Adopted 2003

Youth Interaction Safety Policy

Campus Programs For Minors (SB1414)

Southwestern University

Campus Safety and Risk Management

Rev. 2/21/12

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Introduction

Southwestern University has implemented a proactive youth interaction safety policy in order to provide a safer environment for youths participating in S.U. sponsored camps **or** programs involving youths. Our policy includes safe interaction guidelines, adult employee criminal background checks, compliance with Senate Bill 1414 (campus program for minors), and outside-sponsored camp contract indemnification.

Benefits

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

Steps to Implement

1. Review Youth Interaction Policy and the Campus Program For Minors with all staff
2. Conduct background checks on all staff – initial or bi-annual with SUPD
3. Complete annual sign-off forms for all staff and file for recordkeeping purposes
4. Ensure compliance with Campus Program For Minors
    a. Ensure sexual abuse training for all qualified staff
    b. Submit Form to DSHS if required
5. Complete a risk management plan to help ensure a safe program

Interaction Guidelines

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

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

Always be in view of others, supervise in pairs whenever possible. All physical contact should be appropriate (i.e. high fives, bones). Staff should not engage in, initiate or encourage inappropriate contact, such as chest bumps, kisses, hugs, butt slaps or sitting on laps. Respect the privacy of campers/youths, avoid sharing opinions or making inappropriate comments when in the presence of campers/youths. Use of alcohol, drugs or tobacco products is prohibited. Staff should not have informal communication with campers after the conclusion of camp. All campers/youths must have adult supervision until released to a parent or guardian. No campers/youths are to be transported in personal vehicles. A camper requiring medical attention is to be directed to the athletic trainer, parent, or a medical provider.

Overnight Camps/Programs

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

Never have a camper in private quarters. Plan and schedule so that the boys and girls are separated by some barrier other than a wall (i.e. by floors or wing), and that they are supervised in the residence halls by same-sex staff.

Report a sick camper immediately to the athletic trainer, parent, or medical provider. Inspect the community bathrooms at least once every four hours for messes or damage; do not enter a bathroom or shower stall to assist a camper without another staff present. Always have campers follow University guidelines relative to safety (i.e. fire alarm - evacuation, severe weather, etc.) Never leave campers alone in the residence halls.

Counselor Judgment

What are the physical risks involved in this activity/decision? Are there any foreseeable risks? What dangers can be avoided? What would I do if the campers parents were watching?

Background Checks

Employee background checks will be conducted through a reputable private firm specializing in this field. S.U. Police will administer the process. All disclosures required by the Federal Credit Reporting Act will be provided to job applicants. SUPD will review initial results of the background check. If there is a question of eligibility, the file will be forwarded to Human Resources ** to further review and make the final determination and appropriate notification. Please note: you can review a summary of rights and information related to the Fair Credit Reporting Act at www.southwestern.edu/safety - Programs - Youth Interaction – Background checks – Your Rights.

A. All Southwestern University youth camp/program employees and volunteers must undergo a criminal background check. The following convictions, regardless of when the conviction occurred, will render the camp employee/volunteer ineligible for participation:

1. Any drug distribution activity (misdemeanor or felony)
2. Rape
3. Aggravated Assault or Battery
4. Child abuse or molestation
5. Murder
6. Kidnapping
7. Or any other felony or crime involving moral turpitude, which involves acts of physical violence.

B. The following convictions may render employee/volunteer ineligible for participation and will initiate a more detailed review:

1. Any drug related activity (misdemeanor or felony)
2. Assault or Battery
3. Any crime involving the endangerment of a minor
4. Or any other felony or crime involving moral turpitude, which does not involve acts of physical violence.

C. Any arrest (including a citation), charge, conviction or plea of no contest (nolo contendre) involving a summer youth camp employee/volunteer relating to any of the above crimes (A&B) must be reported to the camp director immediately upon such arrest or conviction. Failure to do so may result in disciplinary action.

D. Any participating summer youth camp employee/volunteer who will be responsible for transporting camp participants by vehicle must undergo and pass a driver history check as required by the Southwestern University Fleet Safety policy. Please avoid any one on one transportation of youths.

E. Any summer youth camp employee/volunteer with convictions stated under section B may request an appeal upon denial of participation. An appointed senior level committee will review appeals.

