



# WINSTON-SALEM STATE UNIVERSITY

## Youth Program Coordinator Handbook

This handbook provides information, policies, procedures, best practices, and standards for Winston-Salem State University programs hosting participants under the age of 18.



*While policies and programs are presented accurately within this handbook, the university reserves the right to revise any section or part without notice or obligation.*

**April 2023**

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# Section 1

## Introduction

Winston Salem State University (WSSU) welcomes the presence of minors who participate in a wide range of activities, research, programs, camps and events offered by various academic or administrative units operated on or off campus. Serving the community and state through youth programming is integral to our mission and tradition of service.

The Office of Conferences and Institutes monitors compliance with [Minors on Campus Policy](#), which promotes the safety and well-being of minors entrusted to the university's care. To support the protection of minors, this policy outlines what is required of WSSU community members who work in activities and programs with minors and informs individuals of their reporting obligations in instances of known or suspected child abuse or neglect of minors. For questions or concerns please do not hesitate to contact Conferences and Institutes at 336.750.2121 or [conferences@wssu.edu](mailto:conferences@wssu.edu).

### **Mission**

To promote the safety of youth participating in WSSU programs through a comprehensive compliance program including the development, facilitation, monitoring, revision and oversight of policies, protocol, training and compliance related activities to provide a safe and healthy environment for participants.

### **Contact**

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## **Minors Regulation [Minors on Campus Policy](#)**

### **History**

- In September 2020, WSSU adopted [Minors on Campus Policy](#) for the purpose of all youth programming to follow requirements as set forth by the University of North Carolina.
- WSSU has tasked the Office of Conferences and Institutes with the
  - oversight of these policies,
  - responsibility for training WSSU employees, and
  - authority of enforcement of the policies.
- In early 2023, software was purchased as software to be used to manage compliance and registration of camps and camp participants.
- The regulation can be viewed here: [Minors on Campus Policy](#) and is listed in Appendix A.

## Core Elements of the Minors Regulation

- Requires approval of programs and activities serving minors by the dean, vice chancellor or their designee
- Registration of covered programs and activities serving minors
- Required
  - written agreement
  - liability waiver
  - emergency contact information
- Recommended
  - medical history and insurance
  - media release
  - pick-up authorization
  - personal boundaries
  - other agreements appropriate for the program
- Background checks – annually Covered Individuals per [Minors on Campus Policy](#) with two exceptions
- Training
- Required mandate to report instances of neglect, abuse or inappropriate behavior with minors,
- Includes non-university entities serving minors in WSSU facilities.

The Minors Regulation applies to programs and activities in which WSSU is knowingly supervising the minor participants, providing online programs for minors through a registration process, or knowingly allowing a third-party to use WSSU property for the purpose of operating a program or activity primarily serving or including minors.

## Definitions

- **Child Abuse or Neglect:** The North Carolina Division of Social Services provides that child abuse is “the intentional maltreatment of a child and that can be physical, sexual, or emotional in nature.” DSS provides that neglect is “the failure to give children the necessary care they need.”
- **Covered Program:** A program or activity in which Minors participate that is sponsored by a University Department, a student organization, or a Third Party entity sponsored by a University Department.
- **Covered Program Staff:** All individuals 18 years old or older who work with, instruct, or otherwise come in direct contact with minors in covered program, even if these individuals are volunteers.
- **Minors:** For the purposes of this policy, minors are defined as individuals who are younger than 18 years of age and are participating in a Covered Program. With the exception of the mandatory reporting requirements below, this policy does not apply to students under the age of 18 who are enrolled or matriculated at the University.
- **University Property:** All campus grounds, buildings, facilities, stadiums, or other improvements, that are owned, leased, used, or otherwise controlled by the University.
- **Third-Party:** An organization or individual from outside of the University that uses University facilities to conduct a Covered Program pursuant to an approved contract or other use agreement with a sponsoring University Department and with the prior approval of the Protection of Minors on Campus Coordinator. For example, athletic camps or academic camps.
- **University Community or University Community Members:** University faculty, staff, unpaid volunteers, interns, students, temporary employees, visiting scholars, and any other University affiliates.

**Determine if Your Program Falls Under [Minors on Campus Policy](#).**

The determining factor for *in-person* programs regarding whether the activity or program falls under [Minors on Campus Policy](#) depends on who is providing direct supervision for the care, custody and control of the minors while they are participating in WSSU activities.

The determining factor for *virtual/online* programs depends on if WSSU is providing online programs for minors through a registration process, meaning WSSU personnel are collecting personally identifiable information (PII) for the minor participants such as email, phone, address, age, name, etc.

**Does your program fall under [Minors on Campus Policy](#) ?**

In-Person

**YES** - WSSU covered individuals are providing direct supervision for the care, custody or control of the minors. This applies to covered programs and activities providing supervision for minors regardless of duration or location.

**NO** - Minors will be supervised by parents, guardians, chaperones or an outside entity throughout the duration of the program. Examples of activities that do not fall under [Minors on Campus Policy](#) include external field trips and campus visits.

Virtual

**YES** - WSSU is offering an online program for minors through a registration process. Register your program or activity online.

**NO** - WSSU is offering a free webinar without collecting registrant information. See best practices for non-covered programs.

**NO** - Minors initiate email conversations through a link on the WSSU website. See best practices for non-covered programs.



## Section 2 Getting Started

### How to Get Started

There are several components of planning youth programs and activities 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 registering participants.

### Registering a Program

#### Instructions for Registering a Covered Program Online (SECTION DRAFT UNTIL SOFTWARE IN PLACE)

Programs and Activities serving minors must be registered per [Minors on Campus Policy](#). Go to [www.wssu.edu/camps](http://www.wssu.edu/camps) to create an account or login. Click on “Register Your Program.” Complete the compliance form for your program. Incomplete information will delay the approval of your program.

### Program Registration Checklist

#### Details

- Program Short Name:
- Vice Chancellor, Dean or their Designee having supervisory authority over the program: (**need name**)
- Sponsoring Unit:
- Indication of Approval from Sponsoring Unit to host program: (Y/N; Please provide email or letter.)
- Date of Approval:
- Full Name of Program: (2022 Sport Camp for Middle Schoolers)
- Person responsible for program or activity
- Phone number for responsible person
- Program description: (Learn sport skills...)
- What system will be used for participants to register? (ie. Google forms)

#### File Upload or Email

- What forms or Agreements will parents/guardians complete?
  - [Emergency Contact Information](#)<sup>1</sup>
  - [Insurance and Medical Information](#)
  - [Minors Involved in Activities](#)<sup>2</sup>
  - [Participant Consent, Release, and Waiver](#)
  - [Photo Release Form](#)
  - [Program Expectations and Parental Permission](#)
  - [Rules and Guidelines](#)

#### Personnel Set Up

- Anybody who should have access to edit the registration form

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<sup>1</sup> Required for in-person programs.

<sup>2</sup> Only required if minors are to be engaged in activities as described in the form.

### Youth Program Details

- Estimated total number of participants for this youth program
- Total number of staff/volunteers
- Participant minimum age
- Participant maximum age
- Youth program website (optional)

### Schedule Details

- Start date, end date, primary location for each session of the program:
- Indicate if it is overnight and include the number of staff and participants. Upload the roster of participants when available, but at least 10 days prior to the start date.

### Program/Activity Staff Details

- Require all of the following forms to be completed by all paid staff and volunteers:
  - Personal Boundaries for Working with Minors
  - Program Expectations
  - Background Check Form
  - Dietary Allergens Alert Form
- All forms must be submitted prior to the start of camp for all Covered Individuals

### **Non-Covered Programs**

Programs in which supervision is being provided by parents, guardians, teachers, chaperons, coaches or others outside of WSSU are not covered by [Minors on Campus Policy](#).

### Training for Individuals Working with Minors

The required training for covered individuals has information and best practices that are useful for all programs and activities involving youth. The training video and printable version are publicly available under the “Training” heading on the camps website, [www.wssu.edu/camps](http://www.wssu.edu/camps). These can be adapted to the needs of your program. **Training is required annually for all Covered Individuals.**

### Personal Boundaries

The required [Personal Boundaries form](#) for covered individuals has information and best practices that are useful for all programs and activities involving youth.

### Supervision Ratios Provided by the American Camp Association

ACA Required supervision ratios:

- 5 years & younger 1 staff for each 5 overnight participants and 1 staff per 6 day participants
- 6–8 years 1:6 for overnight, and 1:8 for day
- 9–14 years 1:8 for overnight and 1:10 for day
- 15–17 years 1:10 for overnight and 1:12 for day

### Risk Management

- Clearly articulate the [rules and guidelines for the program](#) along with the consequences for not following them. You can adapt these to fit the needs of the event.



- Chaperones should have access to the emergency contact information for the youth in their care at all times.
- Call 911 or the WSSU Police at 2900 for medical emergencies or refer to local Urgent Care for non-emergencies. (You can provide a list of geographically close facilities but do not make recommendations.)
- Food allergy information should be collected if meals or snacks are served. Be aware if any in your group have allergies.
- Make sure the youth in your program stay hydrated and take appropriate breaks prior to scheduled activities.
- In case of schedule changes or emergencies have a communication plan in place.
- Here are the basics for [What to do in Case of An Emergency](#)
- The [Campus Safety App](#) provides a way for all individuals to receive RamAlert emergency information. Program staff and volunteers, as well as chaperones can download this to stay up to date with WSSU operations.

### Reporting Abuse or Neglect

Both, as a matter of WSSU policy and North Carolina State law, any member of the WSSU community who reasonably suspects that a minor has been abused or neglected by a parent, guardian, caregiver, or staff member is required to report that suspicion. The “[Reporting Suspected Child Abuse/Neglect Procedure](#)” associated with this Policy applies to the protection of all minors (including Enrolled Students) while those minors are present on University property or while participating in Covered Programs.

### University Resources

There are several resources listed on the [camps website](#). These resources are listed in the left column for your convenience.

### External Resources

- American Camp Association Camps on Campus Resources
  - The American Camp Association [Camps on Campus](#) website provides research and toolkit articles relevant to many topics in providing programs for youth.
  - There are also articles specific to ACA’s [Core Competencies](#) and [Standards](#).
- Monique Burr Foundation
  - [Prevention webinars](#)
  - [Training topics related to child protection](#)
- Centers for Disease Control and Prevention Resources
  - [Caring for children in a disaster.](#)
  - [Preventing child sexual abuse within youth serving organizations.](#)
  - [Child Welfare Information Gateway](#)
- Darkness to Light
  - [Sexual Abuse Resource](#)
- National Child Abuse Hotline
  - 1-800-4-A-Child or 1-800-422-4453
- Praesidium
  - Praesidium has conducted and compiled over 25 years of research. Their experts provide valuable insight for protecting minors from abuse. Click [here](#) for 2020 report.

- Quick reference active shooter pocket card
  - [Active Shooter - Pocket Card Information](#)
- Redwoods Group
 

The [Redwoods Group](#) provides safety resources and training videos that may be useful.
- The Trevor Project (LGBTQ Youth)
 

<https://www.thetrevorproject.org/>

## **Agenda**

The next step to developing the program is to map out the agenda detailing the activities, locations and timeframes. Youth participants must be properly supervised at all times from drop-off to pick-up. Ensure that all meals, free time, and transitional times are accounted for and supervision is provided. Reserve the spaces that will be needed. Coordinate with the appropriate offices for meals in a dining hall or transportation needs.

## **Operating Procedures Checklist**

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. Standards for best practices can be found on the [American Camp Association website](#). Topics to be addressed with staff include the following:

### Identification of Program Staff

- How will parents and program participants be able to identify program staff?
- Will they wear specific clothing or nametags?

### 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?

### Emergency Communication

- How will you communicate with parents if an emergency occurs?
- This could include medical issues, incidents affecting only one or two children or weather issues that require cancellation of activities.
- The program must provide an emergency contact name and phone number for parents who may need to contact their child during the event.

### Behavior Management

- Who would handle youth with behavior issues that need to be dealt with away from the rest of the group?
- 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 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 program participants that violates approved program activities, established law, or [Minors on Campus Policy](#) is prohibited.

## **Accommodations**

For programs that host participants overnight, arrangements may be made through the [Office of Conferences and Institutes](#) to provide accommodations. Approximate available dates run from June 1 through July 31, and space is allotted on a first-come, first-served basis.

An initial up-to-date list of all attendees with room assignments, if applicable, must be provided to the Office of Conferences and Institutes no later than 2 weeks (10 business days) prior to arrival.

## **Overnight Supervision**

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

- Additional supervision is required for overnight programs. See the Supervision Ratio section of this guide for acceptable staff to participant ratios based on the participant age group.
- 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.

