

Adopted 2003

# Youth Interaction Safety Policy

## Campus Programs for Minors (SB 1414)



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## **Introduction**

Southwestern University has implemented a proactive **Youth Interaction Safety Policy** to ensure the safety/security of youth on our campus, mitigate liability, and define the roles and responsibilities of Southwestern University staff and volunteers. Our policy includes safe interaction guidelines, criminal background checks, online training for camp/program staff, compliance with Senate Bill 1414 (campus program for minors), and third-party sponsored camp contracts.

## **Benefits**

Implementing this policy will help to protect participating youth from potential misconduct incidents, help protect camp/program staff from potential false allegations of misconduct, as well as to help promote the University interests in providing a safe, educational and enjoyable camp/program experience.

## **Steps for Camp Directors to Implement – SUMMARY**

1. Review the **Youth Interaction Policy** with all camp/program staff prior to them participating in youth camps/programs as well as on an annual basis.
2. Review **Youth Protection Requirements** with all camp/program staff.
3. Collect a signed copy of the “annual sign-off form” for all participating camp staff during initial implementation and on an annual basis. These forms should be retained by the department for period of two-years for camp/program recordkeeping.
4. Initiate and verify successful completion of annual **Background Checks** for all camp/program staff.
5. Initiate and verify successful completion of *EIIA Camps on Campus: Keeping Children Safe* online training course for all camp/program staff.
6. Ensure compliance with **Campus Program for Minors** (if required for your camp/program). See flow chart on page 13 to determine if your camp is required to participate in web based training or exempt. Review pages 10-16 if sexual abuse awareness training is required for your camp staff.
  - a. If your camp qualifies.
  - b. Ensure child abuse awareness training is completed by all qualified staff.
  - c. Submit required forms to DSHS.
7. Camp/program staff responsible for transporting participants must complete the appropriate **Driver Safety Training**.

### **Youth Interaction Guidelines**

The primary interaction guidelines are provided below and are to be followed by all camp/program staff.

**The preferred method is to avoid private one on one interactions and have another adult observer (can be an SU student) present during all interactions with youth participants.**

**Following these Guidelines can also help in Protecting Yourself from False Allegations.**

- Use the rules of “line of sight” and “three or more” - always be in view of others and supervise in pairs.
- All physical contact should be appropriate, such as high fives and fist bumps.
- Staff should not engage in, initiate, or encourage inappropriate contact, such as chest bumps, kisses, hugs, posterior slaps, or sitting on laps.
- Respect the privacy of campers/youth, and avoid sharing opinions or making inappropriate comments when in the presence of campers/youth.
- Use of alcohol, drugs or tobacco products is prohibited.
- Staff should avoid non-group social media or electronic communication with campers/youth. Camp/program communication should be sent to all participants as a group. If individual communication is needed, please include the participant’s parent/guardian and another staff member on your message.
- All campers/youth must have adult supervision until released to a parent or guardian.
- No campers/youth are to be transported by staff in personal vehicles.
- A camper requiring medical attention should be directed to the athletic trainer, parent, or a medical provider.

### **Overnight Camps/Programs**

The following are additional precautions related to overnight campers who stay in campus/other housing.

- Never have a camper in private quarters. Plan and schedule so that boys and girls are separated by some barrier other than a wall (i.e. by floors or wings), and that they are supervised in the residence halls by same-sex staff.
- Report a sick camper immediately to the athletic trainer, parent, or medical provider.
- Inspect the community bathrooms frequently for messes or damage; do not enter a bathroom or shower stall to assist a camper without another staff member present.
- Always have campers follow University guidelines relative to safety (i.e. fire alarm – evacuation, severe weather, etc.)
- Never leave campers alone in the residence halls.