** Each case will be independently reviewed and individual circumstances will be considered in making the final determination.

3rd Party Sponsored Camp Contracts

3rd party sponsors will be required to provide proof of one million dollar occurrence-based liability insurance with an indemnification to Southwestern University. Liability policies may not have exclusions for sports camps/athletics, physical/sexual abuse, harassment or molestation. Sponsors will be asked to make all advertisements clear that Southwestern University is only hosting the facility/grounds for their camp program. Southwestern University will ask that sponsors take reasonable precautions and support safe guidelines similar to our youth camp safety policy including compliance with Senate Bill 1414 (Campus Program For Minors).

Important Administrative and Clarification Information

- Staff/coaches who are required/expected to participate in youth camps/programs as a function of their primary job duty (Upward Bound, Operation Achievement) must pass a criminal background check as a contingency for employment. An offer should be made prior to processing the background check, employment will be contingent upon successfully passing the criminal background check.
- Staff/coaches who volunteer their services or serve as a secondary job duty at a youth camp/program, may be hired without a contingency, but **must** pass the criminal background check prior to participating in a youth camp/program.
- Department/Program Director should provide completed applicant release forms for the background check (with current address) for participating counselors/staff to SU Police at least 10 business days prior to the start of the first camp. Forms are available at S.U. Police as well as www.southwestern.edu/safety
- Department/Program Director should ensure components of the Campus Program For Minors are implemented – training and submission to DSHS if required.
- Department/Program Director must review this policy with all camp/program staff prior to them participating in youth camps/programs as well as on an annual basis. Collect "a signed copy of the annual sign-off form" for all participating camp staff during initial implementation and on an annual basis. These forms should be retained by the department for permanent recordkeeping.
- Applicant release forms for counselors who have been previously reviewed and approved by SU need only provide their current address for all subsequent bi-annual reviews.

- Contracted teachers who have recently passed (one year period) a public school criminal background check will be asked to provide written verification. If verification cannot be obtained, they will be required to pass our criminal background check.

- Department/Program Director should update the master camp/program counselor list whenever changes occur (add new counselors/remove non-participating counselors) and forward an updated version to SU Police.

- Key Terms for the application (intent) of this policy:
    - "youth" does not include Southwestern University students
    - camps/programs are Southwestern University sponsored athletic camps, academic or student programs that participate in close interactions with youths with or without parental supervision or oversight
    - "staff" includes directors, camp counselors, coaches, assistant coaches, student assistants, staff, faculty, contracted teachers or any other adult or student acting as a supervisor/mentor/counselor in a paid or volunteer status

Annual Sign-Off Form

To help insure a safe youth camp/program environment, Southwestern University has implemented a Youth Interaction Safety Policy. The policy includes interaction guidelines. All employees are required to review the entire youth interaction policy on an annual basis. In addition, each staff should sign they have read and agree to follow the youth interaction policy and interaction guidelines. Note: A summary of your rights and other information related to the Fair Credit Reporting Act is available to you at www.southwestern.edu/safety - Programs - Youth Interaction – Your Rights.

Departments are responsible to collect and file these sign-off forms on an annual basis.

I have read and understand the entire SU Youth Interaction Policy.

Print Name	Signature	Date

Campus Programs For Minors - Senate Bill (SB) 1414

February 8, 2012

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

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

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

- **employee is a person of any age who receives any compensation, pay, stipend or reimbursement of any value (ex. course credit). Each employee must successfully complete state required training prior to the start of camp.*

- ***contact with campers does not include an employee acting as a guest speaker, entertainer or a person who visits for a limited purpose or limited time if the person has no direct and unsupervised interaction with minor campers – (ex. sign-in coordinator during registration, guest speaker or other person when they will not be in a one on one interaction with a camper). These employees/persons would not be required to obtain training in order to participate in the camp.*

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

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

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

1. A Southwestern sponsored program or a 3rd party sponsored program hosted at Southwestern
2. A program (camp) *involving minors**
3. A program (camp) with a total duration of four (4) days or more (does not need to be consecutive days and would include counting partial days as full days)

