



Guide for Activities or Programs with Minor Participants **Effective 3/31/2017**

The University of Alabama (“the University” or “UA”) is committed to providing a safe and welcoming experience for minors. Faculty, staff, students, student employees, graduate assistants, contractors, or volunteers are therefore expected to hold themselves to the highest standards of conduct when interacting with minors, as outlined by the [Policies and Procedures Governing Activities or Programs with Minor Participants](#). This Guide is designed to assist with the development of guidelines and practices to support compliance with University policy regarding activities or programs for or that include minors, including camps, conferences, and outreach activities. Terms defined in the University’s Policy Governing Activities or programs with Minor Participants carry the same definitions when used herein. All areas/programs are still subject to all other relevant UA policies and procedures, including the UA [Child Protection Policy](#) and the [Facilities and Grounds Use Policy](#). Except for the exclusions listed in the next paragraph, all activities or programs for and that include minors are within the scope of this Policy. This includes, but is not limited to:

- Activities or programs for or that include minors that *the University operates* on campus or in University facilities, including, but not limited to: overnight camps, instructional programs, day camps, academic camps, and sports camps.
- Activities or programs for or that include minors that are operated, conducted, or organized by Third Parties that take place on campus or in University facilities, including, but not limited to, facility rentals to third-party organizations.
- Activities or programs for or that include minors that the University operates that do not take place on campus, including, but not limited to, outreach and community service activities.
- Faculty or staff who bring minors to campus as interns or volunteers outside of a structured activity or program for or that include minors (e.g., to intern in a laboratory).
- Student organizations or any other University affiliated organization operating, facilitating, or sponsoring activities or programs for or that includes minors.

This policy does not apply to:

- Undergraduate and graduate academic programs in which individuals under the age of 18 are enrolled for academic credit or have been accepted for enrollment.
- Events on campus open to the general public that minors also attend.
- Medical care given to minors in an in-patient or out-patient setting in the University Medical Center or other University patient-care setting.

- Normal operations of licensed childcare facilities or programs are expected to comply with all applicable laws and regulations and are outside the scope of this Policy. However, separate camps or programs sponsored by these facilities could be subject to this Policy.
- Minors employed by the University.

All questions, documents, or communications should be directed to:

Dr. Marcy Huey - Compliance, Ethics, and Regulatory Affairs Coordinator
 Box 870107, 401 Queen City Avenue
mhuey@fa.ua.edu, 205-348-2335

I. General Program Requirements

Activities or programs for or that include minors must have in place, enforce, and make available upon request guidelines that address the following areas, as applicable to the particular program:

1. *Transportation plans*, including information regarding the transportation of minors at the beginning and end of the program, to and from the program, and within the program, whether by parents, guardians, Program Staff or others. Transportation guidelines should outline any procedures that will be implemented to identify and manage who can or cannot pick up a participant at the close of a program or day. Programs that use University vehicles or drivers must also comply with University policies regarding drivers and vehicles [available here](#);
2. *Emergency plans*, including guidelines for weather emergencies and for communicating and responding to UA Alerts;
3. *Program plans*, including guidelines that detail the appropriate levels of access to and supervision of minors, including Program Staff-to-participant ratios;
4. *Program plans*, should also include guidelines that detail the appropriate physical contact and communication by Program staff with minors based on the age of the minor and the nature of the program activities. Any behavior or contact between Program Staff and Program Participants that violates approved program activities, established law, UA's [Child Protection Policy](#), or other relevant UA policies is prohibited.

In addition to these guidelines, each program participant and staff member must complete and submit a [Release of Liability, Assumption of Risk, and Indemnification](#) form.

Each program or activity must develop a *Parent/Guardian Communication and Information package*.

These must include procedures for the notification of the minor's parent/legal guardian in case of an emergency, including medical or behavioral problems, natural disasters, or other significant program disruptions. Participants and their parents/guardians must be advised of this procedure in writing prior to program participation. Programs should request parent contact information and keep this information accessible for use in the event of an emergency.

