



UPHA Athlete Protection Policy

INTRODUCTION

The United Professional Horsemen's Association, Inc. (UPHA) is committed to improving the development, safety and welfare of athletes and participants involved in equestrian sport. The safety and welfare of all athletes and participants is paramount to the UPHA.

In 2025, the UPHA published the UPHA Athlete Protection Policy for the development, implementation and internal review of effective athlete welfare and misconduct prevention strategies for UPHA leadership and its members. This policy identifies types of prohibited conduct including child abuse, sexual abuse, emotional misconduct, physical misconduct, bullying, harassment, hazing and additional misconduct. All forms of misconduct are intolerable and in direct conflict with the UPHA Athlete Protection Policy.

All members are responsible for knowing the information contained in the policy. The policy can change and be updated annually following approval by the Board of Directors.

Protecting Youth Victims from Sexual Abuse and Safe Sport Act of 2017

The Protecting Youth Victims from Sexual Abuse and Safe Sport Act of 2017 was signed into law in February 2018. This Act includes the following requirements for all amateur sports organizations that are engaged in interstate or international commerce or activities.

Mandatory Reporting: All adult members interacting with youth athletes are mandatory reporters; however, it is not necessary to be a UPHA member to report an alleged violation. Any suspected child and sexual abuse must be reported within **24 hours** to the appropriate law enforcement agency. *Refer to the Reporting Procedure section for additional reporting details.*

Prevention Policies: Establish reasonable procedures to limit one-on-one interactions between a minor athlete and an adult. *Refer to Section IV, UPHA Safe Athlete Environment, for additional prevention policies.*

Prevention Training: Offer and provide consistent training to all adult members who are in regular contact with youth athletes. Visit the *UPHA website, www.uphaonline.com, for prevention training resources and information.*

Retaliation: Prohibit retaliation by the applicable organization against any individual who makes a report. Refer to the Reporting Procedure, Section V Confidentiality and Bad-Faith Allegations.

Athlete Protection Policy

I. COMMITMENT TO SAFETY

United Professional Horsemen's Association (UPHA) is committed to creating a safe and positive environment for athletes' physical, emotional, and social development and to ensuring that it promotes an environment free of misconduct. All UPHA members 18 years of age (or older) participating in UPHA-classes or affiliated events, including staff (paid or unpaid), UPHA Committee members, and UPHA Board members are required to be compliant with Federal and State laws regarding SafeSport training per s.534 Protecting Young Victims From Sexual Abuse and Safe Sport Authorization Act of 2017 (information on abuse prevention training can be found on our website here). This policy provides guidance and describes the behavioral standards to which all UPHA members and athletes will be held. Implementation of this policy is further defined below.

If any UPHA member, staff, board member, or volunteer observes inappropriate behaviors (i.e., policy violations), including suspected physical or sexual abuse or other misconduct, it is the personal responsibility of the UPHA member, board member, or volunteer to report the observation to the appropriate Law Enforcement Agency or to the UPHA President and/or Executive Director. It is the responsibility of the report recipient to convey the information to the UPHA Ethics Review Committee Chair or when applicable, the appropriate law enforcement authorities. UPHA will take appropriate action, including, when warranted, convening an Ethics Review Committee meeting to investigate the complaint or allegation. It is not the responsibility of the report recipient to investigate or determine the credibility or validity of the complaint or allegation.

UPHA recognizes that athlete training and motivation processes vary across trainers/instructors and athletes. However, UPHA expects all trainers/instructors and athletes to employ motivational and training methods that avoid misconduct or appearance thereof.

UPHA members, staff, board members, volunteers, athletes, and other participants shall refrain from all forms of misconduct and related activities that give the appearance of misconduct under the following categories:

- Emotional misconduct
- Physical misconduct
- Harassment
- Bullying (include cyber)
- Hazing
- Sexual misconduct, including child sex abuse

II. PROHIBITED CONDUCT

A. Emotional misconduct is defined as a pattern of deliberate, non-contact behavior with the potential to cause emotional or psychological harm to the athlete or any act described as emotional abuse or misconduct under federal or state law (e.g. child abuse, child neglect). Non-contact behaviors include verbal acts, physical acts, and acts that deny attention or support.

