Participants with disabilities may require additional care or support sessions that should be administered in a private setting. Written permission of the participant, or a ward participant's parent or guardian, if applicable, is required in advance of such individual care or support session(s), and sessions must be conducted in compliance with all applicable Eagle Mount policies or protocols. Individuals providing such care must have any required license(s) and must notify, if at all possible, a Covered Individual on location before any individual care or support session takes place. Such individual care or support sessions may include:

1. Toileting
2. Diapering
3. Assistance in changing between clothing and sports equipment

Prohibited One-on-One Interactions: Except as set forth above, minor/ward participants will not be left unattended or unsupervised during Eagle Mount activities, including being left alone during practice time, and Covered Individuals are prohibited from being alone with an individual minor/ward participant or participant in any room or building.

Violations: Violations of this policy must be reported to Eagle Mount pursuant to its Reporting Policy. Violations will be addressed under the Disciplinary Rules and Procedure and may result in the sanctions as set forth therein, including temporary or permanent suspension. Some violations may constitute physical or sexual abuse that must be reported to appropriate law enforcement authorities.

Physical Contact with Participants

Appropriate physical contact is a productive and inevitable part of sport. Participants are more likely to acquire advanced physical skills and enjoy their sport participation through appropriate physical contact. Especially in adaptive sports, participants may require physical assistance with equipment and movement. However, guidelines for appropriate physical contact reduce the potential for misconduct in sport.

Appropriate Physical Contact: Eagle Mount adheres to the following principles and guidelines in regards to physical contact with our participants.

Common Criteria for Appropriate Physical Contact: Physical contact with participants – for safety, consolation and celebration – has multiple criteria in common which make them both safe and appropriate. These include:

1. the physical contact takes place in public
2. there is no potential for, or actual, physical or sexual intimacies during the physical contact
3. participant receives verbal notice of the contact about to take place
4. the physical contact is for the benefit of the participant, not to meet an emotional or other need of an adult

Safety: The safety of our participants is paramount, and in many instances, we make the program space safer through appropriate physical contact. Examples include:

1. spotting a participant so that they will not be injured by a fall or piece of equipment
2. positioning a participant's body so that they more quickly acquire a skill, get a better sense of where their body is in space, or improve their balance and coordination (with consent)
3. in emergencies, making participants aware that they might be in harm's way because of others around them or because of equipment in use

Celebration: Sports are physical, and we recognize participants often express their joy of participation, competition, achievement and victory through physical acts. Appropriate public expressions of celebration include:

1. greeting gestures such as high-fives and fist bumps
2. congratulatory gestures such as celebratory side hugs, "jump-arounds" and pats on the back for any form of athletic or personal accomplishment

Consolation: It may be appropriate to console an emotionally distressed participant. Appropriate consolation includes publicly putting an arm around a participant while verbally engaging them to calm them down.

Prohibited Physical Contact: Prohibited forms of physical contact, which shall be reported immediately under our Reporting Policy include, without limitation:

1. massages or rubdowns
2. asking or having a participant sit in the lap of a Covered Individual
3. lingering/repeated embraces of participants that go beyond the criteria for acceptable physical contact
4. slapping, hitting, punching, kicking or any other physical contact meant to discipline, punish or achieve compliance from a participant.
5. "cuddling" or maintaining prolonged physical contact during any aspect of training
6. playful, yet inappropriate contact (e.g., tickling or "horseplay" wrestling)
7. continued physical contact that makes a participant obviously uncomfortable-expressed or not
8. any contact that is contrary to a previously expressed personal desire for decreased or no physical contact, where such decreased contact is feasible in a competitive training environment.
9. physical conduct in violation of the Sport Protection Policy.

Violations: Violations of this policy must be reported to Eagle Mount pursuant to its Reporting Policy. Violations will be addressed under the Disciplinary Rules and Procedure and may result in the sanctions as set forth therein, including temporary or permanent suspension. Some violations may constitute physical or sexual abuse that must be reported to appropriate law enforcement authorities.

