University Policies and Procedures

06-22.00 – Protection of Minors in University Programs and Activities

I. Scope:

This policy applies to all Towson University ("TU") sponsored programs, programs held at TU, and/or programs housed in TU facilities that involve the participation of Minors. This policy applies to any such programs, activities, or housing, regardless of the duration of activity, program, or length of stay. Examples of such programs, activities, or housing opportunities governed by this Policy include, but are not limited to, summer camps, academic camps, outreach activities, workshops, conferences, tutoring, educational programs, clinical supervision provision, licensed child care facilities and programs, and activities operated, sponsored, and/or supported by an Affiliated Entity. All such programs, activities, and/or housing of Minors subject to state licensure are required to comply with applicable laws and regulations.

With the exception of TU’s obligations to report Child Abuse or Neglect, this policy does not apply to: (1) events on campus that are open to the general public and which Minors attend at the sole discretion of their parents or legal guardians or (2) private events where Minors attend under the supervision of their parent, guardian or supervising adult.

II. Definitions:

A. Activity Involving Minors: A TU-Sponsored Activity, an Outside Activity, and/or an Affiliated Entity Activity involving Minors.

B. Affiliated Entity: Any organization or other entity affiliated with the University.

C. Coordinator: The TU employee or employees designated to coordinate each TU administrative unit, Affiliated Entity or Outside Entity wishing to have one or more programs, activities, and/or housing opportunities. A Coordinator may be an Associate or Assistant Dean, Assistant Chair, Assistant Vice President, Management Specialist or other staff.

D. Hazardous Location: A location containing radiation-producing machines, nuclear magnetic resonance ("NMR") machines, autoclaves, industrial equipment, and/or high voltage equipment.

E. Minor: A person under the age of 18, unless they are currently enrolled at TU.

F. Outside Entity: An entity which is not part of TU and is not an Affiliated Entity.

G. Outside Entity Activity: Activities on campus which are operated, supported, or sponsored by the Outside Entities and may or will be attended by Minors.
H. Procedures: Procedures established by the University to implement this Policy. The Program, Activity, and/or Housing Procedures may be amended from time to time without the need to amend this Policy.

I. Prohibited Activity: An activity which TU forbids Minors from participating in, including, though not limited to, those which may or will involve:
   1. Contact with human blood, human body fluids, or human tissue. In addition, the Office of Environmental Health and Safety ("EHS") must review a laboratory that uses or stores human blood, human body fluids, or human tissue to determine if additional safety measures are required for a Minor to be in the laboratory. In some cases, the type of materials or research may prohibit a Minor in the laboratory.
   2. Exposure to confirmed human carcinogens, reproductive toxins, water or air reactive chemicals, or highly toxic materials.
   3. Exposure to radioactive materials or radiation-producing machines.
   4. Operating or assisting with the operation of a motor vehicle.

J. Program, Activity and/or Housing Administrator: A TU college or administration unit employee with responsibility for a specific TU-Sponsored Activity of Affiliated Entity Activity; or an Outside Entity employee, acceptable to TU, with responsibility for a specific Outside Entity Activity.

K. Program, Activity, and/or Housing Coordinator: A University official designated to implement this Policy.

L. Prohibited Area: An area where TU prohibits minors from accessing, including thought not limited to:
   1. Animal care facilities;
   2. Human anatomical care laboratories (except for approved tours); and
   3. Locations where human research activities occur (except for approved tours).

M. Restricted Activity: An activity open only to Minors who are at least 16 years old. Restricted Activities include working in Wet Laboratories, Hazardous Locations, and other activities as stated in the Procedures.

N. Sponsor: A Towson University Employee who has accepted responsibility for supervising a participant(s) in a program, activity, or housing opportunity involving Minors. Sponsor may include a Co-Sponsor.

O. Student Organization: A Registered Student Organization as defined in University Policy 05-10.00, Student Organization Registration.

P. University-Sponsored: Any program or activity operated by, supported by, or sponsored by TU, including but not limited to graduate and/or undergraduate course offerings.

Q. TU-Sponsored Activity: A TU-sponsored activity, located on or off campus, for groups consisting of, or including, Minors.

