Southwestern University

Youth Interaction Safety Policy

Introduction

Southwestern University is implementing a proactive youth interaction safety policy in order to provide a safer environment for youths participating in S.U. sponsored athletic camps or other campus programs/activities involving youths. Our policy will include safe interaction guidelines, adult employee background checks for counselors/staff and outside-sponsored camp contract indemnification. 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.

Process

Departments must ensure that this policy is reviewed with all counselors/staff/students participating in a camp/program (requires signing the annual signoff form). S.U. Police will administer the employee background check through a reputable private firm specializing in background checks. All disclosures required by the Federal Credit Reporting Act will be provided to job applicants. A sub-committee will confidentially review the results and determine whether the employee is eligible or ineligible to participate in youth camps/programs. All information related to background checks will be used solely for eligibility and employment purposes, and will not be disclosed to third parties, except to University employees with a need for such information to perform their job duties. Departments that participate in youth camps/programs will be responsible for effectively communicating/reviewing and insuring implementation of all components of this policy for all participating counselors/staff/students. This policy will apply to existing counselors as well as future prospective counselors. Initial background checks will be conducted on all new employees who participate in youth camps/programs. Student counselors will be subject to one initial background check only (will cover a 4 year term). Additional background checks on staff must be conducted on a bi-annual basis (every 2 years) in an effort to promote a prudent and proactive youth safety policy. Departments are responsible for facilitating this bi-annual background check.

Summary Information

Interaction Guidelines:

The main emphasis of the interaction guidelines will be to avoid questionable contact between counselors and youth participants (youth does not refer to S.U. students). 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. This will provide greater protection to the youth and the counselor.

Employee Background Checks:

Includes a criminal records search and review that will be compared against our qualification criteria for determination of eligibility. This will help guard against having a counselor with a criminal record supervise or have close interaction with youth camps/programs. This process will be held confidential.

Outside Camp Contracts:

Camp sponsors will be required to (1) provide proof of adequate liability insurance, (2) provide a statement of indemnification to Southwestern University and (3) ensure that advertisements/literature do not associate Southwestern University as being a camp sponsor. Southwestern University will only act as the facility host and will strongly encourage all camp sponsors/programs to support similar youth-safety guidelines.
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Interaction Guidelines

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

- Always be in view of others (Ex. Upward Bound Building: When meeting in an office – leave door open and have another staff present in the building. If privacy is required, inform another staff member that the door will be closed for a private conversation and make sure they will remain nearby in the building). If no other staff member is present in the building, the meeting should be rescheduled or moved to a more public location.
- Supervise in pairs whenever possible
- All physical contact should be appropriate (i.e. high fives, bones). Counselors 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
- Counselor 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/medical provider

Overnight Camps/Programs

In addition to the above, the following are additional precautions related to overnight campers who stay in campus/other housing.

- Never have a camper in private quarters
- Make sure that the boys and girls are separated by some barrier other than a wall (i.e. floors or wings), and that they are supervised in the residence halls by same-sex counselors
- Report a sick camper immediately to the athletic trainer/medical provider who will handle parent contact if necessary
- 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 counselor 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

Ask yourself the following questions regarding situations or decisions you may find yourself in as a youth camp counselor.

- What are the physical risks involved in this activity/decision?
- Are there any foreseeable risks? What dangers can be avoided?
- Who is this activity/decision for, the campers or me?
- What would I do if the campers or their parents were watching?
- What would I do if the Director were watching?
- Could my action/decision cost me my job?
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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. A sub-committee made up of three members of the Safety Committee will review initial results of the background check. If there is a question of eligibility, the file will be forwarded to a senior level committee to further review and make the final determination and appropriate notification.

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.

Outside Sponsored Camp Contracts

Outside 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.

May 2003 – rev. 10-31-05
006936.00001:780661.02
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NOTE: Important Administrative and Clarification Information

- Counselors/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.

- Counselors/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.

- Departments should provide completed applicant release forms for the background check (with current address) for participating counselors/staff to SU Police for at least 10 business days prior to the start of the first camp. Forms are available at S.U. Police – Robin Aleman (1657) as well as www.southwestern.edu/safety.

- Departments 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 – Robin Aleman (alemanr@southwestern.edu).

- Completed applicant release forms for student counselors should be provided to SU Police at least 10 business days prior to the start of their camp/program.

- Departments must review this policy with all camp/program counselors (staff and student) prior to them participating in youth camps/programs as well as on an annual basis. Departments will be responsible to review, distribute and collect “a signed copy of the annual sign-off form” for all participating camp counselors 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 (Upward Bound) 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.

- Key Terms for the application (intent) of this policy:
  - “youth” does not include Southwestern University students
  - camps/programs are Southwestern University sponsored athletic camps or other programs/activities (such as Upward Bound/Operation Achievement) that participate in close interactions with youths with or without parental supervision/oversight
  - “counselors” 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
# Youth Interaction Safety Policy

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<th>Sub-Committee Review Team</th>
<th>Senior Committee Review Team</th>
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<td>Human Resources Benefits Coordinator</td>
<td>Athletic Director</td>
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<td>S.U. Police</td>
<td>V.P. Fiscal Affairs</td>
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<td>Director of Campus Safety &amp; Risk Management</td>
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