

## Grinnell College Policy for the Protection of Minors

Edit Date: July 31, 2017

### I. Policy Statement

Grinnell College (“the College”) strives to protect the welfare of minors who are on campus or who are participating in a program, activity, or event (collectively, “program” or “programs”) sponsored by the College.

The Policy for the Protection of Minors (“the Policy”) provides guidelines for maintaining a safe environment for minors at the College and applies to all authorized staff, college-sponsored or organized programs, and programs organized by an external organization or individual utilizing College facilities.

This policy does not supersede state or federal laws that apply or pertain to minors. Grinnell’s Child Abuse Reporting Policy<sup>1</sup> is a related policy and is applicable to all minors. It is the responsibility of all employees and faculty to comply with the policy.

### II. Definitions

- a. “Authorized staff” means any student, faculty, staff, or volunteer of the College, acting in their official capacity on behalf of the College, who supervises a college-sponsored or organized program that includes minors. All authorized staff must submit and pass a criminal background check which will be administered and reviewed by Human Resources.
- b. “Minor” means any person under the age of 18 years.

### III. Minors Affected by the Policy

The Policy applies to the following minors:

- a. Minors involved in a program organized or sponsored by the College and supervised by authorized staff, on or off campus; and
- b. Minors involved in a program organized or sponsored by an organization external to the College, but utilizes College facilities, or property owned or leased by the College.

### IV. Minors Not Affected by the Policy

The Policy does not apply to the following minors:

- a. Visiting minors<sup>2</sup>; or
- b. Overnight visitors, hosted by an enrolled student<sup>3</sup>.

Nothing in Section IV shall be construed to prevent the College or its employees from protecting minors from sexual and physical abuse or complying with the College’s Child Abuse Reporting Policy or mandatory reporting requirements under state or federal law.

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<sup>1</sup> [http://www.grinnell.edu/sites/default/files/documents/child\\_abuse\\_reporting.pdf](http://www.grinnell.edu/sites/default/files/documents/child_abuse_reporting.pdf)

<sup>2</sup> The College offers many educational, cultural, athletic, religious, and other programs that are open to the public. In addition, many areas of the campus are open to the public as a resource or recreation to members of the community. The College welcomes the presence of minors at all age-appropriate public events and for informal visits with the understanding that the parent, legal guardian, or other responsible adult assumes full responsibility for a minors safety and behavior while on campus.

<sup>3</sup> Overnight stays may be requested by minors over the age of 16, including overnight visits by siblings and guests of enrolled students, when hosted by an enrolled College student. All such visitors are required to comply with applicable rules for guests as well as adhering to College policies that apply to the campus community. See the Grinnell College Overnight Policy and Release Form at <https://admission.grinnell.edu/register/oprform>.

## V. Programs Subject to the Policy

The policy applies to all programs, sponsored or organized by the College, and including the participation of minors. These programs may include family-oriented art workshops, educational programs, tutoring, and mentoring, and community service activities. Other programs subject to the Policy include, but are not limited to:

- a. **Student Teaching in Preparation for Licensure**  
The Policy applies to the College's student teaching program, organized in coordination with the Iowa Department of Education, to prepare students for licensure. Students participating in this program shall sign an acknowledgement that they understand and will comply with the expectations outlined in the Policy (see Appendix 2).
- b. **Student-Led Activities**  
The policy applies to any student group planning to host an activity or program involving a minor. Student groups are required to have an authorized faculty or staff advisor oversee their planning process and onsite at any events. Students participating in this program shall sign an acknowledgement that they understand and will comply with the expectations outlined in the Policy (see Appendix 2).
- c. **External Programs and Non-College Sponsored Activities Using the College's Facilities**  
The Policy applies to programs sponsored by an external individual or organization outside of the College, using College facilities<sup>4</sup>. Such programs shall sign an acknowledgement that they understand and will comply with the expectations outlined in the Policy (see Appendix 2).