## **Housing Considerations Checklist**

- Establish a curfew and communicate it to parents/guardians and participants
  - What are the curfew times?
  - Who enforces the curfew?
  - What policy is in place to enforce the curfew?
  - Are the participants separated by sex?
  - What is the plan to keep them separated?
  - What is the plan for non-binary individuals?
- Determine who will have access to which doors if staying on WSSU property.
  - Program participants should have access to their assigned room only. Staff members should have access to exterior doors.
  - Exterior doors must remain closed and locked at all times.
  - Do not prop exterior doors open.
  - Do not allow unknown individuals into the residence hall.
  - Participants must manage their key(s). Lost keys are expensive.
- Inform participants of safety provisions specific to the facility in which they are housed (See Conferences and Institutes contract for specifics).
  - No alcohol, controlled substances, or illegal drugs
  - No firearms, weapons, fireworks, explosives
  - Windows must remain closed and locked.
  - An identifier such as a wristband and/or name badge must be visible on participants while on campus participating in a program.
- Will participants be housed in facilities other than residence halls?
  - If yes, consider:
    - Will each participant have his/her own bed?

- How many participants will be in each room?
  - What other groups/camps/programs are being housed in the same facilities?
- How will the housing area be restricted to the public?
- Who will have access to the housing area?
- Instruct participants about emergency exit locations, policies, and common meeting areas in the event of an emergency or building evacuation.
  - Make sure that participants know who to contact if they have an emergency while at the housing facility.
  - Have participants been informed of rules and expectations regarding conduct (e.g. horseplay, pranks, etc.) while they are staying overnight at the housing facility?
  - Who would staff and/or participants contact in the event of an emergency while in housing?
- Establish a policy for managing the situation if a participant is absent and unaccounted for at the housing facility.
  - Sweep the area.
  - Try to contact the missing participant.
  - Contact the parents/guardian.
  - Notify the police.

## **Transportation**

Programs and camps hosting minors should contact the [Office of Parking and Transportation](#) to make arrangements for arrival and departure. Transportation plans, including information regarding the transportation of minors at the beginning and end of the program, to and from the program, and within the program, whether by parents, guardians, Program staff or others should be documented and shared with parents. For overnight programs, transportation plans must include parking, drop-off, and/or pick-up information for moving in and out of residence halls. There are charges for all transportation and parking of staff on campus. You may contact the [Office of Parking and Transportation](#) for a quote. Billing for your camp will be included in the invoice provided by Conferences and Institutes, unless you wish to be billed directly.

- Use of personal vehicles to transport minors is not allowed.
- Vehicles and/or drivers can be reserved through [the Office of Parking and Transportation](#).
- Call 911 for emergency medical transportation needs.

## Transportation Considerations Checklist

- Develop a policy for participant transportation
  - How will participants arrive at the program?
  - Who will meet them when they are dropped off?
  - How will the check-in process be managed?
  - How will they depart from the program?
  - How will the check-out process be managed?
  - What is the process for unaccompanied minors?
  - If minors will check themselves in or out of the program, there is a waiver for the parents/guardians to sign.

- Does the program agenda include travel during the program?
  - If so, how will the participants travel and who will drive them?
- All drivers must have a driving check. The driving check can be requested on the background check form that is submitted through Human Resources.
- Personal vehicles cannot be used to transport minors.
- If you are using 12 or 15 passenger vans all drivers should take the safety course.
  - There must be another adult besides the driver to provide supervision when using a 15-passenger van.
  - Seat belts must be worn at all times.
- If multiple vehicles are used to transport participants:
  - Ensure drivers are aware of directions and destination location.
  - Ensure drivers have a way to communicate with each other.
  - Ensure there is a plan for supervision for rest stops.

### Buses

Bus parking is limited, please contact [the Office of Parking and Transportation](#) to arrange for a parking location.

### Rental Bikes and Scooters

Rental bikes and scooters are available exclusively for use by individuals who are 18+. Remind participants in your program that they are not permitted to use rental scooters or bikes if they are under the age of 18.

### Vehicle Use

- All vehicles on campus need to obtain a parking permit. Contact [the Office of Parking and Transportation](#) for additional information.
- Private vehicle use to transport minors is prohibited.
- A staff member trained on accident procedures should be in each vehicle transporting participants/staff.
- Transportation procedures should include seating limits, required use of seat belts/booster seats, passengers remaining seated, and wheelchair-handling procedures when applicable.
- Vehicles transporting 15 or more participants should have a staff member, in addition to the driver, who is trained in safety responsibilities and group management.
- All drivers must be trained; non-university drivers must provide proof of training, including behind-the-wheel driving when the vehicle to be driven differs in size/capacity from the driver's regularly driven vehicle on:
  - Backing up
  - Loading/unloading passengers
  - Handling breakdowns
  - Passenger illness
  - Handling participant behavior
  - Tracking location of participants during refueling
  - Completing safety checks
  - Evacuation procedures if buses are used. (Buses have emergency exits such a roof hatch or specific windows that can be pushed out for emergency evacuation.)

## **Emergency Plans**

Emergency plans, including guidelines for weather emergencies and for communicating and responding to RamAlerts must be documented and provided to all program staff. Emergency plans should be specific to the needs of youth participants. [Emergency procedures](#) have been developed to be shared internally with staff prior to the start of the program and cover a wide range of situations.

Each program or activity must also develop a plan for communicating pertinent emergency procedures to the parent/guardian of each program participant. The 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 must keep parent/guardian emergency contact information accessible for use in the event of an emergency.

Refer to the Risk Management section in this handbook for more details.

## **Written Agreements and Forms**

Programs are responsible for collecting contact information for the parent/legal guardian of every minor participating in the program, as well as for providing the parent/legal guardian with information on how to reach his or her minor in the event of an emergency.

WSSU-sponsored programs should have each minor and his/her parent/guardian execute a WSSU-approved liability waiver form. WSSU-sponsored programs are responsible for maintaining the executed waivers in accordance with WSSU's record retention schedule.

### Forms to Collect from the Parents/Guardians

- Liability waiver/Participation Agreement:
  - See link to samples below.
- Emergency Contact Information
  - For at least 2 parents/guardians or other authorized adults.
  - The form should also include authorization for 2-3 individuals whom the minor can be released to after the program.
- Insurance and Medical Information Form
- Photo and Media Release Form
- Vehicle Release Form
- Challenge Course or other Athletic Release Forms
- Appropriate Use of Technology Form
- Rules, Guidelines, and Behavior Expectations with a disciplinary plan signed by parents and participants – parents keep a copy with the information and they turn in a signature page.

These forms for programs serving minors can be found on the [camps website](#). Programs can customize these forms as needed for their specific program activities.

## **Managing Medical Issues**

This section outlines best practices for collecting and maintaining medical information and the requirements for medication management in all activities or programs covered under [Minors on Campus Policy](#). Medical information can include all information related to health and wellness, and medication includes both prescription and over-the-counter items. Information regarding medical information requirements, security, and medication management procedures should be communicated to the parent or guardian of the youth participants in advance of the program.

### Handling Medical Information

Depending on the nature and usage of the information collected, medical information can be covered by a variety of regulations, standards, or best practices, including HIPAA. Regardless of the specific standard, medical information is private, individually identifiable information, and should be treated as such. Access to these records should be restricted to the minimum number of people necessary. The records should be stored securely. Necessary program staff should be informed of their participants health history and medical needs. Inform parents in writing of situations when they will be notified of camper illness or injury. Document when parents have been contacted or attempts to contact have been made. Maintain records of all healthcare provided and reports of all incidents requiring professional medical treatment.

- Programs of less than four (4) hours duration generally require minimal medical information, but this can vary depending on the program activities.
- Programs can utilize the [Insurance and Medical Information form](#) to collect information.
- Programs of more than four (4) hours should collect medical, insurance, and consent to treat information from participants.

### Accidents and Injuries

Regardless of the length of time of the activities, each program shall have a plan for responding to accidents, injuries and emergency events, including communication to participants and their parents/guardians.

All accidents and injuries must be documented and kept in a secure location with the participant's other medical information.

### Medication Management

- For programs of more than four (4) hours, at least two program staff members should be designated as the contacts for medication management. Both parents/guardians and participants must be advised in pre-program communications who these staff members are and that program staff will be collecting and storing medications during the duration of the program or activity.
- The only exceptions will be for inhalers, EpiPens, and other such rescue medication that should remain with the participant at all times.
- No program, regardless of length, can refuse to allow necessary medications, such as insulin, asthma inhalers, EpiPens, or other related.

### Medication Collection, Storage, Self-administration, Documentation Checklist

- Parents/Guardians should place all over-the-counter and prescription medications for each youth participant in one plastic bag with their first and last name and date of birth written on the outside of the bag.
- All medicine must be in its original container and must clearly indicate the dosage.

- As part of the drop-off/check-in, all youth participants should be asked if they have any prescription or over-the-counter medications. If so, the medication should be submitted to the designated staff member(s).
- If participants do not have their medications in a bag, programs should be prepared to provide a clear plastic bag.
- When the medicine is collected, staff will review the medication information previously submitted on the program registration and ensure it matches the turned in medications.
- If something in the previously submitted information has changed (new medications, altered dosage, etc.), a new form should be completed at check-in.
- The designated staff member must ensure the participant's medication bag has their name and date of birth on the outside and will add the room number and program name on the outside.
- If the program is large, a picture of the participant should be attached or included in the medication bag.
- The bag should be maintained with a designated staff member for the duration of the program.
- The designated staff member should transport the medication with them as needed and store it when not in use.
- The medicine must be stored in a secure manner at all times.
- Since staff members for programs and activities are not licensed to prescribe or administer medications, they will only hold the bag of medication for the participants and provide it when they need to take medication.
- Program staff should review their participant's medication information to be familiar with when medications are needed. It is the participant's responsibility to contact staff for their medications, but staff should still be aware of when youth participants need the medications to remind them as needed.
- Participants will self-administer the medicine according to the dosage on the container, under the supervision of the designated staff member.
- Double-check to make sure you do not give a participant another participant's medication bag. Ask them to state their name, date of birth, and the name of the medicine and the dosage prior to allowing them to take it.
- At no time will a staff member handle a bottle or the contents of the participant's medication directly; nor will any staff member provide guidance on how the medication should be taken.
- If the participant is unsure of the medication to take or correct dosage, program staff will contact their parent or guardian for clarification.
- Any time a participant is given access to their medication (only given by a designated staff member), ensure this is recorded.
- Prescription items should be taken according to physician instructions. Over-the counter (OTC) medications should be taken according to the manufacturer's directions.
- While it is not usually necessary to follow-up on prescription items, OTC may require some follow up. Depending on the need that precipitated the OTC medication, that leadership team member may check on the participant after one hour to see if the medication has alleviated the symptoms. If this is done, follow-up information should be recorded. If the participant's condition has not improved or has worsened, notify the Program Coordinator to determine the next actions to be taken and contact the participant's parent/guardian.
- All designated staff members will keep their medical record forms for the duration of the program and



then turn in to the Program Coordinator at the end of the program.

- ❑ All medications and medication bags will be returned to the participant's parent/guardian when the program is over.

### Seeking Medical Care

If it appears that a participant requires medical care, the parent/guardian should be contacted.

- It is best for parents/guardians to pick up a sick participant and take them to their established medical care provider.
- If parents/guardians are not available to pick up the participant and the situation is not an emergency, there are several urgent care clinics near campus that may be used for treatment of illnesses or injuries that do not warrant an emergency room visit. WSSU has no relationship to these clinics and cannot endorse the quality of care.
- In the event of an emergency, contact 911. All emergency transportation should be coordinated through 911.
- Program staff should remain with any participant who needs medical attention.
- Reminder: Personal vehicles should never be used to transport minors.

### 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.

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 WSSU partners.

Participants could be responsible for fees associated with providing ADA accommodations, depending on the agreed upon arrangements. WSSU cannot be responsible for the cost of providing these services for programs that are owned by third parties.

### Food Allergy Accommodations

Food allergies and other special dietary needs are a growing condition in the youth population. Even those well versed in organizing camps may have seen an increase in food allergies in recent years. All programs should be prepared to accommodate participants with food allergies and other special dietary needs.

A food allergy is the body's negative reaction to a protein in a food. Allergic reactions can have a myriad of symptoms. A severe allergic reaction called anaphylaxis can lead to death; the person can stop breathing and/or could have a heart attack. Allergic reactions can occur quickly and from very small amounts of the allergen.

