



# PACIFIC LUTHERAN UNIVERSITY

## MINORS ON CAMPUS POLICY

*Approved by President's Council September 1, 2020*

### **PURPOSE:**

Pacific Lutheran University is committed to promoting the safety and well-being of individuals who visit or use our campus for any reason. The purpose of this policy is to provide for appropriate supervision of minors who are involved in University sponsored programs, programs held at the University and/or programs housed in University facilities. This policy does not apply to (1) minors who have been admitted and matriculated as students at the University; (2) to general public events where parents/guardians are invited/expected to provide supervision of minors, or (3) to events where parents/guardians are explicitly required to accompany their children.

### **DEFINITIONS:**

**Minor** – a person under the age of eighteen (18).

**University Facilities** – Facilities owned by or under the control of the University.

**Programs** – Programs and activities offered by various academic or administrative units of the University, or non-University groups using University facilities. This includes but is not limited to workshops, sport camps, academic camps, conferences, pre-enrollment visitation, and similar activities.

**School Groups** - Primary and secondary school students participating in University programs under the supervision of teachers, administrators and/or volunteers from their school.

**Sponsoring Department** – The academic or administrative department of the University which offers a program or sponsors a non-University group's use of the University facilities.

**Authorized Adult** – Individuals, age 18 and older, paid or unpaid, who interact with, supervise, chaperone, or otherwise oversee minors in program activities, recreational, and/or in residential facilities. This includes but is not limited to faculty, staff, students, volunteers, and interns. The Authorized Adults' roles may include positions as coaches, instructors, counselors, chaperones, etc. Authorized Adults are considered to be mandatory reporters in accordance with University policy.

**Direct Contact** – Having care, supervision, guidance or control of minors or routine interaction with minors.

**One-On-One Contact** – Personal, unsupervised interaction (in person or virtually) between any Authorized Adult and a participant without at least one other Authorized Adult, parent or legal guardian present.

**POLICY:**

A sponsoring department offering or approving a program which involves minors or provides University housing for minors participating in a program, school groups participating in a program, or a non-University group being sponsored for a program, whether utilizing University housing or not, shall:

1. Establish a procedure for the notification of the minor's parent/legal guardian in case of an emergency, including medical or behavioral problem, natural disasters, or other significant program disruptions. Authorized Adults with the program, as well as participants and their parents/legal guardians, must be advised of this procedure in writing prior to the participation of the minors in the program.
2. For residential programs at University facilities, provide a list of all program participants and a directory of program staff to Hospitality Services. The sponsoring department, school group and/or the non-University group shall ensure that they maintain a list that includes participant's name, room assignment, gender, age, address, and phone number(s) of parent or legal guardian, as well as emergency contact information.
3. Obtain a Medical Treatment Authorization form from the parent/legal guardian for residential programs and athletic programs. The form must include the following:
  - a. A statement informing the parent/legal guardian that the University does not provide medical insurance to program participants.
  - b. A statement authorizing the release of medical information and emergency treatment in case the parent/legal guardian cannot be reached for permission.
  - c. A list of any physical, mental, or medical conditions the minor may have, including any allergies that could impact their participation in the program.
  - d. All emergency contact information including name, address and phone number of the emergency contact.
4. Participants' medications may be distributed by program staff under the following conditions:
  - a. The participants' family provides the medicine in its original pharmacy container labeled with the participants' name, medicine name, dosage and timing of consumption.
  - b. Program staff shall keep the medicine in a secure location, and at the appropriate time for distribution shall meet with the participant.
  - c. The staff member shall allow the participant to self-administer the appropriate dose as shown on the container.

