

UNIVERSITY OF GEORGIA

POLICY FOR PROGRAMS AND ACTIVITIES SERVING MINORS

The University of Georgia is committed to providing a safe and healthy environment for all who participate in programs and activities on campus or otherwise affiliated with the University. There are a variety of opportunities available for minor children, including academic camps, athletic camps, clinics, research, after-school programs, work or activities under the supervision of an individual faculty member, enrichment classes, and other activities. These programs and activities are integral to the University's mission as a land-grant and sea-grant institution and provide a benefit to both the University and the larger community. This Policy recognizes the special duty of care and supervision when working with minors and sets forth operational requirements to enhance the protection of minors.

I. Definitions

Mandatory Reporter: Any person who is required by Georgia law (O.C.G.A. §19-7-5) to report suspected child abuse to the appropriate authorities. Mandatory Reporters include but are not limited to faculty/teachers, administrators, counselors, social workers, psychologists, law enforcement personnel, and other persons who participate in providing care, treatment, education, training, supervision, coaching, counseling, recreational programs, or shelter to Minors.

Minor: Any person under 18 years of age (O.C.G.A. §39-1-1).

Program/Activity: Any academic, admissions, athletic, educational, research, service, leadership, or recreational program serving one or more Minors, including, but not limited to, camps, clinics, conferences, workshops, tutoring, mentoring, group lessons, seminars, competitions, internships or experiential learning, conducting or viewing research, pre-enrollment visits, after-school programs, or other enrichment opportunities.

Program/Activity Administrator: Any individual who has primary and direct operational responsibility for the overall content and execution of a Program/Activity and who serves as the primary point of contact.

Program/Activity Staff: Individuals, whether paid, volunteer, or for academic credit, who have care, custody, control, and/or direct contact or interaction with Minors involved in Programs/Activities. This includes, but is not limited to, University administrators, faculty, staff, students, volunteers, and third parties when operating a Program/Activity.

Third Party: An individual, organization, or entity external to the University, to which the University allows use of its facilities to operate a Program/Activity.

Sponsoring Unit: Any department or unit of the University that offers a Program/Activity.

University Facility: A building, structure, classroom, research or teaching laboratory, outdoor area, grounds, or athletic venue owned, leased, or controlled by the University, or used in connection with any Program/Activity.

II. Applicability

This Policy applies broadly to all Programs/Activities serving one or more Minors, including those:

- (1) Offered by departments or units of the University at a University Facility or sponsored by the University at other locations;
- (2) Offered by the University's registered student organizations at a University Facility or sponsored by University registered student organizations at other locations; or
- (3) Offered by Third Parties utilizing a University Facility.

This Policy does not apply to:

- (1) Programs/Activities for Minors enrolled in undergraduate or graduate academic coursework;
- (2) Events or visits to campus where Minors are supervised by their parent/guardian;
- (3) Events at the University that are open to the general public or invited guests where parents/guardians are expected to provide supervision of Minors;
- (4) Minor employees; and
- (5) University of Georgia employees or students hosting family members, friends, or other guests.

This Policy shall supplement, not replace, any existing safety and security measures, policies, or codes of conduct currently in place or hereinafter enacted.

III. Requirements

This Policy provides minimum operational requirements for Programs/Activities involving Minors. Recognizing that all Programs/Activities are unique as to subject matter and risk, each Program/Activity Administrator, Sponsoring Unit, or Third Party must evaluate the nature of the Program/Activity and take appropriate actions to ensure the safety and security of all individuals involved and to ensure compliance with all applicable laws, regulations, and policies.

(A) Review and Approval

The following considerations should be addressed by the Program/Activity Administrator in advance of the Program/Activity:

- (1) Alignment of the Program/Activity with the University's mission;
- (2) Appropriate subject matter and fully planned activity itinerary;
- (3) Appropriate staffing and supervision ratios, with special regard to avoiding one-on-one contact between Minors and Program/Activity Staff;
- (4) Program/Activity Staff Code of Conduct and guidelines;
- (5) Appropriate training for Program/Activity Staff;
- (6) Minor Code of Conduct, Applicable Forms, Waivers, and any supplemental Program/Activity guidelines;

- (7) Program/Activity orientation and information for Minors and parents;
- (8) For Minors working in University laboratories, follow the UGA Policy on Minors (not Acting as Students/Employees) in Research Laboratories, Clinics, and Animal Facilities;
- (9) Transportation arrangements;
- (10) Housing arrangements with special consideration for overnight Programs/Activities;
- (11) Contracts for Auxiliary Services and Food Services;
- (12) Safety and security planning including, but not limited to:
 - a. Basic first aid;
 - b. Emergency response and notification plans;
 - c. Reporting protocols for injury and/or illness; and
 - d. Inclement weather plans;
- (13) Response protocols for accusations of misconduct;
- (14) Insurance;
- (15) Any licensing or exemption required by a government agency; and
- (16) Record retention policies.