Communication and parent information packages for programs that involve overnight stays or use of University housing by minors must have guidelines that address all of the previously mentioned items as well as compliance with all applicable UA policies that appropriately address the following:

- a.) Personnel identification to be worn by Program Staff;
- b.) Curfews;

- c.) Code of conduct for participants;
- d.) Prohibitions on the use of alcohol, tobacco, and non-prescribed drugs; and
- e.) Appropriate residential supervision, which, among other things, includes proper supervisor-to-participant ratios;
- f.) Program contact information for parent use.

II. Registration and Approval

University departments sponsoring activities or programs for or including minors must maintain an up-to-date listing of those programs. Such lists should include each program's dates, times, locations, attendance (including age range and number of participants), and the contact information for the Program Director. All activities or programs for or involving minors must be registered and final approval received before program activities begin. Registration for ongoing and pre-established activities or programs for or involving minors must be completed annually prior to the beginning of the University academic year. Registration for other activities or programs for or involving minors should be completed no less than eight weeks in advance when possible, but must be completed and approved before an activity or program for or involving minors begins. Registration is [available here](#).

Required documentation to initiate the registration and approval process includes:

- An application to offer activities or programs for or involving minors.
- A complete description of the activities and a planned itinerary must accompany the application. Include any additional information, documentation or waivers required for program activities.
- Insurance information for the program. Activities will be cross-referenced with the current program insurance policies to ensure adequate coverage.
- A complete listing of Program Staff must accompany the application. Individuals under the age of 19 should be identified on the registration form. Parent/Guardian email addresses should be provided for Program Staff under the age of 19. Training completions and background checks will be verified to ensure compliance.
- Program applications should identify which program staff member will be responsible for keeping/administering medication or handling illness/injury.
- A copy of all previously mentioned guidelines and communication plans (see section I).

All documents will be reviewed by appropriate UA departments, including Risk Management, Emergency Preparedness, Human Resources, Compliance, and other areas as needed. Reviews will be accomplished via an electronic routing process to maximize efficiency. Final approvals will be provided to the UA Program Sponsor via email.

III. Training Requirements

Colleges and units must ensure that individuals working in activities or programs for or including minors complete all required training as outlined in this *Guide* as well as any other training that may be required by specific camps.

All faculty, staff, students, student employees, graduate assistants, and volunteers with care, custody, or control of minors must complete the following training courses annually:

1. The Office of Human Resources provides training on the University Child Protection Program in accordance with the UA [Child Protection Policy](#).
2. Campus Security Authority (CSA) training – this training will be provided via DocuSign as an email to all Program Staff upon registration.
3. Medical Information/First Aid – only for those with responsibility for distributing medicine or for providing medical care - this training will be provided via DocuSign as an email to appropriate Program Staff upon registration.

Colleges and units must ensure that faculty, staff, students, student employees, graduate assistants, and volunteers have completed all required training annually *before* they work in activities or programs for or including minors.

If training is completed via an in-person training session, training records must include who attended, what was covered, when and where the training was presented, and participants must sign a roster indicating their understanding. Records of training must be kept consistent with the unit's record keeping and the University's Records Retention Schedule. Copies should be provided to the Compliance, Ethics, and Regulatory Affairs Coordinator.

IV. Counselor to Participant Ratios

Counselor to participant ratios should conform to the ratios listed below. Programs or activities involving minors with a small (less than 5) number of participants should have two individuals responsible for oversight. In large groups of participants, programs may need to provide additional staff for the oversight of campers, depending on the intended activities. Regardless of the number of participants, at least 80% of the counselors must be age 18 or older.