### **Staff Judgment**

*Ask yourself: What would I do if the campers’ parents were watching?*

### **Youth Protection Requirements**

- Child abuse in any form will not be tolerated. Avoid any questionable situations; children can mistake well-meaning attention as sexual misconduct. The State of Texas law requires that Child Abuse or Sexual Abuse, real or alleged, be reported to proper authorities for investigation. Anyone who suspects or discovers child abuse should report it immediately to the Camp Director.
- Anyone that witnesses a minor in imminent danger or a crime against a minor in progress should immediately call 911.
- A report must be made within 48 hours of the initial suspicion of abuse or neglect of a minor to:
  - the University Police Department at 512-863-1944; and
  - Title IX Coordinator at 512-863-1441; and
  - Texas Department of Family and Protective Services Abuse Hotline at 800-252-5400 or through their secure web at <https://www.txabusehotline.org/Login/Default.aspx>.
- To make an anonymous report in a non-emergency situation, select the anonymous reporting link found at <https://www.southwestern.edu/life-at-southwestern/title-ix/help-for-sexual-misconduct-sexual-assault/>
- Failure of a person to comply with the reporting requirements of this policy and state law is a violation of state criminal law, and the person may be subject to disciplinary action, up to and including termination.

### **Background Checks**

The Program Director should provide completed applicant release forms for the background check (with current address) for participating staff/volunteers to the Southwestern University Police department (SUPD) at least 10 business days prior to the start of the first camp/program. Program Director is responsible to verify/confirm with SUPD that all members have successfully passed their annual background checks. Release forms are available at SUPD as well as at [www.southwestern.edu/safety/programs-policies](http://www.southwestern.edu/safety/programs-policies).

- Student volunteers/mentors will only be required to conduct a one-time criminal background check to be eligible to participate in camps/programs involving youth for the duration of their four-year study at Southwestern.
- Staff/coaches who are required/expected to participate in youth camps/programs as a function of their primary job duty must pass their initial criminal background check as a contingency for employment; they must have annual background checks beginning in their second year of employment.
- Staff/coaches who volunteer their services or serve as a secondary job duty at a youth camp/program must pass the annual background check prior to participating in a youth camp/program.
- Contracted teachers who have recently passed (one year period) a public school criminal background check will be asked to provide written verification. If verification cannot be obtained, they will be required to pass our criminal background check.

Background checks will be performed by SUPD through a reputable private firm specializing in this field. After reviewing the initial results of the background check, if there is a question of eligibility, SUPD will forward the file to Human Resources. In this situation, Human Resources will make the final determination and appropriate notification. Note that you can review a summary of rights and information related to the Fair Credit Reporting Act at [www.southwestern.edu/safety/programs-policies](http://www.southwestern.edu/safety/programs-policies).

Any arrest (including a citation), charge, conviction or plea of no contest (nolo contendere) involving a participating youth camp/program staff member must be reported to the camp director immediately upon citation, arrest or conviction.

**Driver Safety**

Any participating youth camp/program staff member who will be responsible for transporting camp participants in University vans or third-party rented vehicles must:

- Have an authorized driver's license check performed by SUPD every three years.
- Complete SafeColleges on-line defensive driver training & vehicle safety policy modules every five years.
- If vans will be used to transport campers, they must complete SafeColleges 15-Passenger Van Safety training every five years.
  - If the staff member is an inexperienced van driver, they must also complete Southwestern's behind-the-wheel training.
- Follow Southwestern University's safe driving rules as listed in the SafeColleges vehicle safety policy.
- Avoid any one-on-one transportation of youth.

Additionally, if camp/program staff members will be driving university owned utility carts while carrying out the responsibilities of their assignment, they must:

- Complete SafeColleges on-line utility cart safety and utility cart policy modules every five years.

**Annual Sign-Off Form**

To help insure a safe youth camp/program environment, Southwestern University has implemented a Youth Interaction Safety Policy. The policy includes interaction guidelines. All camp/program staff are required to review the entire youth interaction policy on an annual basis. In addition, each member should sign to acknowledge that they have read and agree to follow the youth interaction policy and interaction guidelines.

Program Directors are responsible for collecting and permanently filing these sign-off forms on an annual basis.