Emotional misconduct does not include professionally accepted coaching methods for skill enhancement, physical conditioning, team building, discipline or improving athletic performance. (examples of professionally accepted coaching methods can be found on the UPHA website)

Examples of *Emotional misconduct* prohibited by this Policy include the following:

- Verbal Acts—A pattern of verbal behaviors that personally attack an athlete (e.g., calling the athlete worthless, fat, or disgusting) or repeatedly and excessively yelling at a particular athlete or athletes in a manner that serves no productive training or motivational purpose.
- Physical Acts—A pattern of physically aggressive behaviors, including throwing equipment or water bottles, at or in the presence of participants; punching walls, equipment or other objects; and denial of athlete attention and support, including a pattern of ignoring an athlete for an extended period or routinely and arbitrarily excluding athletes from practice.

B. Physical misconduct is defined as contact or non-contact conduct that causes or reasonably threatens to cause physical harm to an athlete or other participant, or any act or conduct described as physical abuse or misconduct under federal or state law (e.g. child abuse, child neglect, assault). *Physical misconduct* does not include professionally accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline or improving athlete performance in the context of the competition of equestrian sport. (examples of professionally accepted coaching methods can be found on the UPHA website)

Examples of *physical misconduct* prohibited by this Policy include the following:

- Contact offenses—Behaviors that include punching, beating, biting, striking, choking, or slapping an athlete; intentionally hitting an athlete with objects or sporting equipment; encouraging or permitting an athlete to return to play pre-maturely following a serious injury (e.g., a concussion) and without the clearance of a medical professional; providing alcohol to a minor athlete; providing illegal drugs or non-prescribed medications to any athlete; and prescribing dieting or other weight-control methods (e.g., weigh-ins, caliper tests) without regard for the nutritional well-being and health of an athlete.
- Non-contact offenses—Behaviors that include isolating an athlete in a confined space (e.g., locking an athlete in a small space); forcing an athlete to assume a painful stance

or position for no athletic purpose (e.g. requiring an athlete to kneel on a harmful surface); and withholding, recommending against, or denying adequate hydration, nutrition, medical attention, or sleep.

C. Harassment is defined as a repeated pattern of physical and/or non-physical behaviors that are intended to cause fear, humiliation or annoyance, offend or degrade, create a hostile environment or reflect discriminatory bias in an attempt to establish dominance, superiority or power over an individual athlete or group based on gender, race, ethnicity, culture, religion, sexual orientation, gender expression, or mental or physical disability or any act or conduct described as harassment under federal or state law.

Examples of *harassment* prohibited by this Policy include the following:

- Physical offenses—Behaviors that include hitting, pushing, punching, beating, biting, striking, kicking, choking, or slapping an athlete or participant; and throwing at or hitting an athlete with objects, including sporting equipment.
- Non-physical offenses—Behaviors that include making or electronically distributing negative or disparaging comments about an athlete’s sexual orientation, gender expression, disability, religion, skin color, or ethnic traits; displaying or electronically posting offensive materials, gestures, or symbols; and withholding or reducing participation to an athlete based on his or her sexual orientation.

D. Bullying is defined as the intentional, persistent, and repeated pattern of committing or willfully tolerating physical and non-physical behaviors that are intended, or have the reasonable potential, to cause fear, humiliation, or physical harm in an attempt to socially exclude, diminish or isolate the targeted athlete(s), as a condition of membership or any act or conduct described as bullying under federal or state law. Bullying does not include group behaviors intended to establish normative behaviors or promote cohesion such as verbal admonition to encourage an athlete to train harder or push through a difficult training regimen.

Examples of *bullying* prohibited by this Policy include the following:

- Physical behaviors—Behaviors that include hitting, pushing, punching, beating, biting, striking, kicking, choking, or slapping an athlete; throwing at, or hitting an athlete with, objects such as sporting equipment; and willful tolerance of described behaviors by others within the sport.
- Verbal and emotional behaviors—Behaviors that include teasing, ridiculing, intimidating; spreading rumors or making false statements; use of electronic communications, social media, or other technology to harass, frighten, intimidate or humiliate (“cyber bullying”); and willful tolerance of described behaviors by others within the sport.

E. Hazing is defined as coercing, requiring, forcing, or willfully tolerating any humiliating, unwelcome, or dangerous activity that serves as a condition for joining a group or being socially accepted by a group's members or any act or conduct described as hazing under federal or state law. *Hazing* does not include group or sport activities that are intended to establish normative athlete behaviors or promote athlete cohesion.

