

Protection of Minors Student Organization Leader Information Packet 2016-2017

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Introduction:

Vanderbilt believes strongly in educating individuals on best practices for keeping minors safe. The Protection of Minors policy was created to standardize University practices and to establish expected codes of conduct when interacting with minors. **All undergraduate and graduate/professional students are now required to annually complete an educational module on protecting minors.** Vanderbilt students participating in a student organization, course, or other Vanderbilt activity that involves interactions with minors may also be required to undergo additional compliance measures, such as a background clearance, as discussed below. Resources and additional information about this policy and the requirements can be found on the [Vanderbilt Risk Management website](#).

At the beginning of the semester, student organization leaders will be notified about a Protection of Minors Student Leader Training. It is recommended that a leader from each returning organization that interacts with minors attend one of these trainings. For organizations newly working with minors or with new leadership not knowledgeable of Protection of Minors policy compliance, the training is required. The Protection of Minors policy will be thoroughly explained during this training, and handouts will be distributed.

As a student organization leader, you will be required to do the following:

1. Be knowledgeable of the Protection of Minors policy, and the rules for registering, tracking, and participating in an event that involves minors.
2. Distribute relevant Protection of Minors information to your organization members.
3. Ensure that **every member** of the organization's roster completes the Protection of Minors 101 module, or, if they completed the module last year, the Protection of Minors Annual Renewal module prior to any event with minors. Your POM Adviser can tell you which members of your organization are not in compliance. You may also have your members go to the following website to check their compliance date and print you a copy verifying a POM 101/Renewal date after July 1 of the current school year:
<https://webapp.mis.vanderbilt.edu/pomcc/index>.

*If you are a student organization that is required to complete a background check, all members of the roster must be in compliance with that requirement as well.

Compliance Requirements:

The Protection of Minors policy **applies** to events including, but not limited to: tutoring, mentoring, and special events involving minors (e.g., holiday parties, conferences, etc). The policy **does not apply** to concerts, performances, or speakers where minors will **ONLY** be part of the general audience. Minors are defined as people under the age of 18 who are **NOT** Vanderbilt students.

Student organizations that intend to interact with minors through their events are required to register in Anchor Link and specify that they will interact with minors during the registration process. There are two classifications of student organizations that interact with minors, Level 1 and Level 2, which are based on the type of supervision at the organization's events.

- **Level 1:** These organizations host **events with minors where the minors are supervised by a third party organization, or by the minors' parents or guardians.** Organizations with Level 1 events must complete the Protection of Minors 101 module.
- **Level 2:** These organizations host **events with minors where the minors are supervised by Vanderbilt students or personnel and there is no third-party organization or parental supervision.** Organizations with Level 2 events must complete the module, as well as background clearances. Organizations must be approved to participate in Level 2 activities by the Office of Student Accountability, Community Standards, and Academic Integrity.

If you are a Level 1 organization that registers a Level 2 event, your event will be canceled. If your group would like to discuss the possibility of becoming a Level 2 organization, please contact doscompliance@vanderbilt.edu. Please note that Level 2 groups are limited, and require additional compliance measures.

All of an organization's events that include interactions with minors must be registered in Anchor Link and have attendance tracked (see below for more details on the registration process), and all members on the organization's roster must be in compliance with the Protection of Minors policy two weeks prior to the first event with minors. This means all members on the organization's roster must have completed the relevant Protection of Minors module and, if required, background checks. If an event involving interaction with minors is registered in Anchor Link and the entire organization's roster has not completed the module and/or background check by two weeks prior to the event, the event and any reservations of event space will be **canceled**. If the organization wishes to reschedule the event, they must re-register the event in Anchor Link. It is important to keep your roster up-to-date, and only include active members. In addition, it is recommended that you contact your Protection of Minors adviser a minimum of **four weeks prior** to your event date to check your organization's compliance. Your adviser can provide you a list of organization members who still need to complete the required compliance measures.

