

## Policy on Programs Involving Minors

### GOVERNANCE AND LEGAL

Effective Date: June 4, 2014

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Supersedes:

Related Policies:

Policy on Background Checks and Credential Verifications

Responsible

Office/Department:

Office of Risk Services

Keywords: Minors; high school students; children; sports camps; pre-college programs; young scholars; youth programs; CORI; SORI; background check; criminal records check

### I. Purpose and Scope

Northeastern University is committed to promoting a safe environment for minors who come onto the campus for participation in University-sponsored organized programs and activities, or who participate in University-sponsored activities that take place off campus. This policy applies to University-sponsored activities and programs in which minors participate, on or off campus, to University-sponsored programs run by recognized student organizations, and authorized programs that take place on University property or facilities that are operated or sponsored by third parties.

This policy provides program registration and other requirements to promote the safety of minors participating in such activities. In addition, the University expects that all members of the community, not only those involved in Programs for minors that come within this policy, will adhere to the general standards and code of conduct for interacting with minors that underlie this policy, and also will report any good faith suspicions of child abuse, neglect, or exploitation to the Northeastern University Police Department and/or other appropriate agency.

Exclusions: This policy does not apply to:

1. minors who are enrolled Northeastern students, and come within the University's Student Code of Conduct;
2. minors employed by or volunteering on behalf of the University, who are covered by University policies promoting a safe and healthy workplace;

3. the Russell J. Call Children's Center, which is licensed and regulated as a daycare center under state law;
4. participation by minors in a research protocol approved by the Institutional Review Board;
5. community service activities such as tutoring or mentoring sponsored by recognized nonprofit or community service organizations (such as Big Brother/Big Sister) in which Northeastern students participate, *provided that* if the organization proposes to use University facilities for such community service activities, the organization is responsible for compliance with this policy.
6. minors who may be on campus to attend a performance or event or who may be on campus as the child of a parent, guardian, employee, student or agent.

## II. Definitions

For the purposes of this policy:

**A Minor** is anyone under the age of eighteen covered by this Policy.

**Responsible Adults** are those persons eighteen years of age or over or registered as a University student who are responsible to supervise, manage, chaperone, direct, coach, teach, tutor, or otherwise interact directly with minors in connection with a Program, as defined below, whether they are faculty, staff, students, interns, volunteers, employees or contractors of the University or a Third-Party Sponsor of a Program.

**A Program** refers to any organized activity sponsored, offered, or otherwise facilitated by any University Program or Third-Party Sponsor, as defined by this policy, which is intended for the enrollment and participation of minors, but does not include Admissions tours and hosted overnights, or athletic events, performances, and other presentations that are open to the general public which minors might attend at the discretion of their parents or guardians.

**University Program Sponsor** is the Department, organization, or other unit of the University sponsoring, hosting, authorizing or otherwise operating a Program, or authorizing the use of University facilities for operation of a Program by a non-University entity.

**Third Party Sponsor** refers to a non-University entity hosting, organizing, or operating a Program in University facilities or on University property.

**Criminal Background Check** refers to a review of a person's criminal record history (the Massachusetts Criminal Offender Record Information, known as CORI, or CORI-equivalent in any jurisdiction where a person has lived in the last seven years), and includes a search of the Sex Offender registry Information (SORI, or SORI-equivalent).

**Required Training** is instruction required of all Responsible Adults prior to their working with minors in any Program covered by this policy, and annually thereafter as long as the Responsible Adult continues to take part in a Program, as provided for in Section III, c. 3 of this policy.

### **III. Policy**

To promote the safety of minors participating in activities at or sponsored by Northeastern University, all Programs must meet the following requirements, in addition to any applicable federal, state, or local law, and University policies.

#### **A. Registration**

Programs must be registered with Risk Services with sufficient advance notice to meet the requirements and purpose of this Policy. The Office of Risk Services is responsible for administering the registration of Programs and any related requirements and procedures. Risk Services will develop and publish guidelines for the registration of Programs.

Any requests for clarification as to whether a particular Program is covered by this Policy or any of the provisions of this Policy must be sent to the Office of Risk Services.

#### **B. Criminal Background Checks and Training**

Responsible Adults who will have direct unsupervised contact with minors enrolled in Programs are required to have criminal background checks, consistent with applicable federal, state and local laws. Accordingly, prior to beginning any task in a Program that involves contact with minors, Responsible Adults are required to

1. complete a self-disclosure form; [Self-Disclosure Form](#)
2. complete a criminal background check for all jurisdictions where the person has lived in the last seven years; and
3. participate in Required Training, which can include on-line or live training that satisfies the requirements for mandated reporters under Massachusetts G.L. c. 119, § 51A and/or other applicable federal, state or local requirements.

## **Written Agreement(s)**

For all minors enrolling or participating in a University Sponsored Program, the parent/guardian must execute a University Participation Agreement/waiver.

[University Participation Agreement and Release](#)

An authorized signatory of each Third Party Sponsor must complete a Conference Services or Facilities Use Agreement when using university facilities (depending on whether housing, dining, or Northeastern Husky Card or identification card services are required). All such contracts must include:

- a. A provision that the Third Party Sponsor understands and accepts responsibility for adhering to this Policy and the attached Guidelines, including by requiring voluntary self-disclosure forms, Required Training, and criminal history/background checks of all Responsible Adults in its Program(s);
- b. A provision requiring that in addition to the standard certificate of insurance required of external organizations using campus facilities, the Third party Sponsor shall obtain additional endorsement(s) appropriate to activities involving minors; and
- c. A provision acknowledging the Third Party Sponsor's obligation to prepare the written plans and procedures listed above, and to make those available for review by the University upon request.

## **C. Reporting Allegation(s) of Inappropriate Behavior**

The University expects that every member of the university community will immediately report to Northeastern University Police Department if he or she knows or has a good faith belief that a child has been abused, neglected or exploited. This includes not just information or suspicions of on-campus conduct, but also suspected abuse or neglect by a parent, guardian, or custodian/caretaker. Under this Policy, every Responsible Adult is required to report immediately to Northeastern University Police Department if he or she has reasonable cause to believe that a child is suffering physical or emotional injury resulting from abuse, neglect -- including malnutrition -- or exploitation. Northeastern University Police Department is the University's designated agent to receive such reports when required under M.G.L. c. 119, §51A, or other applicable state laws and will assist in making required oral and written reports to the state or local agency.

Anyone making a nonfrivolous report in good faith is protected under state law from criminal and civil liability for making the report. Further, the University will not tolerate retaliation or discrimination against anyone making a good faith report of suspected child abuse.

#### **IV. Additional Information**

The University expects all members of the University community to adhere to and act in accordance with this Policy. Failure to comply may lead to disciplinary action up to termination, and/or revocation of the opportunity to access or use University facilities. Likewise, failure by a Third Party Sponsor to adhere to the Policy shall constitute a breach of the Conference or Facilities Use Agreement and will result in termination of the organization's ability to access or use University facilities.

The University reserves the right to restrict, deny, or place conditions on activities or programs that host minors on University property. The University reserves these same rights with respect to its authority to limit minors' access to University facilities and to require any minor to leave the campus if the minor does not comply with University rules and procedures.

#### **V. Contact Information**

Report reasonable suspicions of child abuse, neglect, or exploitation to the Northeastern University Police Department by calling 617-373-2121. If you believe that a child is in imminent danger you should call their emergency line at 617-373-3333.

If you have questions about the registration process, contact the Office of Risk Services, 617-373-6963, [http://www.northeastern.edu/risk\\_services/](http://www.northeastern.edu/risk_services/).