

Columbus State University

Policy Name:	Protection of Minors on Campus
Policy Owner:	Office of Legal Affairs, Ethics, and Compliance
Responsible University Office:	Office of Business and Finance / Office of Risk Management
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Policy Number:	TBD
Related Policies:	Board of Regents: 12.9 Programs Serving Minors

I. Purpose of Policy

Columbus State University is committed to the safety and protection of all individuals. In keeping with this philosophy, CSU, as well as the entire University System of Georgia (USG), is committed to the establishment of best practices that will provide a safe and healthy environment for all individuals who participate, volunteer, or work at CSU events, particularly minors/children. To that end, CSU has established the following guidelines, standards, and required training for employees, students, and volunteers who interact with minors on CSU's campus.

II. Scope of Policy

This Policy applies to any event, program or activity involving minor children that is sponsored by CSU, or by any third party using any University facilities.

III. Definitions

Minor: any child under the age of 18 that is not enrolled as a student at CSU. (*“Enrolled” students are students signed up for classes for course credit. Students who are being tutored by faculty members are not considered “enrolled at CSU” under this policy.*)

Abuse or Neglect of Minors: physical injury or death inflicted upon a child under the age of 18 by other than accidental means; neglect or exploitation of a child; sexual abuse of a child; or sexual exploitation of a person under the age of 18. (*Information about how to detect Abuse or Neglect of Minors will be given in training*)

Event: any activity, camp, or program that is held using Columbus State University facilities and/or services, and requires full supervision of the minor by the University, or a third party. This responsibility includes providing supervision, and instruction and/or recreation where the minors are apart from their parent(s) or legal guardian(s).

CSU Sponsored Event: programs and activities that are organized, managed, sponsored, or controlled by CSU or its students, faculty, or staff in their official University capacities/roles.

Exempt Events: any program or activity that is open to the general public where *minors* attend at the sole discretion of the parent(s) or legal guardian(s) (e.g., athletic events, concerts, festivals); non-CSU sponsored, private or personal events not open to the general public (e.g., weddings, birthday parties, seminars); academic activities in which CSU faculty interact with students under the age of 18 who are enrolled at CSU; activities involving personal instruction by a CSU faculty or staff member and a minor in which a prior agreement was reached between the parent or legal guardian of the minor and the instructor for the personal lessons; educational field trips sponsored by schools, school districts, or other educational/social entities.

Non-University Organization: a group that has no affiliation with Columbus State University, the University System or Georgia, or any of its member institutions.

Third Parties: entities, including vendors, that contract to use CSU facilities.

IV. Guidelines for Interacting with Minors on Campus

CSU faculty, staff, and students participating in CSU sponsored events have a legal, moral, and ethical duty to act appropriately when interacting with minor children by maintaining appropriate physical, emotion, and sexual boundaries. Adherence to the guidelines set forth herein, including the receipt of required training, is essential to the ensuring the safety and well-being of minors interacting with the CSU Community.

- A. **Safety and Security Procedures:** If possible CSU faculty, staff, and event volunteers should not be alone with a minor individual. If an individual finds themselves alone with a minor, or sees a minor who is by themselves and should be with a group, they must follow these steps:
 1. Stay in plain sight where others can see you;
 2. Call Continuing and Professional Education, University Support Services, Oxbow Meadows, the Coca-Cola Space Science Center, or any other CSU department or entity (e.g. College of Education) to find out which group the minor might belong with in order to reunite them with the group;
 3. If necessary, call University Police and have them send an officer over to either wait with the minor, or take the minor to where they need to be (the faculty, staff, or volunteer person should not leave the minor unattended at any time, and must wait until they are relieved by either a University Police Officer or someone from the group in which the minor is involved)

- B. **Code of Conduct:** The University System of Georgia has provided a Staff and Volunteer Code of Conduct that must be signed by each individual working an event, and kept with the other event information. If you do not have one, it can be obtained by emailing the Director of Risk Management.