Cross contact where an allergen has been transferred to another food or surface but isn't visible can cause an allergic reaction. The only way to avoid an allergic reaction is to not eat or breathe in the allergen.

Programs providing food should have a method for soliciting and collecting information on food allergies. 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 signs and symptoms of an allergic reaction and ready to implement emergency protocol.

## **Parent Communication**

Communication and parent information packages must address the following:

### Information to Provide to Parents/Guardians Checklist

- Detailed Schedule/Agenda
  - Drop-off and pick-up procedures: The program should have and use procedures for an orderly arrival and departure of participants, for the loading and unloading vehicles, and supervision during these times.
  - Parents should be provided with written pick-up and drop-off times, including a system to communicate any changes, safety procedures, and safety rules for buses/vans.
  - A description of the arrangements for supervising minors during activities and free time
- Emergency Contact
- Ways they can reach their minor and/or communicate with the program director
- Authorization to Pick Up
- Insurance and Medical Information
  - With a consent to treat
  - Procedures for managing any medications that may be needed by the participant during the program or activity
- Photo/Media Release
- Vehicle Release
- Liability Waiver
- Rules and Guidelines or Behavioral Contract for Participants
- Arrival and departure procedures
- Rules for camper behavior
  - Steps a camper should take if separated from the group
  - Locations to which participants do and do not have access
  - Use of any free time
  - Cell phone and computer use
  - Safety equipment
  - Personal property brought to camp
  - Respect for people and property
  - Importance of following directions
  - Gifts to or from staff

- Appropriate dress and footwear
  - Visitors
  - Pets and service animals
  - Residence hall rules and curfew
- Prohibit weapons, tobacco products, alcohol, illegal drugs, pornography, violence, and hazing.
  - Camp rules may explain that attending camp is a privilege and describe the grounds and procedures for discipline or dismissal. The institution may reserve the right, in its discretion, to determine whether a rule has been violated. If so, the camper may be subject to dismissal from the camp at the camper's expense with no refund. Legal guardians should also agree to pick up a participant immediately upon notification of dismissal, suspension, or other removal.
  - Participants will benefit from an initial orientation and ongoing reminders about camp behavioral expectations.
  - If internet access is provided to the participants, parents should be notified that there are no restrictions placed on the content.
  - Disciplinary plan including procedure for removing a participant from the program if necessary.
  - Identification to be worn by program staff. Program staff should be easily identifiable by the parents and by the participants so we can tell which adults are in charge for any given program. Could mean wearing a specific shirt with the program name on it, or a name badge or a hat, etc.

## **Screening, Hiring and Training**

### **Training, Hiring and Screening Process**

This process should include an application and screening process for each job category that has been reviewed by Human Resources within the last three years.

#### Application

Depending on the nature of the program and the number of program staff (covered individuals) needed, programs may need to hire additional staff and volunteers. If the additional staff are to be WSSU employees, either permanent or temporary, you will need to follow the process as set forth by WSSU Human Resources. When new covered individuals are being added to a program, the process should begin with an application that gathers information specific to the needs of the program. This may include but is not limited to skills, mindset, and experience. Questions should be open-ended and provide insight to the integrity and character of the applicant.

#### Interviewing

Personal Interviews should be conducted to gain insight into the character and integrity of the applicant. Use behavior-based interview questions and scenarios to determine appropriate fit for the program and to screen for red flag (concerning) attitudes and behaviors. If a response seems concerning, ask follow-up questions to gain a better understanding.

#### Screening

Criminal background checks are required for covered individuals, annually with two exceptions:

- 1) The first exception applies to covered program staff who are also WSSU employees or students and who are continuously employed by or enrolled in WSSU without any break in their employment or enrollment.
- 2) The second exception is for covered program staff continuously employed by or volunteering for third parties who do not have a break in employment or volunteer service that lasts one hundred twenty (120) days or more.

Appropriate references must be contacted before hiring covered individuals.

WSSU students who serve as covered individuals must also have a student conduct check.

Covered Individuals who will be driving minors are required to have a driving check which is requested through the background check form and submitted through Human Resources.

WSSU employees must self-disclose any incident that would make them ineligible to work with minors.

Records must be kept consistent with the unit's record keeping and the WSSU records retention schedule.

Criminal background checks that return any offense could potentially disqualify a person from being employed by or assigned to a program or activity involving minors. Social media findings can be considered in the review of potential program staff members. Any areas of concern will be forwarded to the appropriate WSSU officials for review.

In the event that WSSU officials restrict a person from working with minors, this restriction will be communicated to the Program Coordinator. Convictions in the following categories or categories that are similar in nature to the following will disqualify a potential staff member from working in a youth program:

- Felony
- Murder
- Child abuse or neglect
- Crimes against children, including child pornography
- Spousal abuse
- Crimes involving rape or sexual assault
- Kidnapping
- Arson
- Physical assault or battery
- Drug-related offenses committed during the preceding 5 years.
- Misdemeanor (Committed as an adult against a child)
- Child abuse
- Child endangerment
- Sexual assault
- Child pornography
- Criminal offenses relating to the abuse, exploitation, or neglect of an elder, an individual with disabilities, or animals will also be considered.

## Hiring

- Prior to hiring, inform your candidate(s) that they will have to fulfill the requirements of [Minors on Campus Policy](#) including a criminal background check, reference checks, and/or a DMV driving check as applicable. They must agree to these before the checks are requested and processed.
- Prior to accepting a position, program staff should be provided job descriptions and information on the nature and diversity of the program and population served.
- Written personnel policies should address general equal employment opportunity policies, benefits, time off/absence, performance evaluation, severance/grievance procedures, and work rules and personal conduct, including harassment policies.
- Resident program staff should be provided with time off daily.

It is the responsibility of the Program Coordinator to ensure each Covered Individual in the program has met the requirements of Minors on Campus Policy, including background checks, WSSU checks, driving checks, and training.

## Training

- Covered individuals are required to complete required training annually, which may be delivered online or in-person, and covers the requirements as stated in [Minors on Campus Policy](#).
- Upon completion, program staff will receive a certificate of completion. A printable copy of the training is available on the minors on campus website.
- Program staff who fail to complete the required training cannot be approved to work.

## Program Specific Training should include but is not limited to the following:

- Create and sign a staff behavior expectations agreement.
- Practice good judgment and leadership.
- Discuss appropriate social media, video and picture taking.
- Do community building activities to learn to work as a team.
- Participate in first aid, health and safety training.
- Review program agenda. Staff need to know exactly what will be happening during each time block of each day.
- Discuss best practices for supervision and interaction with participants.
- Determine communication plan with their participants and with management.
- Discuss prevention of abuse, bullying or harassment.
- Discuss personal boundaries.
- Discuss appropriate dress.
- Practice conflict resolution.
- Prepare for incident reporting.
- Learn emergency response protocols. Including communicating with parents.
- Individuals who have a conduct or police interaction while serving in the program, must self-disclose to the program coordinator.

## **Responsibility of Covered Individuals**

Program staff who have unsupervised access to the participants are “covered” individuals. They are covered by Minors on Campus Policy.

Program coordinators and covered individuals have a unique responsibility to the participants, their parents, and WSSU. They are required to act proactively, safely and appropriately at all times and especially in an emergency. They must act in a manner that will protect the participants' safety, physical and emotional well-being.

Responsibilities of a Covered Individual include, but are not limited to:

- Ensuring the safety of each participant.
- Executing or implementing the program's supervision and instruction plan.
- Creating a memorable experience by providing:
  - Instruction that is appropriate for each participant's age and ability
  - Encouragement that enables each participant to increase the confidence needed to acquire new skills.
  - Serving as a role model for participants in their care.
  - Monitoring the behavior of participants to ensure they adhere to the program's rules and guidelines.
  - Enforcing the rules and immediately communicating any issues that occur to the program coordinator.

**Personal Boundaries**

All programs may be held accountable for following best practices as set forth in training. Additionally, employees and volunteers of the program shall not, unless required by exigent circumstances:

- Have contact with minors in seclusion; there should be two or more covered individuals present during activities when minors are present;
- Enter a minor's room, bathroom facility, or similar area when that minor is staying overnight in WSSU housing without another covered individual in attendance;
- Share accommodations with minors with the exception of minors' parents or guardians sharing accommodations with their own children;
- Engage in abusive conduct of any kind toward, or in the presence of a minor;
- Strike, hit, administer corporal punishment to, or touch in an inappropriate or illegal manner, any minor;
- Provide alcohol or illegal drugs to any minor. Covered individuals also must not provide prescription drugs or any medication to a minor unless specifically authorized in writing by the parent or legal guardian as being required for the minor's care. In case of emergency, individuals must call 9-1-1;
- Use a personal vehicle to transport a minor;
- Use personal text, email or social media to communicate with minors outside of the official program; or expose minors to sexually explicit materials, such as pornography.
- There is zero-tolerance for drugs and alcohol:
  - WSSU is committed to a drug-free workplace. Covered individuals suspected of possessing, selling, or distributing drugs will be reported to the WSSU Police.
  - The university prohibits the use of all forms of tobacco products on WSSU property. In order to adhere to WSSU policy, covered individuals must refrain from smoking or vaping during the program session.
  - Covered individuals may not possess or use alcohol or drugs on or around the WSSU owned/leased property.
  - Covered individuals may not return to WSSU property intoxicated or under the influence of drugs.

## Physical and Verbal Interactions

### Appropriate Physical Interactions

- High fives
- Fist bumps
- Hand shakes
- Pats on the head, shoulder or upper back (when culturally appropriate)
- Holding hands (with young children in escorting situations)

### Inappropriate Physical Interactions

- Full-frontal hugs
- Kisses
- Lap sitting
- Wrestling
- Hand slapping
- Piggyback rides
- Tickling
- Allowing a youth to cling to a designated individual's leg
- Massaging of any kind given by or to a youth
- Touching bottom, chest, or genital areas

### Appropriate Verbal Interactions

- Positive reinforcement
- Appropriate jokes
- Encouragement
- Verbal praise

### Inappropriate Verbal Interactions

- Name calling
- Discussing sexual encounters
- Secrets
- Cursing
- Off-color or sexual jokes
- Shaming
- Belittling
- Derogatory remarks
- Harsh Language that may frighten, threaten or humiliate youths
- Derogatory remarks about the youth or his/her family
- Compliments relating to physique or body development

## **Covered Individual-to-Participant Supervision Ratios**

Program staff to participant ratios should conform to the ratios listed below. Programs or activities involving minors with a small (less than 5) number of participants should have a minimum of two individuals responsible for oversight. In large groups of participants, programs may need to provide additional staff for the oversight of youth participants, depending on the intended activities.

At no time should a participant or group of participants be left alone or without the appropriate number of program staff. The following supervision ratios should be maintained at all times while the participants are in the care, control, or custody of program staff. This includes but is not limited to:

- Periods when participants are given “free” or “rest” time.
- Overnight when participants are housed in residence halls or hotels without being accompanied by their parents/guardians. There should be sufficient staff on each floor to maintain the appropriate ratio for the age of the participants.
- Travel to and from meals and activities.
- Additional staff may be needed to ensure ratios are met at all times.
- If the calculation results in a fractional number, always round up to the nearest whole number.
- If participants from multiple age groups are combined in a single group, the ratio for the youngest participant in the group should be applied.

#### Supervision Ratios Required by the American Camp Association

- 5 years & younger 1 staff per 5 for overnight participants and 1 staff per 6 for day participants
- 6–8 years 1:6 for overnight, and 1:8 for day
- 9–14 years 1:8 for overnight and 1:10 for day
- 15–17 years 1:10 for overnight and 1:12 for day

#### One-on-One Interactions

Never be alone with a minor. One on one meetings can take place in a populated public space. If there is a need for a private conversation, two Program staff must be present. If it is impossible to have two staff members present at all times, assign an adult roamer who visits each area selectively, leave all doors open, and ensure that doors have glass windows.

Only cleared staff and volunteers can assume responsibility for the minors.

### **Behavioral Management**

#### **How to Implement Behavioral Management**

There are occasions when it may be necessary for covered individuals to address behavior issues with participants while they are participating in a program. When a participant’s behavior creates a risk for the physical health and safety of another child, themselves, or the staff these procedures should be followed:

- Discipline is an important part of the covered individual’s duties.
  - Be fair. All rules are the same for everyone.
- Give a verbal warning.
  - Explain to the participant(s) why behavior is inappropriate.
  - Give the participant(s) time to refocus and/or redirect their behavior.
- Do not admonish the entire group.
- Talk directly with the participant.
- Use quiet authority. Do not yell or use abusive language. No physical contact.
- It is the covered individual’s responsibility to be a mediator in disagreements between participants.
- Let participants know their boundaries.
  - Do not assume the participants know what is expected.



