UNC GREENSBORO

# Guide for Operating Youth Programs

Version 1.7

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Contact

youthpro@uncg.edu

https://oiigc.uncg.edu/compliance/youth-programs/

**Note:** The University of North Carolina at Greensboro may modify or make exceptions to this guide at any time based on business needs. This Guide is not intended to be a set of inflexible requirements, nor is it intended to limit the appropriate discretion of officials as warranted by the individual circumstances of an individual or situation.

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# 1. Overview

UNC Greensboro welcomes the presence of minors who visit the university and participate in a wide range of activities, programs, camps, and events offered by academic or administrative units taking place on or off campus. Serving the community and state through youth programs is integral to our mission and tradition of service. UNCG is committed to providing a safe experience for minors participating in youth programs as well as the employees and volunteers who host them.

Faculty, staff, students, student employees, graduate assistants, contractors, and volunteers are therefore expected to hold themselves to the highest standards of conduct when interacting with minors, as outlined in the Youth Programs Policy.

This Guide is designed to assist Youth Programs with developing procedures and practices that support compliance with the Youth Programs Policy. As a reminder, Youth Programs are subject to all other applicable UNCG policies and procedures, including the Minors on Campus: Reporting Policy.

## 1.1 Mission

The Office of Institutional Integrity and General Counsel monitors compliance with the Youth Programs Policy and this Guide. With respect to the Youth Programs Policy, the mission the University is to promote the safety of minors participating in Youth Programs at UNCG ("youth participants") through a comprehensive compliance program, which includes: (i) the development, revision and oversight of policies; (ii) dissemination of training, and (iii) compliance-related activities, including monitoring.

## 1.2 Contact

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Office of Institutional Integrity and General Counsel
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## 2. UNCG Youth Programs Policy

Unless excluded below, the Youth Programs Policy and this Guide apply to **all** Youth Programs associated with UNC Greensboro that serve one or more youth participants, where one or more of the youth participants are left in the care or supervision of UNC Greensboro faculty, staff, students, student employees, graduate assistants, contractors, or volunteers. Youth Programs subject to the policy and Guide may be operated on or off campus. The policy and Guide apply year-round and are not limited to Youth Programs that operate during the summer months.

### 2.1 Core Elements of the Youth Programs Policy

The policy aims to protect minors and improve accountability across campus for legal, regulatory, and ethical responsibilities related to minors through the following core elements:

- **Division/Departmental Approval** by the dean, the Director of Athletics, or a vice chancellor with supervisory authority over the Youth Program.
- **University-level registration and approval** of Youth Programs.
- **Written Agreements and Information Collection**, including consent for emergency treatment, liability waivers, photography/media releases, emergency contact information.
- **Staff Screening**, including background checks, driving checks, and disciplinary record checks.
- **Required Reporting** of instances of neglect, abuse, certain crimes, or inappropriate behavior with minors.
- **Conduct Standards** for program staff and other individuals working with minors.

### 2.2 Scope

2.2.1 **In-Scope**. Youth Programs subject to the Youth Programs Policy and the Guide include:

a. **University-sponsored programs in UNCG facilities.** 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.

b. **External entity programs.** Activities or programs for or that include minors that are operated, conducted, or organized by external entities that take place on campus or in University facilities, including, but not limited to, facility rentals to external entities.

c. **University-sponsored programs in off-campus facilities.** 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.

d. **Faculty or staff activities.** Faculty or staff who bring minors to campus for activities or programs occurring outside of a structured activity or program where a parent, legal guardian, or other adult acting in a supervisory role (e.g., coach or teacher) is not present. This could include auditions, lessons, tutoring, tours, or activities or programs

during which minors serve as interns or volunteers, often under the mentorship or instruction of a faculty or staff member (e.g., to intern in a laboratory).

e. **Student or university-affiliated activities.** Activities or programs operated, facilitated, or sponsored by student organizations or any other University-affiliated organization that include minors and during which members of the UNCG community are responsible for direct supervision of the minors.

2.2.2 **Exclusions**. The activities and programs listed in this section are not subject to the registration and compliance requirements outlined in the Youth Programs policy and this Guide. Except for activities and programs falling into categories "a" and "b," such programs occurring in UNCG facilities should complete a safety registration with the University, which enables the UNC Police Department and the Office of Emergency Management to provide support in emergency situations.

a. **Undergraduate/graduate academic activities.** Undergraduate and graduate academic activities or programs involving a minor participant who is enrolled or who has been accepted for enrollment as a student at the University, including orientation activities.

b. **Licensed childcare providers.** Normal operations of licensed childcare facilities or educational programs, such as the UNCG Child Care Education Program, the Moss Street Partnership School, and the Middle College at UNCG. These facilities and programs are subject to state laws and regulations with requirements that supersede this policy and are outside the scope of this policy. However, separate camps or programs sponsored by these programs could be subject to this policy.

c. **Clinical or therapy providers.** University-affiliated clinical or therapy providers delivering counseling or treatment services to minors, such as the Psychology clinic, the UNCG Speech and Hearing Center or the Vacc Counseling and Consulting Clinic.

d. **Research or grant-funded programs.** Research programs or grant-funded activities involving minors which are approved by the University's Institutional Review Board (IRB) or research activities otherwise authorized under the University's Minors in Research Laboratories Policy.

e. **Student recruitment.** Student recruitment activities, including open houses and admissions visits and tours, that are scheduled to last no longer than one day and do not include an overnight stay.

f. **Events for the general public.** Events on campus open to the general public that minors may also attend (e.g., sporting events, theatre performances, etc.).

g. **Accompanied minors.** Events or programs offered by University personnel during which the minor is accompanied by a parent, legal guardian, coach, or teacher at all times.

2.2.3 Excluded, or out-of-scope programs should refer to Appendix D for recommendations and resources.

## 2.3 Definitions and Roles and Responsibilities

Terms used in this Guide carry the same definitions stated in the Youth Programs Policy.

- **Youth Program:** A "Youth Program" is any event, operation, or endeavor that is (1) operated, conducted, or organized by any unit or organization supported by or affiliated with the University or occurring in University facilities; (2) that includes minors; and (3) during which parents or legal guardians are not expected to be responsible for the care, custody, or control of the minors. A Youth Program may be University-Sponsored or sponsored by an External Entity but held on University facilities.
    - **University-Sponsored:** A "University-Sponsored" Youth Program is any Youth Program that: (1) the university solely owns and operates; (2) the university jointly operates with another organization; or (3) the university contracts with another organization to provide. University-Sponsored Youth Programs may or may not take place in University facilities.
    - **External Entity Activities and Programs:** "External Entity Activities or Programs" are Youth Programs that are offered by an individual or entity that is not affiliated with UNC Greensboro but take place in whole or in part in UNCG facilities. The external entity assumes full responsibility for the supervision of youth participants.
- **Minor:** A "minor" is any person who has not reached the age of 18 years.
- **Youth Participant:** A "Youth Participant" is a minor attending a Youth Program at or affiliated with the University.
- **Program Staff:** "Program Staff" consists of both paid and unpaid individuals who have direct contact with youth participants, and may include faculty, staff, students, student employees, graduate assistants, contractors, or volunteers. Program staff are responsible for (1) planning, teaching, coordinating, and carrying out activities and/or (2) supervision of youth participants in the activities or programs. The term "Program Staff" does not include individuals who provide services that are limited in nature (such as a lecture or presentation) and who have no direct individual contact with, or oversight of, youth participants.
- **The Guide for Operating Youth Programs:** The "Guide" contains detailed procedures and guidelines for operating Youth Programs at UNC Greensboro.
- **University Facilities:** "University Facilities" are facilities owned by or under the control of UNC Greensboro.
- **Volunteer**: A "volunteer" is any individual working in an unpaid capacity in a Youth Program. Volunteers are subject to the UNCG Volunteer Policy and Procedures.
- **University Compliance Director:** The "University Compliance Director" is an attorney in the Office of Institutional Integrity and General Counsel who is responsible for administering this policy. The University Compliance Director provides compliance approval for Youth Programs, certifying that Youth Programs meet the requirements of this policy and the Guide and, therefore, are approved to operate in affiliation with the University or in University facilities.

# 3. Program Planning

There are several components to planning youth programs and activities that must be considered early in the planning process to ensure that youth participants are provided with a safe and secure environment. This section outlines the major topics that should be addressed prior to registering the program or registering participants.

## 3.1 Agenda

The first step in developing the program is to map out the agenda, detailing the activities, locations, and timeframes. Youth participants must be properly supervised at all times from drop-off to pick-up. The program agenda should outline and ensure that plans for appropriate supervision are in place during all meals, free times, and transitional times.

## 3.2 Operating Procedures

It is important to document expectations of how administrative duties will be handled throughout the event and ensure that all program staff have a clear understanding of their responsibilities.

Topics to be addressed include:

- Identification of Program Staff. How will parents and youth participants be able to identify program staff? Will they wear specific clothing or nametags?
- Procedures for Drop-off and Pick-up. How will you ensure that youth participants are only released to an authorized individual (parent, guardian, or documented designee)? Who will be responsible for managing this process? Youth Programs may incorporate the Sample Drop-Off and/or Pick-Up Authorization Form into their procedures.
- Emergency Communication. How will you communicate with parents if an emergency occurs? This could include accidents affecting only one or two children or larger, more systemic problems (e.g., power outage; bad weather) that require cancellation of activities for all minors. Consider providing an emergency contact name and phone number for parents or legal guardians who may need to contact their child during the program and requesting a list of emergency contacts who are authorized by parents or legal guardians to pick up the youth participant if an emergency occurs.
- Behavior Management. Sometimes minors need a little extra encouragement to follow the rules. Who would handle minors with behavior issues that need to be dealt with away from the rest of the group? If parents must be called to pick up the child, who will supervise them while they wait?
- Physical Contact and Communication with Participants. Operating procedures should also include guidelines that detail appropriate boundaries for physical contact and communication by program staff with youth participants based on the age of the youth participants and the nature of the program activities. Discuss specific issues like communication via social media, sharing of personal information, and supervision of minors in campus residence halls. Any behavior or contact between program staff and youth participants that violates approved program activities, established law, the Youth

Programs Policy, the Minors on Campus: Reporting Policy, or other relevant UNCG policies is prohibited.