Electronic Communications & Social Media Policy

As part of Eagle Mount's emphasis on participant safety, all electronic communications between a Covered Individual and participant must be professional in nature and for the purpose of communicating information about program activities. The concept of two-deep leadership extends into cyber space. There should be no one-one-one online or digital activities between a Covered Individual and a minor/ward participant.

Electronic communication with a minor/ward participant must copy the parent or guardian. If a minor/ward participant communicates to the Covered Individual privately first, said Covered Individual should copy the participant's parent or guardian on the response.

Social Media Platforms: Covered Individuals may not "friend" or "follow" Eagle Mount participants through the Covered Individual's personal social media page(s) or account(s). Participants may friend the official Eagle Mount page. Covered Individuals with authority over minor participants are not permitted to maintain private social media connections with unrelated minor participants and such Covered Individuals are not permitted to accept new personal page requests on social media platforms from participants who are minors, unless the Covered Individual has a fan page, or the contact is deemed as celebrity contact vs. regular contact. Existing social media connections on personal pages with minor participants shall be discontinued.

Instant Messaging: Covered Individuals and Participants may not "follow" each other. Covered Individuals cannot "re-tweet" participant message posts without permission of the participant, or in the case of minors or wards, their parent or guardian. Covered Individuals should use best judgment and professionalism in the content of their public media posting.

Electronic Communications: Covered Individuals and Participants may use email or texting to communicate. All email content between coach and participant must be professional in nature and for the purpose of communicating information about program activities. Parents or guardians must be copied on communications from a Covered Individual to a minor/ward participant. Where the Covered Individual is a staff member, emails to any participant should come from the Eagle Mount email service. Communications to an entire team need not be copied to all parents or guardians but must at a minimum be copied to another Covered Individual.

Locker Rooms & Changing Areas

The following guidelines are designed to maintain personal privacy, as well as to reduce the risk of misconduct in locker rooms and changing areas.

Facilities: Eagle Mount hosts camps and programs for participants at third party locations throughout the year and for various sports activities. These locations may have a changing area, locker room, or bathroom that is shared with the general public. As such, there are likely to be people who are not associated with Eagle Mount at these locations. **Covered Individuals are nevertheless required to abide by the Participant Abuse Prevention Policies at such locations.**

Monitoring: While Eagle Mount does not generally post staff members inside or at the doors of the locker rooms and changing areas, staff members do make occasional sweeps of these areas. Staff members conduct these sweeps, with women checking on female-designated areas and men checking on male-designated areas.

Staff and volunteers make every effort to recognize when a participant goes to the locker room or changing area and, if they do not return in a timely fashion, will check on the participant's whereabouts. Eagle Mount discourages parents from entering locker rooms and changing areas unless it is truly necessary. In those instances, it should only be a same-sex parent. If this is necessary, parents should let an Eagle Mount staff or volunteer person on site know about this in advance.

Mixed Gender Teams: Eagle Mount programming consists of participants of different genders. Privacy rights must be given consideration and appropriate arrangements made. Where possible, Eagle Mount has male and female participants dress/undress in separate locker rooms and then convene in a single meeting space before the training session or team meeting. Once the event is finished, the participants may come to one meeting room and then the male and female participants proceed to their separate dressing rooms to undress and shower (separately), if available. If separate locker rooms are not available, then the participants will take turns using the locker room to change. If Eagle Mount is using a facility that only has a single locker room or changing area, we will designate separate times for use by Covered Individuals, if any.

Use of Cell Phones & Other Recording Devices: Cell phones and other mobile devices with recording capabilities, including voice recording, still cameras and video cameras increase the risk for different forms of misconduct in locker rooms and changing areas. As a result, **THERE WILL BE NO USE OF A DEVICE'S RECORDING CAPABILITIES IN THE LOCKER ROOMS OR CHANGING AREAS.** Such devices should be left outside of the locker room in a secure area, vehicle or checked with a coach or adult volunteer.

One-on-One Interactions: Except for participants on the same team, at no time are unrelated Covered Individuals permitted to be alone with a minor/ward participant in a locker room or changing, except under emergency circumstances.

Undress: Under no circumstances shall an unrelated Covered Individual intentionally expose his or her breasts, buttocks, groin, or genitals to a participant.

