



UNIVERSITY OF RICHMOND

Policy Manual

Policy #:	SEC-2008	Policy Title:	Youth Protection Policy
Effective:	06/03/2024	Responsible Office:	Office of Risk Management
Date Approved:	06/03/2024	Approval:	Vice President and General Counsel
Replaces Policy Dated:	03/29/2021	Responsible University Official:	Senior Director of Risk Management

PURPOSE:

The University of Richmond is committed to providing safe environments and meaningful experiences for minors participating in youth programs hosted or operated by the University. To uphold this commitment and comply with applicable laws, the University has established requirements for those who interact with minors.

SCOPE:

This policy applies to all youth programs. All members of the University of Richmond community should be familiar and comply with the provisions of this policy, any related policies, and applicable procedures.

The reporting obligations set forth in Section SEC-2008.2 of this policy apply to all minors on campus. The remaining provisions of this policy do not apply to:

- Minors admitted or enrolled in classes for academic credit.
- Minors accompanied by a parent, guardian, or chaperone.
- Events on campus that are open to the general public where minors attend presumably with the knowledge of a parent or guardian.
- Minors visiting campus for the purpose of tours or field trips in which the visit is not overnight, and the minors are supervised by visiting staff.

Any exceptions to this policy must be approved by the Office of Risk Management.

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POLICY STATEMENT:

SEC-2008.1 – Policy Definitions

Campus – The term “campus” includes any building or property owned or controlled by the University within the same reasonably contiguous geographic area of the University and used by the University in direct support of, or in a manner related to, its educational purposes, including residence halls and apartments and any building or property within or reasonably contiguous to the campus that is owned by the University, is frequently used by students, and supports University purposes.

Abused or Neglected Child – Under the [Code of Virginia § 63.2-100](#), an abused or neglected child is any child under 18 years of age whose parent or any person responsible for their care:

- Causes or threatens to cause or allows to be caused a non-accidental physical or mental injury;
- Creates a substantial risk of death, disfigurement, or impairment of bodily or mental functions;
- Has the child present during the manufacture or sale of certain controlled substances;
- Neglects or refuses to provide adequate food, clothing, shelter, supervision, emotional nurturing, or health care;
- Abandons the child or neglects to provide adequate supervision for the child’s age and level of development;
- Commits or allows to be committed any illegal act of sexual exploitation or sexual act upon a child including incest, rape, fondling, indecent exposure, prostitution, or allows a child to be used in any sexually explicit visual material; or
- Knowingly leaves a child alone in the same dwelling with a person, not related by blood or marriage, who is required to register as a violent sexual offender.

Direct Supervision – The care, custody, control, or supervision of minors.

Mandated Reporter – Consistent with [Code of Virginia §63.2-1509](#), the following employees or contractors of the University who, in their professional capacity, have a reason to suspect that a child located on the University campus or participating in a University program is an Abused or Neglected Child (as defined above) are required to report their concerns as provided in this policy and Virginia law:

- All staff;
- All faculty;
- All student employees of the University, including but not limited to resident assistants;

- All licensed health care professionals engaged under a contract with the University to provide services to University staff, faculty, students, or minors on campus; and
- All employees of a third-party entity under contract with the University to provide services to minors on the University campus.

Consistent with Code of Virginia §63.2-1509, attorneys who are employed or engaged by the University are not Mandated Reporters as it relates to information gained in the course of providing legal representation to the University.

Minor – A person under eighteen (18) years of age.

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

Program Director – University or Third-Party employee responsible for operating the program and ensuring compliance with the Youth Protection Policy.

Program Staff – University employees, students, or volunteers, and Third-Party employees or volunteers who have direct contact with and supervision of minors.

Program Visitor – An adult who participates in a program without supervisory authority, and who must be supervised by Program Staff at all times.

Sponsoring Unit – An academic or administrative department of the University that is responsible for the coordination of program registration, background screening, and training processes.

Third-Party Program – A program or activity involving minors that is operated by an individual or entity not affiliated with the University.

University Program – A program or activity involving minors that is hosted or operated by the University.

SEC-2008.2 – Mandatory Reporting of Suspected Child Abuse or Neglect

Mandated Reporters who have reason to suspect that a child is an Abused or Neglected Child, have the individual responsibility to report the matter immediately, and in no event more than 24 hours of having reason to suspect. Such report shall be made to:

1. University of Richmond Police at (804) 289-8715 or local law enforcement (for incidents happening off-campus); **AND**
2. Virginia Department of Social Services Child Abuse and Neglect Hotline at (800) 552-7096; **AND**
3. Office of Risk Management using the [Suspected Child Abuse or Neglect Reporting Form](#)

Protection for Mandated Reporters

Consistent with its [Policy Prohibiting Retaliation](#), the University prohibits retaliation or retribution, in any form, against an individual who reports, in good faith, their suspicion or concern that a child is an Abused or

Neglected Child. As used in this policy, reporting “in good faith” means the individual making the report has a reasonable basis to believe that a child may be an Abused or Neglected Child. Anyone who engages in or attempts to engage in retaliation or retribution against an individual who makes such good faith report shall be subject to discipline in accordance with the policies and procedures of the University.

Additionally, under Virginia law, a person making a complaint or report of child abuse or neglect shall be immune from any civil or criminal liability in connection therewith, unless it is proven that person acted in bad faith or with malicious intent ([Code of Virginia 63.2-1512](#)).