- Read over and reiterate the program rules with participants upon arrival to ensure the expectations and rules are understood from the beginning.
- Explain to participants that if rules are not followed, they may be removed from an activity or in some cases the program.
- Always be present.
  - Lack of supervision is a major cause of accidents and problems between the participants.
- A designated individual may discipline a participant as listed above. The following types of discipline are prohibited and will result in immediate dismissal:
  - Corporal punishment
  - Hitting
  - Touching or grabbing
  - Shaking
  - Intimidating a participant
  - Verbal abuse

### Bullying

Bullying is unwanted, aggressive behavior that involves a real or perceived power imbalance. Minors attending programs are susceptible to potential bullying situations. To prevent and target bullying tactics, covered individuals and program coordinators must create a positive and caring environment.

Creating positive relationships is one of the keys to preventing bullying. Bullying is less likely to occur during a program if participants and designated individuals feel closely connected and responsible for one another. When participants develop positive relationships, they feel comfortable voicing their concerns and seeking help when bullying incidents occur. When covered individuals observe behaviors that may eventually lead to bullying, they should intervene immediately. If an incident is ignored, it has the propensity to escalate quickly.

Signs a participant is being bullied or is a bully:

- Unexplainable injuries
- Lost or destroyed clothing, books, electronics or jewelry
- Frequent head or stomach aches
- Eating habit changes
- Difficulty sleeping or nightmares
- Avoidance of social situations
- Feelings of helplessness or decreased self-esteem
- Self-destructive behaviors (e.g. harming themselves, or suicidal thoughts)
- Positive attitude toward violence and the use of violent means
- Dominate and subdue other participants and get their own way
- Impulsive, aggressive, easily angered
- Lack of empathy
- Defiance and aggression toward adults
- Involved in physical or verbal fights
- Unexplained extra money or new belongings
- Doesn't accept responsibility for their actions

Designated individuals should reiterate the following to participants:

- Bullying is not acceptable and will not be tolerated.
- If a bully bothers you, ask staff for help.
- Report bullying when you see and hear about it. Telling is not tattling.

### Harassment Policy

In order to have a productive and caring work environment, any form of harassment is prohibited. The following types of harassment are prohibited including, but not limited to, harassment of a sexual, religious, racial or ethnic nature, or retaliation against someone who has made a complaint of harassment. All program staff must maintain a workplace free from unlawful discrimination and harassment.

If you believe you have been subjected to harassment of any kind, you are encouraged to report it to the program leadership.

A WSSU community member, who in good faith suspects or has knowledge of a material violation of law or university policy, has a professional obligation and is expected to report suspected violations. A WSSU community member who reports in good faith actual or suspected violations of law or university policy will be protected from retaliation.

### Post Program Communication

Covered Individuals may not use their personal email or social media accounts to communicate with participants after the program has concluded. This communication includes, but is not limited to personal email, text messaging, telephone, personal social media accounts. Do not “friend,” “follow,” etc. participants on social networking sites or communicate in online forums, unless they are specifically dedicated to the program. Do not send personal emails or text messages; do not share personal or intimate information with participants. This is for your protection as well as the participants.

### Electronic Communication

#### Appropriate Electronic Communication

- Sending and replying to emails and text messages from participants ONLY when copying other covered individuals and/or the program coordinator
- Communicating through “Program-specific” social media and online forums
- Using professional office email and phone
- “Private” profiles for staff and volunteers which participants cannot access

#### Inappropriate Electronic Communication

- Harsh, coercive, threatening, intimidating, shaming, derogatory, degrading or humiliating comments
- Sexually oriented conversations
- Private messages between designated individuals and participants
- Posting inappropriate comments or pictures
- “Friending” or “Following” participants on social networking sites

Every decision made when working with youth must be a good decision.

## **Risk Management**

### Supervision Planning

- Minors must be supervised throughout the duration of the program or activity.
- The supervision ratios of the American Camp Association are considered best practice for supervision standards. Refer to the Getting Started section in this handbook.
- There may need to be “extra” staff available to maintain ratios all day, every day throughout the duration of the program.
- In public spaces with large groups, make sure staff and participants are easily identified with the Program and each other. Use staff name badges, shirt colors, stickers, numbers, or team names to identify participants with their leader.
- Never be alone with a minor in seclusion. One on one meetings can take place in a populated public space. If there is a need for a private conversation, three people must be present, two program staff must be present. If it is impossible to have two staff members present at all times, assign an adult roamer who visits each area selectively, leave all doors open, and ensure that doors have glass windows.
- Only cleared staff and volunteers can assume responsibility for the minors.
- Minors should be supervised by a staff member at all times.
  - For example: if taking bathroom breaks in a busy public space, check bathrooms, stalls, and spaces prior to minors entering.
  - If a group goes to the restroom, a staff member should stay outside in the hallway to monitor behavior.
  - Only one person at a time should ever be allowed into a single-service restroom.
- During transitions, monitor minors closely. Do not allow horseplay.
- Take a headcount or role call after each transition to make sure nobody is missing.

### Communication and Social Media

- Do not take pictures of minors for personal or social media use on non-program-related outlets.
- Photos can be taken for use in program communications if the minors and parents/guardians have signed a media release.
- Minors should not take pictures of other minors without their knowledge.
- No private social exchanges, messages, texts, calls or emails with minors. Consider using a group forum app such as “Group Me” or “Band.”

### Safety and Planning for the Unexpected

Proper and constant supervision is the first step in managing risk. Minors should be supervised by a staff member at all times.

### Locker Room and Bathroom Guidelines

- Check bathrooms, stalls, and spaces prior to minors entering.
- Only one person at a time should ever be allowed into a single-service restroom.
- During transitions, monitor minors closely. Do not allow horseplay.
- Take a headcount or role call after each transition to make sure nobody is missing.
- Staff should supervise youth by standing close enough to the restrooms, changing or shower areas to hear what is going on, but not be directly inside the areas.
- Staff/Adults should use facilities (restroom, shower, changing area) at different times than youth.
- Staff/Adults should never be alone with a child in a secluded area such as a restroom, locker room or

changing area with the exception of parents/guardians assisting their own children.

### Insurance & Risk Management

When you are working with minors, your attention to their safety at all times is critically necessary. Good decisions and attentive supervision can reduce risk significantly. Avoid distractions while supervising minors.

This list of high-risk activities should be addressed in training for youth programs:

- Activity involving locker room use for showering/changing clothes
- Exposure to potentially hazardous materials or equipment that may cause illness or injury (including but not limited to materials found in labs or shops)
- Travel
- Interaction with animals
- Overnight stays
- Physical activity (more than brief stints or walking)
- Transporting minors in vehicles
- Use of social media for assignments, updates, coordination, announcements, etc.
- Use of technology for projects or assignments

Structured activities should avoid potential for the following:

- Falls
- Athletic injuries
- Horseplay injuries
- Abuse or maltreatment
- Medical or allergic reactions
- Aquatic injuries or drowning

### **Emergency Preparedness**

Emergency Contacts

- On Campus: 336.750.2911
- Off Campus: 911
- RamAlert
  - If you are on campus and there is a RamAlert, think through how this affects the program? What do parents and guardians need to know? Will this affect their pick-up plans?
  - Have a plan for a possible power outage or other interruption to your agenda.
- Emergency Blue Light Security System
- Parents and non-WSSU volunteers can utilize the Rave Guardian app to receive RAMAlerts and WSSU emergency communications.

Preparedness

- Review security concerns, establish a written plan to address possible intruders and active threats, and train staff and participants in the steps to take.
- Provide a safety orientation to staff and participants regarding boundaries, hazards, behavior expectations, and emergency procedures for natural disasters and other reasonably foreseeable

emergencies.

- Develop written search-and-rescue procedures for lost, missing, or runaway persons.
- Develop a plan for emergency communication for contacting parents/guardians of minors, and for communicating with the media.
- Specify supervision ratios, safety rules and behavior guidelines for participants, and emergency procedures if someone is separated from the group.
- Establish written procedures for releasing participants and for verifying absences at the beginning of the day or session.
- Have ready access to contact info for each participant, including name/birthdate, home address, name/address/phone number of parent/guardian, and any additional emergency contacts.

## Public Safety

- Keep doors and windows locked. Always lock doors and windows when you leave.
  - Do not allow those you don't know into the space.
- Walk in groups and stay in well-lit areas whenever possible, especially at night. Do not appear distracted by texting or using headphones while walking.
  - Remain alert.
- Keep your valuables with you or locked securely.
- Know where your participants are at all times.
- If you feel unsafe in any situation, trust your instincts and contact police immediately to report suspicious activities or crimes.
  - If you hear gunshots: Get Out, Hide Out, or Take Out
  - If on campus, save the WSSU Police number, 336.750.2911, in your phone contacts.
- Make sure your contact information is up to date in the WSSU directory. You can update through Banner Rams.
- Parents and non-WSSU affiliates can download the "On Campus" app to receive emergency notifications.

## Active Shooter

### Get Out

- Have an escape route and plan in mind
- Leave your belongings behind
- Keep your hands visible

### Hide Out

- Hide in an area out of the shooter's view
- Block entry to your hiding place and lock the doors
- Silence your phone

### Take Out

- As a last resort and only when you life is in imminent danger
- Attempt to incapacitate the shooter
- Act with physical aggression and throw items at the active shooter
- Lock a door with a chair
  - <https://youtu.be/ZB7Jzr6jRiw>
- Survivor mindset and multiple barricades for a door including a chair

- <https://youtu.be/15EuyCOnFWk>

## Fire

Keep calm and communicate with participants, make sure they all get out.

- Go at least 100 feet from the building in an open area or to a designated location.
- Get a count for your group and report important information to authorities (i.e., one person from our group is unaccounted for or we saw someone messing with the sprinkler earlier.)

## Severe Weather

Thunderstorms and hurricanes

- Avoid being outdoors, especially near trees and water, during a lightning storm.
- Seek shelter indoors, under shelter or in a hard-topped vehicle until the storm passes.

## Tornadoes

If you are notified a tornado is approaching:

- Move immediately to a predetermined shelter.
- Remain there until the “all clear” has been officially given by RamAlert, police, or local media.
- If you are outside, seek shelter in a nearby building or find a ditch or depression in which you can protect yourself from debris.
- After a tornado, beware of broken glass, unstable structures and debris.
- If on campus, report damages to WSSU Police 336.750.2911.

Think about what to do for unexpected circumstances such as power outages.

## **First Aid and Medical**

### General Guidelines

If it is an emergency call 336.750.2911 or 911 and follow instructions.

- Keep calm and move other participants away from the scene.
- Do not move the victim unless there is an immediate threat to life or you need to move the victim to provide care.
- Programs should have access to a first aid kit.
- A staff member with training in the appropriate level of first aid and CPR/AED should be on duty at all times during the program.
- Determine what is needed, ie. ice pack, bandage, ankle wrap, CPR.
- Stay with the participant until the situation is resolved.
- Staff should not provide medicine.
- Emergency transportation should be provided by 911.

## Injuries, Incidents or Accidents

Incidents and accidents can include such things as: minor to major physical injuries of participants and/or counselors; behavioral issues among participants, counselors, or visitors; hospital/doctor visits; violent or potentially violent behavior; the possession or use of alcohol or other drugs; inappropriate physical contact; or

violations or potential violations of policy.

Emergencies, including emergency medical situations, should be reported to WSSU Police at 336.750.2911.

Any incidents, accidents, or injuries occurring during a program or activity for or including minors should be reported according to established policies.

### Symptoms of Anaphylaxis and Use of EpiPen

Anaphylaxis symptoms usually occur within minutes of exposure to an allergen. Sometimes, however, it can occur a half-hour or longer after exposure.

Signs and symptoms include:

- Skin reactions, including hives and itching and flushed or pale skin
- Low blood pressure (hypotension)
- Constriction of airways and a swollen tongue or throat, which can cause wheezing and trouble breathing
- A weak and rapid pulse
- Nausea, vomiting or diarrhea
- Dizziness or fainting
- Participant administers EpiPen unless unable to do so.
- Must go to urgent care even if symptoms improve. The EpiPen only lasts 10-20 minutes

### Heat Exhaustion and Dehydration

Make sure participants stay hydrated and avoid prolonged activity in excessive heat. Signs and symptoms of heat exhaustion include:

- **Mild:** Excessive thirst, headache, muscle cramping, dizziness and fatigue
- **Moderate:** Nausea, pale skin, profuse sweating or inability to sweat, dry mouth and swollen tongue, decreased urine output and dark yellow or amber colored urine
- **Severe:** Fever higher than 103°F, fainting, confusion, lethargy, seizures, difficulty breathing, chest or abdominal pains and rapid heartbeat or palpitation.