- **The rule stipulates 20 minor campers or more are needed to qualify for the training requirements, however, Southwestern University is adopting a more protective approach for the training portion. Southwestern requires training for "employees" for all Southwestern programs (camps) that are four (4) days or more regardless of the number of minors involved. Note: the operator will not need to submit notification to the DSHS for programs (camps) that do not meet the minimum of 20 or more minors.*

Training Information: A state approved training course has been selected that provides on-line training and certification for the convenience of staff involved in programs for minors. The training vendor is in2Vate. It will be the responsibility of the program (camp) director to coordinate this process with Human Resources and each qualified program/camp employee. Please see: Senate Bill 1414 Child Protection Training Procedures for complete details. Refresher training is required every two years if the employee continues to participate in campus programs for minors.

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

Campus Program For Minors website: http://www.dshs.state.tx.us/cpm/

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

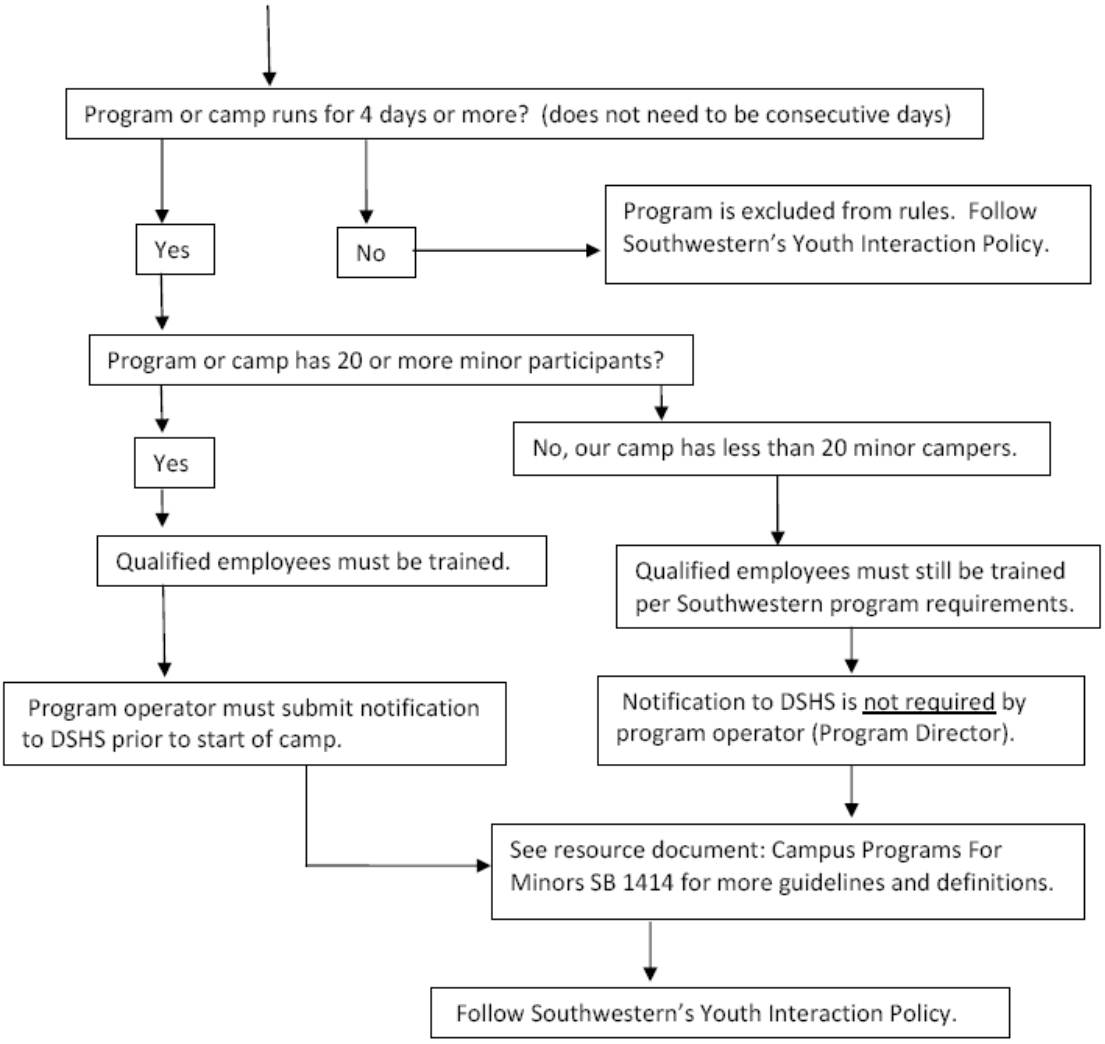
The Southwestern University Youth Interaction Policy (including bi-annual criminal background checks) still applies to our camps/programs. Please remember that the preferred method is to avoid all one on one interaction with minors and to plan your program to have an additional staff person present.

