



VCU

PROTECTION OF MINORS AND YOUTH PROGRAMS HANDBOOK

Equity and Access Services
Protection of Minors Office



VCU Protection of Minors and Youth Programs Handbook

Virginia Commonwealth University (“VCU” or “the University”) is committed to fostering a safe and supportive environment for all individuals in the university community and emphasizes, in particular, the importance of the safety and protection of minors who participate in university or non-university Programs. VCU conducts its operations and maintains its facilities in a manner consistent with its mission of service and access. Programs involving minors are integral to the university’s dedication to the success and well-being of the community.

This guide is designed to assist youth programs in creating their policies and guidelines to support compliance with the VCU Safety and Protection of Minors Policy. Terms defined in the Safety and Protection of Minors Policy carry the same definitions when used herein. All programs are still subject to all other relevant VCU policies and procedures.

Programs are encouraged to use the [VCU Sample Communication Plan](#) and edit it with their program’s specifics.

The VCU Protection of Minors Office also provides the following sample forms, and encourages their use:

- [Parent/Guardian Consent Form](#)
- [Over-The-Counter Medication Authorization Form](#)
- [Emergency Plan Guide](#)
- [Participant Spreadsheet](#)
- [Youth Participant Sign-In/Sign-Out Log](#)
- [Medication Administration Log](#)

Contact:

VCU Protection of Minors Office

youth@vcu.edu

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equity.vcu.edu/protection-of-minors/

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Taxonomy of Youth Activities

Youth Program: Designed for or designed to include non-matriculated minors. Conducted by VCU on or off university property or conducted by a third party on university property.

All programs must register, unless the program is listed in the blue box.

Exceptions: These youth programs must register, but are exceptions to further compliance requirements.

Events on university property for minors at which minors are reasonably expected to be accompanied by a parent, legal guardian, or chaperone, or that minors attend unaccompanied at the discretion of the parent or legal guardian.

Examples:

- Youth spirit days
- Most Admissions events

Campus visits when minors are on university property for a temporary visit and are accompanied by a parent, legal guardian, or authorized chaperone.

Examples:

- High school tour
- Girl Scouts

Minors serving as participants in Institutional Review Board approved research studies, only if all minors are accompanied by a parent, legal guardian or chaperone.

One-time shadowing activities not associated with an organized program, only if the shadowing is conducted within sight and sound of other adults and lasts for eight or fewer hours.

Childcare provided by the VCU Child Development Center.

Youth Program: Non-exceptions. Program staff are supervising and providing custodial care to minors. Compliance requirements for these programs include background checks, safety and protection of minors training, and parental consent and communication forms.

Residential: Overnight stay either in campus housing or off-campus.

Examples:

- Pre-college programs
- Overnight summer camps

Recurring: Multiple sessions over several days.

Examples:

- Summer academic or athletic day camps
- Year-round afterschool programs
- Ongoing research or mentoring

Single Day

Examples:

- One-day workshop
- Athletic or academic recruiting event



Activities not covered by the Safety and Protection of Minors policy.
Neither registration nor further compliance requirements are required.

1. Activities for which minors may be present, but were not specifically invited and the program was not designed for minors.
2. University classes (as listed in the university catalog) in which matriculated minors are enrolled.
3. VCU Health System patient interactions or programs conducted solely by VCU Health.
4. Minors participating in programs which take place on the VCU Qatar campus.
5. Programs consisting of the placement of a matriculated VCU student as a volunteer, intern, etc. within a university course, when the cooperating organization is responsible for the screening or training of the matriculated student.
6. Minors of at least 16 years of age as guests of matriculated students.

POLICY SCOPE

The Safety and Protection of Minors Policy applies to all programs that are designed for or designed to include non-matriculated minors. Such programs are conducted either (1) by the university on or off university property or (2) by others authorized by the university to operate on university property. Such programs include, but are not limited to, camps, clinics, workshops, conferences, research, and other educational activities.

The Safety and Protection of Minors Policy does not apply to:

- University classes (as listed in the university catalog) in which matriculated minors are enrolled;
- VCU Health System patient interactions or programs conducted solely by VCU Health;
- Minors participating in programs which take place on the VCU Qatar campus;
- Programs consisting of the placement of a matriculated VCU student as a volunteer, intern, etc. within a university course, when the cooperating organization is responsible for the screening or training of the matriculated student;
- IRB-approved research that is: 1. Clinical (a licensed healthcare professional operating within a provider-patient relationship); 2. Retrospective or the only association with minors is through records or public observation; or 3. Exempted Research as found by the IRB via [Form HRP-312](#).¹
- Minors of at least 16 years of age as guests of Matriculated Students.² 4

YOUTH PROTECTION FRAMEWORK



The Youth Protection framework contains six main sections addressed in this handbook: Registration of youth programs, staff screening and training, supervision, program planning, records and recordkeeping, and reporting.

¹ All other IRB-approved research is covered by the policy and must register.

² Guests under the age of 16 must be accompanied by a parent or legal guardian.

1. REGISTRATION



All programs under the policy's scope must register with the Protection of Minors Office at least 30 days prior to the start of minor participation. Assistance with registration can be found on the [Protection of Minors Resources](#) page.

To determine if your program is within scope or if it meets an exception, see the Taxonomy of Youth Activities on [page 6](#).

