

## University of Wisconsin-Whitewater Youth Protection Policies for Minors on Campus

This campus policy explains the implementation of University of Wisconsin System Administrative Policy #625 Youth Protection and Compliance.

The purpose of this policy is to protect minors engaged in **Covered Activities**. Covered activities are all events, operations, endeavors, or activities designed for participation by Youth Participants and organized or sponsored by the Institution, and all events, operations, endeavors, or activities designed for participation by Youth Participants held on property owned or leased by the Institution. Covered Activities include, but are not limited to, programs, events, camps, clinics, workshops, symposia, conferences, tournaments, meets, clubs, projects, competitions, internships, job shadowing, mentoring, lessons, coaching, tutoring, field trips, lab visits, precollege programs, and service-learning placements.

**Authorized Adults** are individuals, age 18 and over, paid or unpaid, who are authorized to interact with Youth Participants as part of a Covered Activity following completion of screening and training requirements. This includes, but is not limited to, faculty, staff, volunteers, graduate and undergraduate students, student-athletes, interns, and individuals associated with Third Parties and Affiliated Entities. Authorized Adults are not counted in Supervision Ratios.

**Designated Individuals** are Authorized Adults who are counted in the Supervision Ratio for a Covered Activity. Designated Individuals are responsible for ensuring the care and safety of Youth Participants in Covered Activities. Additional training is required for Authorized Adults serving as Designated Individuals.

### 1. Institutional Oversight

At UW-Whitewater, the Continuing Education Services (CES) unit inside of the School of Graduate Studies and Continuing Education is designated as responsible for the oversight of all Covered Activities in terms of Youth Protection policies, including those not administratively managed by the CES unit. This includes overseeing covered activities on the main campus, branch campus, or any location at which the institution sponsors activities for youth.

The Youth Protection Compliance Specialist in CES is authorized to carry out all oversight responsibilities necessary to ensure compliance of all Youth Protection policies listed here and in other polices

The Youth Protection Compliance Specialist shall serve as the youth protection liaison to the UW System.

### 2. Institutional Sponsor

UW-Whitewater designates Continuing Education Services (CES) as the Institutional Sponsor for all Covered Activities. It assumes the risk associated with Covered Activities. Other campus entities may organize, plan, and conduct Covered Activities, but CES will monitor compliance of all parts of this policy.

### **3. Covered Activity Registration**

UW-Whitewater requires an annual registration for all Covered Activities (with the exception of those held by Third parties). The follow information is required to be collected through the office of Continuing Education Services:

- A. Date(s) and time(s) of Covered Activity
- B. Primary Contact for Covered Activity
- C. Authorized Adults: Names, contact information, confirmation of background check/screening, training date completion
- D. Youth Participants: Names and contact information, including emergency contact

UW-Whitewater designates Continuing Education Services as the entity responsible for oversight of Covered Activities with access to Third Party contracts for Covered Activities.

### **4. Screening**

Criminal background checks (CBC) are required to be completed on all Authorized Adults meeting minimum standards outlined in Regent Policy Document 20-19 for Positions of Trust with Access to Vulnerable Populations. Continuing Education Services will work with Human Resources to implement a procedure that ensures all Authorized Adults will have a completed CBC before these adults are allowed to work with youth at a Covered Activity. CBC results will be reviewed by Human Resources staff, consulting with UW-W Police Services. Human Resources staff will inform CES on whether employment/volunteer status should be denied for any Covered Activities.

All Covered Activities must work with Continuing Education Services to complete reference checks on employees who are Authorized Adults, as well as all people serving as Designated Individuals (regardless of employment status), that meet the standards set in UW System Recruitment Policy 1275.

The Human Resources and Diversity Unit is designated as the retainer of documentation of screening results at UW-Whitewater.

### **5. Training**

All Authorized Adults for Covered Activities must receive documented training on the following content, at minimum, prior to interaction with Youth Participants in Covered Activities: reporting responsibilities, including EO54 Mandated Reporting, and sexual harassment/sexual violence reporting.

All Designated Individuals must receive documented training on the following content, at minimum, prior to interaction with Youth Participants in Covered Activities:

- A. Institutional youth protection best practices (as determined by the Youth Protection Compliance Specialist)
- B. Reporting responsibilities, including EO54 Mandated Reporting and sexual harassment/sexual violence reporting.

Other trainings required for specific camp requirements (such as CPR or First Aid training) will be handled by Camp/Event Directors and is not required to be documented for this policy.

## 6. Prohibited Behaviors

The following behaviors are prohibited a UW-Whitewater Covered Events:

- A. Conduct that violates the law (e.g., child abuse, child sexual abuse, protected class discrimination, emotional abuse, hazing, indecent exposure, child pornography, neglect, physical abuse, sexual abuse, and sexual harassment)
- B. Conduct that violates UW System policies
- C. Actions that are found to constitute Bullying or Grooming
- D. Infringement on privacy of Youth Participants in situations where they are changing clothes or taking showers except in situations where health and safety require
- E. Adults showering, bathing, or undressing with or in the presence of Youth Participants
- F. Use of such devices capable of recording or transmitting visual images in shower houses, restrooms, or other areas where privacy is expected by participants
- G. Use of alcohol when engaged in Covered Activities
- H. One-on-One Interactions between adults and Youth Participants except for one-on-one tutoring that is observable and interruptible.

All Authorized Adults will have an annually signed agreement on file with the Continuing Education Services unit that indicates that they agree to not engage in any of the listed prohibited activities.

## 7. Measures to Maintain adequate Supervision of Youth Participants

UW-Whitewater requires that Supervision Ratios in Covered Activities meet the minimum standards set in the Covered Activity Supervision Ratio below. Designated Individual status is required for all adults serving in Supervision Ratios.