## VI. Programs Not Subject to the Policy

The College does sponsor and/or organize certain programs that are not subject to the Policy because the program has established program-specific standards to comply with external requirements, laws, or regulations that meet or exceed the requirements set forth in the Policy. Those programs include, but are not limited to:

- a. The Grinnell College Preschool Laboratory<sup>5</sup>
- b. Academic Research<sup>6</sup>
- c. Student Internships<sup>7</sup>

## VII. Duties and Responsibilities of the College

- a. Oversight

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<sup>4</sup> These programs include, but are not limited to, local clubs, teams, and sport camps that use the College facilities for practice, meetings, or competition; private not-for-credit music lessons; and on-campus events, tours, activities, and conferences.

<sup>5</sup> The Preschool must comply with a program-specific handbook which outlines procedures and appropriate conduct as well as applicable laws and regulations as set forth by the Grinnell College Institutional Review Board ("the IRB"), the Department of Human Services, and the Department of Education.

<sup>6</sup> Consistent with research involving human subjects, research protocols involving minors are subject to approval by the IRB. When minors are the subjects of academic research, the College assigns responsibility for specific standards of compliance to the respective academic departments according to best practices in that discipline.

<sup>7</sup> College student internships at non-College organizations that involve interaction with children are considered external programs even if the College provides funding or credit for the internship.

- i. The Office of College Services will review proposals to establish any new program or modify any existing program that involves minors to ensure compliance with the policy. All existing programs involving minors will be reviewed by the Office of College Services annually.
- ii. The head of the academic or administrative department sponsoring or organizing the program is responsible for working with authorized staff to ensure compliance with the standards set forth in the policy.
- iii. External individuals or organizations, not otherwise affiliated with an academic or administrative department, sponsoring a program at the College are required to acknowledge and comply with the provisions of the policy (see Appendix 1). For these external organizations or individuals, the campus sponsor will be the Director of Conference Operations (under College Services).

b. Failure to Comply

Failure to comply with the standards set forth in the policy may result in restrictions being placed on the program. Such restrictions may include, but are not limited to, prohibiting authorized staff from interacting with minors, additional oversight of a College department or program, and/or discontinuation of a noncompliant program.

### VIII. Program, Activity and Event Requirements

Programs subject to the Policy must demonstrate compliance with the following:

a. Authorized Staff Training

- i. For programs sponsored or organized by the College and involving the participation of minors, all authorized staff must submit and pass a criminal background check which will be administered and reviewed by Human Resources.
- ii. All authorized staff will complete additional training through the United Educators' course , "*Protecting Children: Hiring Staff Who Work With Minors.*"<sup>8</sup>
- iii. For programs involving fewer than three minors at one time with no overseeing supervisor, the, "*Protecting Children: Identifying and Reporting Sexual Misconduct*" course<sup>9</sup>, or an equivalent training program.
- iv. All authorized staff who will be staying overnight in the dorms or transporting minors must complete adequate training, either through, "*Protecting Children: Identifying and Reporting Sexual Misconduct*"<sup>10</sup> or an equivalent training program.
- v. Authorized Staff are responsible for assuring that all program staff and volunteers maintain appropriate interaction with minors. Authorized Staff will distribute or make available the "*Code of Conduct for Working with Minors*" (See Appendix 3).

b. Communication Plans

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<sup>8</sup> <https://www.edurisksolutions.org/learn-to-protect-children/>

<sup>9</sup> <https://www.edurisksolutions.org/learn-to-protect-children/>

<sup>10</sup> <https://www.edurisksolutions.org/learn-to-protect-children/>

Authorized staff shall establish a Communications Plan (see Appendix 5).<sup>11</sup> The Communications Plan will ensure that parents or legal guardians of participating minors and authorized staff have established a method of communication in the event communication becomes necessary while the program is in session.

c. Transportation Plans

Authorized staff shall establish a Transportation Plan (see Appendix 6).<sup>12</sup> The Transportation Plan will specify the drop-off and pick-up times and locations and will ensure that no minor is left unattended, or alone with a single authorized staff, while waiting to be picked up. The plan shall further ensure that no minor will be released to any person other than a parent or legal guardian without specific written authorization from the minor's parent or legal guardian.

Use of a College vehicle to transport minors in College programs requires the advance approval of the Director of Campus Safety. The driver must be a College employee who meets the College's driver safety requirements.

d. Staffing Ratios

Programs shall demonstrate compliance with established staffing ratios and guidelines (see Appendix 4), to ensure an adequate number of authorized staff to meet the demands of supervising a group of minors.

e. Code of Conduct

Authorized staff shall comply with the established code of conduct (see Appendix 3). This Code of Conduct is a general guideline for appropriate behavior and is not inclusive of all behaviors which may be considered inappropriate, unacceptable, or illegal.

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<sup>11</sup> Not all programs will be required to develop a Communication Plan. Drop-in programs, or informal programs that make collection or maintenance of contact information impractical or unworkable, would not be required to establish a Communications Plan.

<sup>12</sup> Not all programs will be required to develop a Transportation Plan. Programs involving minors capable of providing their own transportation would not be required to establish a Transportation Plan.

Appendix 1

**Sponsoring Organization Acknowledgment and Release**

In consideration of the Trustees of Grinnell College (“Grinnell College”) permitting an organized activity or event taking place either on or off the premises of Grinnell College, the undersigned organization (“Sponsoring Organization”) hereby acknowledges and agrees as follows:

1. The Sponsoring Organization will comply with the Grinnell College Policy for the Protection of Minors and other written expectations and policies provided to the Sponsoring Organization as they relate to activities involving minors (“Minors”) either on or off the Grinnell College premises. Without limiting the foregoing, the Sponsoring Organization shall ensure that there are appropriate screening and training of supervisors, approved communications and transportation plans, compliance with child-to-staff ratio requirements, and an agreement to abide by the code of conduct to be followed by those who interact with the Minors.
2. For any activities occurring on or off the Grinnell College premises in which Grinnell College employees, volunteers or students are not serving in a supervisory or director role (“Sponsoring Organization Activities”), Sponsoring Organization hereby releases, waives and covenants not to sue Grinnell College, its trustees, employees, contractors, agents, students, and volunteers (“Grinnell College Releasees”) from any liability to Sponsoring Organization relating to any injury to persons or property as a result of the Sponsoring Organization Activities.
3. The Sponsoring Organization shall indemnify, defend and hold harmless the Grinnell College Releasees from any loss, liability, damage, or cost, including, without limitation, attorney fees, that may be incurred out of or related to the Sponsoring Organization Activities.
4. The Sponsoring Organization shall procure and maintain policies of insurance adequate to fully protect the Sponsoring Organization, the Minors and others involved in the Sponsoring Organization Activities, and Grinnell College Releasees from and against all expenses, claims, actions, liabilities and losses relating to the Sponsoring Organization Activities. Grinnell College shall be listed on the Sponsoring Organization’s insurance policy(ies) as an “additional named insured.” Sponsoring Organization shall furnish Grinnell College with certificates or insurance at Grinnell College’s request.

The Sponsoring Organization has caused its duly authorized representative to execute and deliver this Acknowledgment and Release as of the date set forth below.

\_\_\_\_\_

Name of Sponsoring Organization

By: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Appendix 2

**Grinnell College Student Acknowledgment**

In consideration of the Trustees of Grinnell College (“Grinnell College”) permitting me to participate in an organized activity or event taking place either on or off the premises of Grinnell College, I hereby acknowledge and agree to comply with the Grinnell College Policy for the Protection of Minors and other written expectations and policies provided to me as they relate to activities involving minors either on or off the Grinnell College premises

Date: \_\_\_\_\_

Signature of Student

\_\_\_\_\_

Printed Name

## Appendix 3

### Code of Conduct for Working with Minors<sup>13</sup>

1. Grinnell College Faculty and Staff Handbook policies on maintaining professional demeanor and behavior (including alcohol and drug use, nondiscrimination policies, etc.) apply to Authorized Staff, paid and volunteer, for all programs involving minors.
2. Authorized Staff, whether paid or volunteer, are responsible to understand and follow College policies, such as those prohibiting weapons on campus and those describing protocols to follow in a campus crisis or emergency.
3. Physical punishment and emotional shaming are not to be used to discipline minors participating in the program. Consult with mentors and supervisors for alternative ways to foster positive behavior by the children.
4. For the protection of minors on campus and for your own protection from unfounded accusations, be highly aware of situations in which your actions could be misconstrued as inappropriate. Maintain professional boundaries and avoid the following actions:
  - a. Ambiguous physical contact such as allowing minors to sit on your lap, massaging, tickling, hugging, etc.
  - b. Bathing or undressing in the presence of minors;
  - c. Taking photos of children on personal cell phones or cameras;
  - d. Bringing a minor (or minors) other than family members to your home;
  - e. Being alone or at some distance apart from others with a minor. Follow these rules:
    - i. Follow the “rule of three” and always make sure there is another Authorized Staff member present with you, especially when assisting with dressing or bathroom use.
    - ii. If privacy is required, meet with the minor in a location that is observable by other Authorized Staff or parents/guardians, such as through an open door, an office window or an outdoor/public location;
    - iii. Minors should use a “buddy system” or otherwise be encouraged to stay together when going to the bathroom, on field trips, or when apart from the group.
    - iv. When helping a single minor use a restroom, check that the interior is safe, then exit and allow the minor to use the restroom alone.
5. Be highly aware of your words and tone of voice in the presence of minors (e.g., profanity, adult topics, sexual innuendo, risqué humor, stereotyping comments, etc.).
6. Do not allow inappropriate language or touching among minors to go unchallenged.
7. Refrain from phrases like “this is our little secret” or similar language that encourages minors to conceal information from their parents or guardians.

Avoid the appearance of favoritism and partiality; do not give or receive gifts.

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<sup>13</sup> Grinnell College Preschool adheres to a more specific Code of Conduct.

## Appendix 4

### **Child-to-Staff Ratios**

Whether offering daytime only activities or overnight stays, Programs need to assure the number of Authorized Staff is adequate to meet the demands of supervising a group of minors. To help assure staffing is sufficient, the College has adopted the American Camp Association's program staff to program participant ratios. With the exception of Special Cases outlined above, which have established their own protocols subject to external standards, Grinnell College expects all Programs which involve minors and which use the college campus facilities to abide by these ratios. In addition to applying the standards, it is advisable for Program directors to attempt to have the Program staff reflect the gender distribution of the participants. The following standards should be met for Programs having overnight stay(s):

- Ages 4-5: One staff member for every five minors.
- Ages 6-8: One staff member for every six minors.
- Ages 9-14: One staff member for every eight minors.
- Ages 15-17: One staff member for every ten minors.

Separate standards, which follow, exist for Programs not involving overnight stay.

- Ages 4-5: One staff member for every six minors.
- Ages 6-8: One staff member for every eight minors.
- Ages 9-14: One staff member for every ten minors.
- Ages 15-17: One staff member for every twelve minors.



## Appendix 5

### **Communication Plan**

What is the timeline for the Program?

How will parents and guardians contact Program leadership?

Where is contact information posted for parents and guardians?

How will Program leadership collect, store, and have easily accessible parent or guardian contact information?

How will Program leadership communicate to parents/guardians that they have fulfilled the requirements of this policy?

How will Program leadership communicate with parent or guardians in the event of an emergency?

Are there drop off and pick up times? Who will staff these times?

## Appendix 6

### **Transportation Plan**

What is the designated location for drop off and pick up?

What are the designated times for drop off and pick up?

How will the program assure the children are picked up by authorized parents or guardians?

What is the staffing plan for (at least two staff members) the drop off and pick up times?

What is the protocol for a child who has not been picked up?