2. STAFF SCREENING AND TRAINING



Screening

- I. All Tier I and Tier II Individuals must undergo a biennial screening process which includes at least both a multi-state criminal background check and National Sex Offender Registry screening. Individuals who do not successfully pass the screening process are prohibited from interacting with minors in a university or non-university program.
 - a. VCU employees who have completed an initial background check upon hire within the previous 24 months may use that screening. Program Supervisors should contact the Protection of Minors Office at youth@vcu.edu with the employee name.
 - b. The VCU Minors management system (Ideal-Logic) links to VCU Sterling

Volunteers accounts. If the VCU unit owns a Sterling Volunteers account, the staff member can initiate a check directly through Ideal-Logic and clearance will automatically

transfer to the staff member's Ideal-Logic profile.

- c. A background check initiated through a vendor other than a VCU Sterling Volunteers account or through the VCU hiring process can also be used provided it meets the requirements above. The Program Supervisor should contact the Protection of Minors Office at youth@vcu.edu with the staff member name, vendor name, date cleared, and attestation that the check performed both a multi-state criminal background check and National Sex Offender Registry screening. The Protection of Minors Office does not request a copy of the background check itself.

- II. All Tier II Individuals must immediately disclose to the Program Supervisor any updates to their relevant background, such as those described below, if they occur at any time since their background screening. Relevant updates include, but are not limited to, arrests, criminal convictions, and relevant reports to Child Protective Services (CPS). Tier I Individuals must also report any such updates to their immediate supervisor.

- III. The following types of convictions will normally render an individual ineligible to work or volunteer with any VCU university or non-university youth program:

- Felony drug possession or drug distribution;
- Any sexual offense;
- Crimes of violence involving physical injury to another person;
- Child abuse, molestation or other crimes involving endangerment of a minor;
- Burglary, robbery, or arson;
- Murder;
- Kidnapping

A full list of barrier crimes can be found in the [Code of Virginia](#).

Individuals who do not successfully pass the screening process are prohibited from interacting with minors in a university or non-university program without express permission from Equity and Access Services or VCU Chief of Police.

Program Supervisors are responsible for ensuring that program staff do not have a criminal background check that would disqualify the individual from participating in the program. If a program staff member returns a flagged background check, the Program Supervisor must either remove the individual from the program or contact the Protection of Minors Office for further guidance.

- IV. Any violation of the VCU Code of Conduct or other VCU policies may disqualify individuals from serving as a Minors Program staff or volunteer.

Training

- I. All Tier I and II Individuals must annually complete the online Safety and Protection of Minors/Clery Act [Training](#) prior to the start of their interactions with minors through the program.
- II. Tier III Individuals are not required to complete the annual Safety and Protection of Minors/Clery Act training but may do so at their Program Supervisor's discretion or for personal

knowledge.

- III. Individuals who complete additional Youth Protection training through an outside organization (e.g. SafeSport) may request to have their VCU Safety and Protection of Minors/Clery Act training requirement waived for one year, only if they completed the VCU training the prior year. Requests can be made through the [form](#) available within the Ideal-Logic Minors portal.

Program Staff Expectations

In addition to required Safety and Protection of Minors/Clery Act training, Program Supervisors should address the following with program staff:

- Responsibilities and expectations;
- Policies, procedures, and enforcement;
- Safety and security precautions;
- Confidentiality issues involving minors;
- How to report suspected child abuse or neglect;
- How to report other problematic behavior by program participants or staff.

Program staff should receive:

- Emergency Plan and detailed procedures, including their personal responsibilities for emergency situations;
- Information about the participants under their care, including: parent/guardian and emergency contact information, allergies/ADA needs, participant contact information (if applicable), rosters, and program agenda;
- Staff Code of Conduct expectations.

VCU youth program staff members are expected to:

General Conduct

- Demonstrate civility, respect, decency, and sensitivity in their communication with all participants and their parents/guardians.
- Conduct themselves with the highest standard of moral and ethical behavior.
- Treat all youth equitably: fairly and consistently, regardless of their actions or behavior, sex, gender, sexual orientation, race, color, religion, culture, place of birth, age, class, ability, health, citizenship, language, or other identities.
- Address problems that are brought to their attention and report incidents as mandated (see [VCU policy](#)).
- Inform the Program Supervisor of any criminal convictions and, if transporting minors, any traffic violations accrued since their most recent background check (see [VCU policy](#)).



- Create an atmosphere where youth feel empowered to tell adults about any boundary violations, harm, or uncomfortable situations they experience or observe.

Boundaries with Minor Participants

- Prior to the start of the program, disclose to the Program Supervisor any pre-existing personal relationships (child, sibling, etc.) with a participating minor. For the duration of their affiliation with this program, the program staff member will follow these university conduct standards for all minors, regardless of pre-existing personal relationships. Any exceptions (ex. transporting their own child in a car) should be cleared in advance with the Program Supervisor.
- Immediately disclose to the Program Supervisor if they are the recipient of any inappropriate interactions from a minor, including physical assault, inappropriate physical or sexual touch, or the recipient of a gift from a minor.

Interactions with Minor Participants

- All contact with minors must be observable and interruptible, and whenever possible, include at least one other authorized program staff member.
- Be mindful of maintaining appropriate authorized adult-to-minor ratios throughout the program.
- Report any incident (injury or illness, accident, program rules violations, or other event that poses a threat to safety or health of a minor) immediately to the Program Supervisor.
- Engage in virtual programs with the same professionalism as in-person programs, including appropriate clothing and awareness of appropriate video backgrounds.
- Include another program staff member or a parent/guardian in any direct electronic communication with a minor.
- Monitor interactions among minors and take steps to address the following types of inappropriate conduct: bullying; hazing; derogatory name-calling; ridicule or humiliation; sexual harassment or touching; harassment or discrimination.
- Not knowingly friend/follow or otherwise engage with participants on social media from non-VCU group pages or accounts.