Southwestern University Safety/Risk Management

Campus Program For Minors Flow Cart

Southwestern Program (Camp)

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



Report suspected cases of child abuse/molestation

S:\Michael-Safety\H&S PLAN\Youth Interaction Policy\New SB 1414 Rules For Camps - Sexual Misconduct\Campus Program For Minors FlowChart.doc

Southwestern University Safety/Risk Management

Campus Program For Minors Flow Cart

3rd Party Program Hosted at Southwestern

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Include Campus Program For Minors contract rider/clause to verify program operator is aware of SB 1414 and state they are in compliance by signing the contract clause.

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University Events Director :

- communicate with 3rd party program director to verify they are aware of Southwestern's more protective criteria and state they are in compliance by signing the contract clause:
  - If you have a four (4) day or more program/camp
    - training of at least two program staff <u>even when camp has less than 20 minors</u>
    - notification to DSHS <u>prior</u> to start of camp

DSHS criteria for reporting to DSHS & having <u>all</u> staff trained

- four (4) day or more program/camp
- 20 minors or more

Note: out of state program operators must be trained by a Texas DSHS approved training provider – on-line provider may be a good option).

Senate Bill 1414: Child Protection Training Procedures

For questions regarding Senate Bill 1414 or the Youth Interaction Policy, please contact Michael DeLance, Safety Officer, x1677.

For questions regarding the on-line training with in2Vate, please contact Chris Murray, Human Resources, x1220.

Program Director/Coordinator Responsibilities

- Determine who within your program needs to take the SB1414 training.
- Notify those who need to take the SB1414 training.
- Ensure participant training is complete and all certificates are kept on file.
- Complete the Campus Program for Minors verification form (EEH-28).
- Submit the form to the Department of State Health Services only if camp is 4 days or more **and** has 20 or more minor participants.

Login and Password for in2Vate on-line Training:
Contact Human Resources (Chris Murray) at ext. 1220. Provide HR with the full names and e-mail addresses for all camp personnel that require training. An in2Vate account will need to be set up by HR for each participant (employee). Login/password and training notifications will be sent out via e-mail. See instructions on next page.

Cost of Training
In2Vate on-line training module is provided free of charge for all Southwestern camp personnel (part of our insurance premiums).

Instructions for Completing the In2vate On-line Training for Summer Camps

Camp Directors will need to send a complete list of all those needing the training to Chris Murray-Human Resources, murrayc@southwestern.edu. The list must indicate the participant's full name and accurate email address as well as which camp he/she will be working. An in2vate account will be set-up for each participant by HR. Once the account is set-up and the training assigned, the following emails will be sent out.

1. ***This is an example of the first email you will receive from in2vate <system@pub.in2vate.com>. It contains your username and password. Please do not change your password as I need to keep track of them. See example below.***

in2vate **Your account information** - Your in2vate account information. Your username is: murrayc@southwestern.edu Your password is:

Your in2vate account information.
Your username is: **murrayc@southwestern.edu** **(example)**
Your password is: _____
You may login to your account by visiting http://www.in2vate.com
Please remember that your password is case sensitive. ~~To change your password, use the Update My Account link on the upper right corner of your browser page.~~
If you have any questions, please contact your system administrator.
****

Chris Murray
Southwestern University – Human Resources
murrayc@southwestern.edu
512-863-1220

2. ***The second email you will receive will tell you that a training course has been assigned to you. See example below.***

Your new training assignment Inbox x

in2vate <system@pub.in2vate.com> 8:51 AM (0 mi
to me

~~Chris Murray:~~ (Your name)
Your in2vate administrator, Chris Murray, has assigned you online training.