**I have read and understand the Southwestern University Youth Interaction Policy in its entirety. I affirm that there is no reason why I should not participate in programs involving youth/minors.**

Print Name	Signature	Date



## Campus Programs for Minors - Senate Bill (SB) 1414

February 8, 2012



[Title 25: Texas Education Code, Chapter 51, Subchapter Z, §51.976](#), Training and Examination Program for Employees of Campus Programs for Minors on Warning Signs of Sexual Abuse and Child Molestation.

The goal of this rule is to provide awareness training to program (camp) staff to help reduce, prevent, and report suspected child abuse/molestation. Recognizing warning signs in minors, understanding behavioral patterns in child molesters and implementing a reporting system to help protect the minor is the main emphasis.

The rules impose a requirement for all *employees\** in a position involving *contact with campers\*\** at a campus program for minors to successfully complete a state approved training and examination program on sexual abuse and child molestation.

- *\*employee* is a person of any age who receives any compensation, pay, stipend or reimbursement of any value (ex. course credit). Each employee must successfully complete state required training prior to the start of camp.
- *\*\*contact with campers* does not include an employee acting as a guest speaker, entertainer, or a person who visits for a limited purpose or limited time if the person has no direct and unsupervised interaction with minor campers – (ex. sign-in coordinator during registration, guest speaker or other person when they will not be in a one on one interaction with a camper). These employees/persons would not be required to obtain training in order to participate in the camp.

A *program operator\** must submit to the Department of State Health Services (DSHS) (DSHS form EEH-28) (<http://www.dshs.state.tx.us/cpm/forms.shtm>) prior to the start of the program, verification that each employee of the program has complied with the requirements of the new rules. Form submittal required only if camp has: 20 or more minors and camp duration is 4 days or more. Copies of training certificates must be retained for each employee for a period of two years after the camp.

- *\*A program operator* is a person who owns, operates or supervises a campus program for minors. Operators must ensure employees have been trained within the preceding two years of the start of the program (camp) start date. Paid Southwestern students may be exempt from the training requirements if their contact is limited to a single class/activity of short duration (approx. 4 hours or less). Unpaid Southwestern students or staff/volunteers are exempt from training. Note: the camp director is the “operator” and has responsibility to comply with SB 1414.

Criteria for a “campus program for minors” (camp) that fall under the SB 1414 training requirement:

- A Southwestern sponsored program or a third-party sponsored program hosted at Southwestern.
- A program (camp) *involving minors*.
- The program (camp) will host a minimum of 20 minors.
- A program (camp) with a total duration of four (4) days or more. This does not need to be consecutive days and includes counting partial days as full days.

**Training Information:** A state approved training course has been selected that provides on-line training and certification for the convenience of staff involved in programs for minors. The training vendor is SafeColleges. It will be the responsibility of the program (camp) director to coordinate this process with Human Resources and each qualified program/camp employee. Please see: Senate Bill 1414 Child Protection Training Procedures for complete details. Refresher training is required every two years if the employee continues to participate in campus programs for minors.

Program operators must comply with this rule by June 1, 2012.

Campus Program for Minors website: <http://www.dshs.state.tx.us/cpm/>

For questions (interpretations) related to Campus Programs for Minors, please contact the Safety & Risk Management Office at x1677.

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**The Southwestern University Youth Interaction Policy (including annual criminal background checks) applies to all camps/programs for youth that are held on our campus.**

**Please remember that the preferred method is to avoid all private one on one interaction with minors and to plan your programs to have an additional staff person present.**

**Senate Bill 1414: Child Protection Training Procedures**

<https://legiscan.com/TX/text/SB1414/id/296728>

For questions regarding Senate Bill 1414 or the Youth Interaction Policy, please contact Michael DeLance, Director of Campus Safety and Risk Management, x1677

For questions regarding the online training with SafeColleges, please contact Human Resources, x1220.

**Program Director/Coordinator Responsibilities**

- Determine who within your program needs to take the SB 1414 training
- Notify those who need to take the SB 1414 training.
- Ensure participant training is complete and all certificates are kept on file.
- Complete the Campus Program for Minors verification form (EEH-28)
- Submit the form to the Department of State Health Services if the camp/program is 4 days or more **and** has 20 or more minor participants.

