

Youth Protection Policy

Unit: Office of Compliance, Ethics, and Regulatory Affairs

Effective Date: 9/1/2017

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Contact: Dr. Marcy Huey

Title: Executive Director for Institutional Compliance

Purpose

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, and/or volunteers are therefore expected to hold themselves to the highest standards of conduct when interacting with minors. This policy establishes requirements for those in the University community who work with any activities or programs for or that include minors (“Youth Programs”), including, but not limited to, camps, conferences, research or outreach activities. In addition to the requirements of this policy, faculty, staff, students, student employees, graduate assistants, contractors, and/or volunteers must adhere to applicable law and other applicable University policies.

Parents or guardians should not leave minors unsupervised on University property unless the minor is engaged in a properly supervised Youth Program.

Policy

For purposes of this policy, a “minor” is any person under 18 years of age.

This policy applies to all faculty, staff, students, student employees, graduate assistants, contractors, and/or volunteers working in Youth Programs. The purpose of this policy is to promote the safety and welfare of minors who participate in Youth Programs, including such activities as camps, conferences, research and outreach activities, among others. Any University personnel planning a program or activity that involves minors or may involve minors in any capacity must contact the Office of Compliance, Ethics, and Regulatory Affairs (205-348-2334; youthprotection@fa.ua.edu) for review and assessment of specific program requirements. Aside from the limited exceptions noted herein, all Youth Programs will be subject to this policy and to the more detailed instructions outlined in the [Guide for Activities or Programs with Minor Participants \(Guide\)](#). All program staff must abide by the requirements outlined in this policy and in the Guide when working in Youth Programs and are expected to comply with all relevant policies and directives to the satisfaction of the University. Any behavior or contact between program staff and program participants that violate approved program activities, established law, UA’s [Child Abuse Reporting Policy and Procedures](#), or other relevant UA policies is prohibited.

1. All organizers for Youth Programs must submit a [registration form](#) and all requested documentation to the Office of Compliance, Ethics, and Regulatory Affairs (205-348-2334; youthprotection@fa.ua.edu) pursuant to the detailed process outlined in the Guide. *Program registration should be submitted and approved before beginning to advertise or accept participant registrations*, but no less than 8 weeks in advance of the program start date. Detailed information on required documentation is available in the Guide and on the [Youth Protection webpage](#). Failure to comply with this policy or the requirements of the Guide may result in the activity or program being denied approval.
2. University departments sponsoring Youth Programs should maintain an up-to-date listing of those programs being offered thru their area. Such lists should include each program’s dates, times, locations, attendance (including age range and number of participants), and the contact information for the UA program sponsor and should include contact information for the program director where applicable.

3. Those working in Youth Programs who witness child abuse or neglect or have information that would lead a reasonable person to believe a minor faces a substantial threat of such abuse or neglect, must follow reporting procedures established in the UA [Child Abuse Reporting Policy and Procedures](#). Any person who makes a good faith report of child abuse or neglect shall not be subjected to retaliation. Further, any person or entity that makes a good faith report of child abuse or neglect is immune under Alabama law from any liability—civil or criminal—that might otherwise be incurred or imposed.
4. Individuals working in activities or programs for and/or including minors must successfully complete required background checks and training before working in such activities or programs. Detailed information on required background checks and training is available in the Guide.
5. Youth Programs may be subject to site visits coordinated by the Office of Compliance, Ethics, and Regulatory Affairs (205-348-2334; youthprotection@fa.ua.edu). Any suspected violation of approved program guidelines or University policy will be subject to investigation by the appropriate University officials. Colleges, units, and individuals must cooperate with investigations when they occur.
6. Compliance with the policy and the Guide is required as a condition of operating programs or activities involving minors at UA. Failure to comply with the requirements of this policy or the requirements further outlined in the Guide can result in the loss of program privileges and other sanctions at The University of Alabama.
7. Individuals working with minors should not be alone with minors. If an activity requires any type of one to one interaction (tutoring, private lessons, interviews, etc.) these interactions must take place in a location that is open, observable, and interruptible.