## 3.3 Housing

### 3.3.1 Accommodations

For programs that require participants stay overnight in UNCG facilities, arrangements may be made with Housing and Residence Life to provide accommodations. All questions regarding housing accommodations should be directed to Housing and Residence Life.

### 3.3.2 Overnight Supervision

Overnight programs present a unique set of challenges that must be managed carefully. Please be aware of the following safety precautions:

- Additional supervision is required for overnight programs. See the Supervision and Program Ratios section of this Guide for acceptable counselor to youth participant ratios based on the youth participant age group.
- Program staff should not enter participant rooms alone. If it is necessary to enter a room to check on a participant, two staff members should be present at all times. In emergency situations, when another staff member is not available, the door(s) must remain open at all times. See the section on One-to-One Interaction.
- Housing and Residence Life staff are responsible for building operations. They are NOT available to provide supervision for youth participants.

### 3.3.3 Additional Housing Considerations

- Curfews. Have you established a curfew and communicated it to parents/guardians and participants? What are the curfew times? Who enforces the curfew? What policies or procedures are in place to enforce the curfew?
- Separation. Will the participants be separated by biological sex? What is the plan to keep them separated? What is the plan for non-binary individuals?
- Housing Facility Safety Protocols. Have you reviewed all applicable Housing and Residence Life policies and procedures? How will you inform participants of safety provisions specific to the facility in which they are housed?
- Other Housing Facilities. Will participants be housed in facilities other than residence halls? If yes, will each participant have their own bed? How many participants will be in each room? What other groups/camps/programs are being housed in the same facilities? How will the housing area be restricted to the public? Who will have access to the housing area?
- Emergency Exits. How will you instruct participants about emergency exit locations, policies, and common meeting areas in the event of an emergency or building evacuation? Do participants know who to contact if they have an emergency while at the housing facility? Have participants been informed of rules and expectations regarding conduct (e.g. horseplay, pranks, etc.) while they are staying overnight at the housing facility? Who would staff and/or participants contact in the event of an emergency while in housing?

## 3.4 Transportation

### 3.4.1 Transportation Plans

Transportation plans, including information regarding the transportation of youth participants 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 should be documented. For overnight programs, transportation plans should include parking, drop-off, and/or pick-up information for moving in and out of residence halls.

Each program should have a plan in place to provide supervised transportation for minor participants in the event that non-emergency medical care is needed. Transportation should not be provided in a staff member's personal vehicle. Instead, either a UNCG Motor Pool vehicle or third-party provider (e.g., rideshare service or taxi) should be used. See the section on Safety and Planning for the Unexpected for information about planning for emergency medical situations.

### 3.4.2 Additional Transportation Considerations

Develop policies and procedures that address the following:

- Arrivals. How will participants arrive at the program? Who will meet them when they are dropped off? How will the check-in process be managed?
- Departures. How will minors depart from the program? How will the check-out process be managed?
- Program Agenda. Does the program agenda include travel during the program? If so, how will the participants travel and who will drive them?
- Driving Checks. All drivers must have a driving check as part of the staff screening process.
- High Occupancy Vans. Pursuant to UNCG's High Occupancy Vans Policy, if UNCG high occupancy vans will be used during the Youth Program, drivers must complete the training module found under Van Driving on the Environmental Health and Safety training website. Seatbelts must be worn at all times.
    - There must be another adult besides the driver to provide supervision when using a high occupancy van for transportation during a Youth Program.

For more information about transportation, including parking, visit the Parking Operations and Campus Access Management website at parking.uncg.edu/.

## 3.5 Emergency Plans

Emergency plans, including guidelines for weather emergencies and for communicating and responding to UNCG Spartan Alerts must be documented and provided to all program staff. Emergency plans should be specific to the needs of the youth participants. The Sample Emergency Plan for Youth Programs has been developed as a document that can be customized and shared with program staff prior to the start of the program. This sample is a starting point that may be customized to cover a wide range of situations.

Each program or activity must also develop a plan for communicating pertinent emergency procedures to the parents or legal guardians of each youth participant. The plan must include

procedures for the notification of the youth participant's parents or legal guardians in case of an emergency, including medical or behavioral problems, natural disasters, or other significant program disruptions. Youth participants and their parents or legal guardians must be advised of these procedures in writing prior to program participation. Youth Programs should request contact information for the youth participant's parents or legal guardians and other emergency contacts authorized to pick up the youth participant and keep this information accessible for use in the event of an emergency.

UNCG students, faculty, and staff are encouraged to sign up for UNCG's emergency notification system, Spartan Alerts. Individuals who are not current UNCG students, faculty, or staff members may register to receive alerts through UNCG's Office of Emergency Management.

See the Safety and Planning for the Unexpected section of this guide for more information.

## 3.6 Participation Agreements

On behalf of each youth participant, the participant's parent or legal guardian must complete and submit a Youth Protection Program Participation Agreement, which addresses release of liability, medical authorization, safety, and photography/media release.

## 3.7 Managing Medical Issues

This section outlines the requirements for collecting and maintaining medical information and the requirements for medication management in all activities or programs included in the UNCG Youth Protection Program. For the purposes of this program, medical information can include information related to health and wellness, and medication includes both prescription and over-the-counter items. Information regarding medical information requirements, security, and medication management procedures should be communicated to the participant's parent or guardian in advance of the program.

### 3.7.1 Medical Information Management

- Access and Security. Medical information is private, individually identifiable information, and should be treated as such. Access to these records should be restricted to the minimum number of people necessary. The records should be stored securely when not in active use. Social security numbers are not required for the receipt of medical care and should not be collected under any circumstances.
- Information Collection. Youth Programs may utilize the Youth Program: Medical Information Form and Youth Protection Program: Medication Management Form to collect information. Overnight programs are required to have medical information and Medication Management Plans as outlined in this Guide.
- Athletic Programs. Programs that involve physical activities, including athletics programs, may need to collect more detailed information. In some cases, a program will need to document the review of more specific information than is collected by the Youth Protection Program: Medical Information Form.
- Emergency Medications. Programs are expected to have plans in place to ensure that youth participants who require emergency medications have access to them. Such

medications may include insulin, asthma medication, epi-pens, or other related medications.

### 3.7.2 Medication Management Plans

Youth Programs are expected to have a written plan that addresses medication collection, storage, self-administration, and documentation. The plan should also address responding to accidents and emergency events, including communication to participants and their parents or legal guardians. Programs may use the Youth Protection Program: Medication Management Plan Checklist as a guide when developing Medication Management Plans.

- **Submit Plan with Registration Request.** These plans should be submitted as part of the program registration process.
- **Train Program Staff.** Each program must train program staff on Medication Management plans and ensure that they understand both their response and their reporting obligations. **If program staff members are not trained to administer medications, they may only store and provide access to medication for participants pursuant to the Program's Medication Management Plan.** Any medicine which the participant cannot self-administer, should be stored and administered by a licensed healthcare professional. If no one is available, arrangements should be made with another health care professional in advance of the participant's arrival. Youth Programs should consult with the participant's parents or legal guardian to arrange reasonable accommodations in the above situation.
- **Collect Insurance Information.** Youth Programs should collect insurance information so that the program can secure medical assistance for a participant should the need arise. Youth Programs may use the Youth Protection Program: Medical Information Form to collect information. This information should be treated as medical documentation and kept in a secure location with the participant's other medical information.
- **Document Distribution.** Medication Management and Administration Plans may include documenting distribution of medication using a tool record as the Youth Program: Medication Administration Record. Prescription items should be taken according to physician instructions. Over-the- counter (OTC) medications should be taken according to the manufacturer's directions.

### 3.7.3 Seeking Medical Care

If it appears that a youth participant requires medical care, the parent or legal guardian should be contacted immediately. It is best for parents/guardians to pick up a sick participant and take them to their established medical provider. Program staff should accompany any youth participants requiring medical attention who is without their parent or guardian.

## 3.8 Accommodating Special Needs

The Americans with Disabilities Act (ADA) requires that Youth Programs provide reasonable modifications of their policies, practices, and procedures when necessary to enable participants with disabilities to participate fully, unless the program can demonstrate that the necessary modifications would fundamentally alter the nature of the services and activities offered by the program.

Reasonable accommodations could include, but are not limited to,

- Ground floor housing assignments for individuals with mobility impairments
- Sign language interpreters for the deaf
- Special meals for individuals with food allergies
- Frequent breaks for individuals with physical disabilities

Youth Programs are responsible for including in their materials:

- An access statement notifying youth participants and their families that the youth participant is entitled to accommodations during the Youth Program, and
- The process for requesting accommodations.

The necessary arrangements must be determined on a case-by-case basis through collaborative communication with the youth participant's parent or legal guardian, the Youth Program, medical professionals and other campus partners. Youth Programs are responsible for working with the youth participant's family to identify and obtain appropriate accommodations. Youth Programs should contact the UNCG Office of Accessibility Resources and Services for assistance with providing accommodations.

Office of Accessibility Resources & Services
Phone: 336.334.5440
Email: oars@uncg.edu

## 3.9 Food Allergy Accommodations

Reactions to food allergens can be severe and may lead to death. Such reactions can occur very quickly after exposure to very small amounts of an allergen, including exposure to invisible allergens due to cross contamination from inadequately cleaned hands and surfaces.

- Youth Programs should develop and train program staff in protocols and procedures designed to accommodate and ensure the safety of participants with food allergies and other special dietary needs.
- When there are participants with allergies, program staff training should also include information about recognizing the signs and symptoms of an allergic reaction and how to implement emergency protocols.
- Youth Programs should have a method for soliciting and collecting information on food allergies such as the Youth Protection Program: Medical Information Form. It is important to clearly communicate with any food vendors regarding food allergies and other special dietary needs.

