

Title: Protecting Minors on Campus Policy	Procedure Number:
Department: Risk Management and Compliance	Implementation Date:
Approved By:	Date Approved:
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Protecting Minors on Campus Policy – Belmont University

I. Purpose and Scope of Policy

Purpose: Belmont University has an obligation to its students, faculty, staff, and visitors to conduct its operations and maintain its facilities in a manner consistent with its mission as an institution of higher education and as a Christian community of learning and service. While there may be occasions for brief visits by children under the age of eighteen (18) (“**Minors**”) to faculty, staff, and students on campus, *unescorted* or *unsupervised* Minors are not permitted on University premises except as provided for in this Policy. In addition to the requirements that may apply under this Policy, the visits of Minors to campus are subject to the same conditions as any other visitor to the University.

Scope: This Policy applies to activities and Programs operated by Belmont University taking place on Belmont's campus or under the authority and direction of the University at other locations including but not limited to E.S. Rose Park, in which Minors will be physically present and participating (“**Programs**”), with the following exceptions: (1) undergraduate and graduate academic Programs in which Minors are enrolled for academic credit and are the only Minors participating; (2) research Programs subject to the review and approval of an Institutional Review Board (IRB) sponsored by Belmont or authorized by Belmont to provide oversight concerning such research Programs; (3) events on campus which are open to the general public and which Minors attend at the sole discretion of their parent(s) or guardian(s); and, (4) Preview Days, Campus Visits by prospective students and such other similar, ongoing Programs as may be designated from time to time by the appropriate Vice President or Provost in advance and in writing as exempted from this Policy,

Athletic camps, academic camps, music camps, laboratories and workshops intended for elementary, middle and high school students and similar activities operated by Belmont University will fall within the scope of this Policy. This Policy applies to such Programs and activities whether they are limited to daily activities or also involve the housing of Minors in residence halls.

For purposes of this Policy, an “**Authorized Adult**” is any adult who has complied with the requirements to be present with Minors under this Policy and who is responsible for either escorting or supervising the Minor(s) while on campus or while participating in any Programs. Authorized Adult may also be a Minor’s parent or legal guardian.

II. Policy Statement

In order to promote the safety and general welfare of all Minors participating in Programs at the University, it is the policy of Belmont University that all Minors participating in Programs must

be reasonably and appropriately supervised by an Authorized Adult who complies with the Code of Conduct provided in this Policy.

III. Implementing This Policy

A. Program Registration. University personnel shall complete the Registration Form for Program with Minors with the details of the Programs they intend to sponsor *at least forty-five days prior to* the first scheduled date of participation by Minors. The Registration Form for Program with Minors can be found at:

<http://www.belmont.edu/risk-management/protecting-minors.html>

The information required for the Registration Form for Program with Minors includes:

- The University employee in charge of the Program;
- The name and contact information for persons representing third parties who may be offering Programs;
- The dates and locations where Minors will be participating;
- The general nature of the activities to be undertaken or offered in the Program;
- The names email addresses and cell phone numbers of all adults who will be participating directly with Minors in the Program; and
- The administrative requirements associated with the Program, including but not limited to waivers and permission slips to be obtained from the parents/guardians of participating Minors and medical emergency forms.

Any requests for clarification as to whether a particular Program is subject to this Policy, or a request for a waiver to this Policy, should also be sent to the Office of Risk Management & Compliance and appropriate Vice President.

B. Background Report. A satisfactory criminal background report will be required of each adult *at least 2 weeks prior* to his or her participation with Minors in Programs covered by this Policy and at least once every four (4) years thereafter. For more information, contact the Office of Human Resources at (615) 460-6456.

It is the responsibility of the person in charge of the Program to ensure that each participating adult has submitted the required criminal background report request form and has subsequently received clearance to participate *at least 2 weeks prior to the event*. The Office of Human Resources will maintain a roster of individuals who have been cleared to participate and the dates on which a new background check will be required.

The background report will be limited to criminal offenses, including, but not limited to, child abuse, for which an individual has been convicted, pled guilty to a felony or misdemeanor, or where such charges are currently pending. The University may accept successful documented background clearances which have been conducted on the participating adult by other employers or entities as long as such reports have been completed within four (4) years from the start date of the Program.