R. Wet Laboratory: A laboratory that uses or stores chemicals, radioactive material, infectious agents, or drugs.

S. Supervising Adult: Parent, guardian or other individual who is taking responsibility for the supervision of the Minor.
III. Responsible Executives and Offices:

Responsible Executive: Chief, Towson University Police Department and Director of Public Safety
Vice President, Student Affairs
Executive Vice President for Academic Affairs and Provost
Vice President, Office of Inclusion and Institutional Equity
Associate Vice President, Human Resources

Responsible Offices: Office of Public Safety
Office of Environmental Health and Safety
Office of Student Affairs
Office of the Provost
Office of Inclusion and Institutional Equity
Office of Human Resources

IV. Responsibilities for Programs, Activities, and/or Housing Opportunities Involving Minors:

A. Coordinator: Each TU administrative unit, Affiliated Entity or Outside Entity wishing to have one or more programs, activities, and/or housing opportunities shall:

1. Coordinator will be responsible for ensuring that the college, unit, Affiliated Entity, or Outside Entity fulfills the requirements of this Policy and the Procedures. The Coordinator may serve in this role for multiple TU administrative units, Affiliated Entities or Outside Entities, as needed.

2. Gather and retain information about Minor participants as required by applicable law and regulation, including this policy and associated procedures.

3. Gather and retain information on each proposed program, activity, and/or housing opportunity.

4. Maintain an annually updated list of approved programs, activities and/or housing opportunities.

5. Maintain rosters of program, activity and/or housing participants and copies of parent or guardian waiver and consent for participation in each, until the later of (a) the date on which each participant in the program, activity and/or housing opportunity has reached the age of 21 years, or (b)
three years after the participants’ last engagement in such program, activity and/or housing opportunity.

6. Obtain a waiver and consent signed by the parent or guardian of the participant Minor, unless the participation of the Minor is part of a school sponsored field trip in which a waiver and consent form was completed as part of participation in the field trip.

7. Request fingerprinting for all proposed TU Professional Employee Sponsors and Coordinators of Programs and Activities involving Minors.

8. Report immediately any incident involving injury to a Minor, disruption of University activity by a Minor, or dismissal of a Minor from a program, activity, and/or housing opportunity.

9. Receive training by TUPD on the University’s Child Abuse Reporting policy, Title IX policies, and reporting obligations of those designated Campus Security Authorities (“CSA”).

10. Verify that the Sponsor (described below) shall:

   a. Have authority over the area where the Sponsor’s assigned participant(s) will be located during hours of the program, activity and housing opportunity;

   b. Agrees to provide appropriate supervision of the assigned participant(s) during operational hours;

   c. Agree to instruct and supervise the assigned participant(s) and make reasonable efforts to ensure that the assigned participant(s) do not enter any Prohibited Area, engage in any Prohibited Activity, or engage in any Restricted Activity if the Minor is under 16 years of age and/or is not authorized to do so;

   d. Accepted in writing, in advance, the responsibility of Sponsor for the program, activity, and/or housing opportunity.

B. Sponsor(s): Each program, activity, and/or housing opportunity shall have a designated Sponsor with primary responsibility for the supervision of Minors in all programs, activities, and/or housing opportunities. Sponsors should act to ensure the safety and good conduct of the Minors. Sponsors shall authorize TU to conduct fingerprinting. Fingerprinting will be repeated at intervals of no less than two years as a condition of remaining a TU Sponsor.
1. Sponsors should:
   
a. Consult with the Office of Environmental Health and Safety ("EHS") to determine whether participants need training. Ensure that participants successfully complete any appropriate safety and/or confidentiality training at the outset. Those who do not complete such training may not be a Sponsor.
   
b. When Minors are not accompanied by a supervising adult(s), obtain from parent or guardian, a signed waiver and consent form for each participant.

V. Implementation:

A. Other Prohibited Activities.

1. Minors who are the children, relatives and/or acquaintances of University faculty, staff, and/or students may not be in a Prohibited Area or in a Wet Laboratory unless participating in an approved program or activity or tour. (The presence of Minors in other areas, whether or not the Minors are related to faculty, staff and/or students, is discouraged and may be prohibited by TU or departmental policy.)

