

Augustana College Minors on Campus Policy

Augustana College is committed to providing a safe and secure environment for minors who participate in programs and activities sponsored by or affiliated with the College, or occurring on campus grounds. In addition to in-person interactions, videoconferencing or other digital forums of contact are covered by this policy.

This policy affirms that commitment by setting forth screening, training, and conduct requirements for individuals working or volunteering in on-campus programs that serve minors. This Policy also applies to programs conducted by Augustana College that serve minors off-campus. Under this policy a “minor” is any person under the age of 18, who is not an enrolled student at Augustana College.

This Policy also outlines how an individual may report a concern, including suspected abuse of any kind of minors, as well as identifying those individuals who are mandated to report suspected child abuse.

Scope

This policy applies to all members of Augustana College’s community, including, but not limited to students, student-employees, faculty, staff, volunteers, and independent contractors. This policy also applies to third parties who conduct programs on campus that serve minors, including their employees, staff, volunteers and independent contractors.

When interacting with minors, individuals must always be aware of the vulnerability of minors in such interactions and be particularly aware of the importance of maintaining appropriate physical, emotional, and general relationship boundaries in such interactions. As with students, covert or overt sexual behaviors with minors, including seductive speech, gestures, or physical contact is strictly forbidden.

1. Reporting of Known or Suspected Child Abuse or Neglect

Any individual who has reasonable cause to believe that a minor participating in any activity on campus, including but not limited to participating in a Covered Program as defined below, is a victim of sexual abuse or any other form of child abuse is required to report the incident.

All personnel of Augustana College, including faculty, staff, student employees and volunteers, are mandated reporters of suspected child abuse under the Illinois Abused and Neglected Child Reporting Act (ANCRA). Employees may refer to the College’s “Mandated Reporting - Illinois Abused and Neglected Child Act” policy in the All-Employee Handbook for more information on reporting requirements. Concerns may also be reported directly to the Department of Children and Family Services as outlined below or to Augustana College designated offices.

Internal Campus Reporting: Any questions about suspected child abuse or reporting obligations

may be addressed to the Director of Access Compliance & Title IX Coordinator at 309-794-7313 or via email at: jenniehemingway@augustana.edu.

Campus Conduct Hotline: Questions or concerns may also be shared through the College's campus conduct hotline (1-866-943-5787). This reporting mechanism is available 24 hours a day and 7 days a week, and does allow individuals to report matters or share concerns anonymously. This means that it is not necessary to disclose names or any other identifying information. Reports received through this hotline relating to alleged violations of this Policy are forwarded to the Director of Access Compliance & Title IX Coordinator who will respond to the complaint. The College's ability to respond effectively, or at all, may be limited if the reporter wishes to remain anonymous. Please note that reporting suspected child abuse on the Campus Conduct Hotline does not satisfy a mandated reporter's obligations under ANCRA.

External Campus Reporting: The College requires all employees and volunteers to report to the Illinois Department of Child and Family Services (DCFS: 1.800.252.2873 or 800.25.ABUSE) if they have reasonable cause to believe a child known to them in their official capacity may be abused or neglected. In addition, any mandated reporter who intends to or has made such a report should notify the Human Resources Director, or the Director of Access Compliance & Title IX Coordinator that a report has been made, as well as the underlying circumstances that caused the report, and document in writing that the report has been made.

Failure to Report: A failure of an employee or volunteer to report suspected child abuse, as required by this policy may result in discipline up to and including termination.

Retaliation: The College prohibits retaliation against any person who in good faith makes or participates in making a report of child abuse or neglect under this policy. The College also prohibits the intentional filing of false reports of child abuse or neglect. Illinois law protects the identity of mandated reporters and provides immunity from liability for making good faith reports, although reporters may be obligated to testify if a case becomes subject to legal or judicial action.

2. Requirements for Programs Serving Minors on College Premises

In addition to the reporting obligations set forth above and further outlined in the College's Mandated Reporting - Illinois Abused and Neglected Child Act policy, this Policy describes screening, training, and conduct expectations for programs that serve minors on Augustana College premises or with Augustana College resources, regardless of College affiliation.