A decision not to permit an individual to participate in a Program covered by this Policy based on the results of a background report will be made by the Director of Human Resources after

consultation with the appropriate Vice President(s), the Office of the Administration and University Counsel, or others as needed. The results of background reports conducted under this Policy will be used only for the purposes of this Policy, except that Belmont reserves the right to take appropriate action with respect to employees who may have falsified or failed to disclose information material to their employment on employment applications uncovered as a result of the background check, including and up to immediate termination of employment. Copies of background check reports will be retained in the Office of Human Resources.

C. Training

Each adult who will be participating with Minors in a Program shall attend in person *annual* mandatory training *at least 2 weeks prior to the event* on the practices and conduct requirements of this Policy, on protecting Minors from abusive emotional and physical treatment, and on appropriate or required reporting of incidents of improper conduct (including, but not limited to, appropriate law enforcement authorities). The appropriate Vice President or area Director may enhance and/or modify the required training Program to meet specific needs of the particular Program involved, in consultation with the Director of Human Resources. Any such enhanced or modified Program must include all the elements described in this Policy. In addition, the appropriate Vice President or area Director shall arrange for sufficiently frequent training sessions to permit Programs to continue to function on a regularly scheduled basis.

It is the responsibility of the person in charge of the Program to ensure that each participating adult has submitted the required training *at least 2 weeks prior to the event*. The Office of Human Resources will maintain a roster of individuals who have completed the training.

Training resources can be obtained from the Director of Organizational Development within the Office of Human Resources www.belmont.edu/hr or (615) 460-6456.

D. Practices

- Every Minor must be provided with reasonable and appropriate supervision by an Authorized Adult while that Minor is on campus.
- Every Program at which Minors are present must have a minimum Authorized Adult to Minor ratio of the following:
 - Ages 6-8 1 staff to 6 overnight participants or to 8 day only participants
 - Ages 9-13 1 staff to 8 overnight participants or to 10 day only participants
 - Ages 14-18 1 staff to 10 overnight participants or to 12 day only Participants
- It is the responsibility of the person in charge of the Program to ensure the event will be able to maintain the appropriate Authorized Adult to Minor ratio *at least 2 weeks prior to the event*.
- The choral activities of Belmont University's School of Music, which involve the regular practices and rehearsals of performance choirs of more than 12 day only participants are exempt from the above ratios. However, such activities shall comply with all other requirements of this Policy.
- For purposes of complying with the staff to participant ratios at overnight camps for high

- school athletic teams, the coaches who accompany their teams shall be counted as staff.
- Every Program should establish security and emergency measures for Minors, including but not limited to:
 - Drop off and pick up procedures (At a minimum such measures shall require every Minor to be checked-in on a daily basis; the collection of contact information from the Minor's parent or guardian; communication of how parents or guardians may reach their Minor in the event of an emergency; a requirement that Minors under 13 must be checked out with signature of parent or guardian; and containment of Minors in specified space during free time, mealtimes, or before the Program begins);
 - Where to go if lost; and
 - Steps to take in the event of an emergency on campus (i.e. fire, tornado, etc.).
 - With prior written consent from the parent or legal guardian of a Minor who drives him or herself to a Program, such Minor may be allowed to drive offsite during lunch time.
 - At no time may an Authorized Adult leave a Minor in the care of a person that is not an Authorized Adult or in an area that is off-limits to Minors.
 - Authorized Adults may not release a Minor under the age of 13 to anyone other than a custodial parent or legal guardian without written authorization from the parent/guardian that his/her child may be released to that individual.
 - Restroom supervision for Minors under the age of 13: Authorized Adults will make sure the restroom is not occupied by suspicious or unknown individuals before allowing Minors to use the facilities. An Authorized Adult will stand outside the doorway while Minors are using the restroom. If Authorized Adults must assist younger children, doors to the facility must remain open.