Prohibited Behaviors:

- Engaging in any form of physical or emotional abuse of a minor. This includes withholding food, water, or access to the restroom as a form of punishment.
- Engaging in sexually inappropriate conduct of any kind toward or in the presence of a minor, including but not limited to:
 - Sexual abuse of a minor;
 - Touching a minor in an inappropriate or illegal manner;
 - Dating or any other romantic involvement with a minor;
 - Making pornography or other sexually inappropriate materials in any form available to a minor or assisting a minor in gaining access to such materials.
- Neglecting the duty of care for a minor under your supervision, including but not limited to:
 - Failing to protect a minor's health and safety (e.g. exposure to unreasonable risk of injury or extreme weather);
 - Failing to ensure the use of appropriate protective equipment (e.g. in laboratory or athletic participation);
 - Leaving a minor consistently unsupervised;
- Bullying (including cyberbullying), harassing, or using derogatory, demeaning, vulgar, or humiliating language towards another person or group of people. This includes sending, posting, or sharing negative, harmful, false, or mean content about program staff or participants online.
- Engaging in inappropriate physical contact with minors, including but not limited to: kissing, full-frontal hugs, lap sitting for children older than preschool age, massages or rubs, piggyback rides, tickling, wrestling, touches on the buttocks, chest, upper leg, or groin; any touching conducted in private, or any contact unwanted by the minor.
- Showering, bathing, or dressing with or in the presence of minors.
- Engaging in one-on-one contact with a minor unless authorized by the Program Supervisor.
- Possessing during the program, allowing to be visible on video during program activities, or being under the influence of alcohol, tobacco, vapes, marijuana, illegal drugs, or weapons.
- Enabling, facilitating, or failing to appropriately address a minor's use of alcohol or illegal/non-prescribed drugs.
- Sharing details about your personal life with or in front of minors, including stories about partying, drinking or drug use, or sexual activity.
- Contacting a minor participant through electronic media or messaging a minor privately for any reason outside of direct program needs, including after the program's conclusion.
- Saving participants' confidential information on any personal electronic devices.
- Taking a photo or video of a minor or a screenshot or recording during a virtual program that includes the image, voice, or personal information of a minor for any reason other than direct program needs, and only if the minor's parent or guardian has signed a media release waiver.
- Offering or making a gift to a minor for the purpose of engaging in any prohibited conduct, including sexual conduct.
- Picking up or dropping off minors from their homes before, during, or after the program.
- Any other behavior prohibited by VCU policies (see [VCU Code of Conduct](#)).

APPROPRIATE PHYSICAL INTERACTIONS	INAPPROPRIATE PHYSICAL INTERACTIONS
<ul style="list-style-type: none"> • Side hugs (when appropriate and initiated by the youth) • Shoulder-to-shoulder hugs (when appropriate and initiated by the youth) • Pats on the back or shoulder • Handshakes • High-gives, hand slapping, and fist-bumps • Pats on the head (when culturally appropriate) • Holding hands with young children in escorting situations 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a youth to cling to an adult's leg • Massaging of any kind given to a youth • Touching a youth's bottom, chest, or genitals
APPROPRIATE VERBAL INTERACTIONS	INAPPROPRIATE VERBAL INTERACTIONS
<ul style="list-style-type: none"> • Positive reinforcement • Encouragement • Praise • Appropriate jokes 	<ul style="list-style-type: none"> • Name calling • Discussing sexual encounters • Secrets • Cursing • Off-color or sexual jokes • Shaming or belittling • Derogatory remarks • Compliments relating to the youth's physique or body development • Harsh language that may frighten, threaten, or humiliate youths

All violations of this code of conduct should be reported through a [Youth Program Incident Report](#) and any other applicable reports (law enforcement, Title IX, etc.). Violation of this Youth Program Staff Code of Conduct may result in disciplinary action, including dismissal from the position as program staff.

3. SUPERVISION



Programs must maintain direct sight or sound supervision of minors under their care, custody, and control at all times during a program, except for restroom usage or sleeping hours, unless the minor's parent/legal guardian provided prior written consent for the minor to be unsupervised at specific times. Permitted examples of a program soliciting specific times of non-supervision could include:

Do you grant permission for your minor to be unsupervised while on the VCU Core Campus for one hour (approximately 11:30 AM -12:30 PM) for lunch each day?

Do you grant permission for your minor to be unsupervised while in the common areas on their assigned floor of the Residence Hall during nightly personal time (approximately 8:00-9:00 PM)?

Programs must not solicit blanket permission of non-supervision from a parent/guardian with the intent of encouraging non-supervision by program staff.

When unsupervised by program staff, minors are not permitted to:

- Leave the VCU [Core Campus](#) boundaries.
- Enter a bedroom that was not assigned to them.
- Leave their assigned floor of the Residence Hall during scheduled times when participants are expected to remain in the building.
- Invite an adult or other minor into their assigned bedroom.
- Engage in illegal activities.

Failure to follow these rules will result in consequences for the minor and the program, including but not limited to: removal of the minor from the program without refund, removal of program staff from their position within the program, or termination of the program.

Programs are encouraged to follow the supervisory ratios determined by the American Camp Association at all times.

Youth programs with a small number (less than five) of participants should have a minimum of two individuals responsible for oversight. The ratio of program staff to participants should reflect the gender distribution of the participants if possible. Program staff should be at least two years older than the participants with whom they work.