All University Programs/Activities must be approved by the Sponsoring Unit's Dean, Director, Vice-President, or Department Head, as applicable. Programs/Activities operated by Third Parties must certify compliance with this Policy to receive approval for facility use.

(B) Program/Activity Registration

After review and approval, the Program/Activity must be registered. To register a Program/Activity, visit: programsforminors.uga.edu.

Programs/Activities must be registered within sufficient time to meet the requirements of this Policy, which is normally not less than 60 days before the Program/Activity's start date. Programs/Activities must be registered annually.

(C) Background Investigation and Screening

All University Program/Activity Staff who have direct contact with Minors are required to undergo a criminal background check (including sex offender registry check) in accordance with the Human Resources Administrative Practice Manual ([HRAP](#)). Program/Activity Administrators must also ensure that University employees who have direct contact with minors and who were hired prior to implementation of the Background Investigation Policy undergo a background investigation prior to working with minors.

Third Parties must certify that all Program/Activity Staff have undergone background checks, which would, at a minimum, satisfy the HRAP requirements. Program/Activity Administrators must be in receipt of background check clearance on all Program/Activity Staff prior to involvement.

Program/Activity Staff must self-report any arrest, charge, or criminal conviction occurring after the date of the background check to their Program/Activity Administrator, prior to returning to a Program/Activity. Additionally, all University employees are subject to the [University's Arrest and Conviction Policy](#) and must complete an Arrest and Conviction Self-Disclosure Form.

Depending on the nature of the Program/Activity, additional screening of Program/Activity Staff beyond background checks may be advisable, including in-person interviews and/or reference checks.

(D) Training

All Program/Activity Staff must be trained on their responsibilities or issues related to Minor health, safety, and security. Training documentation and certifications should be maintained by the Program/Activity Administrator. Required training should at a minimum be completed every two years.

All Program/Activity Staff and all Program/Activity Approving Officials must receive training on the following:

- (1) Mandatory Reporting obligations, including child abuse awareness and prevention; and
- (2) The University's Non-Discrimination and Anti-Harassment Policy and the Board of Regents Sexual Misconduct Policy.
- (3) Code of Conduct for Program/Activity Staff

Additionally, training appropriate to the specific Program/Activity as developed by the Program/Activity Administrator must be also provided on the following:

- (1) Code of Conduct for Minor participants;
- (2) Reporting requirements during the Program/Activity, processes, and contacts;
- (3) Disability accommodations and review and evaluation of special requests;
- (4) Safety and security protocols;
- (5) First aid guidelines and medication management; and
- (6) Activities, risks, and responsibilities of the Program/Activity, as applicable.

(E) Records Retention

All records should be retained in accordance with Board of Regents policies on record retention. Copies of all required forms and documentation pertaining to Minors should be retained for a period of three (3) years after the Minor reaches the age of eighteen (18). Records pertaining to Program/Activity Staff should be retained for five (5) years.

IV. Conduct

The University requires the highest standards of conduct when interacting with Minors, including compliance with all applicable laws, regulations, and policies.

- (A) **Code of Conduct:** All Minor participants and Program/Activity Staff must agree to abide by the applicable Code of Conduct, as well as any supplemental Program/Activity guidelines developed by the Program/Activity Administrator.
- (B) **Requirements for Minor participants:** Parents/guardians must submit required forms before Minors will be allowed to participate in Programs/Activities. These forms may include, but are not limited to, a participation agreement form, authorization to administer medication, pick-up authorization, medical information and authorization, release of claims/waiver of liability, media/photo/video release, and Minor participant's Code of Conduct.

V. Third Party Use of a University Facility

In order to utilize University Facilities for Programs/Activities, Third Parties must execute a Facilities Use Agreement. Use for a Program/Activity requires compliance with this Policy, including certifying criminal background checks and ensuring proper training for all Program/Activity Staff. Please contact the Office of Real Estate in the Office of Finance and Administration for an approved Facility Use Agreement.

VI. Reporting

- (A) **Injury:** In order to maintain a safe environment for all students, faculty, staff, and visitors, it is important that the University be informed, at the earliest possible date, of any injuries that occur at a University Facility or to faculty and staff in the course of their work responsibilities. Please report all injuries via the [online reporting form](#) through Finance and Administration.
- (B) **Child Abuse/Mandatory Reporters:** Any Program/Activity Staff or other Mandatory Reporter who has reasonable cause to believe that suspected child abuse has occurred, shall immediately report the suspected abuse to the UGA Police Department and the appropriate supervisor or Program/Activity Administrator who shall take immediate action. All University employees must appropriately report suspected child abuse. Do not attempt to investigate a matter further or gather additional information before reporting.

If you suspect child abuse, or simply have an idea or uneasy feeling about a possible abuse situation, immediately report the situation to **ALL** of the following:

- (1) The UGA Police Department at 706-542-2200 or 911(emergency);
- (2) The Program/Activity Administrator, Supervisor, or other responsible University Official; **AND**
- (3) The Georgia Division of Family and Children Services at 1-855-GACHILD.