**SafeColleges on-line training**

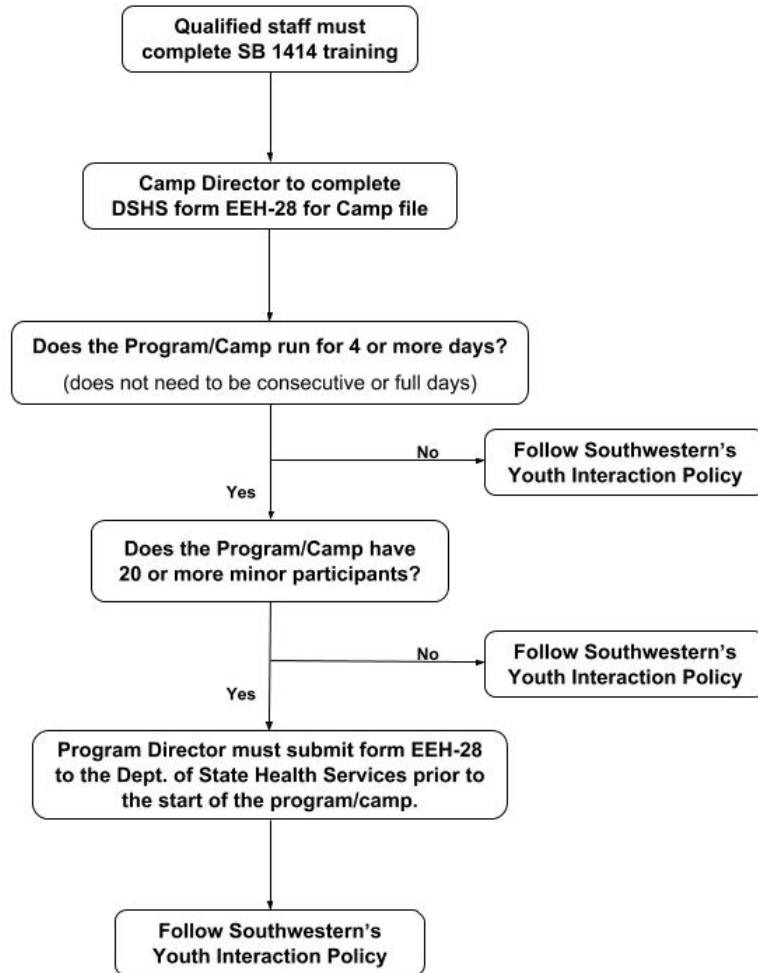
Contact Renee Maule ([mauler@southwestern.edu](mailto:mauler@southwestern.edu)) in Human Resources to initiate the on-line training process at least 10 days prior to the start of your program/camp. In your email, provide the full names and email addresses for all camp staff that require training. A SafeColleges account will be created for each participant (employee). Login information and training notifications will be set out via email. See instructions on the next page.

**Cost of Training**

The required SafeColleges on-line training is provided free of charge for all Southwestern University employees taking on the role of camp/program staff.

### Campus Program for Minors Flow Chart Southwestern University Program (Camp)

Quick guide to determine if your program or camp meets the criteria to comply with SB 1414 and Southwestern University's more protective requirements.



See resource document: Campus Programs for Minors, SB 1414 for more guidelines and definitions. <https://legiscan.com/TX/text/SB1414/id/296728>

### **Third-Party Sponsored Camp Contracts**

Third-party sponsors will be required to provide proof of one million dollar occurrence-based liability insurance with Southwestern University included as an additional insured. Liability policies may not have exclusions for sports camps/athletics, physical/sexual abuse, harassment, or molestation.

Sponsors will be asked to make all advertisements clear that Southwestern University is only hosting the facility/grounds for their camp program.

Southwestern University asks that sponsors take reasonable precautions and support safe guidelines similar to our Youth Interaction Safety Policy including compliance with SB 1414 (Campus Program for Minors).