All areas/programs are still subject to all other relevant UA policies and procedures, including the [Child Abuse Reporting Policy and Procedures](#). Except for the exclusions listed in the next paragraph, all Youth Programs 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 programs, instructional programs, day camps, academic activities, 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). This could also include auditions, lessons, tutoring, or tours where the parent or guardian is not present.
- Student organizations or any other University-affiliated organization operating, facilitating, or sponsoring activities or programs for or that include minors.

This policy does not apply to:

- Undergraduate and graduate academic programs involving a minor participant who is enrolled or who has been accepted for enrollment as a student at the University.
- Properly registered recruiting events sponsored by a University recognized student organization that may be attended by minors who are enrolled or have been accepted for enrollment as a student at the University.
- Events on campus open to the general public that minors may also attend (e.g., sporting events, theatre performances, etc.).
- Events or programs offered by University personnel in which the minor is accompanied by a parent, guardian, coach, or teacher *at all times*.
- Research programs involving minors which are approved by the University's Institutional Review Board (IRB).
- 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. These facilities or programs are expected to comply with all applicable laws and regulations and are outside the scope of this policy. However, separate camps, programs, or activities sponsored by these facilities could be subject to this policy.

Definitions

Activities or programs for or that include minors: Any (1) event, operation, or endeavor operated, conducted, or organized by any unit or organization supported by or affiliated with the University or occurring on University property, (2) that includes minors, **and** (3) during which parents or guardians are not expected to be responsible for the care, custody, or control of the minors. These include third-party activities or programs (defined below).

Minor: Any person under 18 years of age.

Program Director: A program director is the individual on-site who is responsible for the day-to-day operations of the activity or program and who oversees program staff.

Program Participant: A program participant is a minor attending a program or activity affiliated with the University.

Program Staff: Program staff consists of both paid and unpaid individuals who have direct contact with activity or program participants. This may be faculty, staff, students, student employees, graduate assistants, contractors, or volunteers. Program staff are responsible for planning, teaching, coordinating, and carrying out activities and the supervision of participants in the activities or programs.

Third-party activities and programs: Third-party activities or programs are Youth Programs that are offered by an individual or entity that is not affiliated with The University of Alabama and that have a participant group made up, in whole or in part, of minors. These programs complete all or part of their educational and/or business purpose on UA property and the third-party individual or entity assumes full or primary responsibility for the supervision of the minors. These programs may or may not collect fees from participants. Third-party activities or programs must:

- Establish a contractual relationship with the University for the use of facilities and/or resources;
- Provide evidence of insurance coverage in accordance with the requirements outlined by UA's Office of Risk Management, unless the requirements are waived by the Office of Risk Management;
- Be sponsored by or affiliated with a University department, college or recognized student organization and have a designated UA program contact;
- Designate an on-site program director, if not the UA program contact;
- Operate under the administrative purview of a University department;
- Meet the contractual requirements for background screenings and training as outlined in the UA Permissive Use Agreement, the Guide, and this policy;
- Complete the same review and approval process as a University-sponsored activity or program.

The Guide: The University of Alabama Guide for Activities or Programs with Minor Participants.

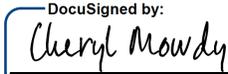
UA Program Contact: This individual represents the department, college, or student organization responsible for the direction or operation of the activities or programs. In the case of third-party activities or programs, this person serves as the liaison between UA and the third-party personnel. The UA program contact must be a full-time UA employee and is responsible for registering the third-party activities or programs.

Volunteer: Any individual working in an unpaid capacity in an activity or program for or including minors.

Scope

This policy applies to all faculty, staff, students, student employees, graduate assistants, contractors, and/or volunteers working in activities or programs for and that includes minors.

Office of the Vice President of Finance and Operations

Signed: DocuSigned by:
 7/24/2019
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Cheryl Mowdy
Assistant Vice President for Finance and Operations