Please visit in2vate.com and login to access this training.

Training Courses Assigned:

- EIIA: Texas Camps Training Program on Child Sexual Abuse and Molestation Approval Number YC13-0101

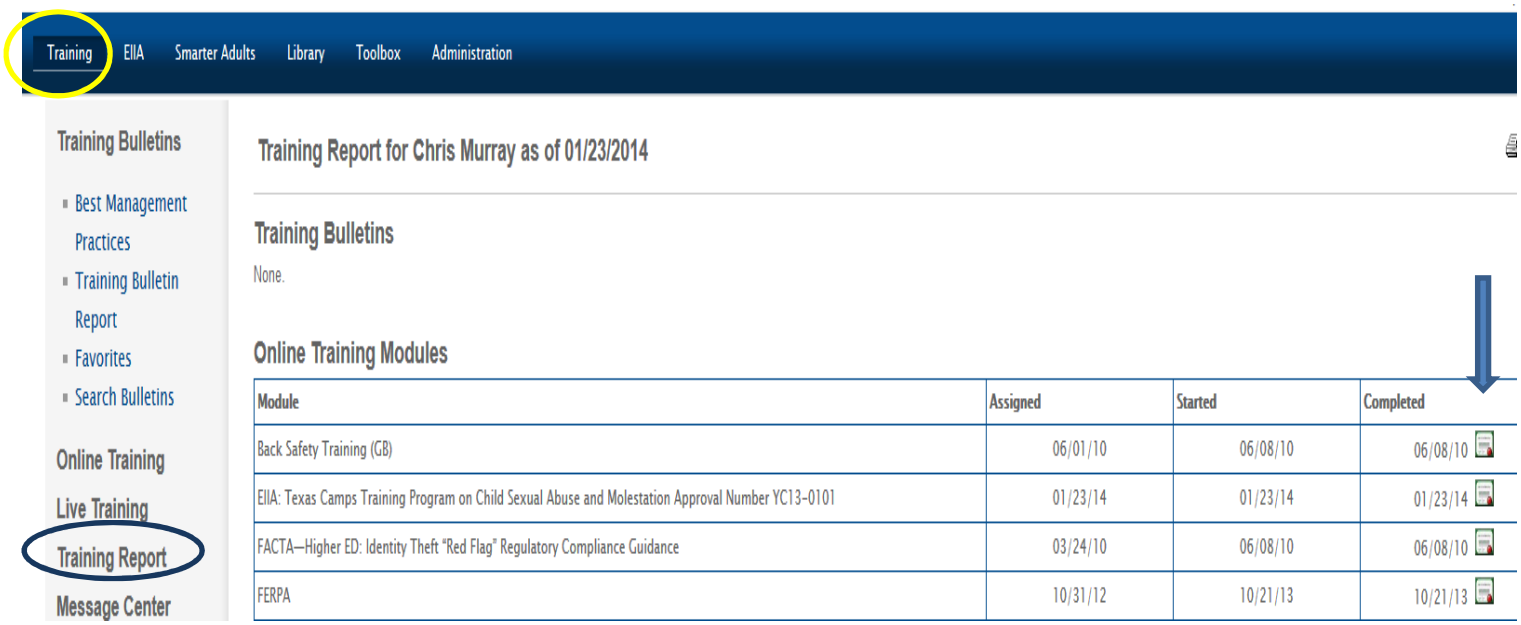
Your user id is: ~~murrayc@southwestern.edu~~ **Your email address**

If you do not remember your password, ~~click the "FORGOT PASSWORD" link at http://in2vate.com~~ **contact system administrator.**

If you have any questions, please contact your system administrator.

Your system administrator is:
Chris Murray
murrayc@southwestern.edu
(512) 863-1220

After completion of the training there will be a quiz of 25 questions. Once you have completed the quiz, you can print out your certificate by going to the "Training" tab and click on "Training Report". This will list all of the training modules you have completed. Find the course you want and click on the certificate emblem at the far right. Save the certificate to your computer and print. See illustration below.



Note: Allow up to 1 hour to complete the training and quiz. Print certificate and forward to Program/Camp Director for record-keeping.