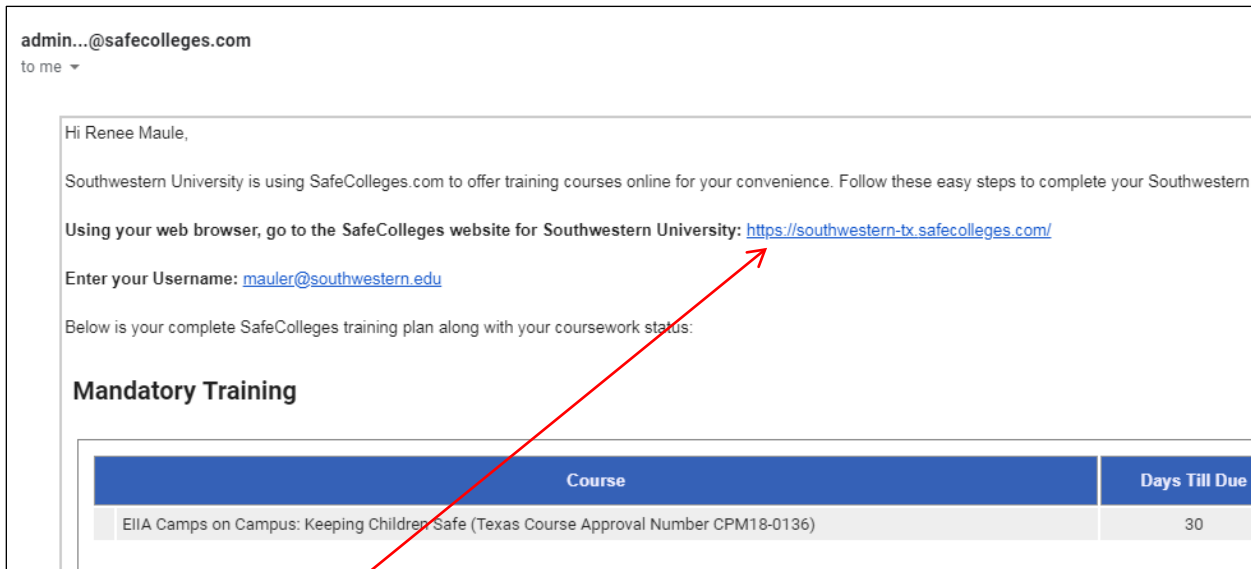
Note: Out-of-state program operators must be trained by a Texas DSHS approved training provider. A listing of these providers can be found at: <https://www.dshs.state.tx.us/cpm/training.shtm>

**Completing Child Abuse Awareness Training**

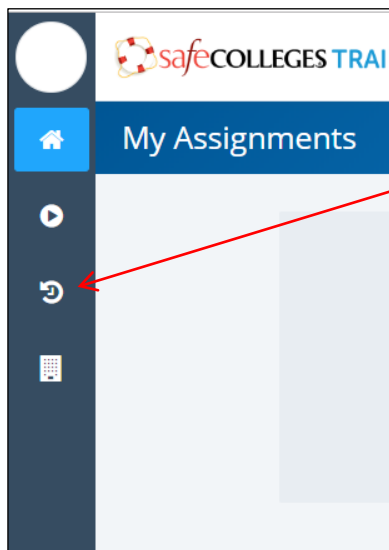
Instructions for Completing the SafeColleges on-line Training *EIIA Camps on Campus: Keeping Children Safe*.

Camp Directors will need to send a complete list of camp/program staff that need to complete this training to Human Resources at least 10 days prior to the start of your event. Submit a separate listing for each event and please include each participant’s full name and their email address.

When the training is assigned, an email will be generated from **admin ... @safecolleges.com** with login and training assignment information.



**Click on the link to access your training assignment.**



When you have completed your training, click on the **“Training History”** button on the left-hand side of your SafeColleges dashboard.

Click on **“View Certificate”** and print for your Camp Director.

