



Policy for Programs and Activities Serving Minors

Coversheet for Policy Website

POLICY NUMBER (to be completed by Policy Administrator)	Policy for Programs and Activities Serving Minors (#3005.1)
<i>Purpose of Policy</i>	This policy provides for the safety and security of children who participate in programs sponsored by Valdosta State University and/or held on Valdosta State University property.
<i>Who Should Know this Policy</i>	Faculty and administrators
<i>Related Documents</i>	Board of Regents Policy Manual §6.9 Programs Serving Minors USG Programs Serving Minors VSU Minors on Campus website VSU Minors on Campus Program Registration Form
<i>Date Policy First Issued</i>	NEW
<i>Date Policy Last Revised</i>	NEW
<i>Issuing Office</i>	Social Equity
<i>Responsible Officer</i>	Minors on Campus Coordinator
<i>Open Comment Period</i>	July 18-August 31, 2018



Policy for Programs and Activities Serving Minors

The Valdosta State University is committed to providing a safe and healthy environment for all who participate in programs and activities on campus or otherwise affiliated with the University. There are a variety of opportunities available for minor children, including academic camps, athletic camps, clinics, conducting or viewing research, after-school programs, work or activities under supervision of an individual faculty member, enrichment classes, and other activities. This Policy recognizes the special duty of care and supervision when working with minors and sets forth operational requirements to enhance the protection of minors.

I. Definitions

Mandatory Reporter: Any person who is required by Georgia law ([O.C.G.A. §19-7-5](#)) to report suspected child abuse to the appropriate authorities. Mandatory Reporters include but are not limited to faculty/teachers, administrators, counselors, social workers, psychologists, law enforcement personnel, and other persons who participate in providing care, treatment, education, training, supervision, coaching, counseling, recreational programs, or shelter to Minors.

Minor: Any person under 18 years of age (O.C.G.A §39-1-1).

Program/Activity/Camp: Any academic, admissions, athletic, educational, service, leadership, or recreational program serving one or more Minors, including, but not limited to camps, clinics, conferences, workshops, tutoring, mentoring, group lessons, seminars, competitions, internships or experiential learning, conducting or viewing research, pre-enrollment visits, after-school programs, or other enrichment opportunities.

Program/Activity/Camp Administrator: Any individual who has primary and direct operational responsibility for the overall content and execution of a Program/Activity and who serves as the primary point of contact.

Program/Activity/Camp Staff: Individuals, whether paid, volunteer, or for academic credit, who have care, custody, control, and/or direct contact or interaction with Minors involved in Program/Activities/Camps. This includes, but is not limited to, University administrators, faculty, staff, students, volunteers, and third parties when operating a Program/Activity.

Third Party: An individual, organization, or entity external to the University, to which the University allows use of its facilities to operate a Program/Activity.

Sponsoring Unit: Any department or unit of the University that offers a Program/Activity.

University Facility: A building, structure, classroom, research or teaching laboratory, outdoor area, grounds, or athletic venue owned, leased, or controlled by the University, or used in connection with any Program/Activity.



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II. Applicability

This Policy applies broadly to all Programs/Activities/Camps serving one or more Minors, including those:

1. Offered by departments or units of the University at a University Facility or sponsored by the University at other locations;
2. Offered by the University's student organizations at a University Facility or sponsored by University student organizations at other locations; or
3. Offered by Third Parties utilizing a University Facility.

This Policy does not apply to:

1. Programs/Activities/Camps for Minors enrolled in undergraduate or graduate academic coursework;
2. Events or visits to campus where Minors are supervised by their parent/guardian/school;
3. Events at the University that are open to the general public or invited guests where parents/guardians/school are expected to provide supervision of Minors;
4. IRB-supervised research;
5. Minor employees; and
6. Valdosta State University employees or students hosting family members, friends, or other guests

This Policy shall supplement, not replace, any existing safety and security measures, policies, or codes of conduct currently in place or hereinafter enacted.

III. Requirements

This Policy provides minimum operational requirements for Programs/Activities/Camps involving Minors. Recognizing that all Programs/Activities/Camps are unique as to subject matter and risk, each Program/Activity Administrator, Sponsoring Unit, or Third Party must evaluate the nature of the Program/Activity and take appropriate actions to ensure the safety and security of all individuals involved and to ensure compliance with all applicable laws, regulations, and policies.