## 3.10 Communication with Parents and/or Legal Guardians

Communications with parents and/or legal guardians should address the following:

- Detailed agenda and/or schedule.
- Free time. The agenda or schedule should explicitly outline when youth participants and describe the arrangements for supervising minors during activities and free time.
- Drop-off and pick-up procedures and times. The program should have and use procedures for an orderly arrival and departure of participants, for the loading and

unloading vehicles, and supervision during these times. Parents should be provided with written pick-up and drop-off times, including a system to communicate any changes, safety procedures, and safety rules for buses/vans.

- Authorization to pick up. Gather information about who is authorized to pick up the participant if the parent is unavailable.
- Medical information and procedures for managing any medications that the youth participant may need during the program or activity.
- Procedures for managing accidents, illnesses, and injuries that may occur during the program.
- Personnel identification to be worn by program staff. Parents/guardians and participants should be able to easily identify program staff (e.g., program staff may wear a specific shirt with the program name on it, a name badge, or a hat, etc.)
- Participation agreement.
- Code of conduct for participants and/or behavioral expectations.
- Disciplinary plan and/or procedures.
- Curfews, if overnight.
- Prohibitions on the use of alcohol, tobacco, and non-prescribed drugs.
- Information about UNCG's wi-fi. If minors will have access to devices that can access the internet, parents should be notified that there are very few restrictions on content on the UNCG network. Participants and parents should also be notified that everyone who uses the University network is responsible for adhering to the Acceptable Use of Computing and Electronic Resources policy.
- Emergency contacts and information.
    - Emergency Contacts. Explain how parents/guardians can reach their minor and/or communicate with the program coordinator for the Youth Program.
    - Emergency Information. Provide information about receiving emergency notifications from the youth program and from UNCG. UNCG students, faculty, and staff are encouraged to sign up for UNCG Spartan Alerts. Individuals who are not current UNCG students, faculty, or staff members may register to receive alerts through UNCG's Office of Emergency Management.

## 3.11 Behavior Management

There are occasions when it may be necessary for Program Staff to address behavior issues with participants while they are participating in a program, especially in instances where a participant's behavior creates a risk for the physical health and safety of another child.

### 3.11.1 Behavior Correction Measures

a. Appropriate Behavior Correction Measures

Correcting behavior is an important part of the program staff's duties. Program staff should be trained to employ appropriate measures, including the following:

- Be fair. All rules are the same for everyone.
- Give a verbal warning.
    - Explain to the participant(s) why behavior is inappropriate.
    - Give the participant(s) time to refocus and/or redirect their behavior.
- Do not admonish the entire group.
- Talk directly with the participant.
- Use quiet authority. Do not yell or use abusive language. No physical contact.
- It is the program staff member's responsibility to be a mediator in disagreements between
  participants.
- Let participants know their boundaries.
- Do not assume the participants know what is expected.
- Read over and reiterate the program rules with participants upon arrival to ensure the expectations and rules are understood from the beginning.
- Explain to participants that if rules are not followed, they may be removed from an activity or in some cases the program.
- Always be present. Lack of supervision is a major cause of accidents and problems between the participants.

b. Inappropriate Measures

Program staff may correct behavior as listed above. The following types of discipline **<u>are not</u>** appropriate.

- Corporal punishment
- Hitting
- Touching or grabbing
- Shaking
- Intimidating a participant
- Verbal abuse

3.11.2 Bullying

Bullying is unwanted, aggressive behavior that involves a real or perceived power imbalance. Minors attending program are susceptible to potential bullying situations. To prevent and target bullying tactics, program staff must create a positive and caring environment.

Creating positive relationships is one of the keys to preventing bullying. Bullying is less likely to occur during a program if participants feel connected and responsible for one another. When participants develop positive relationships, they feel comfortable voicing their concerns and seeking help when bullying incidents occur. When program staff observe behaviors that may eventually lead to bullying, they should intervene immediately. If an incident is ignored, it has the propensity to escalate quickly.

a. Signs a Participant is Being Bullied or is a Bully

- Unexplainable injuries
- Lost or destroyed clothing, books, electronics or jewelry

- Frequent head or stomach aches
- Eating habit changes
- Difficulty sleeping or nightmares
- Avoidance of social situations
- Feelings of helplessness or decreased self-esteem
- Self- destructive behaviors (e.g. harming themselves, or suicidal thoughts)
- Positive attitude toward violence and the use of violent means
- Dominate and subdue other participants and get their own way
- Impulsive, aggressive, easily angered
- Lack of empathy
- Defiance and aggression toward adults
- Involved in physical or verbal fights
- Unexplained extra money or new belongings
- Doesn't accept responsibility for their actions

b. Addressing Bullying

Youth Programs should address bullying when communicating behavioral expectations to program participants. If bullying occurs, program staff should reiterate the following:

- Bullying is not acceptable and will not be tolerated.
- If a bully bothers you, ask staff for help.
- Report bullying when you see and hear about it. Telling is not tattling.

## 3.12 Harassment

Pursuant to UNCG's Policy on Discriminatory Conduct, the University will not tolerate any harassment of or discrimination against persons. UNCG is committed to equal opportunity in education and employment for all persons and will not tolerate any discrimination against or harassment of persons on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, political affiliation, genetic information, veteran status, disabling condition, or age.

All program staff must maintain a workplace free from unlawful discrimination and harassment.

Any program staff member who believes they have been subjected to harassment of any kind, are encouraged to report it to the program leadership. A university community member who in good faith suspects or has knowledge of a material violation of law or university policy has a professional obligation and is expected to report suspected violations. A university community member who reports in good faith actual or suspected violations of law or university policy will be protected from retaliation.

## 3.13 Insurance

Youth Programs must secure insurance coverage in accordance with the requirements outlined by UNCG's Office of Enterprise Risk Management unless those requirements are waived by the Office of Enterprise Risk Management. Youth Programs should contact the Office of Enterprise Risk Management for more information.

Tammy Downs
Risk Manager
Phone: (336) 256-1102
Email: tadowns@uncg.edu
Website: risk.uncg.edu/youth-program-insurance/

## 3.14 Children's Online Privacy Protection Act (COPPA)

The Children's Online Privacy Protection Act (COPPA) was originally enacted in 1998 as a way of protecting kids online. Updated in 2013, COPPA makes it illegal for commercial websites to collect identifying information about kids under the age of 13 without verifiable parental consent.

Certain University sponsored events, including youth programs, camps, tours and similar activities may include participants under the age of 13 may be required to comply with COPPA. University events or other activities which specifically exclude the participation of children under the age of 13 or, those where the participants' information is not collected online, are not required to comply with COPPA.

In all cases, however, Youth Programs should be familiar with the law's requirements. Please visit the FTC's COPPA Compliance website, "Children's Online Privacy Protection Rule: A Six-Step Compliance Plan for Your Business" for more information and for practical tips on how to comply with COPPA.

# 4. Program Registration and Approval

## 4.1 Annual Youth Program Registration and Approval

Youth Programs are responsible for completing a registration process annually before the program begins. Youth Programs must submit a registration form, which includes a compliance assurance process, and other requested documentation as part of the registration process. Youth Programs, whether conducted on behalf of the University or on behalf of an external entity, may not occur without appropriate University approval. Program registration should be submitted and approved before beginning to advertise or accept participant registrations.

## 4.2 Ongoing Activities and Programs

Registration for ongoing and pre-established activities or programs for or involving minors should 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 (8) weeks in advance when possible but must be completed and approved before an activity or program for or involving minors begins.

## 4.3 Program Registration Checklist and Instructions

In order to operate at or in affiliation with UNCG, all Youth Programs are required to register with the University unless an exception applies. Some programs may also be required to provide assurance of compliance with the Youth Programs policy. Visit the Registration and Approval Page of the Youth Programs website for more information.

**Step 1: Register Your Program**

UNCG faculty, staff, students, and volunteers can complete the Youth Programs Registration Form to determine whether a program is required to register with the University, and if so, how to complete the registration process.

**Step 2: Make Sure Your Dean, the Athletic Director or Vice Chancellor is aware of your Program.**

They will be receiving an "Action Required"-mail notification from the registration system to review and approve your Youth Program once it has been submitted.

**Step 3: Familiarize Yourself with the Safety and Compliance Registration Processes**

Refer to the following sections for more information.

- Faculty Working with Minors
- Out of Scope Programs
- Facilities Hosting External Entity Programs
- External Entity Programs
- University-Sponsored Programs

# 5. Program Staff

All program staff must complete training and the screening and hiring process in order to work with youth participants. Program staff may include faculty, staff, students, or volunteers regardless of whether they are paid for the services that they provide to the program.

## 5.1 Training

All Program Staff must complete annual training that covers the Youth Program's policies and procedures. Youth Programs must also ensure that program staff receive training that covers applicable UNCG policies and procedures, including the Youth Programs policy. The Office of Institutional Integrity and General Counsel will provide training materials that program coordinators may incorporate into their program staff training protocols. This training must be completed before Program Staff work with minors as part of the Youth Program. The Youth Program must certify compliance with this training requirement by submitting, through the registration process, the certification statement for the Youth Protection Program: Background Check and Training Certification Statement. Maintain documentation that demonstrates compliance.

## 5.2 The Screening and Hiring Process

For University-Sponsored Youth Programs, this process should include an application and screening, which includes interviewing and conducting disciplinary and criminal background checks. University-Sponsored Youth Programs must follow the policies and procedures as set forth by Human Resources available at https://hrs.uncg.edu/additional-resources/hr-policies/.

Note that volunteers are also subject to the requirements of the University's Volunteer Policy and Procedures.

### 5.2.1 Application

Depending on the nature of the program and the number of program staff needed, programs may need to hire additional staff and volunteers. When new program staff are being added to a program, the process should begin with an application that gathers information specific to the needs of the program. This may include but is not limited to skills, mindset, and experience. Questions should be open ended and provide insight to the integrity and character of the applicant.

### 5.2.2 Screening

#### A. Interviewing

Personal interviews should be conducted to gain insight into the character and integrity of the applicant.