Compliance with the Protection of Minors policy is important and required, and it will be monitored by the Office of Student Accountability, Community Standards, and Academic Integrity. Please be sure to abide by the instructions and procedures outlined in this packet in regards to registering and participating in events that include interaction with minors. Compliance will be tracked through an audit process, which will be completed throughout the year. If a student organization is found to be out of compliance with the Protection of Minors policy, disciplinary action may be taken.

Audit Process:

The Office of Student Accountability, Community Standards, and Academic Integrity in coordination with the Protection of Minors program and Office of Risk and Insurance Management will be in charge of the Protection of Minors audit process. At the end of each semester, ten percent of all events that include interaction with minors will be randomly reviewed. If, during the audit process, it is found that your organization was not in compliance with the Protection of Minors policy, yet you still participated in the event, disciplinary action may be taken. The critical things we will examine during the audit process will include:

- Date the event was registered in Anchor Link and date of the actual event
- Completion of the module and/or background check for all of the individuals on the organization's roster as of the event date
- Event attendance list based on card-swiped or uploaded attendance in Anchor Link
 - We will be checking to make sure that no one who was not on your roster at the time of the event attended the event
- List of minors who participated
- All forms (if necessary) were completed
 - Third party form (uploaded to Anchor Link event at least two weeks prior to event date)
 - Parent permission forms for every minor that participated (student org leader is responsible for keeping these records)

If you have any questions about the Protection of Minors policy, please contact doscompliance@vanderbilt.edu.

Registering Events with Minors:

Student organizations are required to register all events that fall under the Protection of Minors policy in Anchor Link. Events must be registered a **minimum of two weeks in advance**. It is recommended that they be registered earlier to ensure sufficient time for compliance requirements to be met. For events that are recurring/multi-date, it is only required that events be registered for a single instance. **A recurring event is one in which the same activity occurs on a daily, weekly, or biweekly basis involving the same population of students and minors.**

Please note that even if your event is initially approved in Anchor Link, it may still be canceled due to Protection of Minors non-compliance.

Steps for Registering Your Event:

- Go to your student organization's group on Anchor Link (*Note: Only officers with appropriate administrative access will be able to complete the event registration form.*)
- Provide the basic details for your event (ex. date/time, location, event description).
- On the 2nd page of the event form:
 - Indicate that your event will **"have non-VU attendees under the age of 18."**
 - Check all appropriate boxes for any special event needs you have—ex. VUPD/3rd party security, Traffic & Parking, Plant Operations.
- Complete the subsequent pages with the appropriate event details and information regarding the supervision of and interactions with minors at your event.
 - If minors will be supervised by a third party organization, you must upload a scanned copy of the **Third Party Compliance Agreement** to your event registration as well as e-mail a copy to protectionofminors@vanderbilt.edu. (*Note: A scanner is accessible in Sarratt 207.*)

Important Notes:

- If your event is not registered at least two weeks prior to the event date, it will be **denied** and any reservations for on-campus event space **will be canceled**.
- Even if your Anchor Link event is initially approved, if all members of your organization's roster do not complete all required compliance measures two weeks prior to the event, **your event will be canceled**.
- If requested, you must attend a Special Events Registration meeting to discuss event details. The Special Events Committee is comprised of representatives from Reservations and Events, Traffic and Parking, Vanderbilt University Police Department, Plant Operations, Wellness Programs and Alcohol Education, Protection of Minors, and the Office of the Dean of Students.
 - Events that may require attending a special events meeting include, but are not limited to, outdoor events, events that require security, parking, or plant ops, public events, runs/walks.
- If any event details change you must:
 - Edit and resubmit your Anchor Link event.
 - To make any updates, go to the event page, scroll down to the "Manage Events" section at the bottom and click "Change Details."
 - Communicate changes with your Event Manager through Reservations & Events.

