



Policy Title: Protection of Minors

Policy Number:

Date Issued: 4/27/2015

Responsible Executive: Director of Youth Protection

Date Last Revised: 9/5/2018

Responsible Office: Compliance and Risk Services

Protection of Minors Policy

Policy Statement

Baylor University (“Baylor” or the “University”) believes that all members of our community have a moral as well as a legal duty to safeguard the welfare of non-enrolled minors who participate in Youth Programs and activities held on or off campus. Baylor University will not tolerate the mistreatment or abuse of minor participants of Youth Programs. This policy sets forth the efforts our faculty, staff, students, volunteers, contractors, and consultants are required to take to minimize the threat of child abuse and to respond promptly should abuse be observed, suspected, or disclosed.

Reason for the Policy

Baylor University recognizes both its institutional and legal obligations to promote the safety of Baylor related interactions with minors on or off campus. This policy is in compliance with both state and federal laws, including the [Texas Education Code § 51.976](#) as well as the [Texas Youth Camps Administrative Code Rule 265.12](#). All Youth Programs or activities with minor participants will be subject to this policy. Parents or guardians should not leave their minors unsupervised on University property unless their child is a minor participant as part of a covered Youth Program or activity.

Individuals/Entities Affected by this Policy

This policy applies to faculty, staff, students, volunteers, contractors, and consultants who work or volunteer in Youth Programs operated by the University or work on campus areas that support Youth Programs where minor participants are under the supervision of the University or its representatives. Youth Programs covered under this policy include, but are not limited to academic programs, instructional programs, camps, clinics, workshops, conferences, community service, off-campus outreach, official athletic visits, and other similar activities. This policy also applies to External Entities or third-party organizations approved to operate a Youth Program on campus or in University facilities.

Exclusions

Exclusions to this policy include matriculated students, public events, field trips, Institutional Review Board (IRB) approved research, K - 12 school groups (accompanied by teachers), Piper Child Development Center, guest speakers, parents, entertainers, campus tours, and special events where minors are in the care of their parents or guardians and must be supervised at all times.

For activities that require private One-on-One Contact such as, but not limited to, tutoring, auditions, or lessons when the parent or guardian is not present, the activity shall be subject to specifically tailored [Additional Guidelines](#) that are put in place by the person organizing the activity, and such person shall obtain signed waivers and consents for One-on-One Contact from the parents or guardian and maintain those records.

Related Documents and Forms

Other Documents

[Texas Education Code § 51.976](#)
[Texas Youth Camps Administrative Code Rule 265.12](#)
[Texas Mandatory Reporting Law](#)

Forms and Tools

[Pre-Employment Screening](#)
[Youth Program Checklist](#)
[Youth Protection Form](#)
[Summer Camp Policy Manual](#)
[Additional Guidelines](#)
[Post-Program Compliance Form](#)

Definitions

These definitions apply to terms as they are used in this policy.

Authorized Adult	Individuals involved in a Youth Program who have unsupervised access to minor participants. Authorized Adults must meet Minor protection training and criminal background check requirements.
Direct Contact	Contact with Minor participants, whether intentional or unintentional, as part of a Youth Program
External Entity	An external organization, approved by a University department, operating a Youth Program or activity on campus
Hosting Department	The academic or administrative department of the University that operates a Youth Program or provides approval for an External Entity to operate a Youth Program on campus or in a University facility
Minor	A person under the age of 18 participating in a Youth Program. For the purpose of this policy, this definition excludes matriculated students under the age of 18.
One on One Contact	Personal, unsupervised interaction with a single Minor participant without at least one other Authorized Adult, parent or legal guardian being present

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Program Staff	Individuals involved in a Youth Program who have supervised access only to Minor participants and must have an Authorized Adult supervise any interaction they may have with Minor participants
Youth Programs	Programs or activities offered to Minor participants by an academic department, administrative department, or by an External Entity during which Minor participants are under the supervision of the University or the External Entity

Contacts

Subject	Contact	Telephone	Office email/web site
Questions	Director of Youth Protection	254-710-3867	protectionofminors@baylor.edu/ www.baylor.edu/gr

Responsibilities

Dean or Department Head	Approves the operation of a Youth Program by a department, a registered student organization, or an External Entity to use a facility or operate a Youth Program on campus
Director of Youth Protection	The University representative responsible for the oversight of any Youth Program, camp, or activity involving Minor participants held on University property or hosted by the University
Program Director	Individual on-site responsible for day-to-day operations of a particular Youth Program and compliance with University regulations, procedures and guidelines as those pertain to the Youth Program

Principles

Baylor University believes that all members of our community have a moral and legal duty to safeguard the welfare of Minors who participate in Youth Programs and activities. This policy sets forth the efforts our faculty, staff, students, volunteers, contractors, and consultants are required to take to minimize the threat of child abuse and to respond promptly and effectively should abuse be observed, suspected, or disclosed.