- Use behavior based interview questions and scenarios to determine appropriate fit for the program and to screen for concerning attitudes and behaviors. If a response seems concerning, ask follow up questions to gain a better understanding.
- Find out about the applicant's experience working with children (e.g., babysitting, working in youth recreation or youth ministry types of settings). Some of this may be in

their application; however, asking about their experience provides an opportunity to better understand the applicant's experience through follow up questions.[1] 12

- Explain the need for a background check and the types of things the University looks for. Ask them if anything will come up on their background check. Let them know the typical timeline and then let them know as soon as possible the results of the background check. The process may make some applicants nervous even if they have nothing to worry about.[2]

B. Disciplinary Record Checks

Each University student working in a Youth Program must have successfully completed a disciplinary record check through the university's Office of Student Rights and Responsibilities within the past six (6) months. Successful completion of a Disciplinary Record Check means that generally a student must have no Student Code of Conduct violations or pending cases within the past six months.

To conduct a disciplinary record check, the Youth Program should submit the Disciplinary Record Check form to the Office of Student Rights and Responsibilities at osrr@uncg.edu.

Students should be notified that background checks and disciplinary record checks are a required condition for employment or volunteer service in Youth Programs. Youth Programs should incorporate the sample language below in applications for employment.

Note to all student-employee applicants:

*A complete background check is a requirement of applying for this position. This includes criminal background, sex offender registry, and university conduct. Your completed application for this position includes your permission for UNC Greensboro to access your disciplinary records and return a report of "good standing" or "not in good standing" to the employer. If you wish to review your UNC Greensboro disciplinary records, contact the Office of Student Rights and Responsibilities.*

C. Reference Checks

Reference checks are required for all Program Staff before they are hired to work with minors. At least one check, preferably of the potential staff member's current or last employment, is required. Human Resources may advise on the necessity of further checks. When feasible, a reference check should be done directly with the applicant's immediate supervisor.

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[1] Rothenberg, Howard. "The Process of Interviewing Prospective Staff," American Camp Association, available at https://www.acacamps.org/news-publications/blogs/camp-connection/process-interviewing-prospective-staff (last checked on 12/16.2019).

[2] Rothenberg, Howard. "The Process of Interviewing Prospective Staff," American Camp Association

D. Criminal Background Checks

University-Sponsored Youth Programs are responsible for ensuring that all Program Staff successfully complete a criminal background check within the 12 months prior to the start date of the program. Driving checks are also required for Program Staff who will be driving minors. Background checks must be completed and evaluated prior to the employee or volunteer beginning work with youth participants. Background checks will be coordinated by Human Resources consistent with the Policy on Background Checks. Visit the Human Resources Background Check website for more information.

- Individuals whose background check reveals serious driving-related convictions will not be permitted to transport minors as part of their duties.
- Individuals whose background check reveals a prior criminal conviction for a sex offense, a crime against children, or serious violent crime involving assault or injury to others may not participate in any Youth Program.
- 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.
- Convictions in the following categories or categories that are similar in nature to the following may disqualify a potential staff member from working in a youth program:
    - Murder
    - Child abuse or neglect
    - Crimes against children, including child pornography
    - Spousal abuse
    - Crimes involving rape or sexual assault
    - Kidnapping
    - Arson
    - Physical assault or battery
    - Drug-related offenses committed during the preceding 5 years
    - Misdemeanor convictions (committed as an adult against a child)
    - Child abuse
    - Child endangerment
    - Sexual assault
    - Child pornography
    - Stalking or harassment (committed as an adult against a child)

- Criminal offenses relating to the abuse, exploitation, or neglect of an elder, an individual with disabilities, or animals will also be considered.

#### 5.2.3 Hiring

- Prior to hiring, inform candidates that they will have to fulfill the requirements of the Youth Programs policy, including a criminal background check conducted within the 12 months prior to the start date of the program, a student conduct check, reference checks, and/or a driving record check as applicable. They must agree to these before the checks are requested and processed.
- Prior to accepting a position, Program Staff should be provided job descriptions and information on the nature and diversity of the program and population served.
- Resident Program Staff should be provided with time off daily.

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***Note**: It is the Youth Program's responsibility to ensure all program staff have met the requirements of the policy and the Guide, including background checks, student conduct checks, driving checks, and training.*

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#### 5.2.4 External Entities

Background check requirements for External Entity Youth Programs is discussed in the Youth Programs Operated by External Entities section.

### 5.3 Conduct Standards

All Program Staff must complete the Youth Program: Conduct Standards Agreement, which outlines the following conduct standards applicable to all Youth Programs. Program Staff shall not:

a. Have contact with minors in seclusion. If an activity requires any type of one to one interaction (tutoring, private lessons, interviews, etc.) these interactions should take place in a location that is open, observable, and interruptible and may only occur if the youth participant's parent(s) or legal guardian(s) has been informed, given the option to be present, and provided written consent.

b. Engage in abusive conduct of any kind toward, or in the presence of a minor.

c. Strike, hit, administer corporal punishment to, or touch any minor in an inappropriate or illegal manner.

d. Be under the influence of, use, or possess, alcohol or illegal drugs at any time while working with minors.

e. Provide or knowingly allow minors to possess or consume alcohol, tobacco or illegal drugs. Program Staff also must not provide prescription drugs or any medication to a minor unless specifically authorized in writing by the parent or legal guardian as being required for the minor's care. In case of emergency, individuals must call 9-1-1.

f. Give gifts to minors without the knowledge of their parents or legal guardians.

g. Invite minors to a private location or home, accept their invitations for the same, or meet with minors outside of the established program locations or outside of established times without written parental authorization.

h. Use profane, vulgar, sexual, or harassing language in the presence of a minor, or otherwise speak in an inappropriate manner in the presence of a minor, including but not limited to, engaging in romantic or sexual conversations with a minor, making inappropriate or sexual comments, and telling inappropriate or sexual jokes.

i. Expose minors to inappropriate or sexually explicit materials.

j. With the exception of minors' parents or legal guardians as it relates to their own children, Program Staff shall not: (1) share accommodations with minors; (2) use a personal vehicle to transport a minor; or (3) use personal text, email, internet chat, online games, phone, or other forms of social media to communicate privately with minors outside of the official program.

## 5.4 Supervision and Program Ratios

5.4.1 All youth participants should be supervised by at least two (2) or more Program Staff or by their parent(s) or legal guardian(s) at all times. Program Staff should ensure one-to-one contact with youth participants does not occur. For overnight Programs housed in University Facilities, Program Staff should reside in the same housing building, and preferably the same floor.

5.4.2 Program Staff supervising youth participants must be 18 years old or older. Program Staff participating in Youth Programs as counselors-in-training or who are otherwise employed by a Youth Program must be supervised by Program Staff who are 18 years or older.

5.4.3 Youth Programs should determine the level of supervision needed by considering factors such as: (1) the number and age of participants; (2) whether the participants have special needs; (3) the nature of the activities involved; (4) type of housing (if applicable); (5) and the age and experience of the Program Staff.

5.4.4 Youth Programs should also ensure that the ratio of Program Staff to youth participants reflects the gender distribution of the participants (to accommodate supervision in restrooms, etc.) and should meet the following ratios:

Recommended standards for **overnight** Programs housed in University Facilities:[3]

- One Program Staff 18 years old or older for every 6 youth participants ages 6 to 8. Children under the age of 6 are not eligible to participate in overnight Programs housed in University Facilities.
- One Program Staff 18 years old or older for every 8 youth participants ages 9 to 14.
- One Program Staff 18 years old or older for every 10 youth participants ages 15 to 17.

Recommended standards for day-time only Youth Programs:

[3] These recommended standards have been provided by the American Camps Association.

- One Program Staff 18 years old or older for every 6 youth participants ages 5 years and younger.
- One Program Staff 18 years old or older for every 8 youth participants ages 6 to 8.
- One Program Staff 18 years old or older for every 10 youth participants ages 9 to 14.
- One Program Staff 18 years old or older for every 12 youth participants ages 15 to 17.

5.4.5 If youth participants from multiple age groups are combined in a single group, the ratio for the youngest participant in the group should be applied.

5.4.6 Separate sleeping accommodations are required for Program Staff and youth participants, unless the Program Staff is a parent, legal guardian, or sibling of the youth participant. Signed written permission from a parent or legal guardian is required for a youth participant to stay overnight in University facilities. Guests and visitors of youth participants staying in University housing are not permitted in bedrooms; visitation is restricted to building lobby and lounge areas during the hours specified by the Program Director, which cannot be later than 12:00 a.m.

5.4.7 For assistance with determining the appropriate numbers of Program Staff or questions regarding staffing requirements, contact the University Compliance Director (youthpro@uncg.edu).

## 5.5 One-to-One Interactions

One-to-one interactions (tutoring, private lessons, interviews, etc.) may take place only in open, well-illuminated spaces or rooms where they are observable and interruptible by other adults from the activity or program. Such interactions may only occur if the youth participant's parent(s) or legal guardian(s) has been informed, given the option to be present, and provided written consent.

## 5.6 Post-Program Communication

Program Staff may not use their personal email or social media accounts to communicate with participants after the program has concluded. This communication includes, but is not limited to personal email, text messaging, telephone, personal social media accounts. Do not "friend," "follow," etc. participants on social networking sites or communicate in online forums, unless they are specifically dedicated to the Program. Do not send personal emails or text messages; do not share personal or intimate information with participants. This is for your protection as well as the participants'.

5.6.1 Appropriate Electronic Communication

- Sending and replying to emails and text messages from participants ONLY when copying other program staff and/or the program coordinator
- Communicating through "Program-specific" social media and online forums
- Using professional office email and phone
- "Private" profiles for staff and volunteers which participants cannot access

5.6.2 Inappropriate Electronic Communication

- Harsh, coercive, threatening, intimidating, shaming, derogatory, degrading or humiliating comments
- Sexually oriented conversations
- Private messages between designated individuals and participants
- Posting inappropriate comments or pictures
- “Friending” or “following” participants on social networking sites

# 6. Safety and Planning for the Unexpected

Despite best efforts there may be incidents or accidents involving participants or Program Staff. Youth Programs should have plans in place to address such incidents. Proper and constant supervision is critical in managing risks. Participants should be supervised by program staff at all times.