It is acceptable for an individual program staff member to provide program services to a group of participants (e.g., classroom instruction or outdoor activities) if the activity is: (1) conducted

in an open or public area that is well-illuminated, and (2) where the group is observable to and interruptible by others outside the group at all times. This includes classroom or meeting activities where open doors or windows allow for a clear line of sight.

ACA Supervision Ratios

PARTICIPANT AGE	NUMBER STAFF	OVERNIGHT PARTICIPANTS	DAY-ONLY PARTICIPANTS
0-5 years	1	5	6
6-8 years	1	6	8
9-14 years	1	8	10
15-17 years	1	10	12

4. PROGRAM PLANNING

There are several components to planning youth programs that must be considered early in the process to ensure a successful event. This section outlines the major topics that should be explored prior to registering the program or participants.

I. Agenda

The first step in developing the program is to map out the agenda, detailing the activities, locations, and timeframes. Minors must be properly supervised at all times from drop-off to pick-up. The only exception to supervision is for specific periods of time for which parent/guardians have given prior written consent for the minor to be unsupervised. Program Supervisors must ensure that all meals, free time, and transitional times are accounted

for and supervision is provided. The agenda should be provided on the [Communication and Notification Plan](#).

II. Operational 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. All non-internal procedures should be shared with parents on the [Communication and Notification Plan](#).

Topics to consider include:

- Identification of program staff and participants. How will parents and program participants be able to identify program staff? Will they wear specific clothing or nametags? Will minor participants have nametags? How will the program identify participants with special needs?
- Procedures for drop-off and pick-up. How will you ensure that participants are only released to an authorized individual (parent, guardian, or documented designee)? Who will be responsible for managing this process?
- Safety Communication. How will you communicate with parents if an emergency occurs? This could include accidents affecting only one or two children or weather issues that require cancellation of activities. Parents must be provided the Program Supervisor’s name and phone number in case parents need to contact their child during the event.
- Behavior Management. Who would handle children with behavioral incidents that need to be dealt with away from the rest of the group? Is there a set escalation of consequences for behavioral incidents? If parents must be called to pick up the child, who would supervise them while they wait?
- Physical Contact and Communication with Participants. Operating procedures should also include guidelines that detail the appropriate physical contact and communication by program staff with minors based on the age of the minor and the nature of the program activities. Any behavior or contact between program staff and participants that violates approved program activities, established law, or relevant VCU policies is prohibited.
- Who is responsible for reporting various types of incidents? See the Incident Reporting section on [page 29](#) and the [Youth Incident Reporting Table](#).

III. Virtual Programming

When conducting a youth program over a virtual platform, additional safeguards must be considered to promote a safe and appropriate environment. The security measures include:

- A unique password to join
- A “waiting room” for youth before the session begins
- A sign-in displaying the minor’s first name and last initial only to protect their identity
- Virtual backgrounds to allow for privacy between minors and adults
- Limits on screen captures and recording
- Limited ability for minors to share their screens
- A disabled chat feature, or limited chatting between the minor and moderators only
- A default “mute” feature, with moderators able to unmute minors individually for questions or discussion.

At least two adults must be live in a session before allowing minors to join from the waiting room. Multiple moderators should have the ability to close the session in case of

inappropriate behavior or the infiltration of an unauthorized outsider. Multiple moderators should be able to see all chat messages between individuals.

See the [VCU Guidelines for Virtual Youth Programming](#) for more information.

IV. Housing

For programs that require participants to stay in on-campus housing, arrangements may be made with [VCU Conference Services](#) to provide accommodations. See “Documents for Non-University Programs” on [page 27](#) for information regarding a Facility Use Agreement with Conference Services.

Questions regarding housing accommodations may be directed to:

Conference Services
(804) 828-7666
conferences@vcu.edu

Overnight Supervision

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

- a. At least two Tier I or II Individuals, who are on-call, are required to supervise minors for overnight programs. See the ACA Supervision Ratios on [page 16](#) of this guide for recommended counselor to participant ratios based on the participant age group.
- b. Adults who are 18+ must stay overnight in separate rooms from minors unless the adult/minor is a parent/child. In group/cabin sleep settings, it is permissible for Tier I or II adults to sleep in the same room as minors, as long as at least two Tier I or II Individuals are in the room.
- c. Each minor must have and remain in their own bed. Minors are not to sleep in the same bed as other minors or adults.
- d. 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.
- e. Housing and Residential Communities staff are responsible for building operations. They



are NOT intended to serve as supervision for youth participants.

- f. Minors should not leave their floor of the residence hall unless accompanied by program staff.

V. Transportation

Transportation plans should include:

- Mode of transportation (including specifying if vehicle is private or university-owned)
- Destination and expected route
- Expected time and frequency of travel
- Certified drivers
- Expected number and age (for minors) of passengers, including program staff.

For overnight programs, transportation plans must include parking, drop-off, and/or pick-up information for moving in and out of residence halls.

All transportation should be documented, with exact details of route, time, driver, and passengers.

An abridged Transportation Plan, to include mode of transportation, destination, and expected time and frequency of travel, should be shared with parents in the Communication and Notification Plan (see [page 22](#)).

Programs that use university vehicles or drivers must also comply with VCU Operational Risk driving regulations.

- [Defensive Driver Course](#)

If the driver will operate a 15+ passenger vehicle, the following additional trainings are required:

- Van Driver Training
- Behind the Wheel Training (If you did not receive a certificate when you originally took the training, please reach out to the VCU Police Department to secure one)

The Rule of Three must be maintained during transportation; a single minor should never be in a vehicle alone with a single adult. Appropriate supervision ratios (found under “ACA Supervision Ratios” on [page 16](#)) must also be maintained during transportation. The driver should not be counted as a supervising staff member during transportation.