Violations: Violations of this policy must be reported to Eagle Mount pursuant to its Reporting Policy. Violations will be addressed under the Disciplinary Rules and Procedure and may result in the sanctions as set forth therein, including temporary or permanent suspension. **Some violations may constitute physical or sexual abuse that must be reported to appropriate law enforcement authorities.**

Travel & Lodging

Eagle Mount Bozeman has established policies to guide our travel, minimize one-on-one interactions, and reduce the risk of misconduct. Adherence to these travel guidelines will increase participant safety and improve the program experience while keeping travel a fun and enjoyable experience.

Local & Group Travel: Eagle Mount distinguishes between travel for day programs ("day travel"), and group travel involving a coordinated overnight stay ("overnight travel").

Day Travel: Local travel occurs when Eagle Mount does not sponsor, coordinate, or arrange for travel. For local travel, participants, or their parents/guardians (for minor participants) are responsible for making all travel arrangements. In these instances, it is the responsibility of the participant or their parents/guardians (for minor/ward participants) to ensure the person transporting the participant

maintains all safety and legal requirements, including, but not limited to, a valid driver's license, proper insurance, well maintained vehicle, and compliance with all state laws.

To minimize one-on-one interactions, Covered Individuals, who are not also acting as a parent or guardian, may not drive alone with an unrelated minor/ward participant and should only drive with at least two other minor/ward participants or another adult at all times, unless otherwise agreed to in writing by the minor/ward participant's parent or guardian in advance of travel. In any case where a Covered Individual is involved in the minor/ward participant's local travel, a parental release is required in advance. Efforts must be made to ensure that Covered Individuals are not alone with a minor/ward participant or minor/ward participant, by, e.g., picking the participants up in groups.

Covered Individuals who also are a participant's parent or guardian may provide transportation for their own participant without restriction but must still comply with the requirements above with respect to all other participants. We encourage parents and guardians to pick up their participant first and drop off their participant last in any shared or carpool travel arrangement. We also recommend completing a shared travel declaration form signed by the parents/guardians of any minor/ward participant who is being transported as part of such a carpool arrangement.

Group Travel: Group travel is travel that occurs when Eagle Mount sponsors, coordinates or arranges for travel so that its participants can engage in programming. No Covered Individual will engage in program travel without the proper safety requirements in place, including valid drivers' licenses, proper insurance, well-maintained vehicles and compliance with all state laws. All Eagle Mount driving policies apply to group travel.

Eagle Mount makes efforts to provide adequate supervision through staff and volunteers with minor/ward participants. Eagle Mount policy dictates a maximum ratio of nine minor/ward participants to one staff member on trips and away camps.

Travel Notification: Eagle Mount will provide reasonable advance notice of details before group travel. Notice will include the dates, location, and duration of programming. Travel notice also will include lodging information for overnight stays, as well as a contact person within Eagle Mount. For minors and wards, this individual will be the point of contact to confirm your intention to travel and to help with travel details.

For minor/ward participants, Eagle Mount will distribute specific travel itineraries when they become available. These will include a more detailed, hour-by-hour itinerary, as well as contact information for group travel chaperones.

Lodging: Eagle Mount programs are often made up of male and female participants across various ages. Participants will only share a room/tent with other participants of the same sex and age group. Participants will be grouped by age and sex for the purposes of assigning an appropriate chaperone. Eagle Mount will make every effort to provide these groups at least one Covered Individual chaperone of the same sex.

Violations: Violations of this policy must be reported to Eagle Mount pursuant to its Reporting Policy. Violations will be addressed under the Disciplinary Rules and Procedure and may result in the sanctions as set forth therein, including temporary or permanent suspension. **Some violations may constitute physical or sexual abuse that must be reported to appropriate law enforcement authorities.**

Abuse Reporting Policies

Note: Nothing in this policy shall be construed to require a victim of child abuse or other misconduct to self-report. No one should investigate suspicions or allegations of child abuse or other Prohibited Conduct, or attempt to evaluate the credibility or validity of allegations as a condition of reporting to Eagle Mount or to appropriate authorities.