## 6.1 High Risk Activity

The most frequent general liability losses for youth programs, in order of frequency, are: falls, athletic injuries, horseplay injuries, abuse or maltreatment, medical or allergic reactions, and aquatic injuries or drowning.

Youth Programs that incorporate any of the high risk activities listed below should develop and train program staff in policies and procedures designed to control these risks.

- Activity involving locker room use for showering/changing clothes
- Exposure to potentially hazardous materials or equipment that may cause illness or injury (including but not limited to materials found in labs or shops)
- Trips off campus
- Interaction with animals
- Overnight stays
- Physical activity (more than brief stints or walking)
- Transporting minors in vehicles
- Use of social media for assignments, updates, coordination, announcements, etc.
- Use of technology for projects or assignments

## 6.2 Accidents, Incidents, and Illness

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 other violations or potential violations of UNCG policy.

a. Report emergencies, including emergency medical situations, to UNCGPD at 336-334-4444 or 911.

b. Any incidents, accidents, or injuries to youth participants or volunteers in a Youth Program should be reported to the Office of Risk Management and the Office of Environmental Health and Safety. Please refer to the Youth Programs website for a directory of reporting avenues for various types of situations.

c. Any incidents, accidents, or injuries to employees of the University must be reported pursuant to the University's Occupational Injury Reporting Procedures.

d. If illness occurs during a youth program, program staff should consult the UNCG Communicable Disease policy to determine whether the illness should be reported to the University Medical Director. Youth Programs should have procedures in place for

managing illnesses that may occur during the program and communicate those procedures to youth participants' parents or legal guardians.

e. In addition to any other reporting or incident documentation, the Youth Program should subsequently report any accidents or incidents to the University Compliance Director 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 University Compliance Director (youthpro@uncg.edu).

## 6.3 Emergency Preparedness and Public Safety

Youth Programs should prepare to handle the concerns outlined below, many of which are covered in the Sample Emergency Plan for Youth Programs.

### 6.3.1 Emergency Preparedness

- Review security concerns, establish a written plan to address possible intruders and active threats, and train staff and participants in the steps to take.
- Provide a safety orientation to staff and participants regarding boundaries, hazards, behavior expectations, and emergency procedures for natural disasters and other reasonably foreseeable emergencies.
- Develop written search-and-rescue procedures for lost, missing, or runaway persons.
- Develop a plan for emergency communication for contacting parents/guardians of minors, and for communicating with the media.
- Specify supervision ratios, safety rules and behavior guidelines for participants, and emergency procedures if someone is separated from the group.
- Establish written procedures for releasing participants and for verifying absences at the beginning of the day or session.
- Have ready access to contact info for each participant, including name/birthdate, home address, name/address/phone number of parent/guardian, and any additional emergency contacts.
- Advise participants and their families to sign up for UNCG Emergency Alerts provided by UNCG's Office of Emergency Management at https://spartansafe.uncg.edu/stay-informed/text-message-sign-up/.

### 6.3.2 Public Safety

Youth programs should train participants and program staff on the following:

- Keep doors and windows in residence halls locked. Train participants and staff not to open residence hall doors for or let someone into the residence hall that they do not know.
- Walk in groups and stay in well-lit areas whenever possible, especially at night. Do not appear distracted by texting or using headphones while walking.
- Avoid bringing valuables, if possible. If valuables must be brought, they should be kept on individuals or locked securely in the residence hall.
- Participants must always be supervised. Program staff must know where participants are at all times.

- Contact University Police immediately to report suspicious activities or crimes.
    - EMERGENCY: 336.334.4444
    - Non-emergency: 336.334.5963

## 6.4 Criminal Activity and Clery Act Reporting

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) is a consumer protection law that was passed in 1990. It requires all colleges and universities who receive federal funding to share information about their efforts to improve campus safety and inform the public of crime on or around campus. This information is publicly accessible on the University's Clery Compliance Website and in the Annual Security and Fire Safety Report.

### 6.4.1 Campus Security Authority

Campus Security Authority (CSA) is a term used by the Clery Act to indicate someone who may receive crime reports and have a duty to communicate those reports with the UNCG Police. Per the Clery Act, the following members of the community are required to be CSAs:

- Employees of the campus police department.
- Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department (e.g. parking services, contracted event security, etc.).
- Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
- An official who has significant responsibility for student and campus activities. (e.g. deans, directors, athletic coaches, residence hall advisors, faculty/staff advisors for student organizations, etc.)

At UNCG, program coordinators for Youth Programs are deemed CSAs. As a CSA, program directors are required by the Clery Act to report to the UNCG Police any suspected crime reported to them that occurred in Clery geography: on campus, public property immediately adjacent to the campus, or non-campus property or buildings owned or controlled by the University.

## 6.5 Additional Guidelines

### 6.5.1 Locker Room and Bathroom Guidelines

- Check bathrooms, stalls, and spaces prior to minors entering.
- Only one person at a time should ever be allowed into a single-service restroom.
- During transitions, monitor minors closely. Do not allow horseplay.
- Take a headcount or role call after each transition to make sure nobody is missing.
- Staff should supervise youth by standing close enough to the restrooms, changing or shower areas to hear what is going on, but not be directly inside the areas.
- Staff/Adults should use facilities (restroom, shower, changing area) at different times than youth.

- Staff/Adults should never be alone with a child in a secluded area such as a restroom, locker room or changing area with the exception of parents/guardians assisting their own children.

### 6.5.2 Field Trip Guidelines

When on a field trip with participants, program staff should:

- Complete an initial count of all participants.
- Divide participants into small groups and use the buddy system.
- Take attendance prior to departing, immediately when everyone is in the vehicle, several times once you have arrived, prior to returning to the vehicle, and once participants are in the vehicle for the return trip.

### 6.5.3 Missing/Lost Participant Procedure

Program staff are responsible for knowing the location of participants at all times, both onsite and off for the duration of the program. Staff must account for their participants at all times. Program staff should (1) regularly check attendance, specifically when participants are in transition and (2) immediately notify the program director if a participant is unaccounted for.

If a participant is missing:

- Program staff should conduct a sweep of the area and facilities (rest rooms, residence hall) to find the participant.
- Contact the participant directly if applicable.
- The program coordinator for the Youth Program should contact parents to apprise them of the situation and see if the participant was already picked up, or if parents have ideas on where the child may be.
- If the participant is not located after the aforementioned steps have been completed, program staff should
    - Call 911 immediately
    - Report:
        - The participant's name and age
        - What the participant was wearing
        - Last place the participant was seen
        - Other potentially helpful information, e.g., indications that the participant is homesick or has had conflicts with other participants or program staff

# 7. Identifying and Reporting Child Abuse and Neglect

## 7.1 Duty to Report Inappropriate Conduct or Suspected Inappropriate Conduct

a. North Carolina law and UNCG policy require any person 18 years of age or older who becomes aware of or even suspects that a child is a victim of abuse, neglect, or of a sexual or violent offense to report the allegation to the appropriate authorities. See N.C.G.S § § 7B-301 and 14-318.6. See also the UNCG Minors on Campus: Reporting Policy.

b. In the event the program coordinator for a Youth Program suspects inappropriate conduct or receives an allegation of inappropriate conduct, the program coordinator must immediately ensure the safety of any minors participating in the Youth Program, irrespective of any other limitation or requirement, including removal of minors from dangerous or potentially dangerous situations occurring within the context of the program.

c. If you encounter a situation in which a minor is at immediate risk of harm or the victim of a criminal act, please contact UNCG Police or the appropriate Police Department immediately by dialing 9-1-1. UNCG Police or the appropriate Police Department will make a final determination as to whether a matter merits further investigation. University community members must not attempt to make such judgments independently of law enforcement. Reporting to University officials does not relieve the obligation of a University community member to also make a report directly to law enforcement in the event the minor is at immediate risk.

### 7.1.1 What to Report

a. Your report should include all available information regarding the known or suspected abuse or neglect, including, but not limited to: the name of the child, the child's whereabouts, the names and addresses of the parents, guardians, or caretakers for the child, and the character and extent of the injuries.

b. 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. However, you should not delay making a report to gather this information.

c. Do not directly question or solicit information from the child or from the person suspected of improper behavior. Likewise, do not delay making a report to gather evidence. That is not your role; the role of investigation lies with city, county, and state officials. Additionally, efforts to further question, solicit information, or engage in detailed conversation can harm an investigation and hinder the ability of investigators to substantiate a claim in an investigation.

## 7.2 Identifying Abuse[4]

a. What is Abuse?

[4] For more information, see "Recognizing Child Abuse and Neglect: Signs and Symptoms," Child Welfare Information Gateway, available at https://www.childwelfare.gov/pubPDFs/signs.pdf (last checked, June 7, 2022).

Abuse generally means (1) mental, emotional, physical, or sexual injury to a child, or (2) failure to prevent such injury. Abuse may occur in the following forms:

- **Physical Abuse.** When a parent or caregiver is responsible for any non-accidental physical injury to a child.

- **Sexual Abuse.** Occurs when an adult uses a child for sexual purposes or involves a child in sexual acts. Additionally, it occurs when an older or more powerful child using another child for sexual gratification or excitement.

- **Emotional Abuse.** A parent or caregiver harms a child's mental and social development, or causes severe emotional harm. While a single incident may be abuse, frequently emotional abuse is a pattern of behavior that causes damage over time.

b. What is Neglect?

Neglect of a child generally means (1) failure to provide a child with food, clothing, shelter, and/or medical care; and/or (2) leaving a child in a situation that places them at risk of harm.