Examples of *hazing* prohibited by this Policy include the following:

- Physical acts—Requiring or forcing consumption of alcohol or illegal drugs; physical restraint of an athlete through tying, taping or other means; sexual simulations or sexual acts of any nature; sleep deprivation; unnecessary schedule disruption or the withholding of water and/or food; social actions or public displays that are illegal or meant to draw ridicule; physical assault including beating or paddling; excessive training requirements focused on individuals within the team; and willful tolerance of any such acts by others on the team.

F. Sexual misconduct is defined as sexual assault, sexual harassment, sexual abuse, or any other sexual intimacies that exploit an athlete or any act or conduct described as sexual misconduct under federal or state law. Minors cannot consent to sexual activity with an adult, therefore all sexual interaction between a minor and an adult is prohibited.

G. Child sexual abuse is defined as any sexual activity with a child where consent is not or cannot be given or any act or conduct described as child sexual abuse under federal or state law. Included under child sexual abuse are any sexual contacts accomplished through deception, manipulation, force or threat of force, regardless of participant age, and all sexual interactions between adult and child, regardless of child understanding. Peer-to-peer child sexual abuse (i.e., sexual contact between minors) can also be abusive, depending on the existence of an aggressor, age difference between the children and/or any existence of an imbalance of power or intellectual capability.

Examples of *sexual and child sexual misconduct* prohibited under this Policy are as follows:

- Touching offenses—Behaviors that include fondling an athlete's breasts or buttocks; the exchange of reward in sport (e.g., team placement, scores, feedback) for sexual favors; genital contact; sexual relations; or intimacies between persons in a position of trust, authority and/or evaluative and supervisory control over athletes or other sport participants.
- Non-touching offenses—Behaviors include a coach discussing his or her sex life with an athlete; a coach inquiring about the sex life of an athlete; a coach request for or sending of nude or partial-dress images to an athlete; exposing an athlete(s) to pornographic material; sending athletes sexually explicit or suggestive electronic or written messages or photos (e.g. "sexting"); and deliberately exposing an athlete to sexual acts.

H. Peer-to-Peer Sexual Abuse

Approximately 1/3 of all child sexual abuse occurs at the hands of other children and the

obligation to report extends to peer-to-peer child sexual abuse. Whether or not a sexual interaction between children constitutes child sexual abuse turns on the existence of an aggressor, the age difference between the children, and/or whether there is an imbalance of power or intellectual capabilities.

Any concerns that an interaction between children may constitute sexual abuse should be reported to the appropriate law enforcement authorities.

I. Grooming

Because sexual abusers “groom” children for abuse – the process used by offenders to select a child, to win the child’s trust (and the trust of the child’s parent or guardian), to manipulate the child into sexual activity and to keep the child from disclosing abuse – it is possible that a UPHA member, staff member, board member, and/or volunteer may witness behavior intended to groom a child for sexual abuse. All questions or concerns related to inappropriate, suspicious, or suspected grooming behavior should be directed to the UPHA President &/or Executive Director.

III. AUTHORITY, TRUST AND IMBALANCE OF POWER

Due to the nature of the trainer/instructor-athlete relationship, the trainer/instructor maintains authority over the athlete and instills the athlete’s trust. An imbalance of power is always assumed between a trainer/instructor and an athlete.

Note: Bullying, harassment, and hazing, defined above, often involve some form of emotional misconduct.

A. Willfully Tolerating Misconduct

It is a violation of the UPHA Athlete Protection Policy if an UPHA member, staff, board member, or volunteer, knows of misconduct but takes no action to intervene on behalf of the athlete(s), participant(s), and/or volunteer.

B. Violations

Violations of the Athlete Protection Policy shall be reported pursuant to our Reporting Policy and will be addressed under our Disciplinary Rules and Procedure.

C. Other Potentially Disqualifying Factors

Individuals may be disqualified from roles within UPHA on account of any one of the following criteria:

- Ever held liable for civil penalties or damages on account of physical or sexual abuse of a minor
- Ever subject to any court order involving sexual or physical abuse of a minor or domestic order of protection
- Documented complaints of sexual or physical abuse of minors with another

organization (paid or volunteer), including termination or resignation (voluntary or involuntary) from positions due to such complaints

- Any history of other behavior that would violate the misconduct standards set forth in this Policy.