Camper Age	Minimum Number of Program Staff at All Times	Ratio of Program Staff: Overnight Campers	Ratio of Program Staff: Day-only Campers
5 years and younger	2	1:5	1:6
6–8 years	2	1:6	1:8
9–14 years	2	1:8	1:10
15-18 years	2	1:10	1:12

All camp staff ratios should confirm to guidelines from the American Camps Association, plus 1 additional staff member, meaning that programs should maintain one additional staff number over the number required by the above listed ratios. For example, a day camp of 10 year olds with 5 participants would require 2 staff members at all times. A day camp of 10 year olds with 50 participants would require 6 staff members (1:10 ratio means 5:50 so 5 staffers plus one additional for a total of 6 staff members). For assistance with determining the appropriate numbers of Program Staff or questions regarding staffing requirements, contact the Compliance, Ethics, and Regulatory Affairs Coordinator.

V. Minors with Special Needs

Each camp or program for or including minors must establish a set of standards for reasonably accommodating minors with special needs. These include, but are not limited to, the modification of policies, practices, and procedures, effective communication prior to and during the camp or program for minors and the removal of physical or communication barriers to programs, activities, goods or services. Programs must provide ample time for participants to disclose any reasonable accommodations they may need during their participation in the program. Programs must communicate contact information for a specific individual responsible for the identification of reasonable accommodations.

For questions or assistance with securing reasonable accommodations, contact the Compliance, Ethics, and Regulatory Affairs Coordinator.

VI. Illness, Injury, and Medication

Any incidents, accidents, or injuries occurring during a program or activity for or including minors should be reported to UA according to established policies, including:

- Those involved should submit a General Incident Report using the [General Incident Report](#) form.
- Employees who are injured during working hours should submit an [On the Job Injury Form](#).
- Student/Non-Employee injuries should be submitted using the [Student/Non-Employee Injury Report](#).
- Any issues that are not addressed under these policies should be reported to UAPD (348-5454).

All programs must obtain authorization to administer any medication, including prescription and non-prescription, from the participant's parent or guardian in a written, signed and dated format using a completed Medical Information Form. This form expires at the end of the program. The participant's parent or guardian may not authorize administering medication in excess of the medication's label instructions or the directions of the child's health-care professional. Parent or guardian authorization is not required for administering a medication to a participant in a medical emergency to prevent the death or serious bodily injury of the participant, provided that the medication is administered as prescribed, directed, or intended. If the program chooses not to administer any medication, parents or guardians must be notified of this prior to the participant's enrollment in the program.

Medication given must be dispensed from the original container to the individual for whom the medication was prescribed within the expiration date. Over-the-counter medication must be labeled with the individual's name along with a Medical Information Form. When a staff member or volunteer administers the medication, they must record the full name of the participant, name of medication, date and time medication was given and full name of staff member or volunteer who administered the medication.

All medication must be stored out of reach of all participants or locked in storage in a manner that does not contaminate food, or refrigerated, if required, separate from food.

Medication must be returned to the participant's parent or guardian or upon completion of the program or upon participant dismissal from the program.

All documentation associated with illness, injury, or medication should be submitted to the Compliance, Ethics, and Regulatory Affairs Coordinator at the close of the camp.

VII. Reporting of Incidents or Accidents

Incidents and accidents can include such things as: minor to major physical injuries of participants and/or counselors; behavioral issues among participants, counselors, or visitors; hospital/doctor visits; violent or potentially violent behavior; the possession or use of alcohol or other drugs; inappropriate physical contact; or violations or potential violations of UA policy.

Emergencies, including emergency medical situations, should be reported to UAPD at 205-348-5454.

In addition to any other reporting or incident documentation, the UA Program Contact or Program Director should report any accidents/incidents to the Compliance, Ethics, and Regulatory Affairs Coordinator as soon as possible. If consultation regarding reporting is needed, or if there are questions on the process or other support needed, please contact the Compliance, Ethics, and Regulatory Affairs Coordinator.

VIII. Abuse or Neglect of a Minor

In accordance with the UA Child Protection Policy, if you know or suspect that a child under the age of 18 is a victim of child abuse or neglect, you must act.

In deciding whether or not to report an incident or situation of suspected abuse or neglect, it is not required that you have proof that abuse or neglect has occurred. Any uncertainty in deciding to report suspected abuse or neglect should be resolved in favor of making a good faith report.

