



# **UNIVERSITY SYSTEM OF GEORGIA**

**Programs Serving Minors Policy**

**For**

**The University System Office**

**2023**

**(Last revised 3-27-2023)**

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## I. Policy Purpose Statement

The purpose of this policy is to promote the safety and welfare of non-student minors who participate in programs offered by or through the University System Office (USO). These programs include but are not limited to academic camps, athletic camps, clinics, research opportunities, after-school programs, pre-college programming, work, or activities under the supervision of an individual faculty or staff member, enrichment classes, and other activities.

## II. Definitions

Term	Definition
Child Abuse	Non-accidental physical injury, neglect, exploitation, sexual abuse, or sexual exploitation.
Mandatory Reporter	Any person who is required by Georgia law (O.C.G.A. §19-7-5) to report suspected child abuse to the appropriate authorities. Mandatory Reporters include but are not limited to faculty/teachers, administrators, counselors, social workers, psychologists, law enforcement personnel, and other persons who participate in providing care, treatment, education, training, supervision, coaching, counseling, recreational programs, or shelter to Minors.
Minor	Any person under 18 years of age (O.C.G.A. §39-1-1)
Youth Program	Any academic, admissions, athletic, educational, service, leadership, or recreational program or activities serving one or more non-student Minors, including, but not limited to, camps, clinics, conferences, workshops, tutoring, mentoring, group lessons, seminars, competitions, internships or experiential learning, conducting or viewing research, after-school programs, or other enrichment opportunities.
Program Director	The individual who has primary and direct operational responsibility for the overall content and execution of a Youth Program and who serves as the primary point of contact.
Camp Director	The individual with the primary responsibility for direct oversight of non-student minors and program activities and who runs, maintains or otherwise directs the functions of a Youth Program.
Sponsoring Unit	Any department or unit of the USO that offers a Program/Activity including Third Party programs.
Third Party	An individual, organization, or entity external to the University System of Georgia.

## III. Applicability:

### A. Covered Programs:

This Policy applies broadly to all Youth Programs by the USO serving one or more non-student Minors, including those:

1. Offered by USO departments or sponsored by the USO at other locations;
2. Offered by Third Parties utilizing a facility primarily used by the USO.

### B. Exclusions:

This Policy does not apply to:

1. Programs for Minors enrolled in undergraduate or graduate academic coursework;
2. Events or visits to the USO where Minors are supervised by their parent/guardian;
3. Events at the USO that are open to the general public or invited guests where parents/guardians are expected to provide supervision of Minors; or
4. USO employees or students hosting family members, friends, or other guests.

## IV. Summary of Policy Requirements

The following is a summary of the requirements for Youth Programs. Details of each requirement are provided below as part of this policy.

- A. All Youth Programs must have a Sponsoring Unit and be registered annually with the USG Office of Ethics and Compliance;
- B. All Youth Program staff, volunteers, or other Mandatory Reporters who have reasonable cause to believe that suspected Child Abuse has occurred, must follow the specific reporting procedures outlined in this policy;
- C. All Youth Program staff and volunteers who are reasonably anticipated to have direct contact or interaction with minor program participants must be properly screened to include a criminal history background check completed in accordance with the Human Resources Administrative Practice Manual;
- D. Program Directors must ensure that all staff and volunteers working in Youth Programs complete annual training approved by the Office of Ethics & Compliance;
- E. All Program staff and volunteers must annually sign and agree to abide by the Staff and Volunteer Code of Conduct as well as any supplemental Youth Program guidelines developed by the Program Director or Sponsoring Unit;
- F. Program Directors must ensure appropriate retention of records to include:
  1. Signed Staff and Volunteer Code of Conduct forms;
  2. Training records;
  3. Injury or misconduct reports;
  4. Waiver forms; and
  5. Program surveys / evaluations.

## V. Registration

**General:** All ongoing and proposed Youth Programs must be submitted for approval annually by the appropriate Sponsoring Unit and the USG Office of Ethics and Compliance.

### A. Sponsoring Unit Review & Approval

The Sponsoring Unit supervisor must first review and approve the Youth Program request. Requests for approval shall be submitted using the [Youth Programs Registration Request Form](#). A PDF of this form is attached Exhibit A. The Sponsoring Unit supervisor must certify that a plan is in place to address any of the following considerations that would apply to the proposed Youth Program:

1. Planned activities are consistent with the USG's mission;
2. A qualified Camp Director is in place,
3. Appropriate screening and training of staff and volunteers;
4. Pre-camp training of staff & volunteers by the Camp Director;
5. Staff & Volunteer Code of Conduct
6. Appropriate staffing and supervision ratios;
7. Assignments and responsibilities of staff and volunteers;
8. Risks associated with specific activities are identified and addressed;
9. Orientation session for Youth Program participants;
10. Safety and security protocols are in place to include the requirement of constant supervision, taking and retaking attendance, and having a lost child protocol;
11. Prevention of bullying, hazing and misconduct;
12. Response protocols for injury, illness or misconduct;
13. Record retention;
14. Appropriate forms and waivers are in place to include a detailed summary of activities in the release of liability;
15. Licensing or exemptions by government agencies;
16. Transportation needs;
17. Housing needs;
18. Facility Use Agreement, if applicable.