IV. UPHA SAFE ATHLETE ENVIRONMENT

Due to the nature of the practice and competition environments, trainer/instructor-athlete interactions are expected to occur in open spaces.

A. Appropriate One-On-One Interactions

When an individual meeting is deemed necessary to address an athlete's concerns, trainers/instructors, staff members, and/or volunteers are to observe the following guidelines:

- *Individual meetings should occur when others are present; in publicly visible and open areas; where interactions can be readily observed.*

B. Individual training sessions

In the event of an individual training session(s) with a minor athlete or participant, written permission from the minor athlete's parent or guardian must be provided to the trainer/instructor. UPHA encourages the presence of a parent or guardian at individual training sessions.

1. Prohibited One-On-One Interactions

Except as set forth above, minor athletes and participants will not be left unattended or unsupervised during UPHA classes or affiliated events and UPHA trainers/instructors, staff members, board members, and/or volunteers are prohibited from being alone with an individual athlete or participant in any room, or confined space.

2. Physical Contact with Athletes

UPHA recognizes appropriate physical contact between athletes and trainer/instructors, staff members, board members, or volunteers is a productive and inevitable part of the sport. Athletes are more likely to acquire advanced physical skills and enjoy their sport participation through appropriate physical contact. Accordingly, UPHA sets forth the following guidelines for appropriate physical contact to reduce the potential for misconduct in sport.

3. Appropriate physical contact, whether for celebration, consolation, or safety, has the following common criteria that make it both safe and appropriate:

- Contact takes place in public
- Contact includes no potential for or actual physical or sexual intimacies
- Contact is for the benefit of the athlete and not to meet the emotional need of the UPHA trainer/instructor

Examples of *appropriate physical contact* for safety include positioning an athlete's body for the purpose of skill development or the rendering of first aid. Examples of *appropriate*

physical contact for celebration and congratulations include greetings such as high-fives, fist bumps, brief hugs, or pats on the back for athletic or personal accomplishment. Examples of *appropriate physical contact* for consolation of an emotionally distressed athlete include public embrace of a crying athlete, side hug (arm around shoulder) while verbally engaging them in an effort to calm them down, or lifting or dusting off a fallen athlete in encouragement.

4. Prohibited physical contact, either through suggestion or action, is not acceptable and shall be reported immediately per the Reporting Policy.

Examples of *prohibited physical contact* include lingering or repeated embrace of an athlete beyond *appropriate physical contact*; slapping, hitting, punching, kicking, or other physical contact meant to discipline, punish, or achieve compliance from an athlete; “cuddling” or prolonged physical contact during any aspect of training or travel; playful yet inappropriate contact that is not part of training (e.g., tickling or “horseplay”); continued physical contact that makes an athlete obviously uncomfortable, whether expressed or not; or any contact contrary to a previously expressed desire for decreased or no physical contact where feasible in the training environment. With an age-appropriate exception of immediate family members, *prohibited physical contact* additionally includes asking/having an athlete sit on the lap of a trainer/instructor, staff member, board member, or volunteer.

V. ELECTRONIC COMMUNICATIONS AND SOCIAL MEDIA POLICY

In the interest of UPHA athlete safety, all electronic communications between a UPHA trainer/instructor, staff, board member, or volunteer and athlete(s) must be professional in nature and for the purpose of communicating information about equestrian athlete activities. Any communication between a trainer/instructor and minor athlete(s) via email, electronic text, or App messaging shall also copy the minor athlete’s parents or guardians.

A. Facebook, Blogs and Similar Sites

All UPHA posts, messages, text, or media of any kind must be professional in nature and for the purpose of communicating information about UPHA activities. UPHA members, staff, board members, and volunteers must use social media communication channels appropriately and be aware of the power of these sites have over the lives of athletes.

B. X, Instant Messaging and Similar Media

Trainers/Instructors and athletes may “follow” each other.

C. Texting And Similar Electronic Communications

Texting is allowed between trainers/instructors and athletes. All texts between trainers/instructors and athletes must be professional and for the purpose of communicating information about equestrian activities.

D. Electronic Imagery

UPHA and/or its members may capture through photography or videography images of UPHA activities and UPHA athletes. Any publication of images must be respectful and for the purposes of communicating about UPHA activities. Minor athletes may not be identified in publication without expressed, written (electronic) consent of a parent or guardian. Please refer to the UPHA member portal for an example of a consent waiver.