### Emergency Evacuation Plan

Program Coordinators must discuss the program emergency evacuation plan with all designated individuals. In addition to this plan, program directors must ensure that designated individuals: escort the participants out of the building and proceed to a safe area designated by the program emergency plan; and remain with their assigned program group and take attendance immediately.

If all participants and staff are accounted for, the program director will maintain order and follow the instructions of emergency personnel.

If a participant or designated individual is missing when attendance is taken, immediately notify the emergency personnel and follow their instructions.

## Field Trip Procedure

When on a field trip with participants, designated individuals should adhere to the following directives:

- Complete an initial count of all participants.
- Divide participants into small groups and use the buddy system.
- Take attendance prior to departing, immediately when everyone is in the vehicle, several times once you have arrived, prior to returning to the vehicle, and once participants are in the vehicle for the return trip.

## Missing/Lost Participant Procedure

Covered individuals are responsible for knowing the location of participants at all times, both onsite and off for the duration of the program. Staff must account for their participants at all times:

- Regularly check attendance, specifically when participants are in transition.
- Immediately notify the program director if a participant is unaccounted for.

If a participant is missing:

- Do a sweep of the area and facilities (rest rooms, residence hall) to find the participant.
- Contact the participant directly if applicable.
- Program Coordinator will contact parents to inform them of the situation and see if the participant was already picked up, or if parents have ideas on where the child may be.
- If the participant is not located after the aforementioned steps have been completed:
  - Call WSSU Police (if on campus) at 336.750.2911 or 911 immediately
  - Report Should include:
    - Participant's name and age
    - What the participant was wearing
    - Last place the participant was seen
    - Other potentially helpful information, e.g., indications that the participant is homesick or has had conflicts with other participants or program staff

## Clery Act and Campus Security Authority

### **Jeanne Clery Act**

The Jeanne Clery Act (<https://www.clerycenter.org/the-clery-act>) is a consumer protection law that was passed in 1990. It requires all colleges and universities who receive federal funding to share information about their efforts to improve campus safety and inform the public of crime on or around campus. This information is publicly accessible through WSSU's annual security report.

### **Campus Security Authority**

Campus Security Authority (CSA) is a term used by the Clery Act to indicate someone who collects crime reports. Per the Clery Act, the following members of the community are required to be CSAs:

Employees of the campus police department or campus security department Any individual who has responsibility for campus security (for example, kiosk guards, event security, or student escorts)

An official who has significant responsibility for student and campus activities including, but not



limited to, student housing, student discipline, and campus judicial proceedings.

At WSSU, program coordinators are deemed campus security authorities (CSA). As a CSA the program coordinators are required by the Jeanne Clery Act to report to WSSU any suspected sexual assault or other crime that occurs on campus, on property immediately adjacent to WSSU, or on non-campus property or buildings owned or controlled by WSSU.



## Section 3

# Planning Online Programs for Minors

### Quick Reference Guidelines for Online Interaction with Minors

#### **Permission from parent(s) or legal guardian(s)**

- Collect a signed parental consent form with language for parents/guardians to consent to online interactions (and recording if applicable).
- Collect participant registration information including name, email (if available), phone number, physical address, age/grade, gender.
- Collect emergency contact information for the parent(s) legal guardian(s) including phone number and email address.
- Inform parents/guardians of their responsibility to monitor the minor participant throughout the duration of the program if it is offered in real-time.
- Inform parents and obtain their consent if live interactive sessions will be recorded.
- Inform parents/guardians on how to report technical problems, raise concerns about staff or the program, report discrimination/harassment, and request disability accommodations.
- Clearly outline the days/hours of the program, outline exactly what the program entails and state that there is to be no contact between staff and minors outside of the established program.
- Provide rules or a code of conduct for online interactions to the participants and have the parents/guardians sign it along with the participant.
- Include a disclaimer or content advisory if there is risk of physical injury or emotional distress, if you are providing content via video that can be viewed at will.
- Use a “Program Expectations and Parental Permission” form that can be modified to meet the needs of your program or activity.

#### **Communication**

- Follow the [Guidelines for Electronic Communications with Youth](#).
- Have two or more program staff present in online interactions with minors or send the virtual meeting link to the participant’s parent/legal guardian so they have the option to participate.
- For live programs with minors, conduct a check-in at the beginning of the program with cameras on to confirm the identity of the participant.
- Define which platforms will be used for communication, content delivery and storage and limit all communication to official Program platforms.
- Use proper WSSU credentials, such as logging in with your Banner ID and password.
- Avoid using personal email addresses and personal social media platforms. Only properly branded program/unit specific platforms should be used.
- Avoid texting directly with minors, use a group platform and involve another adult staff member.
- Take steps to eliminate the presence of unregistered attendees by having the leader admit each participant individually.
- Check attendees against registration lists.
- Follow the [Personal Boundaries for Working with Minors](#).
- Remember there is to be no staff-to-youth contact outside the program.
- Determine how participants will be allowed to communicate with each other. Monitor posts or

submissions to ensure appropriate content.

- There is to be zero tolerance for bullying or harassment.
- Consider sending a short survey to the parents after real time interactions to gather any concerns, questions or feedback.
- Consider disability accommodations in the online environment. Can minors with sensory impairments participate?

### **Recording**

- Avoid recording sessions with minors. There are legal risks, and children who would miss in-person activities would not typically have a recording of the event. Participant privacy must be protected and FERPA and/or other privacy laws may apply. There may also be a need for intellectual property protections. It is best to avoid recording interactions with minors.
- If you decide to record, the content should be “locked down,” password protected, and only available for a specified amount of time to those associated with the program, an exception would be content that is used for promotional purposes to be shared through Program websites and communication channels in the same manner as in-person interactions.
- Avoid recording personally identifiable information (PII) of minors such as names with photos, or chat transcripts.
- Consider if the participants need access to recorded material or if only the program leaders need access.
- The person recording must announce that the recording is starting before recording so that all are aware.

### **Staff Training**

- Prohibit "friending" youth on social media. Any private electronic communication between staff and youth, including the use of social networking websites such as Facebook, Instagram, Snapchat, direct messaging, texting, etc. is prohibited.
- Make all communication between staff and youth transparent.
- Maintain boundaries: keep discussions to curriculum or activity; no discussion of personal issues, sexual conversations, pornography or references to drugs or alcohol.
- Provide examples of appropriate electronic communications. For example: only respond to emails/text/messages when copying a supervisor or parent/guardian, only utilize work issued email addresses or phone numbers.
- Provide examples of inappropriate electronic communications, such as “friending or following” youth on social networking sites, engaging in sexual conversations or sharing of intimate personal information.
- Stress importance of professional appearance and setting.
- Provide clear expectations of when staff can use their personal cell phones (emergencies, field trips, when approved by a supervisor).
- List of information or items that can or cannot be stored on staff’s personal devices such as photos of youth participants.
- Provide staff with a [Program Expectations form](#) that meets the needs of your program or activity.

### **Staff Supervision**

- How will Program staff be supervised?
- Will leadership "sit in" on programs, perhaps at random, unannounced times?
- Will there be staff meetings to reinforce staff training or hold discussions with individual staff?

## Reporting Incidents

- Incidents that cause concern can be [reported here](#).
- Disclosures of child abuse should be reported to DSS and law enforcement per [guidelines here](#).



## **Section 4**

# **Child Abuse Identification and Reporting**

### **Identification and Reporting**

Per North Carolina law, any person or institution who has cause to suspect that any juvenile is abused, neglected or dependent, or has died as a result of maltreatment, as defined by [G.S.7B-101](#), shall report the case to the director of the Department of Social Services in the county where the juvenile resides or is found, as outlined in [G.S. 7B-301](#). Additionally, if the child is a victim of a violent offense, sexual offense or misdemeanor child abuse under [G.S. 14-318.2](#), report to local law enforcement.

The North Carolina DSS defines child abuse as “the intentional maltreatment of a child and that can be physical, sexual, or emotional in nature.” DSS defines neglect as “the failure to give children the necessary care they need.”

Both, as a matter of WSSU policy and North Carolina State law, any member of the WSSU community who reasonably suspects that a minor has been abused or neglected by a parent, guardian, caregiver, or staff member is required to report that suspicion to the appropriate county DSS.

For incidents involving employees or volunteers occurring on the WSSU campus, regardless of the residence of the minor involved, the Forsyth County DSS is the appropriate contact for filing reports.

For more information, refer to: [Child Protective Services \(CPS\) intake](#) to submit a report in Forsyth County: 336.703.2287.

For a directory of all county DSS offices in North Carolina, click [here](#).

For cases requiring immediate intervention on WSSU property or involving WSSU employees, also contact WSSU Police: 336.750.2911. For locations outside of wssu property, if the child is in danger, an immediate intervention is necessary. Call the local county DSS office and the local police or 911 at once.

### **Child Abuse Report Checklist**

Your report should include all available information regarding the known or suspected abuse or neglect, including, but not limited to:

- the name of the child.
- the child’s whereabouts.
- the names and addresses of the parents, guardian, or caretaker for the child.
- the character and extent of the injuries.
- The report should also contain, if known, any evidence of previous injuries to said child and any other pertinent information that might establish the cause of such injury or injuries, and the identity of the person or persons responsible for the same. However, you should not delay making a report to gather this information.

Do not directly question or solicit information from the child or from the person suspected of improper

behavior. Likewise, do not delay making a report to gather evidence. That is not your role; the role of investigation lies with city, county, and state officials.

## **Identifying Abuse**

### **What is Abuse? Abuse includes**

- mental, emotional, physical, or sexual injury to a child, or
- failure to prevent such injury.

### **What is Neglect? Neglect of a child includes**

- failure to provide a child with food, clothing, shelter and/or medical care; and/or
- leaving a child in a situation that places them at risk of harm.

### **Tips for Recognizing Abuse:**

- Listen closely. Youth participants often form a bond with program staff and may disclose past or current abusive situations.
- Believe them. It is not your responsibility to investigate or substantiate claims. Remember that even highly regarded members of the community sometimes turn out to be abusers.
- Watch participants carefully. Up to 40% of children who are sexually abused are abused by older, more powerful children. As youth programs place more emphasis on controlling adult/child interactions, they sometimes leave openings for peer abuse. Identify blind spots where peers might be alone together and supervise them closely. Also, remember that peer abusers may be victims of abuse themselves.
- Know what you are looking for. Child abuse can take many forms including:
  - Harm or threatened harm to a child's health or welfare can occur through nonaccidental physical or mental injury, sexual abuse or sexual exploitation or attempted sexual exploitation.
  - Sexual abuse may be perpetrated by an adult or another child and includes the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or having a child assist any other person to engage in, any sexually explicit conduct or any simulation of the conduct for the purpose of producing any visual depiction of the conduct; or the rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children as those acts are defined by law. Sexual abuse also includes any activity that is meant to arouse or gratify the sexual desires of the perpetrating adult or child. Sexual abuse may or may not involve touching.
- Sexual exploitation includes allowing, permitting, or encouraging a child to engage in prostitution and allowing, permitting, encouraging or engaging in the obscene or pornographic photographing, filming, or depicting of a child for commercial purposes.
  - Negligent treatment or maltreatment of a child includes the failure to provide adequate food, medical treatment, supervision, clothing, or shelter.
- Err on the side of caution. In deciding whether to report an incident or situation of suspected abuse or neglect, it is not required that you have proof that abuse or neglect has occurred. Any uncertainty in deciding to report suspected abuse or neglect should be resolved in favor of making a good faith report.

### **What Are the Types of Abuse?**

- Physical Abuse: When a parent or caregiver is responsible for any non-accidental physical injury to a child.

- Sexual Abuse: Occurs when an adult uses a child for sexual purposes or involves a child in sexual acts. Additionally, it occurs when an older or more powerful child using another child for sexual gratification or excitement.
- Emotional Abuse: A parent or caregiver harms a child's mental and social development or causes severe emotional harm.
- While a single incident may be abuse, frequently emotional abuse is a pattern of behavior that causes damage over time.
- Neglect
- When a parent or caregiver does not give the care, supervision, affection and support required for a child's health, safety and well-being.

