



Programs Serving Non-Student Minors on Campus

GEORGIA STATE UNIVERSITY

INSURANCE AND RISK MANAGEMENT & OFFICE OF LEGAL AFFAIRS

Training Agenda

Background/Policy

Program Registration & Requirements

- Sponsored Programs
- Online-Only Programs
- Minors in Labs
- Screening and Background Investigations
- Training Program staff (today, we are training the trainers)

Hosted Programs

Other compliance issues

Implementation Forms



Programs Serving Non-Student Minors Policy

- **USG BOR Policy 12.9 “Programs Serving Minors”:** directs all USG schools to develop Policy
- GSU passes Policy Effective 1/1/2017
- Implementation Date 5/1/2017
- Addresses operational standards when the University sponsors activities for non-student minors (“Sponsored Program”) or allows third parties to host activities using our facilities (“Hosted Program”)
- Policy applies to academic camps, athletic camps, after-school programs, workshops, conferences, licensed child-care facilities, programs w/ care and custody of non-student minors sponsored or hosted by University
- WE HAVE BEEN TOLD BY USG TO EXPECT AN AUDIT THIS YEAR OR NEXT YEAR



How to Get Started

- Pre-Planning
- Is Program GSU-Hosted or 3rd Party?
- Code of Conduct
- Background Checks
- Registration
- Program Checklist
- Facilities Use Agreement (if applicable)



Pre-Planning

- Each program has a designated program director
- Safety & Security planning
 - Background checks on volunteers, staff and student workers
 - GSU code of conduct must be reviewed and signed by all program participants
 - Appropriate participant-to-staff ratio provided (consideration of age & activity)
 - Guest visitation protocols in place
 - Check-in & check-out procedures in place
 - Inclement weather protocols in place
 - Established protocol for injury or illness
 - Protocol for reporting and responding to participant, staff or volunteer misconduct (including mandatory reporting)
 - Emergency notification procedures in place
 - Inspection of facilities to be used



Pre-Planning

- Appropriate Forms & Waivers
 - Participation Agreement and Waiver
 - Parental consent form
 - Medical information & release
 - Sports physical, as appropriate
 - Authorization to administer medications
 - Over the counter medication
 - Self-administration of prescription medication
 - Media release
 - Pick-up authorization
 - Health insurance information has been obtained



Pre-Planning

- Facility Usage, Insurance & 3rd Parties
 - Facilities have been reserved and there are no scheduling conflicts
 - Appropriate forms completed including Facility Use Agreement, including sign off Amar Agha in Legal
 - Certifications from 3rd party camps that items on checklist are being done
 - Appropriate insurance obtained for 3rd party sponsored camps
 - General liability
 - Other insurance as appropriate
- Transportation
 - Transportation needs have been identified
 - Authorized vehicles and drivers have been arranged
 - Pickup Authorization

Program Employment

- Institution employees educated on proper use of leave
- Structured volunteer program registration



Program Director Responsibilities

- Program Registration
- Screening and Background Investigation
- Ensure all Staff are Trained!
 - Mandatory Reporting: [ProSolutions](#)
 - Staff Code of Conduct: signed forms
 - Relevant Policies
 - Responsibilities and Expectations
 - Safety and Security Procedures
- **Documentation of Training (certificates, training materials, attendance lists, etc.) must be kept on file by all Program Directors**



Program Director Responsibilities

Ensure Minimum Program Requirements Are Established and Documented

- Qualifications of personnel leading and supervising the program;
- Screening and background checks of staff and volunteers;
- Supervision ratios;
- Safety and security planning;
- Response protocols for injury, illness, participant misconduct, and staff misconduct;
- Transportation needs, if any;
- Housing needs, if any;
- Participation requirement forms; and
- Licensing requirements of other government agencies.




Program Registration

- Office of Insurance and Risk Management maintains the program registry
- 2 steps
 - Initial information- submit basic info about your program
 - Check items off checklist as you go; you must complete checklist before program begins, including all background checks!
- It is ok to register first and complete the checklist as you make progress towards meeting requirements.
- Information about programs may be requested by USG or DECAL
- Add staff info as available
- **IMPORTANT: by completion of the checklist, you are certifying that your program is in compliance with all requirements!**



Registration System Demo

<https://risk.gsu.edu/minors-on-campus>



Minors on Campus Event Registrations

admin

Is this an Athletics program?

