Grinnell College Policy for the Protection of Minors

Edit Date: December 19, 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 Policy¹ 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. "Volunteer" means any student, faculty, staff, alum, or community volunteer who reports to an authorized staff person. Volunteers must read Code of Contact and sign acknowledgement.
- c. "Program staff" means any paid or unpaid staff for a specific program who reports to an authorized staff person. Program Staff must read Code of Contact and sign acknowledgement.
- d. "Minor" means any person under the age of 18 years. "Community Minor" means any minor from the greater Grinnell community.

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 minors²; or

 $^1\,http://www.grinnell.edu/sites/default/files/documents/child_abuse_reporting.pdf$

² 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.

b. Overnight visitors, hosted by an enrolled student³.

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.

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 specifically serving community minors. 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 facilities⁴. Such programs shall sign an acknowledgement that they understand and will comply with the expectations outlined in the Policy (see Appendix 1).

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:

³ 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.

⁴ 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.

- a. The Grinnell College Preschool Laboratory⁵
- b. Academic Research⁶
- c. Student Internships⁷

VII. Duties and Responsibilities of the College

a. Oversight

- i. The Office of Auxiliary 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 Auxiliary 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

- 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." 8
- iii. For programs involving fewer than three minors at one time with no overseeing supervisor, the, "Protecting Children: Identifying and Reporting Sexual Misconduct" course⁹, or an equivalent training program.

⁵ 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.

⁶ 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.

⁷ 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.

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

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

- 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" 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

Authorized staff shall establish a Communications Plan (see Appendix 5).¹¹ 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).¹² 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.

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

¹¹ 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.

¹² 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.

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.
- 5. The Sponsoring Organization shall send Grinnell College a copy of their organizational policy regarding training and background checks.

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 [.]	

Grinnell College Code of Conduct Acknowledgment

consideration of the Trustees of Grinnell College ("Grinnell College") permitting me to				
participate in an organized activity or event taking p	lace either on or off the premises of Grinnell			
College, I hereby acknowledge and agree to comply	with the Code of Conduct for Working with			
Minors, 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	Ç			
Signature of Student/Staff/Faculty/Volunteer	Date:			
Printed Name				

Code of Conduct for Working with Minors¹³

- 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 please 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 make sure there are always two Authorized Staff members present with any camper (3 people minimum), 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, 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.

¹³ Grinnell College Preschool adheres to a more specific Code of Conduct.

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.

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?

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?

Sample Permission Form

Program Name
Short Description
Location
Dates and hours

Registration information

Parents/Guardians are required to complete this registration form before their children may participate. Parent, guardian, caregivers are welcome to stay with child during programming. If a caregiver is under 18, that caregiver will require a registration form signed by their parent or guardian. If no registration form has been completed, child/caregiver will not be considered a participant in the program. All registered participants or guardians will be required to sign-in and sign-out for each program they attend.

Child name:	
Child age/grade:	
Parent name and contact	
 Address phone (w) Phone (c) Phone (h) e-mail: 	- -
Does your child have allergies, dietary needs, or special health concerns we sho Yes- please explain My child has	ould be aware of?
• Please list all medications your child is currently taking, if any:	

Emergency contacts

Program staff are able to handle everyday bumps and bruises. Should an emergency arise where medical attention is required, parents will be notified immediately. If parents cannot be reached, the person(s) listed as the emergency contacts will be called. All efforts will be made to contact you prior to taking medical action. If we need to contact either parent/guardian at work or home, but are unable to reach you, please provide two people who would be authorized to talk with our staff about your child (children).