## **B. Review and Approval by USG Office of Ethics & Compliance**

All ongoing and proposed Youth Programs must be reviewed and approved annually by the USG Office of Ethics and Compliance in coordination with the USG Office of Legal Affairs. The approval should take place prior to any public advertisement of the program.

## **VI. Background Investigation and Screening**

In accordance with [BOR Policy 6.9 Programs Serving Minors](#), all staff and volunteers working in Youth Programs who are reasonably anticipated to have direct contact or interaction with Minors must be appropriately pre-screened. Criminal history background checks must be completed by the USG Office of Human Resources in accordance with the [Background Investigation](#) procedure outlined in the Human Resources Administrative Practice Manual. Staff and volunteers working in Youth Programs are considered Positions of Trust in accordance with the Human Resources Administrative Practice Manual. Criminal history background checks must be completed for new and current employees consistent with the standards for Positions of Trust as outlined in the [Background Investigation](#) procedures.

Reference checks should be completed as required by the [General Criteria for Employment](#) provisions outlined in the Human Resources Administrative Practice Manual. Consistent with the [Implementing Procedures](#) in the Business Procedures Manual, personnel in charge of screening staff and volunteers should be aware of the inherent limitations of background checks and should seek to utilize other screening methods in addition to background checks, when possible, to include written applications, in-person interviews and reference checks.

## **VII. Training**

In accordance with [BOR Policy 6.9 Programs Serving Minors](#), all staff and volunteers working in Youth Programs who are reasonably anticipated to have direct contact or interaction with Minors must be appropriately trained.

### **A. Program Director Training**

All new Program Directors must attend Youth Program training provided by or approved by the Office of Ethics and Compliance.

### **B. Staff and Volunteer Training**

Program Directors must ensure that all staff and volunteers working in Youth Programs complete annual training approved by the Office of Ethics & Compliance. The training provided must address, at a minimum, the following:

1. Purpose & mission of the Youth Program;
2. How to maintain a positive, respectful and encouraging environment;
3. The planned schedule of activities;
4. Assignments and responsibilities of staff;
5. Preventing bullying, hazing and other misconduct;
6. Staff Code of Conduct;
7. Cell phone and electronics expectations;
8. Maintaining constant supervision;
9. Safety and security protocols;
10. Reporting and responding to incidents of misconduct;
11. Resolving conflicts between program participants;
12. Detecting and reporting abuse or neglect;
13. How to report other concerns; and
14. Process for reporting injury or illness.

Training may be expanded depending upon the program activity and the staff or volunteer's role in the program or activity.

## **VIII. Mandatory Reporting of Abuse or Injury**

### **A. Mandatory Reporting of Child Abuse**

Any Youth Program staff or volunteer who has reasonable cause to believe that suspected child abuse has occurred, shall immediately report the suspected abuse to ALL of the following:

1. The Program Director or other appropriate supervisor who will take immediate action to ensure the safety of the Minor. The Program Director should also ensure the USG Office of Ethics & Compliance is notified;
2. The USG Office of Safety and Security (404) 962-3177, Chief Mike Coverson, Cell: (470) 426-3706 (If the Minor is in immediate danger, 911 should be called); AND
3. The Georgia Division of Family and Children Services at 1-855-GACHILD. (If the Minor is in immediate danger, 911 should be called).

A Mandatory Reporter must ensure that the Division of Family and Children Services is notified of the suspected abuse immediately and in no case later than 24 hours after the Program/Activity Staff (or other reporter) first had reasonable cause to suspect the abuse. If you suspect child abuse, or simply have an idea or uneasy feeling about a possible abuse situation, the matter should be reported.

By doing so, you are not necessarily making an accusation; you are merely reporting facts for trained professionals to evaluate and investigate.

### **B. Injury:**

In order to maintain a safe environment for all program participants, faculty, staff, and visitors, it is important that the USG Office of Ethics and Compliance be informed, at the earliest possible date, of any injuries that occur in any Youth Program.

## **IX. Conduct**

The USG requires the highest standards of conduct when interacting with Minors, including compliance with all applicable laws, regulations, and policies.

- A. Code of Conduct:** All Program/Activity Staff must agree to abide by the USO Youth Program Code of Conduct, as well as any supplemental Program/Activity guidelines developed by the Program Director. Code of Conduct Forms should be reviewed and signed by all staff and volunteers. The USO Code of Conduct form is attached as Exhibit B;
- B. Requirements for Minor participants:** Parents/guardians must submit required forms before Minors will be allowed to participate in Programs/Activities. These forms may include, but are not limited to, a participation agreement form, authorization to administer medication, pick-up authorization, medical information and authorization, release of claims/waiver of liability, media/photo/video release, and Minor participant's Code of Conduct;

## **X. Third Party Use of University System Office Facilities**

Consistent with Board of Regents Policy 6.14.2, Third Parties must execute a Facility Use Agreement prior to utilizing USO facilities for Programs Serving Non-Student Minors. The Facility Use Agreement must include language in a binding written agreement requiring the non-USG entity to comply with USO policies on youth safety, background checks, training, and minimum insurance requirements.