Will minors enter a laboratory or vivarium?

3

Who is supervising the minors?

List

Form

Who is supervising the minors?

GSU

Both GSU and Non-GSU Group

Minors Parents/Guardians

Non-GSU Group

Previous



Screening and Background Investigations

– new and improved

- IRM will request background checks via Accurate (HR vendor)
- PDs should inform program staff know they will get an email from background check company
- All Volunteers (non GSU and GSU non-employee students) must fill out Volunteer Registration Form.
- Fees



Screening and Background Investigations

- All 3rd party staff and volunteers (including GSU students) must have satisfactory completed background checks prior to camp start date
- For GSU hosted programs, **all GSU staff and volunteers must have completed a background check within the past 12 months.**
- **Please allow 3 weeks (15 business days) for completion of the background check.**
- **Staff or volunteers without completed background checks WILL NOT be allowed to participate in the camp.**
- Background checks now within the registration system
- Personnel in charge of screening volunteers need to be aware of the limitations of background checks and seek to utilize other screening methods, when possible, to include in-person interviews and reference checks.



Training Program Staff

- Mandatory Reporting of Child Maltreatment
- Code of Conduct
- Incident Reporting
- Health, Safety & Security Planning



Mandatory Reporter Training

- Mandatory Reporter Training (Recognizing & Reporting Suspected Child Abuse) is online.
- Link be found at risk.gsu.edu/minors-on-campus : [ProSolutions](#)
- Annual training is mandatory for all staff of University Sponsored Programs.
- Program director (or designee) must keep certificates for 3 years after staff member leaves the program.



Mandatory Reporter Training



- You and your program staff are mandatory reporters.
- Under Georgia law, includes nearly all individuals who work with children/minors.



Role of the Mandatory Reporter

- Required to make a report if you have reasonable cause to believe that a child known to you in your professional capacity is being abused or neglected.
- Program Staff must report to Program Director immediately.
- Program Directors then call 1-855-GA-CHILD (422-2253) immediately to make a report (law requires report within 24 hours).
- Program Directors then inform Insurance and Risk Management.



Role of the Mandatory Reporter:

Training is key to avoiding breakdowns in communication

- Staff see behavior that is risky but do not recognize it as such.
- Staff see risky behavior but do not know who to tell.
- Staff see risky behavior; leadership is informed but appropriate action is not taken.

*** Warning signs must be addressed*



Code of Conduct

- All Program Staff must review and sign at the beginning of their involvement with the program.
- Program director (or designee) keeps certificates for 3 years after staff member leaves the program.
- Specific provisions for certain camps (e.g., cybersecurity, lab safety)



Staff behavior – Social Media

- Staff members are **not allowed to friend/follow/interact with students** or event participants on Facebook, other social communication sites, or direct communication (text, email, etc.) while employed by the program, other than on the official GSU pages and sites.
- Do not share or send photos or videos of our students or other event participants to others.
- You should never post photos of a camper to any social media site or sharing app (including Snapchat). If you want to share a photo of you with a camper, this should be limited to the scope of parental consent.
- Use of any images of campers via GSU sites, apps, handles, etc. is subject to both parental consent to such use and approval via GSU Public Relations and Marketing Communications.
- Do not use names of students or parents on any personal social media site or app or refer to them in any way that could lead to their identification.



Participant Mental Health

- Know the Risk Factors and Warning Signs
- Have a response plan in place
- PDs should access USG's Youth Mental Health First Aid training:
<https://www.usg.edu/mentalhealth/>
- Georgia Crisis and Access Line (GCAL) 1-800-715-4225 (24/7/365)
- Crisis and access line 741741 (text)



Safety & Security Planning

- Review the GSU Emergency Operations Plan and know the protocol
- **Fred Hammett** will speak to plans for active shooter and how to train staff
- Have plans in place for illness (e.g., covid among staff or participants), injury, inclement weather, missing child, unauthorized/no pickup, other possibilities, and train staff on them.
- Once medical forms are reviewed, revise planning/training as needed (e.g., camper asthma, allergies).
- Incident reports should be sent to Program Director, then to Insurance & Risk Management.
- First aid, know who has CPR certification.
- Maintain and post a sheet w/ AED locations
- If Minors will be in labs, that policy also applies.