Minor participants are not legally permitted to operate e-scooters.

VI. Emergency Plans

Emergency plans, including guidelines for weather emergencies and for communicating and responding to VCU Alerts, must be documented and provided to all program staff. Emergency plans should be specific to the needs of youth participants and are especially vital to programs with participants aged 11 and under. The [Youth Program Emergency Plan](#) has been developed as a document to be shared internally with staff prior to the start of the program. This template is a starting point that may be customized to cover a wide range of

situations.

Each program must also develop a plan for communicating pertinent emergency procedures to the parent/legal guardian of each participant. The Communication and Notification Plan must include procedures for the notification of the minor's parent/legal guardian in case of an emergency, including medical or behavioral problems, natural disasters, or other significant program disruptions. Participants and their parents/guardians must be advised of these procedures in writing prior to program participation. Programs should request parent contact information and keep this information accessible for use in the event of an emergency. See the "Communication and Notification Plan" section on [page 22](#).

Transfer of Custody of Care

Minors programs may only release a minor to an authorized adult on the consent form pursuant to any custody obligations, unless there is prior written consent from the parent or guardian authorizing pick up by another adult and the adult provides valid photo ID.

Within the program's Emergency Plan, the program should have a plan for emergency evacuation:

- a. Assembly points, methods to account for all minors at the assembly point and relocation site, primary and secondary means of egress, and complete evacuation of the buildings;
- b. Securing of essential documents, including attendance records, parent contact information, emergency contact information, and information on allergies or food intolerances;
- c. Methods to ensure any health care needs to include medications and care plans; emergency contact information for staff; and supplies are taken to the assembly point or relocation site;
- d. Method of communication with parents and emergency responders;
- e. Accommodations or special requirements for infants, toddlers, and children with special needs to ensure their safety during evacuation or relocation; and
- f. Procedures to reunite minors with a parent or authorized person designated by the parent to pick up the minor;

Reunification is a process that protects the minor's safety and provides for an accountable change of custody from the university to a recognized parent/legal guardian following an emergency incident. In the event of a reunification, the parent/legal guardians will be notified where the reunification center will be located. Please wait for official communication from the university before going to the reunification center.

If a parent/legal guardian is notified that reunification is needed, there are some expectations that parents/legal guardians should be aware of:

- Be patient, and do not pick up your minor without checking in.
- Please remember to bring your photo identification to the check-in center to have your minor released to you.
- Your minor will only be released to a parent/legal guardian or designated adult. The designated adult must be 18 or over.

The Program Supervisor should designate a specific location for minors within mass assembly areas. When identifying an area, consider:

- An area that allows for multiple youth groups to congregate together
- Proximity to supplies and support
- Proximity (as is possible) to likely reunification points for parents/guardians to access their minors
- Secondary assembly points should also be designated, in case the primary assembly point is inaccessible during an emergency
- Additional needs required for members of the minors program with disabilities

Create signage to facilitate easy identification of youth by first responders and parents/guardians within mass assembly areas. Include sign-making supplies, or pre-made signs, in an emergency supply kit.

5. RECORDS AND RECORDKEEPING



I. Parent/Guardian Consent Form

Programs are required to upload an unsigned copy of their Parent/Guardian Consent Form to their registration. Programs are encouraged to use the consent form provided by the Protection of Minors Office, which includes consent for media, transportation, authorized adults, and a liability waiver.

The parent must provide informed consent regarding the location(s) their child will be, transportation provided to their child, any risks to their child, and the policies and procedures followed by the program. This information should be shared to parents through the Communication and Notification Plan.

Consider how the program will identify participants whose parents have declined the media release. Options could include a sticker on the name tag or a unique colored name tag or lanyard.

Program Participant Documentation

The program must maintain a list of all participants and a current directory of all program staff.

This list shall include:

- Each participant's name;
- Local room assignment (if applicable);
- Age;
- Address;
- Any ADA accommodations and medical needs;
- Phone number(s) of parent or legal guardian to be reached throughout the duration of the

program, as well as emergency contact information.

- Gender is required for overnight programs only, though may be collected by programs if necessary.

II. Communication and Notification Plan

Programs are required to upload a copy of their Communication and Notification Plan to their registration. This plan is not required to be signed, and may be combined with the Parent/Guardian Consent Form into one document, provided the parents maintain the Communication and Notification Plan after returning the signed consent pages to the program.

The required Communication and Notification Plan should address the following:

- The program's procedure for the notification of any minor's parent/legal guardian in case of an emergency, including medical or behavioral problems, natural disasters, or other significant program disruptions.

- Notifying any minor participant's parent/legal guardian of the university's Clery Act timely warnings. This can be accomplished by ensuring they are aware of alert.vcu.edu and encouraging them to sign up for VCU's text message alert system. Program Supervisors should notify minor participants of a specific timely warning only if program staff need to take responsive action.

- Information about the university's options for reporting concerns about the program, including the Helpline (866-921-4971).



- Program Supervisors must inform program participants and the parents or legal guardians of all minor participants about safety and security procedures, applicable university policies, rules, and guidelines established by the program, and behavioral expectations. This includes, but is not limited to:

- Detailed agenda
- Transportation plan (see the "Transportation" section on [page 19](#))
- Names of program staff
- Program Supervisor contact information for parent use
- Procedures for managing any medications that may be needed by the participant during the program
- Personnel identification to be worn by program staff
- Drop-off and pick-up procedures
- Curfews (if overnight)
- Code of conduct for participants
- If internet access is provided to the participants, parents should be notified if there are no restrictions placed on the content.