Standards to Protect Children and Prevent Abusive Conduct with Minors

Baylor University expects its faculty, staff, students, volunteers, contractors, and consultants to exhibit exemplary behavior at all times. This is even more important when interacting with non-enrolled Minors who are using Baylor facilities or involved with Baylor programs and activities. The conduct with Minors list below denotes some specific expectations to govern behavior for faculty, staff, student employees, interns, and volunteers as we strive to accomplish our mission together.

General Safety:

Two Adults Practice: It is highly recommended that at least two unrelated, non-familial adults who have had the appropriate background and criminal record checks should be with Minors at any given time. Care should especially be taken to avoid or minimize situations in which individual Minors are alone with a single adult; and such is prohibited unless the person has received training in addition to the background and criminal record check. This rule includes all transportation to/from activities, accompanying a Minor to the bathroom, and giving a Minor a ride home.

One-on-one meetings with a Minor are best held in a public area, or if that is not appropriate or possible, then the door to the room should be left open, and the Program Director or an adult supervisor should be notified about the meeting before it occurs.

Open and Well Illuminated Spaces: Programs and activities involving Minors on or off campus should be held, where feasible, in open and well-illuminated areas that are easy to access and monitor. Abuse typically occurs in locations that are more private and out of sight such as locker rooms, bathrooms, shower areas, dormitory rooms, and classroom spaces after hours. Consequently, the greater the visibility in a particular area, the lower the risk of abuse.

Additional Standards of Conduct:

1. Minors will be treated with respect at all times.
2. Minors will be treated fairly regardless of race, sex, age, religion, sexual orientation, or gender expression.
3. Faculty, staff, students, volunteers, contractors, and consultants will ensure that appropriate speech is used at all times when around Minors.
4. Faculty, staff, students, volunteers, contractors, and consultants are prohibited from having outside contact with Minors in which the relationship is initiated at a Baylor program unless approved by Baylor University administration or further addressed in the program manual.
5. Faculty, staff, students, volunteers, contractors, and consultants will not discuss sexual encounters with or around Minors or in any way involve Minors in their personal problems or issues.
6. Faculty, staff, students, volunteers, contractors, and consultants will not date or become romantically involved with Minors.
7. Faculty, staff, students, volunteers, contractors, and consultants will not use or be under the influence of alcohol or illegal drugs in the presence of Minors.
8. Faculty, staff, students, volunteers, contractors, and consultants will not have sexually oriented materials, including printed or internet pornography, in the presence of Minors.
9. Faculty, staff, students, volunteers, contractors, and consultants will not have "secrets" with Minors.

10. Faculty, staff, students, volunteers, contractors, and consultants will dress in appropriate attire and as outlined in the program manual.
11. Faculty, staff, students, volunteers, contractors, and consultants will adhere to uniform standards of affection, as may be outlined in your program manual.
12. Faculty, staff, students, volunteers, contractors, and consultants will avoid affection with Minors that cannot be observed by others and as further outlined in your program manual.
13. Faculty, staff, students, volunteers, contractors, and consultants will not engage in inappropriate electronic communication with Minors, as may be further outlined in your program manual.
14. Faculty, staff, students, volunteers, contractors, and consultants shall not abuse Minors in anyway including, but not limited to, the following:

Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints

Verbal abuse: degrade, threaten, cursing

Sexual abuse: inappropriate touching, exposing oneself, sexually oriented conversations

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, shelter

Cyber abuse: online behavior which is reasonably likely to have a seriously threatening, intimidating, harassing, or humiliating effect

Or any other abusive means not listed above.

15. Program participants are prohibited from engaging in the following:

Hazing

Bullying

Derogatory name-calling

Games of "Truth or Dare"

Ridicule or humiliation

16. Faculty, staff, students, volunteers, contractors, and consultants will report concerns or complaints about other staff, volunteers, adults, and Minors in accordance with this policy.

Procedures

Authority

The Director of Youth Protection oversees the requirements and compliance of Youth Programs occurring on University property or otherwise hosted by the University. Any exceptions to the requirements as outlined in this policy must be approved in writing by the Director of Youth Protection.