E. Request To Discontinue All Electronic Communications or Imagery

The parents or guardians of a minor athlete (or adult athlete) may request in writing that their child not appear in any form of electronic communication by trainers/instructors (photography or videography) or UPHA.

F. Misconduct

Social media and electronic communications can also be used to commit misconduct (e.g., emotional, sexual, bullying, harassment, and hazing). Such communications by UPHA members, staff, board members, volunteers, parents, or athletes will not be tolerated and are considered violations of our Athlete Protection Policy.

G. Violations

Violations of the UPHA Athlete Protection Policy with regard to electronic communications and social media should be reported to the UPHA President and/or Executive Director according to the Reporting Policy. Complaints and allegations will be addressed under UPHA Code of Ethics Rules and Procedures.

VI. CHANGING AREAS

UPHA holds changing areas as confined spaces, subject to concerns of misconduct between minors, minors and adults, adults being alone with individual minors, or nonofficial or non-related adults having unsupervised access to minor participants, or inappropriate behavior among adults. UPHA's Athlete Protection Policy prohibits any misconduct, including bullying, harassment, hazing, physical, emotional, and sexual in confined spaces, including changing areas. Furthermore, UPHA prohibits the use of any recording device, including voice, camera and video, in any changing area.

REPORTING PROCEDURE

I. WHEN TO REPORT

A. Reporting Physical or Sexual Abuse

UPHA Members or volunteers are required to report suspicions or allegations of physical or sexual abuse by a UPHA member to the appropriate law enforcement authorities.

Any concerns that interaction between minors may constitute sexual abuse should be reported to the appropriate law enforcement authorities.

Concerned citizens have a legal obligation to make a report to the appropriate law enforcement authorities or Child Protection Services when there is reason to believe that a child is dependent, abused, or neglected.

It is important to note that if a person appears to be in imminent danger or needs immediate protection, individuals should call 911 or the local police department immediately.

The UPHA does not investigate suspicions or allegations of physical or sexual abuse or attempt to evaluate the credibility or validity of such allegations as a condition for reporting to the appropriate law enforcement authorities. However, allegations of this nature will be sent to the Ethics Review Committee for consideration.

B. Reporting Misconduct and Policy Violations

If any person observes misconduct or other inappropriate behavior that is not reportable to the appropriate law enforcement authorities, it is the responsibility of each UPHA member and/or volunteer to report their observations to the UPHA President and/or Executive Director.

UPHA also encourages member parents, athletes, and other sport participants to communicate violations of the Athlete Protection Policy to the UPHA President &/or Executive Director. Where applicable, parents may also report to the appropriate law enforcement authorities.

If any person observes misconduct as defined in the UPHA's Athlete Protection Policy, that is not reportable to the appropriate law enforcement authorities, they must report their observations to the UPHA President and/or Executive Director.

Refer to the UPHA Athlete Protection Policy for prohibited conduct.

II. WHO IS RESPONSIBLE FOR MAKING A REPORT?

Every UPHA member, staff member, board member, and/or volunteer must report:

- (1) misconduct and policy violations as defined in UPHA's Athlete Protection Policy, and
- (2) suspicions or allegations of physical or sexual abuse.

III. HOW TO MAKE A REPORT

A. For Reports Regarding Physical or Sexual Abuse

Any person must report any suspicion or allegation of physical or sexual abuse to relevant local law enforcement authorities or child protection services.

It is essential that the following information be provided:

- The victim's and parent/guardian's name, and if victim is a minor, current location (including address if known)
- If there are concerns about the victim's immediate safety
- Any person believed to be responsible for the abuse and their relation to the victim
- The nature, extent, and occurrence of the abuse

An independent investigation can harm the victim and/or interfere with the legal investigative process. UPHA does not attempt to evaluate the credibility or validity of physical or sexual abuse with respect to the propriety (or requirement) of reporting to appropriate law enforcement authorities. Please refer to the state where the incident occurred.

For mandatory reporting laws in your state, visit www.childwelfare.gov.