Questions or Concerns:

- If you have any questions about how to appropriately complete the event registration forms, please contact doscompliance@vanderbilt.edu
- If you have any technical issues completing the event registration forms or you are concerned that your event has not been approved in a timely manner, please contact anchorlink@vanderbilt.edu
- If you have questions regarding any logistics for any on campus event booked through the Office of Reservations and Events or Virtual EMS or need to make any changes, please contact your Event Manager or reservations@vanderbilt.edu

Student Leader Checklist for Hosting Events That Involve Minors:

AT LEAST 4-8 WEEKS BEFORE EVENT:

- Notify your Adviser of the event/activity involving minors
- Make sure your organization's Anchor Link roster is up-to-date with all active members
- Register the event in Anchor Link (*required- must be registered at least two weeks in advance*)
 - Indicate your event will have non-VU attendees under the age of 18 on the second page
- Communicate with all members that completion of the Protection of Minors 101 module/Protection of Minors Annual Renewal module and (if applicable) the background check is required in order to participate in the event
 - Your organization members will receive an initial e-mail asking them to complete the Protection of Minors 101 or the Protection of Minors Annual Renewal module through the Learning Exchange (unless they have already completed it). Depending on the type of event, your organization members may also be contacted to complete a background check.
- Attend a meeting with the Special Events Committee (if requested).
 - If your organization is required to attend this meeting, you will be contacted after registering your event in Anchor Link
- Complete additional forms based upon who will have primary responsibility for supervising the minors at the event:
 - If minors will be supervised by a third party organization:**
 - Third Party Compliance Agreement forms must be completed and uploaded to the Anchor Link event, as well as sent to protectionofminors@vanderbilt.edu*
 - If minors will be supervised by Vanderbilt students (approved groups only):**
 - Parent/Guardian Agreement forms must be completed for all minors who will participate. The student organization is responsible for keeping these forms (they may be requested during an audit)*
 - If parents will supervise minors during the entire event:**
 - No additional forms are required*
- Complete an event plan and provide to parents or, if applicable, any third party organization you are working with or who is providing supervision for the event. Include:
 - Schedule of event activities
 - Logistics for drop-off/arrival, pick-up/departure, and parking if applicable
 - Access to first aid supplies for minor injuries
 - Process for communicating with participants if the event must be canceled last minute (ex. due to severe weather)
 - Contact information for event organizers
 - Other relevant event information for participants, parents, and/or third party

AT LEAST 3 WEEKS BEFORE EVENT:

- Be sure your event is registered in Anchor Link at least two weeks in advance. If two weeks' notice is not provided, the event will be canceled
- Follow up with your members to ensure everyone has completed the Protection of Minors module and (if applicable) the background check
 - You may reach out to your assigned POM Adviser to check and see if any of your student organization members have not completed the module yet
 - Completion of the Protection of Minors 101 module/Annual Renewal module and (if applicable) the background check will be checked two weeks prior to the event date. If **every member** of your student organization roster has not completed the module and (if applicable) the background check

yet, your event will be canceled. For this reason it is important to only include active members on your roster.

- Ensure all necessary forms have been completed (if applicable):
 - Third Party Compliance Agreement form for events where minors will be supervised by a third party organization
 - Upload to Anchor Link event and send to protectionofminors@vanderbilt.edu
 - Parent/Guardian Agreement forms for events where students will provide primary supervision to the minors and parents will not be present
- Assess the number of minors planning to participate and make plans to ensure that the following guidelines and ratio requirements are fulfilled. *The term "adult" used below is defined as a Vanderbilt student or supervising third party staff member.*
 - Minors should never be alone with students or staff.
 - Activities should be visible to others
 - Adult: Minor Ratio requirements
 - Age 5 and under: 1:6Ages 6-8: 1:8
 - Ages 9-14: 1:10
 - Ages 15-17: 1:12
 - If you have any concerns about your organization or an outside group meeting these ratios, please contact protectionofminors@vanderbilt.edu.