Covered Program

“Covered Programs” are programs designed to serve minors. “Covered Programs” include Augustana College programs, activities, workshops, preparatory experiences, including lessons, social events, and other events whether for academic, athletic, recreational or other purposes and whether on or off College premises, unless specifically excluded in this Policy, that are conducted by Augustana employees and/or individuals appointed by Augustana employees, including volunteers and emeritus faculty.

“Covered Programs” include any program conducted by a third party or entity if it serves minors on the Augustana College campus.

Any individual who works, whether on a paid or on a volunteer basis, for a Covered Program and has regular, non-incident contact with minors are considered to be Program Staff. All Covered Programs must designate a Program Coordinator who will oversee compliance with this Policy.

Covered Program Exclusions

Covered Programs do not include:

1. College undergraduate, graduate, and professional or continuing education academic programs to which minor students are admitted and enrolled for academic credit.
2. Regularly scheduled classes or activities designed for enrolled students or individuals accepted for College enrollment.
3. Social events at faculty/staff residential properties. Events at the Dahl President’s Home are not excluded.
4. Campus tours or visits attended by prospective students. Campus visits by prospective students that involve an overnight stay are not Covered Programs, but must comply with safety requirements as communicated by the College.
5. Guest lectures or other one-time academic events.
6. College fairs, festivals, convocations, or other activities that are generally open to persons of all age groups at which minors may be present or participate.
7. College events/visits at which minors will be accompanied by a parent, or legal guardian.
8. College events or other visits to the College by a primary or secondary school or community-based organization when the minor visitors will be chaperoned by a school or organization representative.

Registration

It is expected that at least 14 days prior to the start of a Covered Program, the Program Coordinator will register the Covered Program. In order for the College to know when and where minors are being hosted on or off campus, the Program Coordinator must provide a description of the proposed event, the expected age range and attendee count, along with any other information requested.

Covered Programs conducted or sponsored by Augustana College must be registered with the Director of Access Compliance & Title IX Coordinator at jenniehemingway@augustana.edu or 309-794-7313. Covered Programs conducted by third parties must register with the Office of Conference Services & Campus Scheduling.

Screening Requirements

All persons, who have direct, regular and non-incident contact with minors in a Covered Program are subject to the screening requirements described in this section. “Direct Contact” means to provide non-incident and regular instruction, care, supervision, guidance to or oversight and/or control over minors through a Covered Program. The screening will include, at a minimum, criminal background checks and registered sex offender checks, records of which must be created and maintained for a minimum of three years. College student discipline records will be reviewed when an Augustana College student is a member of the Program Staff.

The Office of Human Resources will conduct the screening of all Program Staff working in College-run programs and will maintain records of completed background checks, and these records will only be accessible through the HR office consistent with established policies and protocols. It is the responsibility of the Program Coordinator of each Covered Program to ensure that Program Staff have background checks on file. Background checks must be updated every year, unless an individual does not have direct contact with minors, in which case the background check must be updated every two years.

After completion of an initial background check, all Program Staff are expected to disclose any new arrests or convictions to the Program Coordinator within 72 hours of the occurrence, and to cooperate in providing information necessary to evaluate the circumstances of the arrest and/or conviction.

Augustana and non-Augustana College sponsored programs must prohibit an individual from working with minors in a Covered Program unless and until the background screenings have occurred in accordance with this Policy. All third parties or entities leasing space for Covered Programs will be required to contractually confirm their compliance with this Policy and this screening requirement.

In no event will individuals be permitted to serve as Program Staff if the background screen includes any information that suggests the person would be a threat in any way to a minor or is otherwise not qualified to work with minors.

Training Requirements

All Program Staff in a Covered Program must complete Sexual Misconduct/Abuse of Minors training. Program Staff may not work with minors in a Covered Program until they have completed the required training. The annual employment training required of all Augustana College employees, if completed by a Program Staff member, satisfies this training requirement. It is the responsibility of Program Coordinators to oversee and verify compliance with these minimum training requirements.