- C. **Training Requirements:** At a minimum, training shall include:
 1. Basic warning signs of abuse or neglect of minors;

2. Guidelines for protecting minors from emotion and physical abuse and neglect;
 3. University requirements for reporting incidents of suspected abuse or negligent or improper conduct; and mandatory reporting requirements of suspected abuse and neglect under O.C.G.A. § 19-7-5
 4. Review the Code of Conduct and sign stating that it has been read and understood.
- D. Ratio of Staff to Minors: Minors participating in events must be supervised by adults at all time, and the events must maintain a proper ratio of staff to minors. Recommended appropriate ratios designated by the Board of Regents of the University System of Georgia are:
1. For minors under age 6 a ratio of 6:1
 2. For minors ages 6 to 8 a ratio of 8:1
 3. For minors ages 9-14 a ratio of 10:1
 4. For minors ages 15-17 a ratio of 12:1
 5. For events that vary in ages, use the 10:1 ratio
- Any event that will be outside of these recommended ratios must be reviewed and approved by the Director of Risk Management.
- E. Contact with Minors: Employees and volunteers of events should be housed in separate rooms from minors, if possible. Under most circumstances individual event staff members should not be alone with a minor on an individual basis. Special exemptions can be made if the event requires that they be alone together (*i.e. tutoring or music lessons*), and if there is prior approval from the minor's parent or legal guardian.

Communications with Minors: Inappropriate communication, including social media, between an employee or volunteer of an event and a minor participant outside of the event is prohibited. If there is a legitimate reason for the employee/volunteer to contact the minor participant outside of the event, they must first gain permission from the minor's parent or legal guardian.

- F. Responsibilities of Directors of events:
1. Hire, train, and supervise staff according to requirements in these Policies and Procedures;
 2. Maintain required documentation, including the collections of waivers, registration forms, and other pertinent documentation;
 3. Set disciplinary guidelines and rules for safety;
 4. Ensure the proper emergency management practices are in place;
 5. Submit to a background check and complete the training video
- G. Responsibilities of Counselors of events:
1. Provide safe and effective supervision for participants;
 2. Complete all required training;
 3. Strive to maintain a safe environment at all times;
 4. Strive to follow established schedules of activities;
 5. Submit to a background check and complete training video

- H. Field Trips and Other Off-Campus Activities: Event directors and coordinators may schedule field trips and other activities off campus, or they may schedule an event requiring transportation from one of CSU's campuses to the other. When transportation for an event is required, the participants and employees/volunteers for the event must use University authorized vehicles driven by University authorized drivers. The Office of Continuing and Professional Education, University Support Services, Oxbow Meadows, or the Coca-Cola Space Science Center will be given notice of travel needs when it receives the enrollment forms. Camp coordinators will coordinate all travel needs with the Office of Transportation accordingly.

V. Guidelines for Holding an Event For Minors Using CSU Facilities

- A. Coordination: All CSU Sponsored Events must be coordinated through Continuing and Professional Education, University Support Services, Oxbow Meadows, the Coca-Cola Space Science Center, or some CSU entity responsible for hosting events.
- B. Notification: Notification of the event must be submitted no later than 30/60 days prior to the start of the event. CSU event forms must be used to notify University Support Services of the event. The Office of Continuing and Professional Education, Oxbow Meadows and Coca-Cola Space Science Center have their own notification forms that must be used.
- C. Compliance with Human Resource Policies: University sponsored events must comply with the policies of the Office of Human Resources and any other appropriate offices regarding hiring practices and procedures, budgetary requirements, accounting practices, payroll, etc.
- D. Non-University Organizations: Non-university organizations may arrange with Continuing and Professional Education, University Support Services, Oxbow Meadows, or the Coca-Cola Space Science Center to conduct a third party event using University facilities and/or services if certain conditions are met.
1. They must have a University department, division, or school sponsor.
 2. They must follow all of the guidelines in these Policies and Procedures in filing for the use of the facilities and/or services
 - i. They must sign a USG-approved facility use agreement/license agreement (these can be found through the facility that is being leased)
 3. They must follow all of the guidelines of these Policies and Procedures for keeping minors safe while using University facilities and/or services.
 4. They will not promote themselves as affiliated with, or sanctioned by, the University; and they are prohibited from using University logos or the University name unless given permission in writing by the University.
- E. Background Check: Employees, volunteers, and any other workers at a third party event must complete and successfully pass a background check through one of the following ways:
1. Complete a background check through Columbus State University's Office of Human Resources. All costs incurred by the Human Resources will be charged to the third party hosting the event.