- d. Any medicine which the participant cannot self-administer, must be stored and administered by a licensed healthcare professional associated with the program.
  - e. Personal EpiPens and inhalers may be carried by the participant during activities.
5. Ensure adequate supervision of minors while they are on University property. All activities involving minors must always be supervised by at least two or more Authorized Adults or by their parent(s) or legal guardian(s). Some of the factors to consider in determining “adequate supervision” are the number, age and gender of participants, the activity(ies) involved, residential or non-residential program, and the age and experience of the Authorized Adults serving as counselors.
  - a. When University students are hosting high school students participating in pre-enrollment visitation, the requirement for two Authorized Adults will be waived.
  - b. This requirement does not apply to licensed healthcare providers or students in clinical, internship or practicum providing healthcare services to minors.
6. Develop and make available to participants the rules and enforcement measures applicable to the program. Program participants and staff must obey all University policies and may be removed from the program for non-compliance with policies and rules. The following must be included in program rules:
  - a. The possession or use of alcohol, drugs, fireworks, guns and other weapons is prohibited.
  - b. Rules and procedures governing when and under what circumstances participants may leave University property during the program.
  - c. No violence, including sexual abuse or harassment, will be tolerated.
  - d. Hazing of any kind is prohibited.
  - e. Bullying including verbal, physical, and cyber are prohibited.
  - f. No use of tobacco products will be tolerated.
  - g. Misuse, damage or theft of property is prohibited. Charges will be assessed against those participants who are responsible for damage or misuse of University property.
  - h. Inappropriate use of cameras, imaging, and digital devices is prohibited in any areas where privacy is expected.
7. Obtain all media and liability releases as part of the program registration process. All data gathered shall be confidential and shall not be disclosed except as provided by law.
8. Assign a staff member who is at least 21 years of age to be accessible to participants. The staff member must reside in the residence hall during the program, if applicable. Additional Authorized Adults will be assigned to ensure one-on-one contact with minors does not occur and that appropriate levels of supervision are implemented. See item 10 below.
  - When there are High School students participating in pre-enrollment visitation, the hosting University student(s) will not be required to be at least 21 years of age and the requirement for two Authorized Adults will also be waived.
9. All Authorized Adults who have direct contact with minors are required to have a current background check on record with the University at the time of hire and/or beginning work with

minors. Background checks will be completed by Human Resources, Student Employment or Risk Services depending on the Authorized Adult's role at the University.

10. Require the program to provide and supervise trained counselors (also considered to be Authorized Adults) who must be at least 18 years of age, in accordance with the following:
  - a. The ratio of counselors to program participants must reflect the gender distribution of the participants, and should meet the following:
    - Participants: 6-8 years of age: one (1) counselor to six (6) participants
    - Participants: 9-14 years of age: one (1) counselor to eight (8) participants
    - Participants: 15-18 years of age: one (1) counselor to ten (10) participants
  - b. Training for the counselors must include, at a minimum, information about responsibilities and expectations; policies, procedures, and enforcement; appropriate crisis/emergency responses; safety and security precautions; confidentiality issues involving minors; mandated reporting; and University responsibility/liability. Counselors must know how to request local emergency services and how to report suspected child abuse (counselors are considered to be mandatory reporters).
  - c. Responsibilities of the counselors must include, at a minimum, informing program participants about safety and security procedures, University rules, rules established by the program, and behavioral expectations. Counselors are responsible for following and enforcing all rules and must be able to respond to emergencies.

11. All University employees and volunteers, regardless of their status as a mandatory reporter as defined by University policy, who, in the course of their business or volunteer activity, have reasonable suspicion of child abuse are to make a report as outlined in PLU's Personnel Manual.

In addition, All University employees and volunteers, regardless of their status as a mandatory reporter as defined by University policy, who, in the course of their business or volunteer activity, receive a specific disclosure from a person that a minor is a victim of child abuse, or that an individual has abused a child, are also required to make a report as outlined in PLU's Personnel Manual.

- If a minor is in immediate danger, contact Campus Safety to obtain immediate protection for the minor.
- At the earliest possible time after you receive information that someone has experienced this conduct, you must forward the information to Campus Safety, Office of Student Rights and Responsibilities, Human Resources, or a member of the University Dispute Resolution Committee.

12. Authorized Adults participating in programs and activities covered by this Policy shall not:
  - a. Have one-on-one contact with minors: there must be two or more adults present during activities where minors are present. Authorized Adults also shall not have any direct electronic contact with minors without another adult being included in the communication.

- b. In the case of Authorized Adults supervising minors overnight, Authorized Adults should not enter a minors' room, bathroom facility, or similar area without another adult in attendance, consistent with the policy of not having one-on-one contact with minors.
- c. Separate accommodations for adults and minors are required other than the minors' parents or guardians.
- d. Engage in abusive conduct of any kind toward, or in the presence of a minor.
- e. Strike, hit, administer corporal punishment to, or touch in an inappropriate or illegal manner any minor.
- f. Pick up minors from or drop off minors at their homes, other than the driver's child(ren), except as specifically authorized in writing by the minor's parent or legal guardian.
- g. Authorized Adults shall not provide alcohol or illegal drugs to any minor.
- h. Make sexual materials in any form available to minors participating in programs or activities covered by this Policy or assist them in any way gaining access to such materials.

Items 12a, 12b, and 12c, do not apply when there are High School students participating in pre-enrollment visitation, hosted by University student(s).

Item 12a does not apply to licensed psychologists/counselors or student interns providing psychological and counseling services to minors.

13. If an allegation of inappropriate conduct has been made against an Authorized Adult participating in a program s/he shall discontinue any further participation in programs and activities covered by this Policy until such allegation has been satisfactorily resolved.

#### FURTHER INFORMATION

For questions, additional detail, or to request changes to this policy, please contact the Director of Risk Services.