A. Review and Approval

The following considerations should be addressed by the Program/Activity Administrator in advance of the Program/Activity:

1. Alignment of the Program/Activity with the University's mission;
2. Appropriate subject matter and fully planned activity itinerary;
3. Appropriate staffing and supervision ratios, with special regard to avoiding one-on-one contact between Minors and Program/Activity Staff;



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4. Program/Activity Staff Code of Conduct and guidelines;
5. Appropriate training for Program/Activity Staff;
6. Minor Code of Conduct, Applicable Forms, Waivers, and any supplemental Program/Activity guidelines;
7. Program/Activity orientation and information for Minors and parents;
8. Transportation arrangements;
9. Housing arrangements with special consideration for overnight Programs/Activities/Camps;
10. Contracts for Auxiliary Services and Food Services;
11. Safety and security planning including, but not limited to:
 - a. Basic first aid;
 - b. Emergency response and notification plans;
 - c. Reporting protocols for injury and/or illness; and
 - d. Inclement weather plans;
12. Response protocols for accusations of misconduct;
13. Insurance;
14. Any licensing or exemption required by a government agency; and
15. Record retention policies

B. Program/Activity Registration and Renewal

Program Administrators must follow the below steps in order to register their Programs/Activities/Camps.

1. Complete the online Minors on Campus Form for approval by the Minors on Campus Coordinator: <https://www.valdosta.edu/administration/social-equity/minors-on-campus/minors-on-campus-form.php>;
2. University sponsored Programs/Activities/Camps that are approved will be added to the Minors on Campus Registry.
3. Third Party Programs/Activities/Camps approved will be required to submit a Third Party Facilities Use Agreement and insurance certificate;
4. All Programs/Activities/Camps, University Sponsored or Third Party, must register annually.

C. Background Investigation and Screening

All University Program/Activity Staff who have direct contact with minors are required to undergo a criminal background check to include, but not limited to, each state the individual resided and federal criminal history check covering a minimum of seven (7) years, national sex offender search and social security number check. Criminal background checks for VSU



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employees and volunteers with direct contact with non-student minors must have been run and cleared by the VSU Office of Human Resources within the past twelve (12) months before initial direct contact with non-student minors and every four (4) years afterward. Offenses dealing with domestic abuse, drugs, violence, crimes against the elderly, infirm, etc. must be assessed carefully. The youth program will be charged the vendor fee for the criminal background check. Program/Activity Administrators must be in receipt of background check clearance on all Program/Activity Staff prior to involvement.

Program/Activity Staff must self-report any arrest, charge, or criminal conviction occurring after the date of the background check to their Program/Activity Administrator, prior to returning to a Program/Activity. Additionally, all University employees are subject to University System of Georgia Human Resources Administrative Practice Manual's mandatory reporting of charges or conviction of a crime other than a minor traffic offense. Depending on the nature of the Program/Activity, additional screening of Program/Activity staff beyond background checks may be advisable, including in-person interview and/or reference checks.

Personnel in charge of screening volunteers should be aware of the inherent limitations of background checks and should seek to utilize other screening methods, when possible, in addition to background checks to include in-person interviews and reference checks.

D. Training

All Program/Activity Staff must be trained on their responsibilities or issues related to Minor health, safety, and security. This training is provided through VSU and via Everfi training website. The training must be complete within the past twelve (12) months before initial direct contact with a minor and then every two years afterward. Training documentation and certifications should be maintained by the Program/Activity Administrator.

All Program/Activity Staff must receive training on the following:

1. Mandatory Reporting obligations, including child abuse awareness and prevention;

Additionally, training appropriate to the specific Program/Activity as developed by the Program/Activity Administrator must be also provided on the following:

1. Code of Conduct for Program/Activity Staff and Minor participants;
2. Reporting requirements during the Program/Activity, processes, and contacts;
3. Disability accommodations and review and evaluation of special requests;
4. Safety and security protocols;
5. First aid guidelines and medication management; and
6. Activities, risks, and responsibilities of the Program/Activity, as applicable.



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E. Records Retention

All records should be retained in accordance with Board of Regents policies on record retention. Copies of all required forms and documentation pertaining to Minors should be retained for a period of three (3) years after the Minor reaches the age of eighteen (18). Records pertaining to Program/Activity Staff should be retained for five (5) years.

F. Code of Conduct

The University requires the highest standards of conduct when interacting with Minors, including compliance with all applicable laws, regulations, and policies.

1. Code of Conduct: All Minor participants and Program/Activity Staff must agree to abide by the applicable Code of Conduct as well as any supplemental Program/Activity guidelines developed by the Program/Activity Administrator.

2. Requirements for Minor participants: Parents/guardians must submit required forms before Minors will be allowed to participate in Programs/Activities/Camps. These forms may include, but are not limited to, a participation agreement form, authorization to administer medication, pick-up authorization, medical information and authorization, release of claims/waiver of liability, media/photo/video release, and Minor participant's Code of Conduct.