2. Complete a background check through an approved non-partisan outside agency.
 3. Results of all of the background checks must be submitted at least 3 weeks before the start date of the event. If a criminal background check reveals adverse information or unfavorable results, the University will conduct an individualized assessment to determine whether the results disqualify an individual from participating in a program or activity involving minors. Individuals who choose not to complete a background check will not be allowed to participate in the CSU program, activity, or event.
- F. Safety Course: An online safety course must be taken in order for any person, staff member or volunteer, to work directly with minors. The course is offered by the Department of Risk Management. The list of individuals, who have taken the course, as well as individual completion results, will be retained online for the Office of Continuing and Professional Education; the Department of Risk Management; and for the sponsoring department, division, or school.
- G. Insurance: Third parties must have a general liability insurance policy that can either add CSU as a third party insured, or sign up for Tenants and Users Liability Insurance Policy (TULIP) at tulip.ajgrms.com. Certificates of insurance naming CSU as a third party insured must be sent to the Director of Risk Management. All groups who use the TULIP insurance will have insurance certificates automatically sent by the website.
- H. Document Retention: All documentation mentioned in A-G of this section must be kept for a minimum of 7 years after the final date of the event by the office or campus entity that rented the space (i.e. the Office of Continuing and Professional Education, University Support Services, Oxbow Meadows, Coca-Cola Space Science Center, etc.). The insurance information mentioned in section 7 must also be kept a minimum of 7 years after the final date of the event by the Department of Risk Management.

Parental Forms: A parent or legal guardian for each minor participant in any event must complete a Release, Waiver of Liability, and Covenant Not to Sue form. *(See Appendix A for copy of this form)*. This form also includes a Camper Medical Release Form, and an Authorization to Use Image or Photograph. This document must be kept for at least 3 years after the 18th birthday of any minor participant.

VI. Policies and Procedures for Reporting Abuse or Suspected Abuse

All faculty/staff who are employees or volunteers of the University must report any abuse, reported abuse, or suspected abuse under this Policy as well as Georgia's Mandated Reporter Law. [O.C.G.A. §19-7-5 (2016)]. ***All CSU faculty, staff, students, and volunteers involved in programs serving minors are mandated reporters under this law.***

Steps to Take When Reporting Suspected Abuse: Members of the University should follow the below-listed steps when they have "***reasonable cause to believe***" that a minor has been subjected to abuse, neglect, or exploitation:

- A. Contact University Police at (706) 568-2022, **AND** your Department Supervisor.
- B. If you see or suspect something is happening, do not try to investigate the matter further on your own. Do what you can to ensure the child is safe, but contact 911 and/or University Police first.
- C. Once the incident is reported the reports must be kept with the Office of Continuing and Professional Education, the Department of Risk Management, and University Police.
- D. The University Police Department must ensure that the Columbus Police Department and the Division of Family and Children Services (DFCS) is notified of the suspected abuse immediately and in no case later than 24 hours after the Authorized Adult or Program Staffer (or other reporter) first had reasonable cause to suspect the abuse.
- E. Monitoring any future happenings with any reported abuse should be a collective effort of the Title IX coordinator, the Department of Risk Management, the Director of the department in which the minor was involved, and the Office of Continuing and Professional Education.

VII. Enforcement of Policy

Sanctions for violations of this policy will depend on the circumstances and the nature of the violation, but may include the full range of available University sanctions applicable to the individual including suspension, dismissal, termination, and, where appropriate, exclusion from campus. CSU may also take necessary interim actions before determining whether a violation has occurred. The University may terminate relationships or take other appropriate actions against non-University entities that violate this Policy. This is subject to the University's Progressive Disciplinary Policy.

Points of Contact

For events: Office of Continuing and Professional Education (706)507-8070, University Support Services (706)507-8380

Oxbow Meadows (706)507-8550, Space Science Center (706)649-1470

For insurance: Department of Risk Management: (706)507-8233

Report misconduct: 911, University Police: (706)598-2022, and Department of Children and Family Services: 1-855-422-4453

For questions regarding legal interpretation/requirements: Office of General Counsel: (706) 507-8234