

# VII. COMMUNITY STANDARDS AND POLICIES: W. POLICY FOR ACTIVITIES OR PROGRAMS WITH CHILDREN OR MINOR PARTICIPANTS

## Policy for Activities or Programs with Children or Minor Participants

Denison University is committed to providing a positive and safe experience for minors participating in programs on campus. This policy establishes requirements for those in the university community- faculty, staff, or students, who work with minors in activities or programs on campus or that are otherwise Denison operated.

### Policy Requirements

1. Registration: All activities and programs with minors must register with the Office of Human Resources.
2. Reporting: Those working in activities and programs with minors 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 the specific reporting procedures described here and required by law.
3. Background checks: Individuals must be background checked before working in activities or programs with minors, and regularly thereafter.
4. Training: Divisions must ensure that individuals working in activities and programs with minors complete annual training.

Denison expects parents or guardians to provide supervision over minors on university property unless they are involved in a supervised activity or program with minors. When on campus, the parent or designated adult custodian must maintain supervision of their children at all times. The parent or adult custodian is responsible for children's behavior. Children should not be left alone or under the care of another university student or employee, except for special event childcare organized by the university.

Children are not allowed in classrooms while classes are in session, unless permission is granted by the faculty member and the faculty member is present at all times in the classroom. Children are not allowed into restricted or hazardous areas, unless otherwise allowed in this policy.

### Policy Exclusions

1. Persons under the age of 18 who are enrolled for academic credit or have been accepted for enrollment.
2. Events on university property open to the general public, and that minors attend.
3. Institutional review board (IRB) approved research.
4. Student organizations operating, facilitating, or sponsoring activities and programs with minors.
5. Minors working for the university as employees.
6. Activities and programs with minors operating, conducted, or organized by non-university entities that take place on university property, including but not limited to facility rentals to third party

organizations. (For Denison employees who direct or work with a third party in an activity or program with minors on campus, you must confer with Human Resources to determine whether the program is considered Denison affiliated or separately sponsored.)

### Registration and Approval

Units operating activities and programs with minors must register each activity or program with the Office of Human Resources by submitting the Request to Register a Program Involving Minors Form (<https://my.denison.edu/campus-resources/environmental-health-safety/policies/>).

The sponsorship of a program or event involving children must be by a recognized Denison academic or administrative department. For co-operated programs with a community organization or other outside group, the Denison program sponsor shall be the primary person from Denison responsible for the program. Registration should be completed 60 days in advance of the program/activity start date when possible, but in all events must be completed before an activity or program with minors begins.

### Parent/Guardian Consent and Waiver

When bringing children to campus or going on a field trip, all students must have permission from their parent or guardian by using the Parent/Guardian Consent and Waiver. For events sponsored by Denison, the program leader must collect a parental consent form for every child participating in the program or activity BEFORE the event or program takes place. The Parent/Guardian Consent and Waiver contains emergency contact information and should be readily accessible by the program leader or designated emergency coordinator during the entire program or activity.

### Hosting a Non-University Sponsored Program with Children

Persons wishing to use Denison facilities for non-university sponsored programs, such as camps, conferences, and special events are to coordinate the program through Conferences & Facility Rentals (<https://denison.edu/campus/conferences-facility-rentals/plan-your-event/>).

### Children's Online Privacy

The Children's Internet Protection Act (CIPA) is a federal law to address concerns about access to offensive content over the internet on school and library computers. CIPA imposes certain types of requirements on any school or library that receives funding for internet access. Program leaders should contact Information Technology Services if children will be using university computers to access the internet or if personally identifiable information will be collected for children.

### Reporting Child Abuse or Neglect

The following information is to assist Denison community members and the surrounding community with questions about recognition and management of suspected child abuse, and Denison's policies and practices to prevent and respond to child abuse.

Any faculty, staff, student, student employee, or volunteer who in the course of their duties witness's child abuse or neglect or has information that would lead a reasonable person to believe a minor faces a substantial threat of child abuse or neglect must immediately make two calls:

1. Call state authorities:
  - a. Call 911 if a child is in imminent danger (life threatening, or abuse is being witnessed).
  - b. Call the Children Services Agency if the child is not in imminent danger. 855-O-H-CHILD (855-642-4453), which is a 24-hour

automated telephone directory that will link callers directly to a child welfare or law enforcement office in their county. Municipal or county peace officers can be contacted as an alternative to Children Services: Granville Police Department 740-587-1234 or Licking County Sheriff's Department 740-670-5555.