### **Signs of Physical Abuse**

- Visible and severe injuries
- Aggression toward peers, pets, other animals
- Distinctive shape
- Appears afraid of parents or other adults
- Bruises, burns or scalds, bite marks, scarring, fractures or broken bones
- Fear, withdrawal, depression, anxiety, nightmares, insomnia
- Frequency, timing, and history of injuries (frequent, after weekends, vacations, school absences)
- Immaturity, acting out, emotional and behavior extremes
- Self-destructive behavior or attitudes

### **Signs of Sexual Abuse**

- Difficulty sitting, walking, bowel problems
- Torn, stained, bloody undergarments
- Bleeding, bruises, pain, swelling, itching of genital area
- Any sexually transmitted disease or related symptoms
- Withdrawn, depressed, anxious, aggression
- Eating disorders, preoccupation with body
- Poor peer relationships, poor self-image, poor self-care, lack of confidence
- Sexual acting out, excessive masturbation, sexual behavior or knowledge that is advanced or unusual
- Reports sexual abuse

### **Signs of Emotional Abuse**

- Developmental delays
- Overly compliant or defensive
- Wetting bed, pants
- Extremely emotional, aggressive, withdrawn, anxieties, phobias, sleep disorders
- Speech disorders
- Destructive or anti-social behaviors (violence, cruelty, vandalism, stealing, cheating, lying)
- Health Problems (ulcers, skin disorders, obesity and weight fluctuation)
- Inappropriate behavior for age (Too adult, too infantile)
- Suicidal thoughts and behaviors

## **Signs of Neglect**

- Often hungry, stockpiles or seeks food
- May show signs of malnutrition
- Very low body weight/height for age
- Often tired, sleepy, listless
- Hygiene problems, body odor
- Untreated medical and dental problems

## **How to Respond When a Minor Discloses Abuse**

As a designated individual, a minor may confide that a family member, teacher, coach or a peer, has abused him or her. If this happens, the following steps need to be taken:

- Listen
  - Stay calm and let the minor speak.
  - Avoid denial
  - Do not make assumptions
  - Do not interrogate
  - Be supportive and non-judgmental
- Reassure
  - The minor may be scared, angry, confused and crying.
  - Ask four questions:
    - What happened?
    - When did it happen?
    - Where were you when this happened?
    - Who else was there?Asking any additional questions may contaminate a case.
  - Document exact quotes
  - You can reassure them with a few simple comments like:
    - “I know how hard this is to talk about.”
    - “You are very brave for bringing this out.”
    - “Don’t worry, you are doing the right thing by letting someone know.”
    - “This isn’t your fault. You’ve done nothing wrong.”
    - “I’m very sorry this has happened to you.”
  - Do not make any promises.
  - Write down as much detail and as quickly as you can everything the minor has shared with you, using their actual words, not your interpretation. Report suspected abuse to the Department of Social Services, the police, and the WSSU Risk Assessment Case Manager.
- Report

## **Policies and Record Keeping**

### **Record Keeping and Retention Cycle**

WSSU personnel should follow the guidelines described in the [UNC System Records Retention and Disposition Schedule](#) regarding the management of “Pre-College Program Records” (13.4).



#### 13.4 PRE-COLLEGE PROGRAM RECORDS

Records documenting the participation and performance of youth participants enrolled in pre-college enrichment programs (e.g., Upward Bound Project) at WSSU. Includes recommendations, transcripts, applications, academic advising worksheets, honors and awards received, releases for participation, correspondence, annual performance reports, rosters, and other related records. Also includes applications and monitoring records for undergraduate pre-college mentors.

- For high school students who complete the program, destroy in office **seven years** after completion of the program.
- For high school students who do not complete the program, destroy in office **five years** after separation from the program.
- Destroy in-office applications for students who are not admitted to the program or who do not enroll **one year** after the application period.
- Destroy in office records of all other youth participants after **three years**.
- Destroy in office mentor records after **five years**.
- Destroy annual performance reports and rosters when reference value ends.

In the event a minor is seriously injured during the program, programs should consult with WSSU's Legal Affairs about keeping records for a longer period of time. For example, reports about accidents involving minor visitors cannot be destroyed until the minor reaches the age of 21. See section 11.1 of the [UNC Records Retention and Disposition Schedule](#).

When in doubt, maintain youth records for at least **seven years**. Some youth records may have to be kept even longer.

#### Site Visit Procedures

Periodically, the Office of Conferences and Institutes will visit programs and activities to review policies, procedures and practices and to provide feedback.

The site visit will begin with a pre-visit questionnaire to be completed by the Program Coordinator and submitted to the Office of Conferences and Institutes prior to the site visit.

The questionnaire includes:

- Overview of the program and compliance requirements.
- Transportation
- Behavioral Expectations
- Housing
- First Aid and Medicine
- Photo/Media/Communication
- General Risk Management

*Refer to Appendix D in Section 5 for sample pre-visit questionnaire.*

Following the site visit, the program will be provided with a letter documenting:

- Date of the visit
- Programs coordinators involved in the meeting
- Purpose of the visit
- Known issues or challenges
- Risk management recommendations and compliance items
- Additional action items

### **Compliance with [Minors on Campus Policy](#)**

The Office of Conferences and Institutes is charged with monitoring compliance with this regulation by all programs and presenting training on best practices. Failure to comply with the requirements set forth in this regulation or any related campus policies and procedures may lead to sanctions or disciplinary action, including but not limited to, dismissal from WSSU, revocation of the opportunity to use WSSU property, issuance of a no-trespass notice, and/or suspension or termination of the program.



## Section 5

# Third Party Programs and External Entities

There are special considerations for programs owned or operated by external entities (third parties) but hosted in WSSU facilities. These entities are subject to WSSU policies including [Minors on Campus Policy](#).

### Regulation

Review the Minors Regulation, [Minors on Campus Policy](#)

### Registration

[Covered Third-Party Programs register here](#). "Covered Third-Party Program" means a program or activity operated by an entity other than WSSU which primarily serves or includes minors. Review [this letter](#) for Covered Third-Party programs for more information.

### Facilities Use Policy

Third Parties using WSSU facilities must agree to the Facilities Use Policy, which is included as an attachment to the agreement that you will receive from Conferences and Institutes. This agreement includes a statement acknowledging that WSSU may monitor compliance with requirements for operating a Covered Third-Party Program.

### Insurance

Third-party entities must provide an insurance certificate which details the coverage for the program. This must include the following:

- A. Commercial General Liability insurance, using form ISO CG 00 01 or equivalent, covering all activities contemplated in this agreement, which shall include but need not be limited to, coverage for public liability, bodily injury and property damage, including products and completed operations, personal and advertising injury, contractual liability and sexual abuse and molestation coverage.

The Commercial General Liability Insurance shall provide at minimum the following limits:

<u>Coverage</u>	<u>Limit</u>
Each Occurrence Limit	\$1,000,000
Damage to Premises Rented to You	\$300,000 Any one premises
Personal and Advertising Injury	\$1,000,000 Any one person/organization
Sexual Abuse or Molestation	\$1,000,000 Any one person
General Aggregate Limit	\$2,000,000
Products/Completed Ops. Aggregate Limit	\$2,000,000

Sexual abuse and molestation coverage shall provide defense costs outside the liability limits and also defend any accused insured under a reservation or rights letter, if necessary. The policy shall cover the period of User's occupancy and use of WSSU facilities.

- B. Worker's compensation insurance, where required by North Carolina law; and
- C. Such insurance as required by federal, state, or local laws, codes, or regulations.

### Covered Individuals

Individuals working directly with youth in WSSU facilities through programs hosted by third parties are considered covered individuals. Refer to [Personal Boundaries](#) and additional information for covered individuals starting on page 23 of this handbook.

## **Background Checks**

The process for obtaining background checks for employees and volunteers associated with youth programs operated by external entities differs from the process for WSSU programs.

Covered third-party programs must use a qualified background check vendor (according to reasonable industry standards) and must provide certification that for all covered individuals under their control, a background check has been conducted that includes searches for criminal convictions (federal and in all states and counties in which the individual has lived) and searches against the national and state sex offender registries.

The criminal background check must look back at least five years or since the covered individual reached the age of 18, whichever period is shorter. The background check records should be kept by the third party. The third party will need to attest that they are being done.

All camps, internal or external, will be asked to submit the name and email address of each individual who will be working with their program. Internal WSSU programs will have their information submitted to Human Resources to request the date of the last background check performed. If the background check on an employee was performed more than five years prior to the start date of the camp, a new background check will be ordered. Likewise, Human Resources will order background checks on all volunteers and submit the cost to the camp for the cost of running background checks on volunteers. External camps must submit the dates of background checks for all of their employees and volunteers. If the date does not comply with requirements, the group will be contacted.

WSSU may request records that show compliance with the minors regulation. The records should be stored in a manner that could be provided upon request.

## **Training**

All covered individuals must complete annual training on at least the following topics:

- Applicable WSSU policies, procedures, and rules, including this regulation;
- Behavioral expectations, including appropriate conduct when working with minors and related codes of conduct;
- Risk management best practices, procedures, and guidelines for all program activities;
- Supervision plan for adequate supervision in light of the number and average age of the participants, the program activities, and whether overnight stays are involved;
- Emergency planning, including for medical, severe weather, and other public safety emergencies;
- Basic warning signs of abuse or neglect of minors;
- Guidelines for protecting minors from emotional and physical abuse and neglect;
- Requirements and procedures for the mandatory reporting of incidents involving suspected abuse or neglect or improper conduct;
- Other relevant or appropriate topics related to the specific program.

The required training for covered individuals has information and best practices that are useful for all programs and activities involving youth. Training materials provided by the Office of Conferences and Institutes can be adapted to the needs of your program.

Covered third-party programs are responsible for training covered individuals under their control. Training must be documented by the programs, and all programs must annually certify to WSSU that all employees and

volunteers received the required training.

### **Supervision Ratios Provided by the American Camp Association**

- 5 years & younger 1 staff for each 5 overnight participants and 1 staff for each 6 day participant
- 6–8 years 1:6 for overnight, and 1:8 for day
- 9–14 years 1:8 for overnight and 1:10 for day
- 15–17 years 1:10 for overnight and 1:12 for day

### **Reporting Abuse or Neglect**

Both, as a matter of WSSU policy and North Carolina State law, anybody who reasonably suspects that a minor has been abused or neglected by a parent, guardian, caregiver, or staff member is required to [report](#) that suspicion to the appropriate county Department of Social Services. Additionally, if the child is a victim of a violent offense, sexual offense or misdemeanor child abuse, a report must be made to local law enforcement.

### **Compliance**

WSSU reserves the right to require proof of compliance with the policy.

### **Facilities Hosting Minors**

#### **Reserving Space for Covered Third Party Programs**

When a "Covered Third Party Program" reserves space in your area, please contact the Office of Conferences and Institutes. We will reach out directly to the person responsible for the third party program and ask them to register with our office and offer to help them meet the requirements of the regulation.

The covered third party will register using this [registration form](#). They will need to know:

- The name and contact information for the WSSU administrator responsible for approving the Program: This is the person authorized to sign the agreement on behalf of WSSU for the venue per [Minors on Campus Policy](#).
- The name and contact information for the WSSU venue or department representative supporting the covered third-party program: This is the individual from the facility that the covered third party program will be working with (ie. event coordinator)

#### **Facility Risk Management Questionnaire**

- a. What types of programs for minors do you host in this facility?
  - b. How do clients reserve the space?
  - c. Did you reference the minors regulation, [Minors on Campus Policy](#)?
  - d. Who will direct third party programs to register with the Office of Conferences and Institutes?
  - e. What are the insurance requirements for third party programs?
  - f. What are the biggest concerns you and your staff have concerning programs hosting minors?
  - g. What challenges do programs hosting minors present to you and your staff?
  - h. Are there specific programmatic areas that could use policy/procedure creation or revisions?
2. Are there specific physical areas that need policy/procedure creation or revisions?
  3. What information is provided to your clients in terms of:
    - Transportation and parking
    - Resources or contacts for spills, medical care, equipment

- Preparing for the unexpected (What would you do if?)
  - Adverse weather
  - Increased building traffic or construction
  - Special situations (events, VIP guests, power outage, active shooter, medical emergency, lost participant, etc)
- Evacuation
  - Fire alarm – meeting locations, responsibilities
  - Other reasons to evacuate (ex: gas leak, flood, bomb threat)
- Shelter in place
- Crowd management plans
- General safety
  - Personal safety
  - Lockup at night
  - AED locations
  - Slips, trips and falls
  - Equipment damage & facility maintenance reporting
  - Egress paths, fire extinguishers
  - Reporting suspicious activity
  - Reporting suspected child abuse or neglect
  - Facility/equipment inspections, maintenance, and repairs

## **Faculty Working with Minors**

### **Steps for Faculty Working with Minors:**

- a. Provide your departmental Human Resources representative with details regarding the nature and activities involved in the work and the proposed status of the individual (volunteer, intern, paid).
- b. Contact your Dean, Vice Chancellor or their designee who has supervisory authority over the program or activity for their approval. All activities with minors must be approved at this level.
- c. Review the [Minors on Campus Policy](#).
- d. [Register your program or activity online](#).
  - i. [Review and prepare to distribute required forms](#)
  - ii. Once you register the program you will be required to complete the minors regulation required training course.
  - iii. As part of the training you will be asked to review and agree to [Personal Boundaries for Working with Minors](#).
- e. Provide the [Minors in Field and Lab](#) document and the necessary sample forms above to the parent/guardian of the participant(s) for them to complete. Forms should be stored in the department.
- f. Complete the new employee safety orientation checklist prior to beginning any activities with minors. This is required for paid and unpaid individuals.
- g. For lab safety purposes, no person should work alone and it is prohibited to work with minors one-on-one in seclusion. Every precaution should be taken to make sure that the environment is open for others to observe.