Child Abuse: Although Covered Individuals are not mandatory reporters by Montana law³, any who learn of information and reasonably suspect that a child has suffered an incident of child abuse, including sexual abuse, shall immediately make a report of the suspected abuse to *both* Law Enforcement and Eagle Mount.

Sexual Misconduct: Eagle Mount encourages *anyone* who experiences or becomes aware of an incident of Sexual Misconduct involving a participant to immediately report the incident to Eagle Mount Bozeman and/or to law enforcement if the matter involves possible criminal conduct. Covered Individuals shall promptly report possible Sexual Misconduct directly to Eagle Mount Bozeman whenever they become aware of conduct that could constitute Sexual Misconduct.

Emotional and Physical Misconduct: Covered Individuals are required to report to Eagle Mount emotional and physical misconduct (including bullying, stalking, hazing, and harassment) prohibited under the Safe Sport policy, and violations of other proactive policies.

Other Misconduct and Abuse of Disabled Individuals: Covered Individuals are required to report to Eagle Mount other Prohibited Conduct or policy violations.

Anonymous Reports: Reports may be made anonymously to Eagle Mount. Anonymity means Eagle Mount will not know the personally identifying information of the reporter. It does not mean that the underlying information will be protected. An anonymous report may limit Eagle Mount's ability to investigate and respond to a report, and it may not be possible for Eagle Mount to verify that mandatory reporting obligations have been satisfied. *Consequently, Eagle Mount strongly encourages Covered Individuals to provide their name and contact information when reporting.*

Confidentiality for Third-Party Reporters: Unless necessary to Eagle Mount's investigation or resolution of a matter, Eagle Mount does not disclose a Third-Party Reporter's personally identifying information.

Reporting Options for Claimants: A Claimant may choose to make a report to Eagle Mount to pursue resolution under these procedures and may also choose to make a report to law enforcement and/or pursue available civil or administrative remedies. A Claimant may pursue one, some, or all of these options at the same time. A Claimant who wishes to pursue criminal action in addition to, or instead of, making a report under these procedures should contact law enforcement and/or legal counsel directly.

Claimant's Request for Anonymity: A Claimant may request that personally-identifying information not be shared with a Respondent. Eagle Mount will seek to honor the Claimant's request(s) if it is possible to do so while also protecting the health and safety of the Claimant and the sporting community.

If the Claimant's request for anonymity can be honored

³ Mandatory Reporting of Child Abuse and Neglect - Montana
<https://www.childwelfare.gov/resources/mandatory-reporting-child-abuse-and-neglect-montana/>

If Eagle Mount determines a Claimant's request that personally-identifying information not be shared with Respondent can be honored, Eagle Mount may take other appropriate steps designed to eliminate the reported conduct, prevent its recurrence, and remedy its effect on the Claimant and community. Those steps may include offering appropriate remedial measures to the Claimant, providing targeted training or prevention programs, and/or providing or imposing other remedies tailored to the circumstances as a form of alternative resolution.

If the Claimant's request for anonymity cannot be honored

If Eagle Mount determines it cannot honor a Claimant's request(s) that personally-identifying information not be shared with the Respondent, that no investigation be pursued, and/or that no disciplinary action be taken, Eagle Mount may direct appropriate actions, which may include, without limitation: (i) imposing a no contact directive or other temporary measure; (ii) initiating an investigation; and (iii) arranging, imposing, or extending any other appropriate remedial and/or protective measures.

In such cases, Eagle Mount will make reasonable efforts to protect the privacy of the Claimant. However, actions that may be required as part of any investigation will involve speaking with the Respondent and others who may have relevant information, in which case the Claimant's identity may have to be disclosed. In such cases, Eagle Mount will notify the Claimant that Eagle Mount intends to proceed with an investigation, but the Claimant is not required to participate in the investigation or in any other actions taken by Eagle Mount.

Privacy: Eagle Mount is committed to protecting the privacy of all individuals involved in the investigation and resolution of reported allegations. With respect to any report under these procedures, Eagle Mount, in its discretion, will make reasonable efforts to protect the privacy of individuals involved in Eagle Mount's process, while balancing the need to gather information to assess a report and to take steps to eliminate Prohibited Conduct. Information will be shared as necessary with Eagle Mount staff and counsel, witnesses, and the parties. It may also be necessary for Eagle Mount to notify law enforcement of an allegation of misconduct.