2. Minors participating in a program or activity are not permitted to participate in off-campus travel as part of that program or activity unless the travel was described in the request for approval of the Youth Activity, and in the consent form signed by the parent or legal guardian.

3. Minors are permitted to remain in TU facilities after normal work hours only with a Sponsor of a Minor.

4. Minors should not be issued passwords for University information and data systems and should not be given University keys or swipe cards.

5. No program, activity, and/or housing opportunity shall involve:
   
a. Unobserved or unsupervised one-on-one contact between a Minor and an adult;
   
b. Corporal punishment, inappropriate touching, or boisterous or rough housing;
   
c. Hazing or bullying;
   
d. Presence or consumption of tobacco, alcohol, or illegal drugs;
   
e. Presence or use of firearms or weapons;
   
f. Gifts given between adults and Minors;
   
g. Inappropriate use of cameras, computers, or audio/video equipment;
h. Any private communication not pertaining to program, activity, and/or housing opportunity matter between adults and Minors by email, text, social media, or other means; or
i. Transportation of Minors by adults except in conformance with TU policy.

B. Tours Involving Minors.

1. Any tour for areas not normally accessible to the public and which include Minors must be approved in advance by the appropriate Program Administrator. (Approval will not be required for tours of areas normally accessible to the public such as prospective student tours of campus

2. A tour that includes any Prohibited Area, Wet Laboratory, or Hazardous Location may not be conducted for any Minor below the age of thirteen.

3. A tour of a Prohibited Area, Wet Laboratory, or Hazardous Location may be conducted for Minors thirteen and older only upon satisfaction of the following requirements:
   a. The Sponsor(s) for the tour must be identified to the Program or Activity Administrator
   b. The Sponsor(s) must obtain agreement from, and coordinate the tour with, the administrator(s) responsible for the area(s) to be toured.
   c. Approval of a tour may be subject to conditions (e.g., ratio of participants to guides; time of day).
   d. The Sponsor(s) must give participants a safety briefing before the start of the tour.
   e. A University faculty or staff member who is knowledgeable of the hazards of each tour area must accompany participants at all times that the tour is in that area.
   f. If required, appropriate personal protective equipment and instruction on its proper use must be provided to tour participants.
   g. Tours shall not enter areas that require respiratory protection.
   h. Prior consent of patients must be obtained if patients will be in a Prohibited Area being toured.
   i. Tour participants are strictly prohibited from taking photographs during tours. All cell phones and electronic devices must be turned off during tours. Participants may not wear headphones during tours.

C. Student Organization Programs Involving Minors

1. Any student organization program for a group of or including Minors must be approved in advance by the designated Program, Activity and/or Housing Administrator.
2. Any program must be held in an open area space with no less than 3 student organization members.
3. No programs where one on one interactions with Minors may occur without oversight of a sponsor or supervising adult.
4. Student organization members must review this policy with the Sponsor or supervising adult prior to authorization of program
5. Minors must be accompanied by a designated faculty member, mentor, or guardian while the student organization program is being executed. The recommended ratio is one supervising adult for 25 minors.
6. Activities and programs that involve student volunteers and/or student organizations must provide documentation that a supervising adult will be present at the activity.

D. Reporting Suspected Child Abuse and Neglect.

All Coordinators and Sponsors must report suspected cases of Child Abuse and/or Neglect in accordance with the provisions of the TU Child Abuse and Neglect Policy. https://www.towson.edu/publicsafety/documents/reportingsuspectedchildabuseneglect-policy.pdf

VI. Violations of Policy:

Failure to follow the requirements of this Policy may result in suspension of an approved program, activity and/or housing opportunity, cancellation of a planned or ongoing tour, and/or ineligibility to serve as a Coordinator, Sponsor or in any other capacity. It may also result in discipline, up to and including termination of employment, dismissal from the University, denial of access to the University and/or disqualification for participation in future volunteer activities.

Related Policies:

06-01.50 - Policy on the Reporting of Suspected Child Abuse and Neglect
06-01.60 - Policy on Sexual Misconduct
06-01.00 - Policy Prohibiting Discrimination on the Basis of Race, Color, Religion, Age, National Origin, Sex and Disability
Effective Date: March 6, 2019

Acknowledged by: President’s Council

Kim Schatzel, Ph.D.
President

4/2/19
Date