



UNIVERSITY OF RICHMOND

Policy Manual

Policy #:	SEC-2008	Policy Title:	Safety and Protection of Minors Policy
Effective:	03/29/2021	Responsible Office:	Public Safety – Risk Management
Date Approved:	03/29/2021	Approval:	Executive Vice President and Chief Operating Officer
Replaces Policy Dated:	N/A	Responsible University Official:	Director of Risk Management

PURPOSE:

The University welcomes minors to campus for a variety of specific reasons, including as prospective students, enrollees in a University sponsored program or camp, participants in third party programs in University facilities, and participants in other University programs appropriate for minors off campus.

This policy implements safeguards and describes the requirements for those in the University community who work with minors or programs involving minors. This policy brings awareness to the presence of minors on campus and prescribes minimum requirements for the screening, supervision, and training of individuals working with minors. Compliance with this policy serves to minimize those risks associated with activities involving minors for everyone.

SCOPE:

This policy applies to all programs and activities that involve non-enrolled minors and are sponsored by the University or conducted by other organizations on the UR campus. This includes, but is not exclusive to camps, clinics, workshops, conferences, research, and other educational activities.

Exceptions to this policy include:

- 1) University academic programs and regularly scheduled classes in which minor students are admitted and enrolled for academic credit, including courses for individuals accepted to the University (e.g. URISE, Bridge to Success).
- 2) Activities designed for prospective students (e.g. Richmond Previews, class auditing) or individuals accepted for University enrollment (e.g. Experience Richmond, ANSWER, Richmond Scholars Yield Event).
- 3) Campus visits, as defined in this policy.

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- 4) Instances where the minor is accompanied by a parent, guardian, or chaperone.
- 5) Events on campus that are open to the general public in which minors attend at the sole discretion of their parents or guardians (e.g., athletic events, artistic performances, and community events).
- 6) Short-term or one-time job shadowing activities not associated with an organized program*.

*Job shadowing activities should be conducted in an open and public environments or within sight and sound of other adults.

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POLICY STATEMENT:

SEC-2008.1 – Definitions

Abuse and Neglect

- Physical Abuse – Any non-accidental injury inflicted upon a minor, including endangerment of a minor.
- Sexual Abuse – Any conduct or contact of a sexual nature that occurs between a minor and another person, including endangerment of a minor.
- Emotional Abuse – Any behavioral, cognitive, mental or emotional injury to a minor that results in an observable and material impairment in the minor’s growth, development, or psychological functioning, including endangerment.
- Neglect – The failure to provide for a minor’s subsistence, education, medical treatment or other well-being needs, including failure to protect a minor from harm and failure to provide for a minor’s special care.
- Economic Exploitation – Deliberate misplacement, exploitation, or wrongful temporary or permanent use of a minor’s belongings or money without the consent of a parent or legal guardian.

Campus – All buildings, facilities, and properties that are owned, leased, or controlled by the University.

Campus Visit – An instance when a minor comes to campus for a temporary visit. Examples include participation in a prospective student tour, information session, or interview; visits with University faculty or staff regarding academic interests, including class visits; attendance as an audience member to an event open to the public; or as part of an organizational field trip with appropriate chaperone.

Direct Supervision – The monitoring by sight and sound of interactions with minors by a Tier I or Tier II Individual.

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Third Party Program – A program conducted on campus and administered or financially supported by a non-UR entity.

Job Shadowing Activities – An educational experience where individuals can learn about a particular occupation or profession by accompanying an employee as they perform the targeted job. Shadowing activities are typically varied, short-term, or one-time events that are not connected to an organized program.

Mandated Reporter – A person who is required to make a report of suspected child abuse. Under Code of Virginia 63.2-1509 this includes, but is not limited to:

1. Any person employed by a public or private institution of higher education other than an attorney who is employed by a public or private institution of higher education as it relates to information gained in the course of providing legal representation to a client;
2. Any person 18 years of age or older associated with or employed by any public or private organization responsible for the care, custody or control of children;
3. Any athletic coach, director or other person 18 years of age or older employed by or volunteering with a public or private sports organization or team; and
4. Any law enforcement officer.