ONE WEEK BEFORE:

- Create a list of participant emergency contacts from Parent/Guardian Agreement forms (if applicable)
- Make or purchase name tags for all participants and members
- Communicate any logistical changes to your Event Manager through Reservations and Events

DAY OF:

- Track attendance for all Vanderbilt participants in Anchor Link
 - Ensure no student participates who did not complete the module and/or background check
- Make sure the following items are on hand/set up at the event:
 - List of participants and emergency contacts
 - First-aid supplies/station
 - Name tags
 - List of Important Contacts Including:
 - Student Centers Front Desk: 615-322-2425
 - May be able to assist with issues related to your event space
 - VUPD Emergency: 615-421-1911; VUPD Non-emergency: (615) 322-2745
 - If abuse or inappropriate behavior is suspected or occurs, contact VUPD
 - Department of Child Services (DCS)
 - TN requires reporting of suspected child abuse: DCS 877-237-0004
 - Office of Risk and Insurance Management
 - Internal reporting for concerns of child maltreatment and abuse and/or disclosures of abuse (615) 936-5935.

Appendix A:

Third Party Compliance Agreement



Vanderbilt University Protection of Minors Agreement for Service Between Third Party Groups and Registered Student Organizations

TO BE COMPLETED BY VU STUDENT ORGANIZATION OFFICER

Submit this form to protectionofminors@vanderbilt.edu and attach the completed form to the Anchor Link registered event no later than two weeks prior to the start of the event to avoid event cancellation. (Provide this entire 3 page form to the third party after you have completed the top information):

____ This event is OFF campus ____ This event is ON Campus

Interaction with the minors participating in this event will be under the supervision of the third party.

Vanderbilt Student Organization Participating in this Event:			
Vanderbilt Point of Contact Name and Email:			
Event Start Date	End Date	VU Phone Contact:	
Brief Name and Description of activity/event:			Location:
Estimated Number of Minors		Ages of Minors	
Third Party Group/ Organization Name:			

TO BE COMPLETED BY THE THIRD PARTY COORDINATOR

Vanderbilt highly values and encourages service by our student organizations. As part of that philosophy, Vanderbilt also believes that service with children under 18 years of age (minors) carries additional responsibilities for both our students and our community partners. As a condition of the service activity with the above student group and your organization which serves minors, we ask you review the attached excerpt from our Protection of Minors policy, indicate your understanding and agreement to the items below, and provide your signature.

I certify that ALL personnel attending this event from my organization have:	
<input type="checkbox"/> Completed a cleared criminal background check in the prior four years , and have received training on child abuse prevention and mandatory reporting.	
<input type="checkbox"/> Been informed of/provided the attached excerpt related to Vanderbilt’s Protection of Minors policy and guidelines and agree to abide by all mandatory reporting procedures and the VU Codes of Conduct for interacting with minors (attached). Full policy language can be found here .	
And:	
<input type="checkbox"/> My organization will provide continuous supervision to the participating minors during the event/activity. Vanderbilt students will not be expected or asked to supervise the participating minors.	
<input type="checkbox"/> On campus events: events on campus will require a minimum adult: child ratio and my organization will meet the ratios provided in the attached document (where applicable).	
Printed Name of Third Party Coordinator	Phone Contact
Signature	Date Signed

Vanderbilt Protection of Minors Provision

(The following pages must be read by and provided to all third party event personnel who will be supervising minors – page 1 of 2):

Vanderbilt University personnel adhere to Tennessee state law on mandatory child abuse reporting to either the appropriate law enforcement agency or the state hotline operated by the Department of Children's Service. In addition to external reporting, Vanderbilt has a mandatory internal child abuse reporting procedure. If you have reason to believe abuse or inappropriate behavior has occurred concerning a minor on campus or participating in a Vanderbilt University program, please consult the program director, event host, or Risk Management (615-322-5155), or report via the Vanderbilt hotline at (844-814-5935). The Tennessee Child Abuse reporting hotline number is 877-237-0004.