Parental/Guardian Notification

Eagle Mount reserves the right to notify guardians of Claimants regarding any health or safety risk.

How Reports are Handled: Eagle Mount will report all suspicions or allegations of child physical or sexual abuse to appropriate law enforcement authorities. Eagle Mount will also report abuse of disabled persons to law enforcement as required by law or on its own initiative. Eagle Mount will not attempt to evaluate the credibility or validity of the allegations as a condition for reporting to appropriate law enforcement authorities. As necessary, however, Eagle Mount may ask a few clarifying questions of the person making the report to adequately report the suspicion or allegation to law enforcement authorities.

Immediate Suspension or Termination: When an allegation of physical or sexual abuse, or other misconduct, is made, Eagle Mount may immediately remove that individual from contact with Eagle Mount participants until the allegation has been investigated by an official law enforcement agency, Eagle Mount makes further inquiry, or otherwise.

Notification: Following Eagle Mount's notice of a credible allegation of misconduct, Eagle Mount may consider the circumstances in which it will notify parents or guardians of participants with whom the accused individual may have had contact. It is in Eagle Mount's discretion, as appropriate, to notify its

staff members, contractors, volunteers, parents, and/or participants of any allegation of child physical or sexual abuse or other criminal behavior or misconduct that (1) law enforcement authorities are actively investigating; or (2) Eagle Mount is investigating internally. Advising others of an allegation may lead to additional reports of child physical or sexual abuse and other misconduct.

Disciplinary Rules & Procedures

Receipt of Allegations: On receipt of an allegation of misconduct or other violation of the Safe Sport policy, Eagle Mount will determine in its discretion the appropriate steps to address the conduct based on several factors, including (i) the age of the Claimant, (ii) the age of the Respondent, and (iii) the nature, scope and extent of the allegations. In addition to reporting to law enforcement as required or as Eagle Mount may determine, possible responses include emergency suspension, further investigation, or other disciplinary action. Eagle Mount may undertake a formal investigation in its discretion and may investigate allegations of child physical or sexual abuse, or other misconduct, that have been reported to law enforcement if such investigation does not interfere with any ongoing criminal investigation or prosecution for the same. If the Respondent is a minor, Eagle Mount will contact his or her parents or guardians. Eagle Mount will address allegations against a staff member under its employment policies.

Emergency Suspensions: In certain cases, Eagle Mount may temporarily suspend the Respondent pending final resolution of the complaint to eliminate any potential danger to a participant or other individual. Such temporary suspension is not subject to contest or appeal. The determination to temporarily suspend an individual shall be made by the Eagle Mount Executive Director. An emergency suspension may prohibit the Respondent from participating in any capacity or in any role in the business, events or activities of Eagle Mount during the suspension or impose other appropriate restrictions.

Investigation: As appropriate, and at its discretion, Eagle Mount may institute a formal investigation of the allegations.

Disciplinary Action: In cases where Eagle Mount determines that an investigation is not necessary, or after investigation if applicable, the Executive Director shall determine the appropriate disciplinary action in each case, if any. Sanctions for violations of the Sport Protection Policy will be proportionate and reasonable under the circumstances. Eagle Mount may take the following disciplinary actions, without limitation:

1. Inform the Respondent's direct-line supervisor. in the case of a minor, the minor's parent or guardian
2. Provide the Respondent with guidance, redirection and instruction
3. Temporary suspension from participation
4. Issue a verbal warning
5. Issue a written warning
6. Implement a limited access agreement (e.g., limiting an individual's access to certain facilities)
7. Engage in restorative practices (i.e., creation of a respectful and safe dialogue when a misunderstanding or harm has occurred)
8. Suspend or terminating employment, membership, or participation
9. Eagle Mount Bozeman will notify a Respondent in writing of the Executive Director's decision.

Conclusion

This manual covers many aspects of safety and safety policy at Eagle Mount Bozeman. It cannot cover all possible safety-related scenarios. It is therefore incumbent on all Covered Individuals to hold ourselves and others accountable for maintaining the safest possible environment at Eagle Mount.