E. Conduct Requirements

Authorized Adults shall read and sign a Code of Conduct that includes prohibitions against Authorized Adults:

- Telling minors “this is just between the two of us” or use similar language that encourages Minors to keep secrets from their parent/guardians.
- Having one-on-one contact with Minors outside the presence of others. It is expected that activities where Minors are present will involve two or more Authorized Adults. Individual musical instruction under the auspices of the Belmont University School of Music are specifically exempted from this requirement.
- Participating in a sleepover under the auspices of the Program, unless (1) one of the Minor's parents or legal guardians is present or (2) one of the Minor's parents or legal guardians has given consent and there is at least one other Authorized Adult present at all times.
- Sharing a bed or sleeping bag with a Minor.
- Being alone with a Minor in the Authorized Adult's living quarters.
- Showering, bathing, or undressing with or in the presence of Minors.
- Engaging in any abusive conduct of any kind toward, or in the presence of, a Minor, including but not limited to striking, hitting, punching, poking, spanking, restraining, verbal abuse, or other act intended to cause personal degradation or humiliation.
- Administering corporal punishment to, or touching in an inappropriate or illegal manner any Minor.

- Use of an Authorized Adult’s personal vehicle to pick up or drop off Minors participating in the Program unless the parent or legal guardian of the Minor has provided written permission.
- Coercing Minors into inappropriate acts, pranks or practical jokes by the use of intimidation, or threats or force.
- Hazing or bullying of any kind. Bullying including verbal, physical, and cyber bullying are prohibited.
- Engaging in the use of alcohol or illegal drugs, or being under the influence of alcohol or illegal drugs during Programs.
- Making pornography in any form available to Minors participating in the Programs covered by this Policy or assisting them in any way in gaining access or allowing access to pornography.
- Engaging in intimate displays of affection towards others in the presence of Minors, parents/guardians, and other Authorized Adults.
- Taking any photographs or videos of Minors or posting photographs or videos on a digital, electronic, hosted media, web-based service or any other medium without first obtaining a release in this regard from the Minor’s parent or legal guardian.
- Failing to report abuse, harassment or exploitation of Minors by other Minors participating in the Program.

F. Allegation of Inappropriate Conduct

Authorized Adults shall:

- Immediately report any known violation or reasonably suspected violation of the Conduct Requirements of this Policy which involve or are suspected to involve the abuse of Minors as follows:
 - For situations that involve life threatening emergencies, dial 911.
 - For situations that require action in less than 24 hours, call the Tennessee Department of Children Services child abuse reporting hotline: 1.877.237.0004. Anonymous reporting on the hotline is allowed. If a response is not needed within 24 hours, Authorized Adults have the option of reporting through the forms provided at <https://apps.tn.gov/carat/>
- Following reporting through one of the mechanisms above, Authorized Adults are required to report the matter to the person in charge of the Program and to the Chief of Belmont’s Campus Security. These persons shall immediately report the matter to the Vice President for Administration and University Counsel or his/her designee.
- Assure the safety of Minors participating in Programs covered by this Policy, including, if possible, removal of Minors from dangerous or potentially dangerous situations.
- Discontinue any further participation in Programs covered by this Policy when an allegation of inappropriate conduct has been made against him or her, until such allegation has been satisfactorily resolved.
- Communicate and enforce the No Visitors policy to Minors that includes no visitors with the exemption of parent or legal guardian or if there is written approval from the Minor’s parent or legal guardian.

G. Additional Resources

Local Law Enforcement

Nashville Metro Police Department (615) 862-8600

Helplines

Crisis Center – Crisis Line (24 hour) (615) 244-7444
Tennessee Department of Mental Health – Crisis Line (24 hour) (615) 726-0125
Prevent Child Abuse Tennessee – Crisis Line (24 hour) (615) 383-0994
Sexual Assault Center Tennessee (800) 897-1999
Tennessee Department of Children’s Services (877) 542-2873

Legal Help

Legal Aid Society (615) 244-6610
Tennessee State Bar Association (615) 383-7421

Victim Advocacy

Davidson County District Attorney’s Office (615) 862-5500
Nashville Victim Intervention Program (615) 862-7773
Tennessee Chapter of Children’s Advocacy Centers (615) 333-5832

Resources for Healing

Tennessee Department of Mental Health (800) 560-5767
Family and Children’s Services (615) 320-0591
Mental Health Cooperative (615) 726-3340
Nashville Children’s Alliance (615) 327-9958

Support Groups

Nashville Children’s Alliance (615) 327-9958

Websites

www.darkness2light.org
www.stopitnow.com
www.tncac.org
www.nashvillechildrensalliance.org