## Section 6 Appendices



## **Appendix A: Minors Regulation**

**Authority:** Chancellor

**Responsible Division:** Finance and Administration

**History:** Adopted September 11, 2020

### **Additional Resources**

**Contact:** Vice Chancellor for Finance and Administration, 336.750.2703

### **I. Executive Summary**

Winston-Salem State University (“WSSU” or “University”) strives to create a welcoming and safe environment for all individuals visiting University property or participating in University programs. This Policy on the Protection of Minors (“Policy”) reinforces this expectation by establishing standards, requirements, and procedures that specifically focus on protecting the safety of individuals who are under the age of 18 from abuse and neglect by a parent, guardian, caretaker, or Covered Program Staff member.

### **II. Policy Statement**

As a matter of University policy and North Carolina State law, any member of the University Community who reasonably suspects that a minor has experienced Child Abuse or Neglect by a parent, guardian, caretaker, or Covered Program Staff member has an absolute obligation to report that suspicion to the EEO Officer or designee. In turn, the EEO Officer or designee will report to the Forsyth County Department of Social Services.

### **III. Definitions**

- **Child Abuse or Neglect:** The North Carolina Division of Social Services provides that child abuse is “the intentional maltreatment of a child and that can be physical, sexual, or emotional in nature.” DSS provides that neglect is “the failure to give children the necessary care they need.”
- **Covered Program:** A program or activity in which Minors participate that is sponsored by a University Department, a student organization, or a Third Party entity sponsored by a University Department.
- **Covered Program Staff:** All individuals 18 years old or older who work with, instruct, or otherwise come in direct contact with minors in covered program, even if these individuals are volunteers.
- **Minors:** For the purposes of this policy, minors are defined as individuals who are younger than 18 years of age and are participating in a Covered Program. With the exception of the mandatory reporting requirements below, this policy does not apply to students under the age of 18 who are enrolled or matriculated at the University.
- **University Property:** All campus grounds, buildings, facilities, stadiums, or other improvements, that are owned, leased, used, or otherwise controlled by the University.
- **Third-Party:** An organization or individual from outside of the University that uses University facilities to conduct a Covered Program pursuant to an approved contract or other use agreement with a sponsoring University Department and with the prior approval of the Protection of Minors on Campus Coordinator. For example, athletic camps or academic camps.
- **University Community or University Community Members:** University faculty, staff, unpaid volunteers, interns, students, temporary employees, visiting scholars, and any other University affiliates.



## IV. Guidelines

### A. Registration and Approval.

All Covered Programs must be registered and approved by the appropriate dean or vice chancellor (or approved designee) at least 60 days prior to the initiation of the program or activity. All programs continuously or periodically operating must be approved and registered annually. The registration should include, at a minimum:

- i. A description of the proposed Covered Program;
- ii. A responsible party or sponsor for the proposed Covered Program (Sponsor);
- iii. The designated university administrator or officer supporting the program;
- iv. The period of time for which the Covered Program will operate;
- v. The expected number of employees and/or volunteers involved and minors served;
- vi. An acknowledgment of relevant institutional policies, including requirements for background checks, training, insurance, parking access, and facilities use;
- vii. An acknowledgment of state mandatory reporting requirements related to suspected abuse or neglect of a minor;
- viii. For third party vendors, a statement acknowledging that the constituent institution may monitor compliance with requirements for operating a Covered Program; and
- ix. The name or position of the university administrator or officer with responsibility for approving the proposed Covered Program.

### B. Mandatory Background Checks

A background check must be completed for all Covered Program Staff eighteen (18) years of age or older who work with, instruct, or otherwise come into Direct Contact with Minors in a Covered Program ("Program Staff"), even if these individuals are unpaid affiliates such as unpaid volunteers, interns, or "Direct Contact" is defined as care, guidance, control, or supervision of minors in group or one-to-one settings or the potential for one-to-one interaction with minors. These checks must be completed prior to a Covered Program Staff member having any Direct Contact with minors as part of a Covered Program. A background check with a satisfactory outcome must be completed within six (6) months prior to the start of the Covered Program to satisfy this requirement.

This requirement applies to:

- i. All University faculty, staff, students, or unpaid volunteers, interns, and WSSU independent contractors who will serve as Program Staff.
- ii. Third-party providers must use a qualified background check vendor according to the sex offender registries, and a mandatory driver's license check where transporting minors is involved.

### C. Subsequent Background Checks

Covered Program Staff must undergo subsequent background checks at least annually. There are two exceptions pursuant to which a Covered Program Staff member may have subsequent background checks every five (5) years and required to attest to compliance with background checks annually.

- i. The first exception applies to Covered Program Staff who are also University employees or students and who are continuously employed by or enrolled in the University without any break in their employment or enrollment.
- ii. The second exception is for Covered Program Staff members continuously employed by or volunteering for Third Parties who do not have a break in employment or volunteer service that lasts

one hundred twenty (120) days or more.

#### D. Roles and Responsibilities

##### Covered Program Staff Training Requirements

Each Covered Program must assure that all Covered Program Staff are trained on policies and issues relevant to the protection of Minors. This training must occur at least annually and must occur prior to any Direct Contact with Minors. The management of a Covered Program may enhance and/or modify the University's training requirements to meet specific needs of the applicable Covered Program, but such training must include the following minimum components:

- The University's Policy on the Protection of Minors;
- Sexual abuse and sexual harassment;
- Detection of Child Abuse and Neglect through behavioral signs that Minor victims may exhibit;
- Protecting Minors from Child Abuse and Neglect by adults;
- Protecting Minors from abuse and bullying by peers;
- Laboratory safety for minors (when applicable)

#### E. Applicability

University Community Members (faculty, staff, volunteers, interns, and students), as well as outside third parties (including contractors) who are authorized to use University facilities or property, must comply with this policy.

As used in this Policy the term "Minors" applies to persons under the age of 18 who are not enrolled or matriculated students of the University.

- i. All portions of this Policy apply to the protection of Minors participating in programs sponsored by the University or held on University property, with the exception of students who are enrolled or matriculated at WSSU ("Enrolled Students").
- ii. Enrolled students who are minors are covered by University policies applicable to students and applicable State laws involving the protection of minors and are not subject to the remaining requirements of this Policy.
- iii. The "Reporting Suspected Child Abuse/Neglect Procedure" associated with this Policy applies to the protection of all minors (including Enrolled Students) while those minors are present on University property or while participating in Covered Programs.
- iv. All contracts for the services of independent contractors (including solo and Third Party contractors) who will have Direct Contact with Minors as part of a Covered Program must include a provision that requires compliance with all of the provisions of this

#### F. Compliance

- i. **University Employee:** Violations may result in disciplinary action up to and including termination of employment
- ii. **Unpaid Volunteers, Interns and Visiting Scholars:** Violations may result in end of assignment.
- iii. **University Students:** Violations may result in referral to the Dean of Students.
- iv. **Third-Party Covered Program Staff:** Violations may result in disciplinary action that requires immediate removal from Direct Contact with Minors, and /or University property or facility.
- v. **Covered Programs:** If it is determined that the Covered Program has not complied with any

provision of the University's Policy on the Protection of Minors, the Covered Program may be subject to immediate discontinuation of operation and/or use of University property. At the discretion of the University Coordinator for the Protection of Minors on Campus, the Covered Program may also be banned from future use of university facilities.



## **Appendix B**

### **COPPA**

#### Children's Online Privacy

The Children's Online Privacy Protection Act (COPPA) was originally enacted in 1998 as a way of protecting kids online. Updated in 2013, COPPA makes it illegal for commercial websites to collect identifying information about kids under the age of 13 without verifiable parental consent. Winston-Salem State University complies with the requirements of COPPA.

Certain university sponsored events including summer youth programs, camps, tours and similar activities may include participants under the age of 13. University events or other activities which specifically exclude the participation of children under the age of 13 or, those where the participants' information collection is not done online, are not required to comply with COPPA.

In all cases, however, the events managers and website operators should be familiar with the law's requirements. Please visit the COPPA Compliance webpage for more details or email [uacompliance@fa.ua.edu](mailto:uacompliance@fa.ua.edu) with questions or concerns.



## Appendix C

### Youth Program Checklist

The information that is compiled using this list should be communicated to all program staff and volunteers, participants and their parents/guardians.

- Description of program
- Names and information about program staff
- Program coordinator contact information
- Who parents would contact in the event of an emergency
- How can parents contact participants in the event of an emergency
- Program location information
- Program rules and guidelines
- Information about expectations for parents
- Program schedule/activities
- Registration information
- Check-in process
- Check-out process
- Information regarding unaccompanied minor travel and/or travel arrangements provided by the program
- Parking information including drop off and pick up
- Maps and/or directions
- What program forms must be turned in, the process for doing so and the due date
- How are medical concerns handled including how parents are notified
- Information about storage and access to medications provided by the participants themselves
- Housing information
- Curfew information
- Information about roommates
- Meal information
- ADA accommodation information
- Information about what participants should bring to the program
- Information about what participants should not bring to the program
- Program Code of Conduct for participants
- Consequences for participants
- Program Code of Conduct for staff
- Consequences for staff

## Appendix D

### Protecting Data and Privacy

Be intentional about what you collect, how it is used and who needs the information.

- Only collect information that is needed for the program or activity.
- The participant/parent/guardian should have the right to review, correct and possibly delete or choose not to provide the requested data.
- Be transparent about what you collect, how you use it, with whom it is shared, where it is stored and how it will be deleted or archived.
- Protect the data from non-necessary use. Limit the individuals who have access to the data.
- Do not collect ultra-sensitive data such as social security numbers.
- Highly sensitive data like health information, should not be shared via email.



## **Appendix E**

### **Conferences and Institutes Pre-Visit Questionnaire**

The Office of Conferences and Institutes seeks to promote the safety of youth participating in WSSU programs through a comprehensive compliance program including the development, facilitation, monitoring, revision and oversight of policies, protocol, training and compliance related activities to help programs hosting minors on campus provide a safe and healthy environment for participants.

WSSU welcomes the presence of minors who come to visit the university and to participate in a wide range of activities, programs, camps and events offered by various academic, athletic or administrative units operated on or off campus. Serving the community and state through youth programming is integral to our mission and tradition of service as a land-grant institution. WSSU is committed to supporting a safe environment for minors on campus as well as the employees and volunteers who host them.

The minors regulation, [Minors on Campus Policy](#), governs programs that involve the participation of minors, promotes the safety and well-being of minors entrusted to the university's care, and outlines what is required of university community members who work in activities and programs with minors. It also informs individuals of their reporting obligations in instances of known or suspected child abuse or neglect of minors.

This questionnaire is designed to gather information from programs hosting minors as related to [Minors on Campus Policy](#) and the training components provided by the Office of Conferences and Institutes in regards to mitigating known risks for youth programs. This questionnaire should be completed and shared with the Office of Conferences and Institutes two days prior to the scheduled site visit.

For the purpose of this document, "covered individual" means all individuals 18 years old or older who work closely with, interact, supervise, instruct, or otherwise come into direct, non-incident contact with minors in a program/activity. Invited guest speakers, guest lecturers, or guest instructors whose interaction with minors is limited and only in the presence of a covered individual, are not considered Covered Individuals.

#### **SECTION 1: Program Overview and Compliance Requirements**

1. Name of Program?
2. Who Approves the Program annually? (name of the Vice Chancellor, Dean or Designee)
3. Program Coordinator(s) First and Last Name(s)
4. Program Coordinator(s) email(s)
5. Program Coordinator(s) phone number(s)
6. Description of program including the activities participants will engage in during the program?
7. Primary day location?
8. Primary evening location if applicable.
9. Number of Program participants?
10. Age range of program participants?
11. How many covered individuals (staff and volunteers) supervise the participants?
12. Which of these documents/forms are provided to parents/guardians to complete prior to start? (Check all that apply.) Be prepared to share examples of each of these.