7.2.1 Tips for Recognizing Abuse

- **Listen closely.** Youth participants often form a bond with program staff and may disclose past or current abusive situations.
- **Believe them.** It is not your responsibility to investigate or substantiate claims. Remember that even highly regarded members of the community sometimes turn out to be abusers.
- **Watch participants carefully.** Up to 40% of children who are sexually abused are abused by older, more powerful children. As youth programs place more emphasis on controlling adult/child interactions, it is important to be vigilant about monitoring for peer abuse.
- **Identify blind spots.** Monitor for circumstances where peers might be alone together and supervise them closely. Also, remember that peer abusers may be victims of abuse themselves.
- **Know what you are looking for.** Child abuse can take many forms including:
    - Harm or threatened harm to a child's health or welfare can occur through nonaccidental physical or mental injury, sexual abuse or sexual exploitation or attempted sexual exploitation.
    - Sexual abuse may be perpetrated by an adult or another child and includes the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or having a child assist any other person to engage in, any sexually explicit conduct or any simulation of the conduct for the purpose of producing any visual depiction of the conduct; or the rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children as those acts are defined by North Carolina law. Sexual abuse also includes any activity that is meant to arouse or gratify the sexual desires of the perpetrating adult or child. Sexual abuse may or may not involve touching.

    - Sexual exploitation includes allowing, permitting, or encouraging a child to engage in prostitution and allowing, permitting, encouraging or engaging in the obscene or pornographic photographing, filming, or depicting of a child for commercial purposes.
    - Negligent treatment or maltreatment of a child includes the failure to provide adequate food, medical treatment, supervision, clothing, or shelter.
- **Err on the side of caution.** In deciding whether 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. Remember that by reporting suspected abuse, the ultimate goal is the safety and protection of the child.

7.2.2 Signs of Physical Abuse

- Aggression toward peers, pets, other animals
- Appears afraid of parents or other adults
- Visible and severe injuries (especially with inconsistent/unbelievable explanations)
- Bruises, burns or scalds, bite marks, scarring, fractures or broken bones (same as above: the injury is not consistent with the story; or the child is trying to hide the marks, such as by wearing winter clothes in summer months)
- Fear, withdrawal, depression, anxiety, nightmares, insomnia; and/or sudden change in mood, activity levels, or social involvement
- Frequency, timing, and history of injuries (frequent, after weekends, vacations, school absences)
- Immaturity, acting out, emotional and behavior extremes
- Self-destructive behavior or attitudes

7.2.3 Signs of Sexual Abuse

- Difficulty sitting, walking, bowel problems
- Torn, stained, bloody undergarments
- Bleeding, bruises, pain, swelling, itching of genital area
- Any sexually transmitted disease or related symptoms
- Withdrawn, depressed, anxious, aggression
- Eating disorders, preoccupation with body
- Poor peer relationships, poor self-image, poor self-care, lack of confidence
- Sexual acting out, excessive masturbation, sexual behavior or knowledge that is advanced or unusual
- Reports sexual abuse

7.2.4 Signs of Emotional Abuse

- Developmental delays
- Overly compliant or defensive
- Wetting bed, pants
- Extremely emotional, aggressive, withdrawn, anxieties, phobias, sleep disorders
- Speech disorders

- Destructive or anti-social behaviors (violence, cruelty, vandalism, stealing, cheating, lying)
- Health Problems (ulcers, skin disorders, obesity and weight fluctuation)
- Inappropriate behavior for age (Too adult, too infantile)
- Suicidal thoughts and behaviors

7.2.5 Signs of Neglect

- Often hungry, stockpiles or seeks food
- May show signs of malnutrition
- Very low body weight/height for age
- Often tired, sleepy, listless
- Hygiene problems, body odor
- Untreated medical and dental problems

## 7.3 How to Respond When a Minor Discloses Abuse[5]

Minors may choose to confide in Program Staff working in Youth Programs that a family member, teacher, coach or a peer has abused them. If this happens, take the following steps:

**Listen**

- Stay calm and let the minor speak
- Avoid denial, blame, or judgment
- Do not make assumptions
- Do not interrogate or ask any specific question about the potential abuse. (Asking "How did you feel?"; "What else would you like to share with me?"; or "How can I help you now" are appropriate questions.)
- Be supportive and non-judgmental

**Reassure**

- The minor may be scared, angry, confused and crying.
- Ask ONLY four questions:
    - What happened?
    - Who else was there?
    - When did this happen?
    - Where were you when this happened?
    - Asking any additional questions may have negative impacts on future legal action taken to protect the minor.
- You can reassure them with a few simple comments like:
    - "I know how hard this is to talk about."
    - "You are very brave for bringing this out."
    - "Don't worry, you are doing the right thing by letting someone know."

[5] For mor information, see "Handling Child Abuse Disclosures," Childhelp, available at https://www.childhelp.org/story-resource-center/handling-child-abuse-disclosures/; PDF available at https://www.childhelp.org/wp-content/uploads/2014/10/Disclosure-PDF.pdf last checked, June 7, 2022).

    - "This isn't your fault. You've done nothing wrong."
    - "I'm very sorry this has happened to you."
- Do not make any promises

**Report**

Document exact quotes and write down as much detail and as quickly as you can everything the minor has shared with you, using their actual words, not your interpretation. Report pursuant to the UNCG Minors on Campus Reporting Policy.

For more information about child abuse and neglect, visit the Division of Social Services' website.

# 8. Wrapping Things Up

## 8.1 Post-Program Review

Youth Programs are encouraged to conduct a post-program review to discuss what went well and areas for improvement.

## 8.2 Record-Keeping and Retention

Legal claims against a Youth Program can be made years or decades after a Youth Program ends; therefore, it is critical that records are kept and maintained in a manner that would make them easily accessible, if needed.

At the conclusion of the activity or program, file and maintain the following items for no fewer than 10 years:

- Final list of participants;
- Copies of all participation agreements, waivers, and medical documentation including medication forms, physician's instructions, or medical clearance forms;
- Records of any incidents, injuries, or accidents that may have occurred during the activity or program; and
- Finalized version of participant handbooks and parent communications.

## 8.3 Accountability

Individuals violating the UNCG Youth Programs 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 Student Code of Conduct;
- Faculty, staff and student employees are subject to disciplinary and/or corrective action up to and including termination;
- Applicable unit-level sanctions, and;
- External-entity providers are subject to punitive actions under the terms of their contractual agreement, up to and including termination of contract.

### 8.3.1 Compliance Monitoring and Site Visits

The Office of Institutional Integrity and General Counsel is charged with monitoring compliance with the Youth Programs policy and the Guide, and with presenting training on best practices.

Youth Programs may be subject to announced and unannounced compliance site visits by The Office of Institutional Integrity and General Counsel, University Compliance Director, internal audit, or designees. Findings of noncompliance will be reported to the Youth Program, as applicable, and may also be escalated to the vice chancellor, dean, or Athletic Director having supervisory authority over the program, and to other University officials as needed.

### 8.3.2 Exceptions

Youth Programs may be granted an exception from specific requirements in the Youth Programs Policy and/or this Guide based on unusual circumstances. Requests for an exception must be: (1) communicated in writing in advance before the Youth Program begins; (2) approved by the vice chancellor, Director of Athletics, or dean with supervisory authority over the program; and (3) submitted to and approved by the University Compliance Director. The University Compliance Director will issue a written response to all requests for exceptions.

Requests for exception from the requirements of the policy or this Guide must be submitted using the compliance registration forms.

# 9. Additional Information and Resources

## 9.1 Policy

- UNC Greensboro Youth Programs Policy

## 9.2 Related Policies

- Minors on Campus: Reporting Policy
- Minors in Research Laboratories Policy
- Background Check Policy
- Volunteer Policy and Procedures
- Facility Use Policy
- Communicable Disease Policy

## 9.3 Related Resources

- Youth Programs Website
- Youth Programs Registration Process
- Youth Program: Policy Exception Request Form
- Sample Drop-Off and/or Pick-Up Authorization Form
- Sample Emergency Plan For Youth Programs
- Youth Program: Participation Agreement
- Medical Information Form
- Medication Administration Record (MAR)
- Medication Management Plan Checklist
- Background Check, Conduct Standards, and Training Certification Form
- Conduct Standards Agreement Form
- Disciplinary Record Check Form
- Youth Programs Facility Use Agreement Addendum

## 9.4 Contacts for Additional Information and Reporting

- Office of Institutional Integrity and General Counsel; youthpro@uncg.edu

# APPENDIX A

## 10. Faculty Working with Minors

### 10.1 Steps for Faculty Working with Minors

- ❑ Provide the University Compliance Director (youthpro@uncg.edu) with details regarding the nature and activities involved in the work and the proposed status of the individual (volunteer, intern, paid, etc.)
- ❑ Contact your Dean, Vice Chancellor, or their designee who has supervisory authority over the program or activity for their approval. All activities with minors must be approved at this level.
- ❑ Review the Youth Programs Policy, review the registration instructions, and complete the Registration process.
  - ❑ Provide these sample forms to participants and their families. Collect and maintain completed copies.
    - ❑ Sample Pick Up & Drop Off Form
    - ❑ Program Participation Agreement (it should be customized to the activities of the program).
    - ❑ Medical Information Form
    - ❑ Medication Management Form (if needed)
  - ❑ Advise participants and their families to sign up for UNCG Emergency Alerts from UNCG's Office of Emergency Management at https://spartansafe.uncg.edu/stay-informed/text-message-sign-up/.
  - ❑ Complete the Youth Programs training (will be available on the Youth Programs website). Review and agree to the Youth Program: Conduct Standards Agreement for working with minors.
- ❑ Contact the University Compliance Director if you have questions. 336.334.3067 | youthpro@uncg.edu

### 10.2 Lab Settings

10.2.1 **Minors in Research Laboratories Policy**. If the minors will work in a laboratory setting, review and adhere to the requirements of the Minors in Research Laboratories Policy. For lab safety purposes, no person should work alone and it is prohibited to work with minors one-on-one in seclusion. Every precaution should be taken to make sure that the environment is open for others to observe.

10.2.2 **Lab Safety Training**. Youth participants performing activities in laboratories and/or around research animals are subject to the requirements of the Minors in Research Laboratories Policy, which outlines additional documentation, training requirements, and restrictions. It is the responsibility of the sponsoring faculty member and/or laboratory supervisor to coordinate all necessary training and documentation.

# APPENDIX B

## 11. Facilities Hosting External Entity Programs

### 11.1 Departmental Approval

A UNC Greensboro Dean, Vice Chancellor, or the Director of Athletics is responsible for providing departmental approval for Youth Programs operating within or under the purview of their unit or division.