Risk

Programs should consider areas of risk for their participants, and communicate these risk areas to parents/guardians in the Communication and Notification Plan.

After identifying the program's risk areas, Program Supervisors should determine procedures to mitigate the risks and share these procedures with program staff.

Risk areas could include:

Physical Environment

- Spaces with hazardous materials
- Proximity to rugged terrain or bodies of water
- Spaces of easier abuse, like bedrooms, locker rooms, or unsupervised bathrooms
- Proximity to moving vehicles

Physical Activities

- Strenuous physical activities with high risk of injury
- Activities with high physical contact amongst participants or between minors and adults

Supervision

- No supervision provided during part of a program

Interactions with Minors

- 1:1 adult/minor interaction
- Overnight stays
- Unmonitored virtual interactions

Screening and Training

- Staff or volunteers who have not been background checked or trained.

Transportation

- Transported off-campus

- Transported to an unfamiliar, crowded, or non youth-oriented location.

Youth Age

- Infants, toddlers, elementary school children

Participant Code of Conduct

Minors participating in a youth program conducted by VCU or on VCU's campus must comply with the following conduct expectations. Programs may add to this code of conduct with program-specific expectations and provide it to participants and parents in the Communication and Notification Plan.

Participants will:

- Not possess or use alcohol, tobacco, marijuana or its derivatives, non-prescribed prescription drugs, illicit drugs, or provide to or assist in obtaining such substances for other participants.
- Not possess or use fireworks, firearms, or weapons of any kind.
- Not possess or use sexually explicit literature or other media of any kind.
- Show respect to all other participants, program staff, and the Program Supervisor.
 - Respect others' physical boundaries.
 - Communicate in an appropriate manner, including refraining from foul language, improper gestures, or harsh words. Verbal threats will not be tolerated.
 - Refrain from causing bodily harm to self, other participants, and staff.
 - Violence, derogatory language, harassment, hazing, or bullying will not be tolerated.
 - Any behavior that is sexually inappropriate, threatening, or harassing will not be tolerated, including consensual sexual behavior between program participants.
- Follow appropriate boundaries with program staff.
 - Program staff must not have one-on-one contact with minor participants outside of established program activities, including after the conclusion of the program.
- Treat equipment, supplies, and facilities with respect.
 - Theft of property- regardless of owner- will not be tolerated.
 - Misuse or damage of university property is prohibited. Charges may be assessed against those participants who are responsible for damage or misuse of university property.
- Use cell phones only during free time and not during scheduled activities unless otherwise asked to do so.
 - The inappropriate use of cameras, imaging, and digital devices is prohibited, including use of such devices in showers, restrooms, or other areas where privacy is expected by participants or program staff.
- Adhere to all safety rules and regulations given for each activity.
 - Remain within the program area as directed by the program staff.

Violation of this Youth Program Participant Code of Conduct may be grounds for disciplinary action, including dismissal from the program. Refunds may not be given when a participant is dismissed from the program.

III. Emergency Plan

All programs, especially those with participants aged 11 or under, should create an internal emergency plan establishing procedures for unforeseen events. A sample emergency plan

is found on the POM [website](#), and this or a similar plan should be adapted to the specific program. See section "VI: Emergency Plans" on [page 19](#). An emergency plan is not required to be uploaded to the registration.

IV. Medical Information and Consent Forms

[Medical Information and Consent Forms](#) should be collected in advance of the program, but medical forms are not required to be uploaded to the registration. The program should implement their own medication procedures. Program staff cannot administer medication without proper training (MAT, RN, etc.).

Recommended medication procedures are:

- Prescription or over-the-counter (OTC) medications, including medications for conditions such as food, drug or insect allergies; diabetes; asthma; or epilepsy may be brought to the program under the condition that the medications will be secured by program staff and made available to participant for self-administration as authorized in writing by the participant's parent/guardian. If the participant is unsure of the medication to take or the correct dosage, program staff will contact the parent or guardian for clarification.

- All medications for a single participant should be stored in a plastic zip-lock bag labeled with the participant's name and date of birth. All medications and medication bags will be returned to the participant's parent/guardian when the program is over. An [Over-The-Counter Medication Consent Form](#) must be completed fully in order for participants to self-administer required prescription or OTC medication.

- All medications must be stored in the original product packaging and clearly labeled with the minor participant's name and the medication's name and dosage instructions.

- The need for emergency medication may require that a minor participant carry the medication on their person or that it be easily accessed (i.e., inhalers, EPI-pens, insulin injections). Program staff or other staff or volunteers affiliated with the program will NOT purchase medications of any type (prescription or over-the-counter) for minor participants of any age.

- It is NOT permissible for my minor participant to share any medications with any other participants or with staff.

- It is the responsibility of the participant to come to the designated staff or location at the correct time or onset of symptoms to obtain their medication (as prescribed), if being stored



by the program.

- The designated staff member will log the medication that the participant took.
- The program is not responsible for missed or incorrect doses. It is not the program staff member's responsibility to follow up with participants who do not come to self-administer their own medication.
- It is the responsibility of the parent(s)/legal guardian(s) to be sure that their minor participant's medications brought to the program are not left behind at the end of the program. Failure to do so will result in the medications being destroyed within three working days after the minor participant's last day at the program.