IV. Third Party Use of a University Facility

In order to utilize University Facilities for Programs/Activities/Camps, Third Parties must execute a Facilities Use Agreement. Use for Program/Activity requires compliance with this Policy, including certifying criminal background checks and ensuring proper training for all Program/Activity Staff, and must demonstrate that they have minimum insurance requirements:

<u>Coverage</u>	<u>Limits</u>
Each Occurrence Limit	\$1,000,000
Damage to Premises Rented To You	\$300,000 Any one premises
Personal & Advertising Injury	\$1,000,000 Any one person/organization
Abuse or Molestation	\$1,000,000 Any one person
General Aggregate Limit	\$2,000,000
Products/Completed Ops. Aggregate Limit	\$2,000,000

V. Reporting

A. Injury: In order to maintain a safe environment for all students, faculty, staff, and visitors, it is important the university be informed, at the earliest possible date, of any injuries that occur at a University Facility or to faculty and staff in the course of their work responsibilities.



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B. Child Abuse/Mandatory Reporters: Any Program/Activity Staff or other Mandatory Reporter who has reasonable cause to believe that suspected child abuse has occurred, shall immediately report the suspected abuse to the Valdosta State University Police Department and the appropriate supervisor or Program/Activity Administrator who shall take immediate action. All University employees must appropriately report suspected child abuse. Do not attempt to investigate a matter further or gather additional information before reporting.

If you suspect child abuse, or simply have an idea or uneasy feeling about a possible abuse situation, immediately report the situation to **ALL** of the following:

1. The Valdosta State University Police Department 229-259-5555 or 911 (emergency);
2. The Program/Activity Administrator; **AND**
3. The Georgia Division of Family and Children Services at 1-855-GACHILD

A Mandatory Reporter must ensure that the Division of Family and Children Services is notified of the suspected abused immediately and in no case later than 24 hours after the Program/Activity Staff (or other reporter) first had reasonable cause to suspect the abuse.

By doing so, you are not necessarily making an accusation; you are merely reporting facts for trained professionals to evaluate and investigate.

VI. Accountability

A. Violations and Sanctions: Violators of this Policy will be held accountable for their actions under the Program/Activity's Code of Conduct, University policy, and applicable law. Sanctions for violations may include, but are not limited to, suspension of University funding, non-renewal or termination of the Program/Activity, suspension, dismissal, or termination of University employment or Program/Activity Staff status, or removal or barring from University Facilities.

B. University Funding: University Programs/Activities/Camps that are not approved and registered pursuant to this Policy will not be eligible for payment, repayment, or reimbursement by Valdosta State University Financial Services.

VII. Policy Implementation

This Policy is adopted in accordance with Board of Regents [Policy 6.9, Programs Serving Minors](#).



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VIII. Policy Responsibility

Because the protection Minors is a University-wide concern, a key group of administrators will be charged by the President to serve on a committee to review and address issues arising under this Policy. The committee will consist of four to six administrators selected from the following units: Academic Affairs, Athletics, Human Resources, Legal Affairs, and Student Affairs.

The committee is empowered to take steps necessary to promote the safety of Minors while at the University and for University Programs/Activities/Camps held elsewhere, including:

- A. Recommending changes to this Policy;
- B. Recommending appropriate actions for Program/Activity Administrators, Departments, and Units in accordance with applicable University policies and procedures;
- C. Creating, updating, or modifying forms and resources available for Programs/Activities/Camps serving Minors;
- D. Auditing Programs/Activities/Camps for compliance with this Policy;
- E. Initiating enforcement actions against an individual or Program/Activity; and
- F. Any other action reasonable required in furtherance of this Policy

IX. Forms and Resources

Sample Forms, Program/Activity Checklists, and additional resources:

<https://www.valdosta.edu/administration/social-equity/minors-on-campus/>

University System of Georgia Board Policy 6.9 Programs Serving Minors:

https://www.usg.edu/organizational_effectiveness/programs_serving_minors

University System of Georgia Human Resources Administrative Practice Manual:

<https://www.usg.edu/hr/manual>

University System of Georgia Board of Regents Policy Manual:

<https://www.usg.edu/policymanual/>

Board of Regents Records Retention Policy:

http://www.usg.edu/records_management/schedules/

State of Georgia Mandatory Reporter Law O.C.G.A. §19-7-5 (2016):

https://www.usg.edu/assets/organizational_effectiveness/documents/mandated_reporter_law2016.pdf



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Valdosta State University Public Safety Policy:

<https://www.valdosta.edu/administration/finance-admin/human-resources/policy/public-safety.php>

Valdosta State University Human Resources and Employee Development:

<https://www.valdosta.edu/administration/finance-admin/human-resources/>

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