In making a report, your actions should be as follows:

First, immediately report the information to:

The University of Alabama Police Department at **205-348-5454**.

Your oral report should include all available information regarding the known or suspected abuse or neglect, including, but not limited to, the name of the child, his whereabouts, the names and addresses of the parents, guardian, or caretaker and the character and extent of the injuries. The report should also contain, if known, any evidence of previous injuries to said child and any other pertinent information that might establish the cause of such injury or injuries, and the identity of the person or persons responsible for the same.

Second, do not directly question or solicit information from the child or from the person suspected of improper behavior. That is not your role; the role of investigation lies with city, county, and state officials.

Third, in addition to making an oral report, you must also complete a [Child Abuse or Neglect Report Form](#) and deliver the same to the UA Police Department.

IX. Background Checks

Any faculty, staff, appointee, student, student employee, graduate associate, or volunteer working in activities or programs for and involving minors, and who are likely to have responsibility for the care, custody, or control of a minor as part of that activity or program, must successfully complete appropriate background checks. Individuals must have a federal, state, and sex offender background check. Individuals who have a break in service for fewer than 12 months must disclose any convictions that occurred during the break within three weeks (21 calendar days) of the beginning of participation in activities or programs. If a break in service is longer than 12 months, individuals must have a new background check before working in activities or programs for and including minors.

College and unit activities or programs for and involving minors can require background checks on broader categories of individuals than those who are likely to have responsibility for the care, custody, or control of a minor as part of an activity or program, provided there is a business justification, that checks are made consistently across specific positions and that the process and the results of individual background checks have been approved. Units must perform background checks on broader categories of individuals if required by law.

- A background check must be completed every year to remain eligible to work in activities or programs for and including minors.
- College and unit activities or programs for and including minors must perform background checks on applicable individuals more frequently if required by law.
- Program Staff age 19 or under must successfully complete a Personal Reference Check in place of a criminal background check. Parental consent must be given before UA can perform checks on individuals under the age of 19.
- Records must be kept consistent with the unit's record keeping and the university Records Retention Schedule.
- Contracts with Third Party programs shall include, as a provision of the contract, the requirement that staff or volunteers affiliated with the program submit information needed for UA to complete required background checks in accordance with this policy and established UA procedures OR provided information or verification that background checks on staff provided by a Third Party have been completed to equivalent standards.

Criminal convictions, deferred adjudications and/or sex offender background checks that return any offense could *potentially* disqualify a person from being employed by or assigned to a program or activity involving minors. Any areas of concern will be forwarded to the Compliance, Ethics, and Regulatory Affairs Coordinator for review with appropriate University officials.

Faculty, staff, students, student employees, graduate assistants, contractors, or volunteers must self-disclose felony or misdemeanor convictions that occur after hire/appointment within three (3) business days after conviction, according to UA policy.

X. One-on-one interactions

One-on-one interactions may take place only in open, well-illuminated spaces or rooms observable by other adults from the activity or program.

XI. Accountability

Individuals violating this UA policy or the requirements of this Guide will be held accountable for their actions, which may include, but are not limited to:

- Volunteers are subject to reprimand or loss of volunteer status;
- Students are subject to the Code of Student Conduct;
- Faculty, staff and student employees are subject to corrective action up to and including termination;
- Unit level sanctions, and;
- Third party providers are subject to punitive actions under the terms of their contract agreement, up to and including termination of contract.

Site visits may be coordinated by the Compliance, Ethics, and Regulatory Affairs Coordinator to promote compliance. Colleges, units, and individuals must participate in site visits as required.

XII. Reporting and Investigations

Reporting of known or suspected cases of child abuse or neglected should be reported in accordance with the UA [Child Protection Policy](#). Investigations of allegations of child abuse or neglect will be conducted in accordance with the investigatory protocols of children service agencies, local law enforcement agencies, and/or the University.