Mandatory Reporting of Child Abuse:

Recommended Guidelines for Reporting:

Tennessee Law on mandatory reporting of child abuse and neglect (TCA 37-1-403) states, "**Any person** who has knowledge of or is called upon to render aid to any child who is suffering from or has sustained any wound, injury, disability, or physical or mental condition shall report such harm immediately if the harm is of such a nature as to reasonably indicate that it has been caused by brutality, abuse, or neglect or that, on the basis of available information, reasonably appears to have been caused by brutality, abuse, or neglect."

Selection from VANDERBILT PROTECTION OF MINORS POLICY (Section IV)

Every member of the University community (not limited to individuals who interact with minors) is required by law to report known or suspected instances of the abuse of, neglect of or inappropriate interactions with minors. Members making a report in good faith will be protected from criminal and civil liability for making the report. It is important to understand that every member is required to report any type of suspected abuse, neglect or inadequate care rather than just child sexual abuse.

Two reports, one external and one internal, must be made:

External Report: Tennessee law requires every person to make a report when they suspect sexual or physical abuse or neglect of a minor. Failure to report is a Class A misdemeanor. The required report may be made to the State of Tennessee Child Abuse Hotline at 1-877-237-0004, online at <https://apps.tn.gov/carat/>, to a Tennessee sheriff's office or police department, including VUPD at 615-322-2745. If the situation is a life threatening emergency, contact 911.

Internal Report: Every member of the University community has a further obligation to report known or suspected abuse or neglect of a Minor on campus or in a Vanderbilt program immediately to Vanderbilt University. The preferred method is to immediately contact the Director of Minors Programs in the Office of Risk Management and Insurance at 615-322-5155. Alternatively, known or suspected abuse or neglect of a Minor on campus or in a Vanderbilt program shall be reported to the University hotline at 844-814-5935 or website at www.vanderbiltcompliancehotline.ethicspoint.com.

(The following pages must be read by and provided to third party event personnel who will be supervising minors – page 2 of 2):

Policy Excerpt - VU Code of Conduct for Interacting with Minors

You are required by Tennessee law and Vanderbilt University policy to report actual or suspected abuse or other improper conduct involving a Minor. You also are also required to comply with the following code of conduct when interacting with Minors.

- Do not spend time alone, either on or off campus, with a Minor away from others. If one-on-one interaction is required, meet in open, well lit rooms or spaces with windows observable by other adults from the Program.
- Do not engage in any sexual actions, make sexual comments, tell sexual jokes, or share or view sexually explicit material with or within the vicinity of Minors.
- Do not touch Minors in a manner that a reasonable person could interpret as inappropriate.
- Do not shower, bathe, or undress with or in the presence of a Minor.
- Do not engage in any abusive conduct of any kind toward, or in the presence of, a Minor, including but not limited to verbal abuse, hitting, punching, poking, or restraining, except as required to protect a Minor or others from harm. All incidents involving such conduct, whether or not required to protect a Minor or others from harm, must be documented and disclosed promptly to the Program Director and the Minor’s parent/guardian.
- Be aware of the impact of your words and language on Minors.
- Do not use, possess, or be under the influence of alcohol or illegal drugs while on duty or when responsible for a Minor’s welfare.
- Do not meet with Minors outside of established times for Program activities. Any exceptions require parental authorization and must include more than one adult from the Program.
- Do not engage or converse with Minors through email, text messages, social networking websites, or other forms of social media at any time except and unless there is an educational or programmatic purpose and the content of the communications is consistent with the mission of the Program and the university.
- When transporting Minors in a Program, more than one adult from the Program must be present in the vehicle, except when multiple Minors will be in the vehicle at all times through the transportation. Avoid using personal vehicles if possible.
- Do not tell children “this is just between the two of us” or use similar language that encourages Minors to keep secrets from their parent/guardians.