Consequences for Failing to Report

A Mandated Reporter who suspects that a child may be an Abused or Neglected Child and fails to make a report as required by this policy shall be subject to discipline in accordance with the policies and procedures of the University.

Under Virginia law, a person can be fined up to \$500 for the first failure to report and at least \$1,000 for subsequent failures. If a person knowingly and intentionally fails to report sexual abuse, the person may be guilty of a Class 1 Misdemeanor ([Code of Virginia 63.2-1513](#)).

SEC-2008.3 – Minimum Requirements

This Section applies to all youth programs and activities involving minors, except where excluded. Programs may adopt practices that impose additional or higher standards but must in all cases meet the minimum requirements set forth in this policy.

Sponsoring Unit

Programs must have a Sponsoring Unit and designated contact to coordinate program registration, background screening, and training processes.

Registration

Programs must be registered with the Office of Risk Management at least thirty (30) days prior to the program start date.

Screening

Program Directors and Program Staff are required to clear a biennial background check prior to participation in programs involving minors. This screening must include both a multi-state criminal background check and a National Sex Offender Registry check. Program Directors should contact the Office of Risk Management to request background checks for University programs. Convictions for the following offenses shall disqualify an individual from participating in programs involving minors:

- Child abuse, molestation, or other crimes involving the endangerment of a minor
- Felony crimes of violence against another person
- Felony drug possession or 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 or designee and may disqualify an individual from participating in programs involving minors.

Program Directors must immediately disclose to their direct supervisor any changes in their criminal background, including arrests, convictions, investigations, and reports to Child Protective Services.

Program Staff must immediately disclose to the Program Director any changes in their criminal background, including arrests, convictions, investigations, and reports to Child Protective Services.

Training

Program Directors and Program Staff are required to complete assigned youth protection training before having contact with minors. Training is required on an annual basis thereafter.

Supervision

To the greatest extent possible, Program Directors and Program Staff should avoid One-on-One Interaction with a minor. If One-on-One Interaction is necessary, the interaction must take place in an open, observable, and interruptible location.

Program Visitors may interact with minors only under the supervision of a Program Director or Program Staff.

Incident Reporting

In the event of an adverse incident or injury, Program Directors and Program Staff must:

- Intervene to prevent or minimize harm;
- Report the incident and all relevant details to the Office of Risk Management; and
- Make adjustments to prevent recurrence.

Records Retention

Program Directors shall maintain the following documentation for five (5) years after the program end date:

- Participant Roster that includes name; housing room assignment (if applicable); gender; age; name(s) of parent(s) or guardian(s); and emergency contact information.
- Program Staff Directory
- Youth Program Assumption of Risk and Release Form
- Medical Information and Release Form
- Self-Administration of Prescription Medication Form
- Standards of Behavior Agreement – Participants
- Standards of Behavior Agreement – Staff

All information collected shall be strictly confidential and shall not be disclosed, except as provided by law. Alternate forms may be approved by the Office of Risk Management.

Emergency Planning

It is the responsibility of each Program Director to ensure that Program Staff are familiar with emergency procedures, building evacuation routes, locations of first aid kits and AEDs, and unique building circumstances. The [Office of Emergency Management](#) coordinates the overall emergency planning process and provides strategic guidance at the University. For assistance in planning for emergencies, contact the following resources:

- Emergency Management: (804) 289-8844
- Environmental Health & Safety: (804) 289-8721
- University Police: (804) 289-8715

Compliance

Compliance with this policy is required as a condition of operating a youth program at the University of Richmond. Program Directors and Program Staff who have concerns regarding compliance with the policy are expected to report such concerns to the Office of Risk Management or the University Ethics and Compliance Helpline: (804) 287-1800.

SEC-2008.4 – Third-Party Programs

In addition to the minimum requirements outlined above, Third-Party Programs must:

- Have a written contract with the University for the use of facilities and/or resources;
- Provide evidence of insurance coverage in accordance with the requirements outlined by the Office of Risk Management; and
- Certify satisfactory background screening and training completion for all Program Staff consistent with this Policy.

SEC-2008.5 – Overnight Visits for Prospective Students

Sponsoring Units hosting unaccompanied minors for overnight visits should refer to the Youth Protection Program Guidelines for specific program requirements.

SEC-2008.6 – Program Reviews

The Office of Risk Management shall randomly select programs for review of their compliance with this policy and the Youth Protection Program Guidelines and will provide recommendations for process improvement. Sponsoring Units and Program Directors are required to provide access to relevant information necessary to assess compliance with this policy.

RELATED POLICIES AND RESOURCES:

- GOV-1004 [Policy Prohibiting Retaliation](#)
- GOV-3102 [Policy Prohibiting Sexual Misconduct](#)
- HRM-5003 [Inclement Weather](#)

[GOV-2003 Emergency Management Policy](#)
[Youth Program Guidelines](#)
[Youth Program Assumption of Risk and Release Form](#)
[Medical Information Form](#)
[Self-Administration of Medication Form](#)
[Standards of Behavior Agreement – Participants](#)
[Standards of Behavior Agreement – Program Staff](#)

POLICY BACKGROUND:

Policy was reviewed by President’s Cabinet prior to approval on June 3, 2024.

This policy replaces the Safety and Protection of Minors Policy, which was originally approved March 29, 2021.

POLICY CONTACTS:

Senior Director of Risk Management