Registration and Approval

Fall/Spring Youth Programs

- Required to register programs annually, no later than thirty (30) days prior to programming start date, for required approval by the Manager of Youth Protection

Summer Youth Programs

- Required to submit an event proposal annually, no later than January 14, for required approval by the Manager of Youth Protection

Program Directors for Youth Programs are required to:

- Secure Dean or Department Head approval
- Submit an event proposal or registration
- Consult the [Youth Program Planning Guide](#) for planning needs

Questions related to preparation, timelines, and requirements for Youth Program registration may be directed to protectionofminors@baylor.edu or call 254-710-3867.

Pre-Employment Screening

Program Directors must obtain a completed [Pre-Employment Screening](#) for all new external Program Staff applicants. All screenings must be verified by the Program Directors or their designees prior to the applicant being cleared to work or participate in a Youth Program. The completed forms are to be housed on-site at the program level.

Criminal Background Checks

Every two years, Program Staff who will have Direct Contact with Minor participants must pass a criminal background check prior to being cleared to work or participate in a Youth Program.

[Baylor Human Resources](#) manages the processing of background checks for non-students. Baylor University's [Student Employment](#) office manages the processing of background checks for Baylor students.

Persons are prohibited from participating or working in a Youth Program without meeting the criminal background check requirement. The Program Director is responsible for ensuring that Program Staff have been cleared to participate in Youth Programs.

Criminal Background Checks must meet the following criteria:

- i. County background check

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- ii. Multi-state background check with social security number trace and Alias Search
- iii. National sex offender registry check

All background checks performed by or on behalf of Baylor University will comply with the Fair Credit Reporting Act and other relevant privacy laws and are maintained by Baylor's Human Resources office in compliance with the University's record retention policy.

Questions regarding background check preparation, timelines, and requirements for Baylor Youth Programs may be directed to askHR@baylor.edu.

Training

Authorized Adults must successfully complete minor protection training every two (2) years. Persons are prohibited from supervising Minor participants if they have not met the training requirement and, therefore, any contact with Minors must be supervised by an Authorized Adult who has met the minor protection training requirement.

The Program Director is responsible for ensuring that all Authorized Adults have met the minor protection training requirement before being cleared to have unsupervised access to Minor participants.

The training shall include at a minimum:

- i. how to identify situations of abuse
- ii. how to respond to a disclosure of abuse by a minor
- iii. how to report those situations to appropriate authorities
- iv. how to prevent abuse

Questions regarding online or in person training sessions may be directed to protectionofminors@baylor.edu or call 254-710-3867.

Standard Operating Procedures

The [Texas Youth Camps provision in Administrative Code Rule 265.12](#) mandates that Youth Programs have written procedures that address the following areas that are applicable to the program. Program Directors will ensure that staff are informed of these procedures prior to assuming responsibility for program participants.

- a. Obtain participant forms including, but not limited to, registration, waivers, releases, discipline policy, and signed code of conduct forms for staff and participants
- b. Collect medical history, medical release forms and records, and identify qualified staff persons for dispensing of medication and the securing of medication in a locked location
- c. Establish a weather emergency plan in coordination with the Baylor University Emergency Management Guide

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- d. Have an emergency communication plan for contacting parents/guardians and the media
- e. Ensure the safety and maintenance of facility, grounds, equipment, vehicles and activity areas
- f. Develop appropriate measures to meet the needs of special needs participants
- g. Have available pick up/drop off procedures for parents/guardians, staff, or others.
- h. Establish electronic media requirements pertaining to cell phones, social media, and e-mail. Ensure that a media release is signed by each Minor participant's parent or legal guardian.
- g. Implement staff to participant supervision ratios during all programming including bathroom use, transition times, and free times to ensure that One-on-One Contact does not occur and that appropriate levels of supervision are implemented as noted below as recommended by the American Camp Association.

CAMPER AGE	Authorized Adult	OVERNIGHT PARTICIPANTS	DAY PARTICIPANTS
5 Years	1	NA	6
6 - 8 Years	1	NA	8
9 - 14 Years	1	8	10
15 - 18 Years	1	10	12

Official Athletic Visits

This policy is applicable to official athletic visits when there is the possibility of a Prospective Student Athlete (PSA) being under the supervision of the University or its representatives.

All hosts for PSA official visits must meet the criminal background check and minor protection training requirements.