2. Call Denison Campus Safety at 740-587-6482.
3. Make an anonymous email report to Campus Safety by completing this form (<http://denison.edu/forms/anonymous-tips/>).

Child abuse encompasses physical, sexual and emotional abuse, neglect, stalking, and placing a child in fear of physical harm. Any sexual conduct with a child is considered sexual abuse. No child may legally consent to sexual activity with an adult. This policy prohibits all forms of child abuse, including child abuse defined by Ohio State law. Further definitions may be found from the Ohio Children's Trust Fund (<https://octf.ohio.gov/wps/portal/gov/octf/what-we-do/the-problem/child-abuse-and-neglect-definitions/>). Ohio law, and, for purposes of this policy, Denison, define a child as a person under the age of eighteen and a person with a mental or physical disability under the age of twenty-one.

If consultation is needed regarding reporting, please contact Denison Campus Safety.

This policy also prohibits retaliation against any individual who in good faith reports an incident of child abuse or the possible witnessing of the warning signs of child abuse, retaliation against a person who engages in activities protected under this policy. Reporting, or assisting in reporting, suspected violations of this policy and cooperating in investigations or proceedings arising out of a violation of this policy are protected activities under this policy.

**A failure of a mandatory reporter to report child abuse as required by this policy may result in discipline up to and including termination.**

Any member of the Denison community who provides knowingly false information or who refuses to cooperate in an investigation related to this policy may/will be subject to disciplinary action, up to and including expulsion, suspension, termination, removal from campus, cancellation of contract, or any other means necessary to address the behavior.

**Background Checks**

The university performs pre-employment background checks on all new employees as a condition of employment. The university performs background checks on adjunct faculty and part-time employees (such as coaches, athletic trainers, etc.) whose work involves contact with minor students, and other children as soon as possible after they have been appointed and prior to any contact with minor students, and other children.

Background checks are not required on current employees with the exception of those employees changing positions. For current employees changing positions, including those filling interim positions, a background check is only required when the new position increases the impact of the perceptible risk factor (contact with a child). If an employee experiences a position change within the same or greater perceptible risk factor, a new background check needs to be conducted if it has been five or more years since their last background check.

The university performs background checks on all key students, camp counselors and program leaders, prior to any university-related contact with a child. A background check includes, but is not limited to, a search for criminal convictions, including sex-related offenses in an individual's counties of residence for the past seven years; a search of the state

registry of sex offenders; and a database search for criminal activity in the individual's states of residence for the past seven years.

**Training**

Units must ensure that faculty, staff, appointees, students, student employees, and volunteers are trained annually before they work in activities or programs with minors. Training will include at a minimum the following topics:

1. Recognizing signs of physical, emotional, and sexual abuse, as well as neglect.
2. Reporting suspected child abuse and neglect, including who must report and what are the reporting requirements; how, when, and where to report; and protection of good faith reporting.
3. How to help prevent child abuse.
4. Standards of behavior.
5. The requirements of this policy.

**Standards of Behavior**

Faculty, staff, appointees, students, student employees, and volunteers working in activities and programs with minors are required to sign and abide by the Standards of Behavior Form (<https://my.denison.edu/campus-resources/environmental-health-safety/policies/>). The purpose of these standards is to promote the safety and wellbeing of all minors. Units must have all faculty, staff, appointees, students, student employees, and volunteers sign the Standards of Behavior Form annually, before they work in activities and programs with minors. Records of such forms must be kept by the unit or program coordinator.

**One-on-One Interactions**

Denison affiliates working with minors should not intentionally or purposefully place themselves in a situation where they are alone with a minor unless authorized by the unit head or program coordinator. Approved one-on-one interactions may only take place in open, well-illuminated spaces or rooms observable by other adults from the activity or program. Under no circumstances will any Denison affiliate physically, sexually, verbally, or emotionally abuse or fail to provide the basic necessities of care applicable to the activity/program, such as food or shelter, to participants.