Grade or Age Group	Covered Activity Situation	Ratios (Designated Individuals : Youth Participants)
Ages 3-4	Non-residential	1:4
Ages 4-5	Non-residential	1:6
Ages 5-6	Non-residential	1:10
Ages 6 & under	Residential	1:4
2 <sup>nd</sup> – 8 <sup>th</sup> grade (over age 6)	Classroom setting	1:10
9 <sup>th</sup> – 12 <sup>th</sup> grade	Classroom setting	1:18
2 <sup>nd</sup> – 12 <sup>th</sup> grade (over age 6)	Field trip	1:10 (minimum 2 adults)
	Water Activities & Recreational Sports	1:10
	Non-residential & Residential	1:10

One-on-One Interactions between adults and Youth Participants are prohibited, unless the adult is a Designated Individual and at least one of the following criteria is met:

- A. It is an instructional setting where one-on-one tutoring occurs. In such settings, activities must be Observable and Interruptible.

- B. UW-Whitewater's risk management authority or human resources director (or their designee) in consultation with the employee or department charged with oversight of Covered Activities grants exception to this policy.

Exceptions can also be made in situations where a Familial Relationship exists, or there is an emergency situation.

## **8. Overnight Covered Activities**

Designated Individual status is required to directly supervise youth in overnight Covered Activities.

Designated Individuals must not enter the Youth Participant's room, bathroom facility, or similar area without another Designated Individual in attendance except in emergency situations.

Designated Individuals may not share a bed or sleeping bag with a Youth Participant during overnight Covered Activities.

**9. Emergency Preparedness.** All Covered Activities are required to document minimum emergency preparedness protocols based on the Covered Activity's level of risk and as advised by UW-Whitewater's risk management authority or other relevant stakeholders.

**10. Insurance Coverage.** Covered Activities are required to be covered by Camps and Clinics Blanket Accident Insurance when it applies to the Covered Activity or other coverages as advised by UW-Whitewater's risk management authority.

## **11. Reporting Obligations**

All adults covered under this policy are required to immediately report any suspected physical abuse, neglect, or sexual abuse of a Minor pursuant to the Institution's EO54 reporting procedures.

All adults covered under this policy are required to report the following incidents that occur within a Covered Activity to the Institution through procedures established by the Institution:

- A. Sexual harassment or sexual violence as defined by the Institution's Title IX policy
- B. Incidents resulting in serious physical harm requiring professional medical attention
- C. Incidents of illegal or unauthorized drug use

**12. Escalation Matrix.** Below is the UW-Whitewater Escalation Matrix to guide decision-making around incidents that violate Institutional policy or trigger a reporting obligation as defined in Section 11 (Reporting Obligations).

When a reported incident involving a minor occurs, the following individuals should be notified in order:

Person responsible	Action	Triggers when
Chancellor	Determines appropriate actions	Notified by Vice Chancellor of Administrative Affairs
Vice Chancellor of Administrative Affairs	Determines whether Human Responses or Risk/Safety need to be informed and brought into the situation  Notifies chancellor of situation	Once contacted by Dean of Graduate Studies & Continuing Education
Human Resources	Determines if any personnel action should be recommended	Notified by VC Admin Affairs
Risk/Safety	Determines if any action related to risk management need to be taken	Notified by VC Admin Affairs
Dean of Graduate Studies & Continuing Education	Notifies Provost and Vice Chancellor for Administrative Affairs of incident	
Police	Implements appropriate actions to ensure safety of youth  Coordinates with County Health & Human Services	Report of youth protection violation is received
Director of Camps and Conferences/Continuing Education Services	Contacts Dean of SGSC Confirms if police were notified Contacts police about the situation if not notified	Report from event director of a Youth Protection policy violation
Event Director/Camp Director	Contacts Director of Camps/Conferences and Police (if a mandatory reporting situation)	Any suspected violation of Youth Protection policies

Youth participants and family members will be informed in pre-camp information that they can report any youth protection policy concerns or violations to the camp director, police, or Director of Camps and Conferences.

**13. Retaliation.** UW-Whitewater prohibits retaliatory actions against:

- A. anyone acting in good faith to report a concern about possible violations of Institutional policy,
- B. individuals involved in investigating or responding to concerns, and
- C. anyone involved in enforcement of youth protection policy.

**14. Consequences for Noncompliance:** Violations of this policy and/or associated policies, protocols, or procedures may lead adults covered by this policy to be subject to disciplinary action, including removal from the role or authorization to work with Minors, in accordance with UW-Whitewater policies and procedures.

**15. Contracts with Third Parties:** UW-Whitewater requires all contracts with Third Parties engaged in Covered Activities to:

- A. Clearly allocate responsibility for risks posed by the Covered Activity.
- B. State that Third Parties engaged in Covered Activities meet the minimum requirements outlined in Sections 4 (Screening) through 11 (Reporting Obligations) of this policy. Third Parties are also required to maintain event data equivalent to that outlined in Sections 3 A-D (Covered Activity Registration) and Section 17 (Data Retention).
- C. Inform Third Parties that audits on requirements in the above Section 15B may occur at any time within seven years following the conclusion of the event.

**16. Agreements with Affiliated Entities:** Institutions must require written agreements (e.g., contract, memorandum of understanding) with Affiliated Entities engaged in Covered Activities:

1. Clarify Affiliated Entities must comply with all sections of this policy with the exception of the section on Contracts with Third Parties.
2. Clearly allocate responsibility for risks posed by the Covered Activity.

**17. Data Retention:** Covered Activities are required to store protected health information and other confidential and sensitive data according to Regent Policy Document 25-5.