Program Agenda

- Emergency Contact Information
- Emergency Communication Plan
- Medical History Insurance Information
- Photo/Media Release
- Participant Behavioral Expectations including clearly articulated consequences for misbehavior.
- Vehicle Release
- Liability Waiver, Assumption of Risk, Indemnification Agreement
- Drop off and Pick up transportation
- Permission forms for participants driving themselves
- Parking procedures
- Authorization for departure/pick-up
- Other

1. Have you registered your program online?

- Yes
- No
- It has been submitted.
- It is saved as a draft.

2. Have you read REG 01.25.18, Programs that Involve the Participation of Minors?

- Yes
- No
- Maybe

3. Which of the following requirements of [Minors on Campus Policy](#) can you attest to?

- I understand that my program falls under [Minors on Campus Policy](#), programs that involve the participation of minors, and that we must adhere to all requirements set forth in the regulation.
- I understand that per North Carolina law, any person or institution who has cause to suspect that any juvenile is abused, neglected or dependent, or has died as a result of maltreatment, as defined by G.S. 7B-301, shall report the case to the director of the Department of Social Services in the county where the juvenile resides or is found, as outlined in G.S. 7B-301.
- I understand that WSSU may monitor compliance with requirements for operating a Program.
- I understand that all covered individuals working with my youth program must be listed on the program's Compliance form online.
- I understand that WSSU background checks must be completed for every employee, volunteer, and other covered individual working with my youth program.
- I understand that if covered individuals will be driving participants, a driving check is required.
- I understand that if covered individuals are active WSSU students, they must have a student conduct check.
- I understand that each covered individual must have appropriate reference checks. I understand that all covered individuals who are providing custodial supervision for the care, custody or control of the minors in our program must complete the required training as stated in [Minors on Campus Policy](#).
- What training do your staff and volunteers (covered individuals) complete program to program start?



## SECTION 2: Transportation

1. What policy(ies) do you have in place for participant transportation?
  - a. Drop-off
  - b. Pick-up
  - c. Releasing the participant after the program
2. Do you pick up from designated locations? If so, who provides the transportation and in what vehicle?
3. If using 12 or 15 passenger vans, how are your staff trained?
4. Do you allow participants to drive themselves to or from the program? If so, where do they park? Are they allowed to use their vehicles during the program?
5. Are participants allowed to take ride-share or public transportation?
6. What special circumstances have you experienced or anticipate?
7. Is there ever a time when program staff or volunteers transport participants in their personal vehicles?
8. How is emergency transportation handled?
9. What other training or procedures are in place to minimize risk associated with participant transportation?

## SECTION 3: Behavioral Expectations

### Behavioral Expectations for Participants

1. How are behavioral expectations communicated to participants?
2. What rules and guidelines are the participants expected to follow?
3. What are the consequences or disciplinary procedures if the rules are violated?
4. How are the consequences and disciplinary procedures communicated to parents/guardians?
5. How are violations of behavioral expectations documented? (Should Include the violation as well as the actions taken to correct the behavior.)

### Behavioral Expectations for Staff, Volunteers, Supervisors, Covered Individuals

1. What are the responsibilities of the covered individuals in your program?
2. When do the covered individuals receive training and through what methods? (lecture, role play, discussion, lesson planning, etc)
3. What is involved in training. What topics are covered? What is the duration of the training?
4. What is the plan if they miss a training session? How are they made aware of their responsibilities?
5. What are the behavioral expectations for the covered individuals in your program? (personal boundaries, rules and guidelines)
6. How are personal boundaries and rules and guidelines communicated?
7. What are the consequences if the rules are violated?
8. How are violations of behavioral expectations documented? (Should include the violation as well as the actions taken to correct the behavior.)

## SECTION 4: Housing

1. Will participants be housed overnight in WSSU residence hall(s)? If yes, which hall(s)?
2. Will participants be housed in facilities other than residence halls? If yes, which facilities?
3. What other camp/programs are being housed in the same facilities?
4. Will each camper have his/her own bed?

5. How many participants will be in each room?
6. Will participants be separated by biological sex? If yes, what policy do you have in place to enforce separation? What policies are in place for individuals who identify other than their assigned biological sex?
7. How will the housing area be restricted to the public? Who will have access to the housing area? How are keys assigned? What do participants have access to?
8. Are parents/guardians allowed to assist participants in moving in or out of the residence hall?
9. Are participants instructed regarding emergency exit locations, policies, and common meeting areas in the event of an emergency or building evacuation?
10. Do staff and participants know who to contact if they have an emergency while at the housing facility?
11. Have participants been informed of safety provisions specific to the facility in which they are housed (ie. Windows must remain closed and locked. No propping doors open. Must keep key with them and lock their door whenever out of the room. Must stay in their own wing or on their own floor.?)
12. What is the curfew and how is this communicated to participants? How is curfew monitored or enforced?
13. What is the policy for managing a camper who is absent and unaccounted for at the housing facility (Who should be informed? When and who calls the police? When and who contacts the parents/legal guardians? What are the consequences for the participant?)
14. Have participants been informed of rules and expectations regarding conduct (sneaking out, horseplay, pranks, etc.) while they are staying overnight at the housing facility?

#### SECTION 5: First Aid and Medicine

1. Do the parents/guardians of the participants in your program complete a medical history and insurance form?
  - a.  Does it include a consent to treat and emergency contacts?
  - b.  Does it ask about allergy information?
  - c.  Does it ask about mental, social and emotional health?
  - d.  Does it ask about injuries or learning styles that could affect participation in the program?
  - e.  Does it ask about current medications and what the participant may bring to the program? Are dosages included?
2. How are the forms collected and who manages them? What measures are taken to ensure confidentiality?
3. How is medicine stored? How is it made available to the participants? How is the remaining medicine returned at the end of the program?
4. Does the Program keep stock medicine on hand? If so, what kind?
5. How are the dosages documented?
6. How are common ailments handled? (headache, tummy ache)
7. Who manages the first aid kit(s)? How are they stored?
8. Does your staff have training in First Aid, AED, CPR?
9. What steps are taken to prevent heatstroke and dehydration?
10. How are injuries documented?
11. When are parents/guardians notified of accidents, injuries, or illness? How is this policy communicated to them?
12. How are inhalers and EpiPens stored and managed?

13. What is the procedure for urgent care? What is the procedure for emergencies?
14. How are staff trained to recognize signs of distress? (excessive sweating, difficulty breathing, low blood pressure, rapid pulse, hives)
15. Do the participants complete a medical assessment or exam prior to participation in your program? (athletic programs)

#### SECTION 6: Photo, Media, Communication

1. Who is allowed to take photos/videos of the participants? How are these used?
2. Is electronic communication utilized throughout the program? In what manner?
3. What policies are in place for the participants and the staff regarding photos and media?

#### SECTION 7: General Risk Management

1. How does communication work for the various groups in the program?
  - a. How do staff communicate with their assigned participants?
  - b. How do staff communicate with each other and the program coordinator?
  - c. How do the staff and/or program coordinator communicate with parents/guardians?
  - d. What is the emergency communication plan? (Medical, adverse weather or incident, behavioral)
2. How does check-in and check-out work at the beginning and end of the program?
3. Are parents/guardians required to show ID at check out?
4. Do the participants attend an orientation on the first day?
  - a. If yes, describe what is communicated during the orientation.
  - b. If no, how are the activities, behavioral expectations, rules, and consequences communicated?
  - c. How are participants and program staff and Volunteers visibly identifiable? (name badges, same color shirts, wrist bands, etc.)
5. What policies are in place to reduce risk in these areas:
  - a. Activity involving locker room use for showering/changing clothes
  - b. Exposure to potentially hazardous materials or equipment that may cause illness or injury (including but not limited to materials found in labs or shops)
  - c. Travel as part of your program
  - d. Interaction with animals
  - e. Overnight stays
  - f. Physical activity (more than brief stints or walking)
  - g. Transporting minors in vehicles
  - h. Use of social media for assignments, updates, coordination, announcements, etc.
  - i. Use of technology for projects or assignments
6. Is there any unscheduled time (free time) for the participants? What is the supervision plan during free time?
7. How are meals or snacks provided?
  - a. Where do the participants eat?
  - b. Will any of the meals or snacks be prepared by program staff?
  - c. If so, what plans are in place to ensure proper storage, temperatures, sanitation, food handling, and allergy warnings?
8. Will participants utilize equipment, animals, or tools in activities that require supervision from a skilled

and/or certified individual (i.e. rappelling, zip line, swimming, interaction with live animals, etc.)?

- a. If yes, provide a description of the activities.
  - b. If yes, list the name(s) of the skilled individual(s).
  - c. If yes, is there a written policy?
  - d. If yes, will designated individual(s) and the camp director participate in safety training before participating in the activities?
  - e. If yes, will participants participate in a safety training before participating in the activities?
9. Will participants participate in activities that require protection equipment (helmets, goggles, or padding)?
- a. If yes, will participants participate in a safety training prior to the activity?
  - b. If yes, is a safety check performed on equipment before each use?
  - c. If yes, is equipment appropriate to the size and abilities of participants?
10. Will participants participate in activities that require the use of fire or heat-producing equipment?
- a. If yes, will participants participate in a safety training before participating in the activity?
11. Will participants participate in activities that require the use of laboratories?
- a. Have parents/legal guardians completed the EHPS form for minors in labs and field work?
  - b. Will a qualified adult laboratory supervisor provide direct supervision of the participants in the laboratory environment?
    - i. Is the adult laboratory supervisor a covered individual?
    - ii. If no, are you aware a covered individual should be present at all times?
  - c. Are participants aware of the dress code policy in laboratories?
  - d. Are participants given personal protective equipment (PPE)?
  - e. Are participants informed on how to properly wear and take off PPE?
  - f. Will any activity involve the use of chemicals, ignitable, or noxious gases?
  - g. Have participants received appropriate laboratory safety training? Attach your laboratory safety training policy.
12. Will any activities involve the use of, or access to, firearms, bows, arrows, or pressurized projectiles?
- a. If yes, has equipment been inspected to ensure proper working conditions?
  - b. If yes, are there safety features involved with the equipment mentioned above?
  - c. If yes, have measures been taken to restrict access to the equipment when it is not in use?
  - d. If yes, does the equipment require demonstrations or training to use?
  - e. If yes, will instruction on the safe use or handling of the equipment be provided to designated individual(s) and camper(s)?
13. Will any activities involve the operation of hand or power tools?
- a. If yes, is the equipment in proper working condition?
  - b. If yes, will instruction on the safe use or handling of the equipment be provided to designated individual(s) and camper(s)?
  - c. If yes, does the equipment require demonstrations or training to use? d. Is appropriate safety equipment provided to all participants participating in the activity?
14. Will participants be expected to purchase food or drink items?
- a. If yes, was this expectation communicated to parents and/or legal guardians?

b. If yes, what are your policies if a camper is unable to purchase food or drink items?

If you are hosting an athletic camp, answer the following questions.

1. Have program staff provided information on how to recognize and treat heat exhaustion or heat stroke?
2. What type of physical activities are included in the program (Examples: running, jumping, swimming, climbing activities at a height greater than six (6) feet, lifting weights, contact or field competition sports)?
  - a. What steps have you taken to minimize the risks associated with each of the physical activities listed above?
  - b. Have participants been provided a review of safety or safety training deemed appropriate for the physical activity mentioned above?
3. Will any activities involve water sports (e.g., diving, swimming, scuba, or wading)?
4. Will the physical activities require physical contact between the covered individuals (program staff and volunteers) and participants(s)? If so, for what reasons?
  - a. If yes, are designated individual(s) aware of prohibited conduct?
5. Will participants be in high-risk areas (Examples: locker rooms, showers, dressing rooms, restrooms, stairwells, high security areas)?
  - a. Will Covered Individual(s) accompany participants to these high-risk areas?
  - b. Will the “buddy system” be utilized to ensure that participants are not alone?
  - c. If yes, what policy do you have in place to minimize the risks? Please attach a policy.
  - d. Will non-Covered Individual(s) be present in these high-risk areas?
  - e. If yes, how will your Program ensure participants are safe in high-risk areas?

## Sources

American Camp Association. "Resources for Camps" <https://www.acacamps.org/resources>

North Carolina State University, Department of Risk Assessment, Youth Programs and Compliance. <https://vptm.ehps.ncsu.edu/home/youth-programs-compliance/>