Emergency Contact Name:	
Address:Phone Number:	
Emergency Contact Name:Address:Phone Number:	
Transportation	
Pick-Up/Drop Off: The designated location for drop off and pick up is location for drop off between X and X time, and may be picked up between X and X	
My child will be dropped off by:	
My child is authorized to bike/walk/drive independently to/from the	program
Please list those who are authorized to pick up the child. Your child will not listed/authorized:	not be released to anyone who is
Authorized Name Phone N	
Fieldtrip Permission : As part of the program, students will be transporte approved vehicles both within and out of the school district. Any such travarious hazards and dangers that are not present in a classroom. Of course prevent such accidents from occurring, but you should be aware of the adetravel.	d by bus or other school wel does subject the student to the program will endeavor to
YES – my child has permission to attend field trips included in the pwalking and taking the bus.	orogram. Field trips may include
NO – my child does not have permission to attend any field trips in	cluded in the program.
Parent/Guardian Signature Date	

Your child will not be released to anyone who is not listed/authorized in the Transportation section below

Program release and medical information

without written permission from the parent/guardian.

Administering Medications: Program staff will not dispense any form of medication, prescription, over the counter, or otherwise. If needed, arrangements can be made for you or your designee to administer medication to your child. Additionally, medications cannot be brought into the program. If your child is

found to have a substance in their possession, you will be contacted immediately to collect your child and the substance they possess.
Primary physician and phone number:
Insurance provider:
Policy number:
List of medications:
Liability Release And Medical Authorization
I understand and agree that any injuries or illness my child/children may encounter during this program are solely my responsibility and not the responsibility of Grinnell College. This program is open to the public with the understanding that for children who attend, a parent, legal guardian, or other designated caregiver remains responsible for their care and protection.
I hereby assume all risks of the program including property loss or damage, personal injury and death—resulting from any Program activity (including transportation). I understand and acknowledge that the Program activities may include some risk or danger to the student and/or property. I agree to release, indemnify, defend, hold harmless, discharge, and covenant not to sue Grinnell College, their officers, employees, and agents, and all participants of the Program (collectively, the "Releasees") from and against all liability, damage, or cost, including claims and suits at law or in equity, for injury, fatal or otherwise, and property loss or damage arising out of or related to the student's participation in the Program and Program activities, whether caused by the negligence of the Releasees or otherwise.
I further agree that this Release and Medical Authorization shall be construed in accordance with the laws of the State of Iowa.
In the event of injury or illness, I give my consent for medical treatment, and permission to Program personnel to supervise or perform on-site first aid for minor injuries and to a licensed physician to hospitalize and secure proper treatment (including injections, anesthesia, surgery, or other reasonable and necessary procedures) for the student. I agree to assume all costs related to any such treatment. I authorize my insurance company to pay benefits for the costs of such treatment. I also authorize the disclosure of medical information to my insurance company for the purpose of any claim. I understand each student must provide his/her own medical insurance. I also understand that I am responsible for any medical or other charges related to the student's participation in the Program.
I certify that the student is physically capable of participating in the Program activities. I have disclosed any physical limitations or medical problems which might limit the student's capability to perform Program activities. The program reserves the right to deny anyone the opportunity to participate where a question exists regarding a student's physical capability to safely participate in any Program activity.
I HAVE CAREFULLY READ THIS ENTIRE RELEASE AND MEDICAL AUTHORIZATION, FULLY UNDERSTAND IT, AND VOLUNTARILY AGREE TO BE LEGALLY BOUND BY IT.
Parent/Guardian Signature

Media Release Authorization
YES - I give my permission for my child/children to be photographed or videotaped by staff and other program approved representatives and those photos may be used in publications, news releases of for use on the internet.
NO - I do not give my permission for any photos, videotaping or interviews.
Parent/Guardian Signature
Date

Additional Policies

Weather Policy

Students will have access to a shelter. Students will be shown what to do during a tornado / fire drill during the first week. Students will be dismissed as weather permits. If the heat index rises to concerning levels, students will receive programming inside in an air conditioned space.

Protocol for a child who has not been picked up.

Students need to be picked up from the program by **15 minutes following the end of the program.** If students are not picked up within this time period, staff members will contact the numbers provided.

Program Contact

Name

E-mail

Cell Phone

In the event you cannot reach program staff, please contact Campus Safety at 641-269-4600.