A Mandatory Reporter must ensure that the Division of Family and Children Services is notified of the suspected abuse immediately and in no case later than 24 hours after the Program/Activity Staff (or other reporter) first had reasonable cause to suspect the abuse.

By doing so, you are not necessarily making an accusation; you are merely reporting facts for trained professionals to evaluate and investigate.

For more information on Mandatory Reporting of Child Abuse, see <https://legal.uga.edu/guidance/mandatory-reporting-child-abuse>.

VII. Accountability

- (A) Site Visits:** The Director of Compliance will conduct random site visits of Programs/Activities to ensure compliance with the Policy and to encourage use of best practices when dealing with minors. Following the visit, the Director of Compliance will provide feedback to programs on areas of recommended improvement.
- (B) Violations and Sanctions:** Violators of this Policy will be held accountable for their actions under the Program/Activity's Code of Conduct, University policy, and applicable law. Sanctions for violations may include, but are not limited to, suspension of University funding, non-renewal or termination of the Program/Activity, suspension, dismissal, or termination of University employment or Program/Activity Staff status, or removal or barring from University Facilities.
- (C) University Funding:** University Programs/Activities that are not approved and registered pursuant to this Policy will not be eligible for payment, repayment, or reimbursement by University Business & Accounting Services.

VIII. Policy Implementation

This Policy is adopted in accordance with Board of Regents Policy 12.9, Programs Serving Minors.

IX. Policy Responsibility

Responsible University Senior Administrator: Vice President for Public Service and Outreach

Responsible University Administrator: Director, Georgia Center for Continuing Education & Hotel

Policy Owner: Director of Compliance, Programs and Activities Serving Minors

Policy Contact: programsforminors@uga.edu

Phone Number: 706-542-7255

The Director of Compliance will enhance compliance with the Policy by Program Administrators and Approving Officials; create additional training and engagement opportunities relating to the Policy; institute record retention systems for documenting compliance; improve the online registration and approval process; assess departmental/program compliance; and ensure that the University is engaging in best practices when dealing with minors.

Because the protection of Minors is a University-wide concern, a key group of administrators will be charged by the President to serve on a committee to review and address issues arising under this Policy. The committee will consist of four to six administrators selected from the following units: Academic Affairs, Athletics, Human Resources, Public Service and Outreach, Student Affairs, and 4-H.

The committee is empowered to take steps necessary to promote the safety of Minors while at the University and for University Programs/Activities held elsewhere, including:

- a) Recommending changes to this Policy;
- b) Recommending appropriate actions for Program/Activity Administrators, Departments, and Units in accordance with applicable University policies and procedures;
- c) Initiating enforcement actions against an individual or Program/Activity; and
- d) Any other action reasonably required in furtherance of this Policy.

X. Forms and Resources

Sample Forms, Program/Activity Checklists, and additional resources are available at programsforminors.uga.edu.

Policy History

Adopted by University Cabinet April 26, 2017

Amended: February 10, 2021

Resources

- Auxiliary Services: <https://auxiliary.uga.edu/>
- Campus Safety and Security Policies
 - Environmental Health and Safety: <https://esd.uga.edu/>
 - Office of Emergency Preparedness:
<http://www.policies.uga.edu/FA/nodes/view/1269/Office-of-Emergency-Preparedness>
 - Campus Police
 - Contacting the University of Georgia Police Department:
<http://www.policies.uga.edu/FA/nodes/view/1267/UGA-Police-Contact-Procedures>
 - Clery Act and Timely Warning Procedures for Campus Emergencies and Crime Concerns:
<http://www.policies.uga.edu/FA/nodes/view/1268/University-of-Georgia-Campus-Notification-for-Emer>
 - Weapons Prohibited on Campus:
<http://www.policies.uga.edu/FA/nodes/view/1263/Weapons-Prohibited-on-Campus>
 - Request for Event Security:
<http://www.policies.uga.edu/FA/nodes/view/1266/UGA-Police-Request-for-Event-Security-Procedure>
- Campus Reservations: <http://reservations.uga.edu/reserve/index.html>
- Campus Solicitation Policy: <http://www.policies.uga.edu/FA/nodes/view/772/Solicitation>
- Injury Reporting Guide: <http://hrdocs.uga.edu/injury-reporting-guide.pdf>
- Injury Reporting Login: https://busfin1.busfin.uga.edu/hr/injury_report_login.cfm
- Mandatory Reporting Requirements:
http://legal.uga.edu/pdfs/Child_Abuse_Reporting_Requirements.pdf
- Non-Discrimination and Anti-Harassment Policy: <https://eoo.uga.edu/policies/non-discrimination-anti-harassment-policy>
- Office of Legal Affairs: <http://legal.uga.edu/>
- Board of Regents Sexual Misconduct Policy:
<http://www.usg.edu/policymanual/section4/C327/>
- Board of Regents Records Retention Policy:
http://www.usg.edu/records_management/schedules/
- University Housing: <https://housing.uga.edu/>