### 11.2 Hosting External Entity Youth Programs

#### 11.2.1 Facility Use Agreements

External-entity youth programs must establish a contractual relationship with the University for the use of University facilities via a Facility Use Agreement. The Facility Use Agreement must require that the external-entity youth program comply with the requirements of the Youth Programs Policy and this Guide. It should also include a statement acknowledging that the University may monitor and require proof of compliance with the Youth Programs Policy and the Guide. The completed Facility Use Agreement should be submitted with the program registration form.

The Youth Programs Facility Use Agreement Addendum is provided as a resource and must be used with Facility Use Agreements in order to ensure compliance with the requirements for External Entity Youth Programs.

### 11.3 Registration and Approval

Programs operated by External Entities are subject to the registration and approval process. A UNCG faculty or staff member is required to complete the registration process on behalf of the External Entity. Access the registration forms on the Registration Page of the Youth Programs Website.

Step One: Complete a Registration Form

This form notifies the University that a program wishes to operate at or in affiliation with UNCG and provides information about the program. *As outlined in the Youth Programs policy, this form should be submitted before a program begins advertising or accepting youth participant registrations.*

Step Two: Update the Compliance Registration Form

Prior to the program, update this form to provide the university with assurances that the program meets the requirements of the Youth Programs policy. Contact youthpro@uncg.edu when you are ready to update your form. Please allow sufficient time for review. It may take up to 14 business days to review and respond to your request for approval. It is recommended that the compliance assurance form be submitted 20-30 days before the program start date.

Departments hosting External Entity Youth Programs should also review the Youth Programs Operated by External Entities section for more detailed information. Departments should also

identify a UNCG staff or faculty member to complete the registration process on behalf of the external entity.

### 11.4 Program List

University departments sponsoring activities or programs for or including minors are expected to maintain an up-to-date listing of those programs. Such lists should include each program's dates, times, locations, number of participants, the contact information for the program coordinator for the Youth Program.

### 11.5 University Policies

Listed below are policies to keep in mind when sponsoring youth programs.

- Minors on Campus: Reporting Policy
- Minors in Research Laboratories Policy
- Background Check Policy
- Volunteer Policy and Procedures
- Facility Use Policy
- Communicable Disease Policy

### 11.6 Risk Management Considerations

Consider the following when assessing whether to host a youth program:

- Does the facility use agreement reference the Youth Programs Policy/the Guide, and/or incorporate the above-referenced sample facility use agreement language?
- Who will be the program coordinator for the Youth Program and which UNCG staff or faculty member will be responsible for ensuring that the youth program: (i) registers with the university and (ii) complies with the Youth Programs Policy and the Guide?
- What are the biggest concerns you and your staff have concerning programs hosting minors?
- What challenges do Youth Programs present to you and your staff?
- Are there specific programmatic areas that could use policy/procedure creation or revisions?
- Are there specific physical areas that need policy/procedure creation or revisions?
- What information have you provided to the Youth Program regarding:
    - Transportation and parking
    - Resources or contacts for spills, medical care, or equipment
    - Preparing for the unexpected
        - Adverse weather
        - Increased building traffic or construction

        - Special situations (events, VIP guests, power outage, active shooter, medical emergency, lost participant, etc)
        - **Remember**: Advise program coordinators for external entity programs to encourage youth participants and their families to sign up for UNCG emergency alerts offered by the Office of Emergency Management at https://spartansafe.uncg.edu/stay-informed/text-message-sign-up/.
    - Evacuation
        - Fire alarm – meeting locations, responsibilities
        - Other reasons to evacuate (ex: gas leak, flood, bomb threat)
        - Shelter in place
    - Crowd management plans
    - General safety
        - Personal safety
        - Lockup at night
        - AED locations
        - Slips, trips and falls
        - Equipment damage & facility maintenance reporting
        - Egress paths, fire extinguishers
        - Reporting suspicious activity
        - Reporting suspected child abuse, neglect, or inappropriate conduct involving a minor
        - Facility/equipment inspections, maintenance, and repairs

# APPENDIX C

Note: To access an electronic version of this section that can be shared with external entities, click here.

## 12. Youth Programs Operated by External Entities

There are special considerations for programs owned or operated by external entities but hosted in UNCG facilities. Examples of external entities include coach-owned LLCs, Upward Bound, etc.

### 12.1 Departmental Approval

A UNC Greensboro dean, vice chancellor, or the Director of Athletics is responsible for providing departmental approval for Youth Programs operating within or under the purview of their unit or division, including those operated by External Entities.

Departments hosting External Entity Youth Programs should also review the Facilities Hosting External Entity Youth Programs section for more information.

### 12.2 Facility Use Agreements

External-entity programs must establish a contractual relationship with the University for the use of University facilities via a Facility Use Agreement and must also sign a Youth Programs Addendum. Facility use agreements with external entities must require that such programs are subject to University policies, including, but not limited to, the Youth Programs Policy.

Listed below are policies external entities should be aware of when using UNCG facilities.

- Minors on Campus: Reporting Policy
- Facility Use Policy
- Communicable Disease Policy

Facility Use Agreements with external entities should also include a statement acknowledging that the University may monitor and require proof of compliance with the Youth Programs Policy and the Guide. The completed Facility Use Agreement should be submitted with the program registration form.

### 12.3 Registration and Approval

Programs operated by External Entities are subject to the registration and approval process. A UNCG faculty or staff member is required to complete the registration process on behalf of the External Entity. View and complete the Registration Form on the Registration Page of the Youth Programs Website. As outlined in the Youth Programs policy, this form should be submitted before a program begins advertising or accepting youth participant registrations. Programs should allow sufficient time for review. *It may take up to 14 business days to review and respond to your request for approval.*

## 12.4 Insurance

External-entity entities must provide an insurance certificate that details the coverage for the program and lists UNC Greensboro as an additional insured party. Contact the Office of Enterprise Risk Management for more information.

Phone: (336) 256-1102
Email: risk@uncg.edu
Website: https://risk.uncg.edu/youth-program-insurance/

## 12.5 Emergency Notifications

UNCG's Office of Emergency Management operates an emergency notification system, which is a communication tool used to notify the campus community about any situation or condition that could threaten the safety of individuals on campus. Individuals who are not current UNCG students, faculty, or staff members may register to receive these alerts at https://spartansafe.uncg.edu/stay-informed/text-message-sign-up/. External entity program staff and youth participants and their families are encouraged to register to receive these alerts.

## 12.6 Disclaimer

The following statement must be included in all program related brochures, websites, advertising materials, liability releases, etc.

"(Camp Name) is solely operated by (Legal Name of Entity), which is not affiliated with The Board of Trustees of The University of North Carolina at Greensboro or The University of North Carolina at Greensboro."

## 12.7 External-Entities/LLCs Owned by University Employees

University employees who have ownership interests in external entities/LLCs which operate youth programs in UNCG facilities are responsible for ensuring that they are keeping their external business interests separate from their work at the University. Work associated with the external entity/LLC should be conducted outside of the University-paid workday. University employees who work as staff at events sponsored by external entities should take leave for the duration of the program.

***University property, equipment, finances, materials, electronic and other systems, and other resources may only be used for University purposes or accepted incidental purposes as explained in other relevant UNCG policies.*** UNCG resources must be used for UNCG business purposes and not for personal or external entity/LLC gain.

## 12.8 External Entity Program Staff

### 12.8.1 Background Checks

During the registration process, external entities are responsible for submitting in the registration process, a signed Background Check, Conduct Standards, and Training form, which certifies to the university that all program staff have successfully passed a background check consistent with this section within the 12 months prior to the start date of the program.

The process for obtaining background checks for employees and volunteers associated with youth programs operated by external entities differs from the process for UNCG programs.

Background checks must be conducted by a qualified background check service provider (according to reasonable industry standards).[6] At a minimum, the search must include:

- a review of criminal court records of all counties of residence based on the employee or volunteer's past seven (7) years of residential addresses
- a review for federal criminal court records
- searches against the national and state sex offender registries; and
- if the individual's responsibilities include transporting minors, a mandatory driver's license check that looks back at least five years or since the employee or volunteer reached the age of 18, whichever is shorter.

12.8.2 Results of Background Checks

Individuals whose background check reveals a prior criminal conviction for a sex offense, a crime against children, or serious violent crime involving assault or injury to others may not participate in any External Entity Youth Program at UNCG. Individuals whose background checks reveal other prior criminal convictions are also prohibited from participating in an External Entity Youth Program at UNCG. Individuals whose background check reveals serious driving-related convictions are not permitted to transport minors as part of their duties. External Entity Program Staff should be instructed to self-disclose any incident that might make them ineligible to work with minors.

Convictions in the following categories or categories that are similar in nature to the following disqualify a potential staff member from working in an External Entity Youth Program at UNCG:

- Murder
- Child abuse or neglect
- Crimes against children, including child pornography
- Spousal abuse
- Crimes involving rape or sexual assault
- Kidnapping
- Arson
- Physical assault or battery
- Drug-related offenses committed during the preceding 5 years
- Misdemeanor convictions (committed as an adult against a child)
- Child abuse
- Child endangerment
- Sexual assault
- Child pornography
- Stalking or harassment (committed as an adult against a child)

[6] The university strongly encourages external entities to use of firms accredited by the Professional Background Screening Association.

- Criminal offenses relating to the abuse, exploitation, or neglect of an elder, an individual with disabilities, or animals will also be considered.