Authorized Faculty/Staff Advisor Agreement

By sig	ning this document I agree to serve as the required authorized faculty or staff advisor for
	(Student group name) for the following program, As the
author	ized faculty/staff, I agree to all of the following:
	Be onsite at any events that include minors
	Oversee the planning process
	Submit and pass a criminal background check administered and reviewed by Human Resources.
	Complete required on-line training
	Read and comply with the expectations outlined in the Grinnell College Policy for the Protection
	of Minors.
Printed	d name:
Signat	ure:
_	
Date: _	

If you have any questions regarding this form please contact Rachel Bly, Conference Operations and Events, bly@grinnell.edu. Completed forms should be sent to Mark Watts, Human Resources.

Child Abuse Reporting Policy

I. Policy Foundation

Grinnell College strives to protect the welfare of *children* who are on campus or who are participating in an off-campus program sponsored by the College.

Any employee who, in the scope of their employment responsibilities, *examines, attends, counsels* or *treats* a child is required to report *suspected physical* or *sexual abuse* of a child. Proof that abuse has occurred is not required in order to be obligated to report. This policy is intended to be broad, and any uncertainty about whether reporting is required should be resolved in favor of making a report.

An employee who has made a good faith report of physical or sexual child abuse or who has aided and assisted in the assessment of a child abuse report may expect that no retaliatory action, such as discharge, demotion, suspension or harassment, will be taken against them for doing so.

I.1 Legal Acts

Iowa Code 261.9(1)(h)

L2 Terms and Definitions

Attend is to care for; look after; to take charge of; to watch over.

Child(ren) refers to any person under the age of 18 years.

Counsel is to advise or instruct.

Examine is to observe, test, or investigate, in order to evaluate general health or determine a medical condition.

Physical abuse is any non-accidental physical injury acts or omissions that cause, or fail to prevent, physical injury to a child.

Sexual abuse is the commission of a sexual offense according to Iowa law, including rape, sexual assault, molestation, incest, indecent exposure, or exploitation of a child in a manner in which the child is used for gratification or sexual enjoyment by another person.

Suspect is to believe to be the case or to be probable.

Treat is to deal with (a medical condition, patient, etc.) in order to relieve or cure.

II. Policy body

I. Who Must Report

Employees who, in the scope of their employment responsibilities, examine, attend, counsel, or treats a child must report physical or sexual child abuse when they see, know about, or reasonably suspect the

physical or sexual abuse of a child. This includes most College employees, including, but not limited to, faculty, coaches, student employees, administrators and staff. If an employee is not sure whether they are required to report, they are encouraged to err on the side of caution and report. Proof that abuse has occurred is not required in order to be obligated to report.

This policy does not cover statutory mandatory reporters under <u>Iowa Code 232.69</u> or others that are required reporters by professional ethics. Statutory mandatory reporters have additional responsibilities to report all forms of child abuse as defined in <u>Iowa Code 232.68(2)</u> to the Iowa Department of Human Services.

III. Implementation

I. Reporting Procedures
In the event of an emergency, **first call 911.**

Suspected abuse must be reported within *twenty-four hours* to both:

1. The Grinnell Police Department at 911 or 641-236-2670.

AND

2. The Office of Campus Safety and Security at ext. 4600.

When reporting suspected child abuse, the employee will need to provide the following information to the best of his/her/hir knowledge:

- Name of the alleged victim(s)
- Name of the alleged perpetrator(s)
- Time and date of the incident(s) being reported
- Location where the incident(s) occurred; and
- Any additional information supporting the allegation that misconduct has occurred.

II. Employee Protections

The college will attempt to protect the identity of any employee who makes a good faith report of suspected physical or sexual abuse of a child.

If an employee feels that he/she/zi is being retaliated against for making a good faith report of suspected physical or sexual abuse of a child or because he or she has aided and assisted in the assessment of a child abuse report, he/she/zi must report this immediately to the Director of Human Resources.

Questions about this policy should be directed to the Director of Human Resources at 641-269-4818 or hr@grinnell.edu