B. For Reports Regarding Misconduct and Policy Violations

The UPHA President &/or Executive Director will take a report in the way that is most comfortable for the person initiating the report, including in-person, verbal, or in writing. Regardless of how you choose to report, it is helpful for individuals to provide (1) the name of the complainant(s); (2) the type of misconduct alleged; and the (3) name(s) of the individual(s) alleged to have committed the misconduct. If an in-person or verbal report is submitted, the reporting source will be requested to verify the information in writing prior to being submitted for review.

IV. REPORTING FORM

A. Individuals reporting misconduct and policy violations must complete an Incident Report Form. Information on this form will include:

- 1) *Reporting Source*-name and contact information, role/relationship to the victim
- 2) *Alleged Victim*-name, birthdate or approximate age (if a minor), contact information (if known), relationship of the alleged perpetrator to the alleged victim
- 3) *Alleged Perpetrator*-name of the individual alleged to have committed misconduct, contact information (if known).
- 4) *Other Individuals*-name(s) and contact information of any additional alleged victims or alleged perpetrators.
- 5) *Other Witnesses*-the names and contact information of other individuals who might have information regarding the alleged misconduct
- 6) *Incident Information*- a summary statement of the reasons they believe that misconduct has occurred including the approximate dates and location
- 7) *Safety Concerns*-Any immediate safety concerns for alleged victims named in the complaint

V. CONFIDENTIALITY AND BAD-FAITH ALLEGATIONS

A. Confidentiality

To the extent permitted by law, and as appropriate, UPHA will keep confidential the complainant's name, and not make public the names of potential victims, and the accused perpetrator. The complainant's name will be redacted when going forward to the UPHA Ethics Review Committee.

B. Bad-Faith Allegations

A report of abuse, misconduct, or policy violations that is malicious, frivolous, or made in bad faith is prohibited. Such reports will be considered a violation of the UPHA Athlete Protection Policy and grounds for disciplinary action. Depending on the nature of the allegation, a person making a malicious, frivolous, or bad-faith report may also be subject to civil or criminal proceedings.

C. "Whistleblower" Protection

Regardless of outcome, UPHA will support the complainant(s) and his or her right to express concerns in good faith. UPHA will not encourage, allow or tolerate attempts from any individual to retaliate, punish, allow, or tolerate attempts from any individual(s) to retaliate, punish, allow, or in any way harm any individual(s) who reports a concern in good faith. Such actions against a complainant will be considered a violation of the Athlete Protection Policy and grounds for disciplinary action.

VI. HOW REPORTS ARE HANDLED

A. Physical and Sexual Misconduct Violations

An independent investigation can harm and/or interfere with the legal investigative process. UPHA Members, staff members, board members, and/or volunteers do not attempt to evaluate the credibility or validity of physical or sexual abuse. Laws vary from state to state. Please refer to the state where the incident occurred. Please visit www.childwelfare.gov.

B. Misconduct and Policy Violations

The UPHA Ethics Review Committee addresses internally alleged policy violations and misconduct such as bullying, harassment, hazing, and emotional, physical and sexual misconduct that are not reportable to authorities under relevant state or federal law.

If any individual receives an allegation or observes misconduct or other inappropriate behavior, such as grooming, that is not reportable to the appropriate law enforcement authorities, it is the responsibility of the person to report their observations to the UPHA

President &/or Executive Director.

Upon receipt of a complaint, the UPHA President &/or Executive Director has 48 hours to report the complaint to the UPHA Ethics Review Committee chair, which may then convene the UPHA Ethics Review Committee, or the UPHA President &/or Executive Director may immediately report the complaint to the relevant law enforcement authorities if applicable.

VII. DISCIPLINARY RULES AND PROCEDURE

A. The UPHA Athlete Protection Policy holds all UPHA members, staff, board members, and volunteers responsible for creating and promoting a safe environment. This includes providing participants with support and guidance around appropriate conduct on a day-to-day basis. In the event that any UPHA member, staff, board member, or volunteer observes inappropriate behaviors (i.e., policy violations) among participants, including suspected physical, emotional or sexual abuse or other misconduct, it is the personal responsibility of the UPHA member, staff, board member, or volunteer to report the observation to the relevant law enforcement authorities or UPHA President &/or Executive Director. Upon receipt of a complaint, the UPHA President &/or Executive Director has 48 hours to report the complaint to the UPHA Ethics Review Committee Chair which will determine an appropriate course of action, including, if warranted, convening the Ethics Review Committee.