A recommended [Medication Administration Log](#) is provided on the Protection of Minors Resources [page](#).

Programs should have or know the location of a first aid kit. The first aid kit should contain, at a minimum, the following items:

- Scissors;
- Tweezers;
- Gauze pads;
- Adhesive tape;
- Band-aids, assorted types;
- Antiseptic cleansing solution /pads;
- Thermometer;
- Triangular bandages;
- Single use gloves such as surgical or examination gloves;
- The first aid instructional manual.

Overnight or extended programs should also have or know the location of an emergency supplies kit. The emergency supplies kit should contain, at a minimum, the following items:

- Working, battery-operated flashlight
- Working, battery-operated radio

- Ice pack or cooling agent
- Pens and sharpies
- Blank paper, clipboards, file folders
- Duct tape
- Batteries
- Charging cords for cell phones, hotspots, laptops
- Paper towels/tissues

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, or poses a threat to health and safety of others. 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, or more frequent breaks for individuals with physical disabilities. The necessary arrangements must be determined on a case-by-case basis through collaborative communication with the participant's parent/guardian, the program director, medical professionals and other campus partners.

[Medical Information Forms](#) should be collected in advance of the program and those who indicate that an accommodation is needed should be immediately forwarded to the Program Supervisor to review and work with the specific university entity for the necessary accommodations.

All programs should be prepared to accommodate participants with food allergies and other special dietary needs. Programs serving food should have a method for soliciting and collecting information on food allergies such as the Medical Information Form. It is important to clearly communicate with any food vendors regarding food allergies and other special dietary needs.

When there are participants with allergies, program staff should be familiar with recognizing and responding to signs and symptoms of an allergic reaction.

Please see the [FAQs and Guidance for ADA Accommodations in Youth Programs](#) document for more information.

V. Documents for Non-University Programs

There are special considerations for programs owned or operated by external entities (third parties) but hosted in VCU facilities. These entities are subject to VCU's policies including the Safety and Protection of Minors Policy. A VCU faculty or staff member must be designated as the Point Person for any non-university youth activities or programs, and is responsible for ensuring the non-university entity complies with VCU policy. The Program Supervisor of a non-university program is always the individual from the third party who is operating the program.

Facilities Use Agreement

For all Non-University Programs regardless of exception, excluding VCU Registered Student Organizations, the Program Supervisor must secure a Facilities Use Agreement (FUA) between the university and the person or entity operating the Non-University Program. The FUA must identify the Program Supervisor of a Non-University Program and require compliance with all of the requirements of this policy, including the responsibilities of the Program Supervisor.

- For a Facilities Use Agreement or contract with VCU Conference Services, contact conferences@vcu.edu.
- For a Facilities Use Agreement with any other VCU area, contact VCU Real Estate Services at realestateqa@vcu.edu.

All FUAs must include the following provisions:

- a. A provision assuring that the Program Staff involved with Non-University Programs will comply with the requirements in this policy.
- b. A link to a current copy of this policy.
- c. Proof of the operator's active registration with the Virginia State Corporation Commission (SCC), or equivalent at VCU's discretion.
- d. The following language in parent/legal guardian consent forms: Virginia Commonwealth University (VCU) does not take custodial responsibility of any Minor child who participates in a Program operated by or at VCU, including (insert name of Program), operated by (VCU department or non-VCU person/entity).

Certificate of Insurance

For all Non-University Programs, excluding VCU Registered Student Organizations, the Program Supervisor must provide a copy of the operator's certificate of insurance (COI) wherein VCU is named as an additional insured, which shows coverage sufficient to meet the standard of the university's Operational Risk Office within VCU Occupational Health and Safety. VCU Operational Risk must approve the operator's COI prior to the start of programming.

- a. For questions regarding Certificate of Insurance requirements, contact VCU Occupational Health and Safety at msmosley@vcu.edu or dohs@vcu.edu.

Non-University Program Resources

- a. For questions regarding space use on campus, contact VCU Student Commons and Activities, uscaevent@vcu.edu.
- b. For inquiries about compliance to this policy's specifics and procedures please contact Equity and Access Services at youth@vcu.edu.

VI. Maintaining Records

All records must be kept consistent with the [VCU Records Management Policy](#).

At the conclusion of the event, the program should ensure the following records are accurate within the program registration on the Ideal-Logic Minors portal.

- Program staff list and active dates;
- Required documentation (Parent/Guardian Consent Form, Communication and Notification Plan, and Facility Use Agreement and Certificate of Insurance, if applicable);
- Records of any incidents, injuries, or accidents that may have occurred during the program, submitted through the Youth Program Incident Report within the portal.

Programs must maintain the following records independent of the Minors portal:

- Final list of participants;
- All signed waivers and medical documentation including medication forms, physician's instructions, or medical clearance forms;
- Any documents not submitted to the Minors registration, including but not limited to: participant handbooks, parent/guardian communications, participant work within the program.

6. REPORTING



The [Youth Incident Reporting Table](#) should be consulted for assistance in determining who and how to contact individuals in the case of an unexpected event. The table includes examples of how to notify parents of an incident and staff tips for notification escalation. The guidance document should not be used to discourage the exercise of a VCU employee's best judgement during an incident.