Minor – Any person less than the age of 18 and who is not matriculated or enrolled in a degree seeking program at the University of Richmond.

One-on-One Interaction – Unsupervised interaction between any adult and a minor without at least one other authorized adult, parent, or legal guardian present.

Program Staff – Employees, volunteers, and contractors involved in conducting either sponsored programs or third party programs involving minors.

Sponsored Program – A program administered by an academic, administrative or athletic unit where minors are in the care, custody and/or control of the University during the program's operation, including programs administered through virtual platforms. Mentorship, athletic recruiting, formal prospective student events, and job shadowing activities qualify as sponsored programs.

Sponsoring Unit – The academic or administrative unit of the University which offers a program or gives approval to a third party program for use of University facilities.

Tier 1 Individual (Program Supervisor or Point Person) – This individual may engage in one-on-one interaction with minors and may supervise the interactions of Tier II and Tier III Individuals with minors in youth programs.

- Program Supervisor – Individual with ultimate primary responsibility for the program. Programs may have various individuals who serve in a supervisory capacity, but the Program Supervisor has the authority to make the ultimate decisions concerning the program, including the placement and removal or program staff.

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- **Point Person** – A UR employee in a sponsoring unit who grants permission to a third party organization to use a UR facility, or another UR employee responsible for ensuring that a third party program complies with this policy.

Tier II Individuals – These individuals may engage in one-on-one interactions with minors and may supervise the interactions of Tier III Individuals with minors. Examples may include full-time employees, part-time employees, hourly seasonal staff, interns, or mentors.

Tier III Individuals – These individuals, typically volunteers, must be in sight and sound of a Tier I or Tier II Individual at all times when interacting with a minor. Examples may include volunteers, service-learning students, and anyone who has not completed training and background checks required for Tier II status.

Volunteer – An individual who participates in a program or activity willingly and without pay, and does not have supervisory authority of a program (cannot be a Tier I Individual). Volunteers may also be UR employees acting outside of their standard employment capacity.

SEC-2008.2 – Contracting Requirement for Third Party Programs

Third party programs will have a contract or facilities use agreement through the Events, Conferences, and Support Services (ECSS) office. All contracts and agreements must have a provision assuring that the individuals involved with the third party program will comply with the requirements of this policy. In addition, contracts and agreements must reference and attach a current copy of this policy. For inquiries about compliance with this policy's requirements and procedures, please contact the Office of Risk Management at 289-8824 for assistance.

SEC-2008.3 – Minimum Requirements for Individuals Engaged in Programs Involving Minors

The minimum requirements for individuals engaged in programs and activities involving minors include screening, monitoring and supervision, and training. Minimum requirements are outlined below, and also in the chart entitled, *Safety and Protection of Minors: Minimum Requirements for Individuals Engaged in Programs & Activities Involving Minors* (see the Related Documents section). University departments and units may adopt practices that impose additional or higher standards, but must in all cases meet the standards set forth in this policy.

The Program Supervisor is charged with ensuring compliance with these requirements, and must maintain documentation demonstrating compliance for each program, including maintaining documentation of background screenings and certificates of training for all Tier I and Tier II Individuals.

Screening

- Tier I and Tier II Individuals are required to clear a biennial background screening prior to participation in programs and activities involving minors. This check includes both a multi-state criminal background check and National Sex Offender Registry check. Program Supervisors should contact Risk Management to complete the screening process.
- Convictions for the following offenses shall disqualify an individual from participating in programs and activities involving minors:

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- Child abuse, molestation, or other crimes involving the endangerment of a minor
- Felony crimes of violence against another person
- Felony drug possession or drug distribution
- Any sexual offense

Other offenses, including patterns of misdemeanor convictions, are subject to review and assessment by the Associate Vice President for Public Safety/Chief of Police or designee. Except where required by law or University policy, criminal background checks of University faculty, staff, and students that are conducted pursuant to this Policy will be used only for purposes consistent with this Policy, and will otherwise be kept confidential.