Compliance requirements to be aware of....
contact Office of Legal Affairs with questions that come up

- ADA
- Allergies, Medications
- Title IX (e.g., pregnancy)
- Other discrimination
- Data Privacy
- Open Records Act



Overnight camps

- **If staying on campus, the camp must have a FUA which includes verification of background checks**
- **Need Certificate of Insurance**
- **Checklists need to be completed**
- If rooming minors two or more to a room, they should be housed by age. Generally house minors the same age or within a year or two in age of each other. This will mitigate potential issues of inappropriate behavior based on larger age differences and should help protect against bullying.
- Residential staff should be housed in separate rooms but interspersed around the minors' rooms. This will allow staff to be close enough to resolve issues and be readily available to minors as needed. Ensure staffing ratios are appropriate based on ages of the minors.
- Programs should have well defined and explained rules for minors in the residential component of the program including: common areas that minors can use, off limit floors for males and females, and curfew times for being in rooms and lights out. Minors should be aware of consequences if they are found in off limits areas or leave the dormitory without permission or supervision.
- Overnight hours are the only times typically when minors are alone with other minor participants without staff supervision. Staff need to be aware of the potential for inappropriate behavior at these times, including misconduct, bullying, and cyberbullying.



Online-Only Programs

- Although the policy references minors being physically on campus, most requirements apply to online programs also:
 - Registration
 - Mandatory reporter
 - Background checks
 - GSU Social Media Guidance
- USG memo from June 1, 2020, says that system requirements also apply to online programs.



Minors in Labs

- Additional Required Approvals from Research before Program Registration can be completed
- Registration Demo



Hosted Programs

- Policy
- Facilities Use Agreement
- Registration Demo
- Exceptions: how issued



Hosted Programs: Are you collaborating with an outside organization? Who is supervising?

- Enter into a Facility Use Agreement or License Agreement
- Requirements for screening & background investigations, training, minimum insurance requirements.
- Agreements must be submitted to the Office of Legal Affairs for approval
- Program registration with Insurance and Risk Management;
- Program confirms requirements in place



Hosted Programs: Facilities Use Agreements (FUA) include Minors on Campus Requirements

By signing the FUA, Hosted Programs agree to be responsible for:

- Background checks of their staff/volunteers
- Training their staff on mandatory reporting of suspected child maltreatment
- Safety/Security planning
- Obtaining adequate insurance for injury to minors
- Completing any licensing requirements. Camps in Georgia are regulated by Department of Early Care and Learning (DECAL).
- And registering the program annually.....(DEMO)



Possible Exceptions to Minors on Campus Policy

- A.K.A. “there’s kids at my event, but....”
- The policy includes a number of exceptions.
- But exceptions are not automatic (i.e., just because the Hosted Program thinks they are exempt).
- Hosted Program Director and GSU contact must email Insurance & Risk Management and request the exception in writing.



Hosted Programs Possible Exceptions

- Events where each minor is supervised by their respective parent or legal guardian;
- Events open to the general public (e.g., a concert where it's possible teenagers will come in);
- Private events (weddings, parties) as identified in the Policy;
- Non-residential field trips that are supervised by the minor group's school or organization.



Hosted Programs: Instructions for Requesting an Exception

- Submit the name and dates of the program and include a copy of the FUA in an email to risk@gsu.edu
- Provide rationale for exception (i.e., note that there will be children at this event, but one of the following applies)
 - All children will be supervised by parent or legal guardian;
 - This event is open to the general public;
 - This event is a private event (party, reception) as identified in the policy.
- GSU has the discretion to grant or deny the exception, depending on the circumstances.



All Programs: Forms

- Staff & Volunteer Code of Conduct
- DECAL Exemption Notice
- Program participant forms:
 - Participation Agreement and Waiver (includes Code of Conduct)
 - Emergency Contact, Medical Information and Authorization for Medical Care
 - Participant Pick-Up Authorization
- Document Retention: Participant records must be kept until Participant is 21.
- Other records in accordance with BOR retention policies (available online- e.g., 3 years for Volunteer Agreements).



Ensuring Smooth Transitions

If a Program Director leaves GSU, ensure:

- Next Director has all of the necessary information (e.g., access to electronically stored records, contact information for staff)
- Insurance & Risk Management is notified, and new Program Director information provided.



Finally, thank you!

- Thank you for running wonderful programs and for all your efforts to keep children safe.
- These programs are so important for the children, GSU and the Atlanta community.