I. Suspected Child Abuse or Neglect

All VCU staff are required by law to report any known or suspected instances of child abuse or child neglect to the appropriate authorities while acting in their capacity as a VCU employee. If a staff member becomes aware or suspects that a participant has been a victim of child abuse or neglect, the staff member must

immediately notify the Program Supervisor and file a report with the local Social Services department of the county or city wherein the child resides or wherein the abuse or neglect is believed to have occurred or to the Department's toll-free child abuse and neglect hotline. If you are unsure which county or city to report to, then report to The Virginia Department of Social Services' toll-free child abuse and neglect hotline at **1-800-552-7096**. If an immediate threat to the participant's health or safety is perceived, facility staff should contact VCU Police. For more information on VCU's reporting requirements, please refer to VCU's [Duty to Report policy](#).

Emergency Numbers:

- VCU Police: 804-828-1234
- VCU Helpline: 888-242-6022
- VCU Office of Integrity & Compliance: 804-828-2336
- Richmond City Child Protective Services: 804-646-7000

II. Unexpected Program Occurrences

All unexpected occurrences within a youth program must be reported to the VCU Protection of Minors Office using the Youth Program Incident Form found within the [Minors portal](#). Any individual may report an incident, even if the program or activity is unknown.

Examples of unexpected occurrences to be reported include:

- Behavioral incidents;
- Mental health crises;
- Consensual or nonconsensual sexual activity;

- Alcohol or drug usage;
- Contagious illness;
- Situations of child abuse;
- Medical incidents beyond first aid;
- Vehicle collisions involving minor participants;
- Any incident that involved a report to law enforcement, CPS, Title IX, or any other campus partner.

III. Law Enforcement

The VCU Police Department can provide support for any situation beyond the program's capabilities, even if the incident is not criminal behavior.

In the event of an emergency, contact VCU PD at:

- (804) 828-1234 (emergency)

911 should be called if the emergency requires an emergency medical or fire response. For all other emergency calls, 828-1234 will usually result in a quicker response. 911 calls will still be dispatched to VCU PD.

Examples of situations that should result in an emergency call to VCU PD:

- Missing participant



- Upon realizing a participant is missing, program staff should alert the Program Supervisor and perform a check of probable locations. The initial check should include an attempt to call the participant's cell phone, if applicable, and include asking other participants and program staff if anyone knows where the missing participant is.
- If the participant is still missing after the initial search, contact VCU PD at the emergency number. The program should not wait a designated amount of time before reporting a missing participant.
- Aggravated or repeated physical altercation
 - If a physical altercation can be mediated by program staff, Police do not need to be called. If the altercation includes a criminal act or is a repeated action after program intervention, VCU PD should be called.
- Mental health emergency
 - If a suicide attempt is in progress, call 911.
 - If a participant is engaged in a mental health crisis, including self-harm, beyond the capabilities of the program staff, VCU PD should be called.
- Discussion of suicide or self-harm
 - If a participant is discussing suicide or self-harm, program staff should attempt to determine the context of the discussion, and notify the Program Supervisor. For a discussion of suicide or self-harm relating to a participant personally, VCU PD should be called.
- Sharing or generation of Child Sexual Abuse Materials (nude or AI-generated explicit images)
- Sexual activity between minors or between a minor participant and an adult.

VCU PD can be reached in a non-emergency by calling (804) 828-1196.

Non-emergency services that can be provided by VCU PD include:

- Mediating a non-criminal incident
- Parent/legal guardian notification
- Roll-by or appearance at program for non-intervention de-escalation.

Policy Enforcement

I. Site Visits

The Protection of Minors team may conduct a site visit to review the program for compliance with the Safety and Protection of Minors Policy. Site visits may or may not be announced and will take place during the program. Notes will be taken, and feedback will be given to the Program Supervisor to make any adjustments for compliance purposes. Severe infractions will need immediate resolutions to prevent event termination, while other infractions may need adjustments moving forward.

II. Non-Compliance Procedures

Programs found in non-compliance will receive follow-ups and sanctions based on the severity of the policy violation.

1. In the event of a Moderate violation, the Protection of Minors Office will notify the Program Supervisor by email and include a noncompliance form describing the violation and required remedy. Repeated Moderate violations may result in a Probationary Period.

Examples of Moderate violations include, but are not limited to:

- Program was not registered prior to minor participation.
- Program did not upload required documentation.
- Program staff with gaps of compliance due to expired training during the program.

2. A Major violation or repeated Moderate violations will result in a Probationary Period for the program, and the Program Supervisor and a unit head will be notified via email from the Protection of Minors Office.

Examples of Major violations include, but are not limited to:

- Program staff who began interacting with minors without compliance requirements.
- Minors engaging in unsupervised or unsafe activities during the program.
- Minors participating in an activity that is immediately dangerous to their health or safety, e.g. swimming without a supervising lifeguard.
- Active abuse of a minor.

Based on the severity of the violation, further sanctions may occur. These sanctions could include:

- Required change in programming or staffing by a set date.
- Immediate removal of offending program staff member(s).
- Halting of program if program cannot continue without threat of harm.
- Inability to register future programs on campus for a set amount of time.

Probationary Period

- The Probationary Period is assessed to both the program and the Program Supervisor.
- The Probationary Period will last six months or until the completion of the next program of either the same name or run by the same Program Supervisor, whichever is later. Programs are allowed to continue during the Probationary Period.
- The Program Supervisor will be required to meet with the Protection of Minors Office for additional training and assistance.
- The program and Program Supervisor's compliance will be reassessed at the end of the Probationary Period.
 - If the program has met compliance requirements, the Probationary Period will end.
 - If the program has made measurable progress but has not met compliance requirements, the Probationary Period will extend for another six months and the unit head will be notified.
 - If the program has not made measurable progress, the Probationary Period will extend for another six months and both the unit head and the department head will be notified via email.