- Tier I Individuals must immediately disclose to their direct supervisor any relevant changes that occur, including arrests, convictions, investigations, and reports to Child Protective Services.
- Tier II Individuals must immediately disclose to the Program Supervisor any relevant changes that occur, including arrests, convictions, investigations, and reports to Child Protective Services.
- Tier III Individuals must immediately disclose to the Program Supervisor any arrests, convictions, investigations, and reports involving minors.

Monitoring and Supervision

- Tier I Individuals are responsible and accountable for ensuring program staff comply with this policy and specific program procedures, and are entrusted to engage in appropriate program-related activities without direct supervision.
- Tier II Individuals must engage in appropriate program-related activities at all times and may engage in program-related activities without direct supervision only with specific permission from the Program Supervisor.
- Tier III Individuals may interact with minors only under the direct supervision of a Tier I or Tier II Individual.

Training

- Tier I and Tier II Individuals must annually complete the appropriate online Safety and Protection of Minors Policy Training for their tier and receive a passing score of at least 80%.
- Tier I and Tier II Individuals must view the approved training video.
- Online training and the awareness video are strongly recommended and may be required for Tier III Individuals at the discretion of the Program Supervisor.

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SEC-2008.4 Program Requirements

In addition to the minimum requirements for individuals, Program Supervisors must complete the following procedures and process at least 30 days before the sponsored or third party program begins. The Program Supervisor for a sponsored or third party program is charged with ensuring compliance with these requirements, and must maintain documentation demonstrating compliance.

Program Registration

- For sponsored programs, the Program Supervisor will register their program annually by completing the online Program for Minors Questionnaire located within the University's Event Management System. Program Supervisors should complete this form for both in-person and virtual events no later than 30 days prior to the first scheduled date of participation by minors.
- Third party programs must have a designated UR Point Person. The program's Point Person will annually complete the online Program for Minors Questionnaire located within the University's Event Management System for both in-person and virtual events no later than 30 days prior to the first scheduled date of participation by minors.

Communication and Notification Plans

- The Program Supervisor shall establish an appropriate procedure for notifying parents/legal guardians in case of an emergency, including medical or behavioral problems, natural disasters, or other significant program disruptions. Program staff, participants, and their parents/legal guardians must be advised of this procedure in writing prior to the participation of minors.
- The Program Supervisor shall maintain a list of participants and directory of all program staff, designating each staff member's Tier I, II, and III position. The list shall include each participant's name, room assignment (if applicable), gender, age, address, and emergency contact information.
- Program participants must be informed about safety and security procedures, applicable UR policies, program rules and guidelines established by the program, and behavioral expectations. Program staff are responsible for following and enforcing all rules, providing information to program participants, and responding to emergencies in compliance with this policy.
- Program staff must explain to all parents, guardians, and chaperones of minors UR's commitment and expectations during program participation, including who to contact for any issues or concerns.

SEC-2008.5 – Mandatory Reporting of Suspected Child Abuse or Neglect

Under the laws of the Commonwealth of Virginia and the expectations of the University, if at any time the abuse or neglect of a minor is known or suspected, it must be immediately reported as follows, regardless of whether the abuse or neglect is observed during normal working hours or program activities.

All persons employed by or serving as volunteers on behalf of the University are Mandated Reporters regardless of tier status. Mandated Reporters who know of or suspect child abuse or neglect must report the

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knowledge or suspicion as soon as possible, but not longer than 24 hours after having reason to suspect, by reporting to **all** of the following.

- Program Supervisor
- UR Police Department at 289-8715 or 289-8911 (emergencies)
- Virginia Department of Social Services Child Abuse and Neglect Hotline 1-800-552-7096

SEC-2008.6 – Review of Sponsored Programs

Risk Management shall randomly select sponsored programs on annual basis to review documentation of compliance with this policy and to provide any recommendations for program improvement.

RELATED DOCUMENTS:

Safety and Protection of Minors – Minimum Requirements Chart

University of Richmond F.A.Q. for Protection of Minors

Minors on Campus Website – Background Checks, Training Materials and Video

GOV-3102 Policy Prohibiting Sexual Misconduct

Code of Virginia 63.2-1509

POLICY BACKGROUND:

Policy was reviewed by President’s Cabinet prior to approval on March 29, 2021.

POLICY CONTACTS:

Director of Risk Management