“Take-aways” to remember when working with minors – Protect, Observe, Manage, Report:

- ☉ Rule of three (at minimum); two deep adult leadership
- ☉ If you see something, say something – Risk Management 615-322-5155 or VU Hotline 1-844-814-5935
- ☉ TN is a mandatory child abuse reporting state: 877-237-0004
- ☉ Know and understand how to keep healthy boundaries, minimize opportunity for abuse
- ☉ Group communication always – no one-to-one

Vanderbilt Minimum Allowable Ratios for Programs with Minor Participants (ACA Recommendations)

Age	Day Event/Camp Ratio	Overnight Ratio
5 years and younger	1 Adult : 6 Minors	1:5
6-8 years	1:8	1:6
9-14 years	1:10	1:8
15-18 years	1:12	1:10

Questions about this form? Need Additional Resources? Contact Vanderbilt Office of Risk and Insurance Management, Protection of Minors at 615-322-5155 or protectionofminors@vanderbilt.edu.

Appendix B:

Parent/Guardian Agreement

**Vanderbilt University Registered Student Organization
Participation Agreement for Minors Under 18 Years of Age**

Name of Participating Minor and Activity	
<p>I, (Print Name of Minor's Parent or Legal Guardian) _____ state that (Print Minor's Legal Name) _____ (hereafter referred to as "the minor") hereby consent to his/her attendance and participation in _____, (insert name of Program/Activity) at Vanderbilt University, occurring on/between _____ and _____ (insert program dates).</p>	
Permission to Participate and General Release	
<p>In exchange for allowing the minor to participate in this event or program, the minor by and through the undersigned, agrees to release from liability, indemnify, and hold harmless the Vanderbilt University, its trustees, employees, agents, volunteers, and/or assigns from any and all claims, demands, losses, expenses, actions or causes of action to the minor's person or damage to the minor's property which arises out of or occurs during or as a consequence of the minor's participation in the event or program, whether or not such injury or damage may have been caused, in whole or in part, by any negligence or want or care on the part of the Vanderbilt University, its trustees, employees, agents, volunteers, and/or assigns.</p>	
Emergency Treatment Authorization	
<p>I authorize the Vanderbilt University to provide routine first aid in case of illness or injury. If a parent or guardian cannot be reached, I give my permission for Vanderbilt University to authorize emergency treatment for my child. I acknowledge that any medical treatment will be my financial responsibility and not that of Vanderbilt University. I also hereby affirm that I have health insurance coverage for my minor child.</p>	
Emergency Contact	
Emergency Contact Name:	Relationship:
Emergency Contact Phone (1)	Phone (2)
Photo/Image Release	
<p>I grant permission for photos/images of the minor to be used Vanderbilt University in any Vanderbilt University publications and any other way the University deems necessary and appropriate to promote its activities and mission.</p>	
Acknowledgement	
<p>I, the undersigned, state that I am the parent/legal guardian of the minor whose name appears above. I understand that the above terms and conditions apply to said minor and to myself. I further understand that that said minor cannot participate under ANY circumstances in the above specified event or program without parental consent and that the minor will not be allowed to participate without entering into this agreement. This document is binding upon myself, the said minor, and any person suing on behalf of said minor.</p>	
Parent's/Guardian's Printed Name and Signature (if under 18)	
PRINT	Date
<p>Vanderbilt Protection of Minors Provision: Vanderbilt University personnel adhere to Tennessee state law on mandatory child abuse. In addition to external reporting, Vanderbilt has a mandatory internal child abuse reporting procedure. If you have reason to believe abuse or inappropriate behavior has occurred concerning a minor participating in a Vanderbilt University program, please consult the program director, or Risk Management (615-322-5155), or report via the Vanderbilt hotline at 844-814-5935. The Tennessee Child Abuse reporting hotline number is 877-237-0004.</p>	