Conduct Requirements for Minor Participants

Each Covered Program must demonstrate the existence and communication of rules of conduct (and other relevant program aspects) designed to create a safe environment for all participants in the program. These rules should include the following, but may vary depending upon the age of minors participating in the program and the nature of the program (ie, overnight or day only):

- a. Prohibition of the possession or use of alcohol or drugs on campus.
- b. Prohibition of the possession of fireworks, guns, and any other weapons on campus.
- c. Procedures for when and under what circumstances program participants may leave campus.
- d. A statement confirming that violence of any type will not be tolerated.
- e. Prohibition of hazing and bullying.
- f. Prohibition of theft.
- g. Prohibition of corporal punishment or other physical forms of discipline.
- h. Restriction of residential room visitation to participants of the same gender.
- i. Specification of an age-appropriate curfew time.

Conduct Requirements for Program Staff

Persons working for, participating in or involved with a Covered Program should create an open, welcoming education environment and ensure that the safety and welfare of participating minors is a paramount and shared responsibility. Indeed, positive, appropriate interactions with minors supports their personal and educational development, makes them feel valued, and provides the safe, caring connections that serve as protective factors for minors. Conversely, inappropriate and harmful interactions can put minors at risk for adverse emotional and physical outcomes. In this regard, persons working for, participating in or involved with a Covered Program shall not, in connection with the program:

- A. Engage in abusive conduct of any kind toward, or in the presence of, any minor.

- B. Administer force upon a minor with or without an implement or tool for the purpose of discipline (i.e., corporal punishment).
- C. Touch a minor in an inappropriate or illegal manner.
- D. Engage in the use or possession of alcohol, tobacco or illegal drugs in the presence or vicinity of minors.
- E. Possess, produce, access or make available to minors, any sexually-explicit or otherwise inappropriate images, material or media.

These requirements supplement any other specific job requirements or responsibilities that may be applicable to Program Staff.

Adequate Supervision at All Times.

All Covered Programs must be supervised by at least two or more Program Staff or by their parent(s) or legal guardian(s) at all times in accordance with the standards of the American Camp Association. The following American Camp Association's minor/Program Staff ratio is required at all times:

Age	Ratio for Day Activity only	Ratio for Overnight Camp
5 yrs & younger	1:6	1:5
6-8 yrs	1:8	1:6
9-14 yrs	1:10	1:8
15-17 yrs	1:12	1:10

In addition to these supervision requirements, Covered Programs must honor the “Rule of 3” which requires that at least two Program Staff be present with a minor in any private setting. Program Staff may not be alone with a minor unless they are directly observable at all times. In the rare event an interaction requires a Program Staff to be alone with a minor in a private setting, such as with a music lesson, notice must be provided to the minor’s parent(s) or guardians(s), who must be permitted the option to attend or oversee the activity. The Program Coordinator must identify any required exceptions to this rule.

Additional Requirement: Non-Augustana Covered Programs

Third parties who desire to hold a Covered Program on campus must enter into a written agreement with Augustana College that includes the following:

- a. Representation that all aspects of this Policy have or will be complied with, including but not limited to the screening and training requirements;
- b. Commitment to operate the Covered Program in accordance with this policy and applicable law;

- c. Assumption of full financial responsibility for any loss or liability arising from the Covered Program including execution of an indemnification clause. Verification that the program has obtained general liability insurance for the Covered Program, which must include abuse and molestation coverage, and any required coverages must indicate that Augustana College is an additional insured party.

5. Policy Violations and Compliance

All Covered Programs are subject to audit to determine compliance with this policy. Where necessary, all reports involving a member of the Augustana College community will be addressed according to the relevant College policy. Any faculty member, staff, student employee, student or volunteer who violates this policy will be subject to corrective action up to and including termination of employment or volunteer status and exclusion from the College's premises. In addition, the College will promptly report any behavior that may violate state or federal law to the appropriate authorities.

Policy Adopted: