



SNU POLICY: PROTECTION OF MINORS
SNU POLICY ID: Workplace Performance E-7
Policy Reviewed by: SNU Human Resources
Approval Authority: Vice President for Business Affairs/CFO
Approval Date: October 25, 2021
Next Review Date: October 25, 2026

I. POLICY SCOPE

Southern Nazarene University (“SNU” or “University”) has adopted certain safeguards intended to protect minors (children under 18 years of age, “Minors”). All faculty, staff, students, volunteers, and third-party entities (collectively “SNU Associates”) are expected to know and comply with the provisions of this Policy.

II. REQUIREMENTS

A. DUTY TO REPORT ABUSE & NEGLECT

1. According to Oklahoma state law, **every individual is required to report any reasonable suspicion of child abuse and/or neglect (physical, sexual, mental, or otherwise) directly to the Oklahoma Department of Human Services (DHS).**
2. Therefore, if any individual, including any SNU Associate, has reason to believe that a Minor is the victim of abuse or neglect, it is the individual’s duty to report it immediately. This reporting obligation is on the individual who suspects abuse.
3. **The DHS hotline for reporting is 1-800-522-3511.**
4. Every SNU Associate shall also report any suspected abuse/neglect of any Minor with any connection to SNU to SNU’s **Department of Public Safety at 1-405-491-6309 or extension 6309** from an on-campus phone.
5. Reasonable suspicion: One does not have to know with certainty that abuse is taking place. Reasonable cause to believe or suspect that child abuse has occurred is sufficient.
6. **When in doubt, report it.**
7. The duty to report includes, but is not limited to, the requirement that SNU Associates report any suspected abuse that they witness occurring on or learn of related to University premises or at a University-sponsored program or activity, regardless of location.
8. The duty to report includes both Minors who are currently enrolled at the University or accepted for enrollment, and Minors who are not enrolled or accepted for enrollment as students at the University but who participate in a University program or activity designed to include Minors or who otherwise become known to SNU Associates in their respective capacities.

B. REPORTING PROCEDURES – Utilize the 3 steps shown below to report suspected abuse and neglect:

Step 1	Step 2 – Immediately Report the Abuse/Neglect to DHS	Step 3 – Notify SNU Department of Public Safety
If life threatening, dial 911	DHS 24-hour Hotline: 1-800-522-3511 (Report as much information as possible as set forth below)	1-405-491-6309 or extension 6309 from an SNU on-campus phone.

C. REPORTING INFORMATION

When calling to report suspected child abuse and neglect, it is important to have as much factual information in front of you as possible to enable a prompt investigation; however, the lack of information available must not deter immediate reporting.

- Name, age, gender, and current location of each Minor affected
- Address of Minor(s) affected
- Name of parent(s) or person(s) having custody
- Exact location, date, and time of the alleged abuse and/or neglect
- Name, address, phone number, and relation to the child of the person(s) allegedly responsible for the abuse and/or neglect
- Name of person making the report and where s/he can be reached (NOTE: anonymous reporting is available in most states)
- Nature and extent of any injuries, abuse and/or neglect, including any evidence of prior injuries, abuse, and/or neglect
- Any other information that might be helpful to those investigating.

D. DUTY TO COOPERATE

All SNU Associates shall cooperate with investigations of alleged child abuse/neglect, including agency-initiated, law enforcement-initiated, and/or internal investigations. All SNU Associates shall also cooperate with investigations of alleged violations of this Policy and any applicable University policies/procedures.

E. RETALIATION WILL NOT BE TOLERATED

Retaliatory acts against SNU Associates who make good faith reports or complaints under this Policy, and/or who cooperate in the investigation and handling of such reports, even if the report is later deemed unfounded, will not be tolerated. Any SNU Associate who believes that he or she is the subject of retaliation should contact the Human Resources (HR) Department and/or the Office of Risk Management. The University will promptly investigate all complaints of alleged retaliation.

III. UNIVERSITY PROGRAM SAFEGUARDS

A. DUTY TO SUBMIT TO BACKGROUND CHECKS

1. Criminal Background Checks

- a) All SNU Associates who are responsible for the supervision or care of Minors, or whose duties would require close contact with Minors who are not enrolled or accepted for enrollment at SNU, must undergo a comprehensive background check through the HR Department, unless a *current* background check is on file with the HR Department. For purposes of this policy, “current” background check is defined as a background check that was successfully passed within two (2)

years of the Program (as defined below) start date, which includes at a minimum, the screening results from the National Criminal Database, the National Sex Offender Registry, a Social Security Number (“SSN”) trace and validation, and seven (7) years of Criminal Felony and Misdemeanor checks from all counties (as revealed by the SSN trace).

- b) Background checks that reveal convictions will be reviewed by HR for determination of eligibility for employment or service. Such determination will be communicated to the appropriate hiring manager, director, or volunteer coordinator.
- c) In rare and extenuating circumstances (e.g. the need for numerous volunteers with short lead time due to an emergency) an alternative to background checks may be allowed with HR/Office of Risk Management consent. At a minimum, the alternative method must include the following:
 - i. Recording the names and contact information for the individuals prior to the Program start date;
 - ii. Requiring individuals to show a valid photo ID prior to the Program start date; and,
 - iii. Verifying the names have been checked against the online sex offender registry and disqualifying anyone who is listed in the registry.
- d) Campus officials should consider the duration of the event, whether or not overnight accommodations are involved, and how recently the individual was last required to submit to a background check before allowing an exception to the background check requirement.
- e) **Program** – The term “Program” includes ongoing or planned events that are designed to include Minors such as camps, lessons, workshops, clubs, teams, projects, practices, choirs, bands, tours, open-houses, laboratories, recruiting activities, and clinical settings.

The term “Program” does not include: 1) single performance or events open to the general public that are not targeted toward children (e.g. SNU intercollegiate competitions, plays, concerts), 2) regularly scheduled classes or activities designed primarily for enrolled students who are age 17 and above, and 3) the ongoing activities and events associated with Southern Nazarene University’s Lab School (SNU’s Lab School, specifically, is guided by the regulations and standards imposed via its accreditation through the Oklahoma State Board of Education).

2. Motor Vehicle Checks

SNU Associates that will be driving Minors in connection with approved Programs are required to submit a Motor Vehicle Records check through SNU’s Transportation Office and follow all other steps to be an approved driver for SNU. An Authorized Adult utilizing his/her personal vehicle assumes all auto insurance liability.

B. RISK MITIGATION PRACTICES

Program leaders will ensure that the following risk mitigation practices are adhered to within their Programs:

1. Every adult scheduled to supervise or provide care for Minors in a Program will: be at least 18 years of age; have successfully passed a background check; have completed the *Acknowledgment of Mandated Reporter Status and Standards of Conduct with Minors (the “Acknowledgement Form”, attached below and incorporated into this Policy)*; and, have the consent of the respective Program’s leadership to provide supervision of or care for Minors during the Program (an “Authorized Adult”);
2. Every Authorized Adult complies with the Conduct Requirements set forth in the Acknowledgement Form;
3. Every Minor participating in a Program must be provided with reasonable and appropriate supervision by an Authorized Adult while that Minor is on campus or at a University-sponsored event/activity, regardless of location;

4. Every Program at which Minors are present must have a minimum Authorized Adult to Minor ratio as follows:

Minor Age Group	Number of Required Authorized Adults	Number of Overnight Minor Participants	Number of Day-Only Minor Participants
Ages 6-8	1	6	8
Ages 9-13	1	8	10
Ages 14-18	1	10	12

- a) While classroom teaching is exempt from the above ratios, such activities shall comply with all mandatory reporting requirements of this Policy, along with other University policies/procedures related to classroom safety.
- b) For purposes of complying with the Authorized Adults to Minor ratios at overnight camps for junior high and high school athletic teams, any coaches who may accompany their teams shall be counted as Authorized Adults.
- c) Notwithstanding these ratios, Authorized Adults should be aware that having a second individual present with the Authorized Adult and any individual minor is advisable whenever possible so that no one Authorized Adult can be alone with a single minor in any enclosed, non-public, or otherwise secluded area is advisable as a best practice as well. Another Authorized Adult or non-minor is preferable as this second individual present, but additional minors present so that a one-on-one scenario between an Authorized Adult and a minor is not possible would be a minimum level of safeguard as well.
5. Every Program should establish security and emergency measures for Minors, including, but not limited to:
- a) Drop off and pick up procedures, including the requirement that every Minor is to be checked-in on a daily basis, and that Minors under 13 years of age must be checked out with the signature of a parent or guardian;
- b) The requirement that Authorized Adults may not release a Minor under the age of 13 to anyone other than a custodial parent or legal guardian without written authorization from the parent/guardian that his/her child may be released to that individual;
- c) The collection of emergency contact information from the Minor's parent or guardian;
- d) Communication of how parents or guardians may reach their Minor in the event of an emergency;
- e) Oversight of Minors in specified space during free time, mealtimes, or before the Program begins;
- f) Inclement weather plans;
- g) Where to go if lost; and,
- h) Steps to take in the event of an emergency on campus (e.g., fire, tornado, etc.), including shelter-in-place locations within each facility used by the Program.
6. Restroom supervision for Minors under the age of 13: Authorized Adults will make sure the restroom is not occupied by suspicious or unknown individuals before allowing Minors to use the facilities. An Authorized Adult will stand outside the doorway while Minors are using the restroom. If Authorized Adults must assist younger children, doors to the facility must remain open.

C. USE OF RELEASE FORMS

1. All SNU-sponsored Programs involving Minors will utilize a release form to mitigate liability risks to the University and Program staff.

2. A Program that desires to use the image or likeness, voice, testimony, story, biographical information, and/or intellectual property of a Minor in any format for any purpose must have some type of media release completed on each Minor.
3. Program staff should keep in mind that the signature of a parent/guardian is required on all release forms for Minors.

IV. SANCTIONS FOR VIOLATION OF POLICY

Failure to comply with the provisions of this policy and any related University policy or procedures may result in cancellation of an event and/or discipline in accordance with applicable University handbook policies, up to and including termination of employment, termination of contract, dismissal from the University, issuance of No-Trespass Notices, and/or disqualification for participation in future volunteer activities. Knowingly making a false report or complaint under this policy, or knowingly providing false or intentionally misleading information during an investigation, may also result in disciplinary action up to and including termination of employment and/or dismissal from the University. SNU Associates should also be mindful that failing to report child abuse and neglect, as well as knowingly making a false report are considered crimes in most states.

**ACKNOWLEDGEMENT OF MANDATED REPORTER STATUS
AND STANDARDS OF CONDUCT WITH MINORS**

Child abuse, neglect, and inappropriate conduct, including but not limited to the following, is prohibited:

- Engaging in any form of **physical abuse** of a child (e.g., punching, beating, kicking, biting, shaking, throwing, stabbing, choking, burning, or hitting with any object).
- Engaging in any form of **sexual abuse** of a child (e.g., fondling a child's genitals, penetration of any type, incest, rape, indecent exposure, transmission of a sexual disease, exploitation through prostitution or the production of pornographic materials, and making pornographic or sexually explicit materials available to a minor).
- Engaging in **emotional / psychological abuse** of a child (e.g., constant criticism, threats, or rejection, and withholding love, support, or guidance).
- **Neglecting** the duty of care for a child under the adult's supervision, including but not limited to:
 - failing to protect children's health and safety (e.g., exposure to unreasonable risk of injury or extreme weather)
 - failing to ensure the use of appropriate protective equipment (e.g., in laboratory or athletic participation)
 - failing to meet children's basic needs (i.e., food, clothing, shelter)
 - leaving children consistently unsupervised.
- Leaving a Minor in the care of a person that is not an Authorized Adult or in an area that is off-limits to Minors.
- Engaging in the use of alcohol or illegal drugs or being under the influence of alcohol or illegal drugs during Programs.
- Enabling, facilitating, or failing to appropriately address a Minor's use of alcohol or illegal/non-prescribed drugs.
- Having one-on-one contact with Minors outside the presence of others. It is expected that activities where Minors are present will involve two or more Authorized Adults. Individual musical instruction under the auspices of the SNU Division of Music is specifically exempted from this requirement; however, individual musical instruction should only occur in practice rooms or studios that have doors with windows or where doors can be left open.
- Participating in a sleepover under the auspices of the Program, unless (1) one of the Minor's parents or legal guardians is present or (2) one of the Minor's parents or legal guardians has given consent and there are at least two (2) Authorized Adults present at all times.
- Sharing a bed or sleeping bag with a Minor.
- Being alone with a Minor in the Authorized Adult's living quarters.
- Showering, bathing, or undressing with or in the presence of Minors.
- Taking any photographs, images, or videos of Minors or posting photographs or videos on a digital, electronic, hosted media, web-based service or any other medium without first obtaining a model release in this regard from the Minor's parent or legal guardian. At no time is it appropriate for an SNU Associate or other Minor to take pictures, video, or any other image of a Minor in a bathroom, locker room, dressing/changing room, or swimming facility, even with a parental/guardian model release. Any exception to the swimming facility rule must be approved in advance by Risk Management.
- Failing to report abuse, harassment or exploitation of Minors by other Minors participating in the Program.
- Failing to report abuse, harassment or exploitation of Minors by any adult.
- Engaging in electronic communication with a Minor, including, but not limited to email, online posting, texting, calling, photo sharing, and digital file sharing, without the explicit written consent of one of the Minor's parents or legal guardians.

ACKNOWLEDGEMENT

I have thoroughly read the *SNU Policy for the Protection of Minors* and this *Acknowledgement of Mandated Reporter Status and Standards of Conduct with Minors*, each in its entirety. I have been given the opportunity to contact the Office of Human Resources and/or Risk Management with any questions regarding these documents. I fully understand the requirements set forth and agree to abide by the Standards of Conduct with Minors. **I further acknowledge and understand my mandatory duty to immediately report any suspected abuse or neglect of a Minor** in accordance with the SNU Policy for the Protection of Minors.

SNU Associate Printed Name: _____

SNU Associate Signature: _____

Date: _____