Registered Student Organizations

Registered student organizations working with outreach and community service partners off campus that involve Direct Contact with Minor participants as a service learning activity or part of a University mission or academic program shall comply with all requirements of this policy. The Program Director must ensure that all participating University students comply with this requirement.

External Entities

External Entities seeking to operate a Youth Program or activity on campus must register the Youth Program annually, at least (30) days prior to programming start dates. External Entities applying to operate a Youth Program on campus must:

- Secure a University department host with Dean or Department Head approval
- Submit an Event Proposal with [Baylor Institutional Events](#).
- Submit a Certificate of Insurance (COI) that includes sexual abuse and molestation coverages.
- Submit an [External Organization Acknowledgement Agreement](#) and a [Campus Program for Minors Information Form](#) to the hosting department.

The External Entity assumes full responsibility for the supervision of all Minor participants and compliance with this policy, including but not limited to yearly minor protection training and criminal background checks.

The Hosting Department's Dean or Department Head, or designee, serves in the administrative capacity as custodian of all records received and ensures that all required program information is submitted properly.

Reporting Child Abuse and Neglect

If you suspect that a child has been abused or neglected, you are required by law to submit an external report immediately to the Department of Family and Protective Services (DFPS) at 1-800-252-5400 or any local law enforcement agency.

Failure to make a report is a crime in Texas, punishable by up to one (1) year in prison and a fine of up to \$4,000.00. Texas law protects a person acting in good faith who makes a report of child abuse or neglect that does not arise from their own conduct.

If the situation is a life-threatening emergency, the mandatory reporter must call 911.

To meet legal reporting requirements, it is best to call local law enforcement. If the incident occurred on Baylor's campus or Baylor property, you should call the Baylor University Police Department at 254-710-2222. If the incident took place off campus, you can contact the Baylor University Police Department, who will assist you in connecting with the local law enforcement agency who has jurisdiction to investigate the allegations.

In addition to the above required actions pertaining to child abuse or neglect, any person may also file a report via [Baylor Ethics Point](#) or by telephone by dialing toll-free 866-384-4277 as a way to report anonymously and confidentially activities that may involve criminal, unethical, or otherwise inappropriate behavior in violation of Baylor University's policies.

Types of Abuse or Neglect

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Texas' definitions of "abuse" and "neglect" are defined very broadly and include most threats to a child's physical or mental health or welfare. For more information, staff and volunteers for Youth Programs can refer to all applicable Texas codes and statutes for the current terms and definitions addressing abuse, neglect, exploitation, and abandonment, along with the associated mandated reporting requirements.

For the purpose of this policy, abuse might include, but is not limited to, the following:

- i. Physical Abuse: hitting, spanking, shaking, slapping, unnecessary restraints
- ii. Verbal Abuse: degrading, threatening, cursing
- iii. Sexual Abuse: inappropriate touching, exposing oneself, sexually oriented conversations
- iv. Mental Abuse: shaming, humiliation, cruelty
- v. Neglect: unreasonable withholding of food, water, shelter, and reasonable medical attention.

Lab Safety

Pursuant to the University's Environmental Health and Safety program, non-enrolled Minors are explicitly prohibited from entering University teaching and research labs where hazardous chemical, biological, and/or radiological materials are present and/or hazardous activities are taking place. Additional information is at the [Environmental Health and Safety](#) website.

Overnight Guest

Pursuant to Campus Living & Learning policy, non-enrolled Minors unaffiliated with a covered Youth Program are prohibited from residing overnight in residence halls. Additional information is at the [Campus Living & Learning Guide to Community Living](#) website.

Compliance Monitoring

As a part of compliance monitoring, Youth Programs must complete a [Post-Program Compliance Form](#) at the conclusion of each program, maintain an on-site compliance notebook, and are subject to site visits and document requests in measuring compliance with this policy.

Records Retention

All applications, background checks, training, and other required personnel documentation shall be maintained with the Youth Program in hard copy or electronic format for a minimum of two years following a person's last day of service. Criminal background check records are maintained by Baylor's Human Resources office in compliance with the University's record retention policy.

Enforcement

This policy will be strictly enforced by the Office of Compliance and Risk Services. Failure to comply can result in corrective action up to, and including, dismissal from Baylor University. Violations may also lead to civil or criminal liability. In addition, the program or event in question may be subject to postponement or cancellation.

Periodic Review

This policy is maintained by the Director of Youth Protection. The University will review this policy periodically to capture evolving legal requirements and opportunities for enhancement of the Protection of Minors framework.