12.8.3 Conduct Standards

During the registration process, external entities are responsible for submitting a signed Background Check, Conduct Standards, and Training form, which certifies to the university that all program staff have been provided with a copy of the conduct standards outlined in this section. External-entity program staff must adhere to the conduct standards outlined below Program Staff shall not, unless required by exigent circumstances:

- Have contact with minors in seclusion. If an activity requires any type of one-to-one interaction (tutoring, private lessons, interviews, etc.) these interactions should take place in a location that is open, observable, and interruptible and may only occur if the youth participant's parent(s) or legal guardian(s) has been informed, given the option to be present, and provided written consent.
- Engage in abusive conduct of any kind toward, or in the presence of a minor.
- Strike, hit, administer corporal punishment to, or touch any minor in an inappropriate or illegal manner.
- Be under the influence of, use, or possess, alcohol or illegal drugs at any time while working with minors.
- Provide or knowingly allow minors to possess or consume alcohol, tobacco or illegal drugs. Program Staff also must not provide prescription drugs or any medication to a minor unless specifically authorized in writing by the parent or legal guardian as being required for the minor's care. In case of emergency, individuals must call 9-1-1.
- Give gifts to minors without the knowledge of their parents or legal guardians.
- Invite minors to a private location or home, accept their invitations for the same, or meet with minors outside of the established program locations or outside of established times without written parental authorization.
- Use profane, vulgar, sexual, or harassing language in the presence of a minor, or otherwise speak in an inappropriate manner in the presence of a minor, including but not limited to, engaging in romantic or sexual conversations with a minor, making inappropriate or sexual comments, and telling inappropriate or sexual jokes.
- Expose minors to inappropriate or sexually explicit materials.
- With the exception of minors' parents or legal guardians as it relates to their own children, Program Staff shall not: (1) share accommodations with minors; (2) use a personal vehicle to transport a minor; or (3) use personal text, email, internet chat, online games, phone, or other forms of social media to communicate privately with minors outside of the official program.

12.8.4 Training

All external-entity programs staff are expected to provide training to their program staff on the following topics:

- Applicable university policies, procedures, and guidelines, including the Youth Programs Policy and the Guide;

- Behavioral expectations, including appropriate conduct when working with minors and related codes of conduct;
- Risk management best practices, procedures, and guidelines for all program activities;
- Supervision plan for adequate supervision in light of the number and average age of the participants, the program activities, and whether overnight stays are involved;
- Emergency planning, including for medical, severe weather, and other public safety emergencies;
- Basic warning signs of abuse or neglect of minors;
- Guidelines for protecting minors from emotional and physical abuse and neglect;
- Requirements and procedures for the mandatory reporting of incidents involving suspected abuse or neglect or improper conduct pursuant to N.C.G.S. 7B-301 and 14-318.6 and UNCG's Minors on Campus: Reporting Policy; and
- Other relevant or appropriate topics related to the specific Program.

The Office of Institutional Integrity and General Counsel provides training on UNCG requirements for University-Sponsored Programs, and this same training can be made available for external entities upon request.

External entities are responsible for training their program staff. Training must be documented by the Programs, and all Programs must annually certify to the University that all employees and volunteers received the required training.

## 12.9 Accountability and Compliance Monitoring

### 12.9.1 Accountability

External entities violating the UNCG Youth Programs Policy, or the requirements of this Guide will be held accountable for their actions, which may include, punitive actions under the terms of their contractual agreement, up to and including termination of contract. UNCG retains the right in the University's sole discretion, to immediately eject and bar from University property any individual associated with the external entity at any time for just cause.

### 12.9.2 Compliance Monitoring and Site Visits

The Office of Institutional Integrity and General Counsel is charged with monitoring compliance with the Youth Programs policy and the Guide, and with presenting training on best practices.

UNCG retains the right to, or to direct UNCG's agent, contractor, auditor, or designee to, inspect, audit and request copies of any and all records related to the external entity's compliance with the Youth Programs Policy and the Guide. External entities must promptly cooperate with any such efforts and requests. External-entity youth programs may also be subject to announced and unannounced compliance site visits by the Office of Institutional Integrity and General Counsel, auditors, other university officials, contractors, or designees.

# APPENDIX D

## 13. Recommendations for Out-of-Scope Programs

Although the programs listed below are not required to complete a compliance registration with the university pursuant to the Youth Programs Policy, this section outlines considerations that such programs should address.

### 13.1 Out of Scope Programs

a. **Undergraduate/graduate academic activities.** Undergraduate and graduate academic activities or programs involving a minor participant who is enrolled or who has been accepted for enrollment as a student at the University, including orientation activities.

b. **Licensed childcare providers.** Normal operations of licensed childcare facilities or educational programs, such as the UNCG Child Care Education Program, the Moss Street Partnership School, and the Middle College at UNCG. These facilities and programs are subject to state laws and regulations with requirements that supersede this policy and are outside the scope of this policy. However, separate camps or programs sponsored by these programs could be subject to this policy.

c. **Clinical or therapy providers.** University-affiliated clinical or therapy providers delivering counseling or treatment services to minors, such as the Psychology clinic, the UNCG Speech and Hearing Center or the Vacc Counseling and Consulting Clinic.

d. **Research or grant-funded programs.** Research programs or grant-funded activities involving minors which are approved by the University's Institutional Review Board (IRB) or research activities otherwise authorized under the University's Minors in Research Laboratories Policy.

e. **Student recruitment.** Student recruitment activities, including open houses and admissions visits and tours, that are scheduled to last no longer than one day and do not include an overnight stay.

f. **Events for the general public.** Events on campus open to the general public that minors may also attend (e.g., sporting events, theatre performances, etc.).

g. **Accompanied minors.** Events or programs offered by University personnel during which the minor is accompanied by a parent, legal guardian, coach, or teacher at all times.

### 13.2 Safety Registration

The Safety Registration form is for programs that fall outside the scope of the Youth Programs Policy and is only necessary for UNCG programs located in UNCG facilities in Greensboro, NC. The information collected on this form is shared with UNCG Police and Emergency Management Departments. It informs the University's first responders so they can provide support to your program in the event of an emergency. Access the registration form on the Registration Page of the Youth Programs Website.

### 13.3 Reporting Abuse or Neglect

North Carolina law and UNCG policy require any person 18 years of age or older who becomes aware of or even suspects that a child is a victim of abuse, neglect, or of a sexual or violent offense to report the allegation to the appropriate authorities. See N.C.G.S § § 7B-301 and 14-318.6. See also the UNCG Minors on Campus: Reporting Policy.

### 13.4 Training for Individuals Working with Minors

The University Compliance Director will develop and make available a training module that can be adapted for the needs of your program. The training will include information about the Youth Protection Program Conduct Standards, and reporting and other requirements.

### 13.5 Supervision Ratios provided by the American Camp Association

Minors in UNCG's facilities must be supervised. The American Camp Association has outlined supervision ratios that serve as a guideline.

# APPENDIX E

## 14. Compliance Registration Process

In order to operate at or in affiliation with UNCG, all Youth Programs are required to register with the University unless an exception applies. Programs falling into the categories listed below ("In-Scope Programs") are also required to provide assurance of compliance with the Youth Programs policy.

### 14.1 In-Scope Programs

- **University-sponsored programs in UNCG facilities.** 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.
- **External entity programs.** Activities or programs for or that include minors that are operated, conducted, or organized by external entities that take place on campus or in University facilities, including, but not limited to, facility rentals to external entities.
- **University-sponsored programs in off-campus facilities.** 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 activities.** Faculty or staff who bring minors to campus for activities or programs occurring outside of a structured activity or program where a parent, legal guardian, or other adult acting in a supervisory role (e.g., coach or teacher) is not present. This could include auditions, lessons, tutoring, tours, or activities or programs during which minors serve as interns or volunteers, often under the mentorship or instruction of a faculty or staff member (e.g., to intern in a laboratory).
- **Student or university-affiliated activities.** Activities or programs operated, facilitated, or sponsored by student organizations or any other University-affiliated organization that include minors and during which members of the UNCG community are responsible for direct supervision of the minors.

### 14.2 Registration and Compliance Assurance

Access the registration forms on the Registration Page of the Youth Programs Website.

#### Step One: Complete a Compliance Registration Form

This form notifies the University that a program wishes to operate at or in affiliation with UNCG and provides information about the program. *As outlined in the Youth Programs policy, this form should be submitted before a program begins advertising or accepting youth participant registrations.*

#### Step Two: Update the Compliance Registration Form

Prior to the program, update this form to provide the university with assurances that the program meets the requirements of the Youth Programs policy. Contact youthpro@uncg.edu when you are ready to update your form. Please allow sufficient time for review. It may take up to 14 business days to review and respond to your request for approval. It is recommended that the compliance assurance form be submitted 20-30 days before the program start date.

## Change Record and Version History

| Date | Version | Summary |
|---|---|---|
| 02/10/2020 | 1.0 | Initial guide finalized and published. |
| 02/14/2020 | 1.1 | Several sections of the Guide and the Emergency Planning template were updated to provide information about the Office of Emergency Management's new temporary Spartan Alert subscription service. Learn more about the service on the Spartan Alert web page and contact the Office of Emergency Management with questions. |
| 02/27/2020 | 1.2 | Updates were made to Recommendations for Out-of-Scope Programs (Appendix D) to reflect that the online training module is not yet publicly available. The section was also updated to include a link to the Youth Programs Conduct Standards Agreement. |
| 03/02/2020 | 1.3 | Updates were made to section 7, "Identifying and Reporting Child Abuse" to provide additional information about proper methods for receiving and reporting disclosures of child abuse.<br><br>Added the Change Record and Version History section.<br><br>Updated the Table of Contents. |
| 5/27/2020 | 1.4 | Updates were made to contact information sections throughout the document to reflect changes in staffing. Updates were also made to the registration language in several sections to reflect the newly adopted registration forms and process. |
| 6/7/2022 | 1.5 | Updates were made to contact information sections throughout the document to reflect changes in the University's organization structure and to provide hyperlinks to a registration tool. |
| 3/3/2023 | 1.6 | Updated hyperlinks following University website changes that caused broken links. Updated location of Camp Association Ratio reference document and updated contact information and name of Office of Enterprise Risk Management. |
| 2/7/2025 | 1.7 | Updated hyperlinks following University website changes that caused broken links. Updates were made to the background check language in several sections to reflect requirements for currency. |

**Resources**

This guide was compiled with the assistance of content provided by:

The Higher Education Protection Network

North Carolina State University

UNC Chapel Hill

The University of Alabama

The University of Texas at Austin

The American Camp Association