## **XI. Record Retention**

All records should be retained in accordance with Board of Regents policies on record retention. Copies of all required forms and documentation pertaining to Minors should be retained for a period of three (3) years after the Minor reaches the age of eighteen (18). Records pertaining to Program/Activity Staff should be retained for five (5) years. The forms retained should include signed copies of the Staff and Volunteer Code of Conduct.

## **XII. Forms and Resources**

Sample Forms, Program/Activity Checklists, and additional resources are available on the USG's Programs Serving Minors Resource Page.

# Exhibit A

## Programs Serving Non-Student Minors Approval Form





**UNIVERSITY SYSTEM OFFICE**  
**APPROVAL FORM**  
**Programs Serving Non-Student Minors Activities**

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**Purpose:** The University System Office (USO) has established a centralized database to track programs and activities serving non-student minors that are sponsored by or overseen by the USO. Programs and activities include summer camps, sports camps, after-school programs, clinics, and enrichment programs. Program Administrators must complete the below form and provide 24-hour contact information. Registration also requires certification of compliance with the Policy for Programs and Activities Serving Minors. **All programs and activities must be registered**, whether they are sponsored by the USO or hosted by third parties.

Completed forms must be approved by the appropriate Vice Chancellor or Director. Completed forms must also be approved by the appropriate Cabinet member. Completed forms should be forwarded to the USG Office of Ethics and Compliance at least 30 days prior to the start of the program.

**Policy Requirements:** In accordance with USG Policy, all programs serving non-student minors must be properly authorized. The USG policy requirements are set forth in the below policy sections:

1. [BOR 6.9 Programs Serving Minors](#)
2. [BPM 16.9 Implementing Procedures](#)
3. [USO Procedures for Program Serving Minors](#)

**Please provide the information requested below:**

1. **What is the official name of this Program?**

2. **Is the Program administered by or sponsored by the USO?**

Yes                      No

3. **What are the planned beginning and ending dates of this Program?**

From: \_\_\_\_\_ To: \_\_\_\_\_

4. **Where will the program and activities take place? Please provide details below to include any field trip or excursions that will be taken and whether the facility and needed equipment have been reserved.**

**5. Provide an overview of the camp agenda and the activities planned for youth participants.**

**6. What are the goals and learning objectives for youth participants? Please include some of the soft skills you plan for participants to learn: working with others, communication skills, problem solving, organizing abilities, etc.**

**7. Is this a residential program where youth participants will be staying overnight?**

**Yes                  No**

**8. Will the Program provide participants with transportation at any time?**

**Yes                  No**

**9. What is the expected number of participants?**

**10. Minimum age of minor participants**

**11. Maximum age of minor participants**

**12. Number of staff (including volunteers)**

**13. Has the checklist on the Programs Serving Minors Resource Page been reviewed for purposes of planning and compliance with policy requirements?**

**Yes                  No**

**14. Name of the employee who has primary responsibility for program oversight?**

**Name:**

**Title:**

**Department:**

**Email Address:**

**Emergency Contact Number:**

**15. I have read and agree to abide by the institution's Programs Serving Non-Student Minor's Policy**

**Yes**

**No**

\_\_\_\_\_  
**Signature of Program Sponsor**

**Date** \_\_\_\_\_

\_\_\_\_\_

## CERTIFICATION FOR AUTHORIZING PARTY:

**16. Name of Approving Official (Vice Chancellor, AVC, Director or Department Head)**

**Name:**

**Title:**

**Department:**

**Email Address:**

**Approving Official has discussed with the Program Sponsor, who has demonstrated compliance or a definite plan of action for the following minimum Policy requirements:**

- **Qualifications of personnel leading and supervising the Program**
- **Alignment of the Program / Activity with the University's mission**
- **Appropriate program forms to include a Staff & Volunteer Code of Conduct**
- **Background checks for all staff and volunteers working with non-student minors**
- **Appropriate supervision ratios for program activities**
- **Safety and security planning – to include first aid and medical emergencies**
- **Response protocols for injury, illness, participant misconduct and staff misconduct**
- **Transportation and housing needs – to include appropriate staff for co-ed residential programs**
- **Appropriate training for staff and volunteers to include:**
  - **Mandatory reporting obligations**
  - **Roles and responsibilities**
  - **Safety and security procedures**
  - **Staff & Volunteer Code of Conduct**
- **Record retention procedures**

Date \_\_\_\_\_

\_\_\_\_\_  
**Signature of Approving Official**

**Cabinet Level Approval:** \_\_\_\_\_ **Granted** \_\_\_\_\_ **Denied**

Date \_\_\_\_\_

\_\_\_\_\_  
**Cabinet Level Supervisor**

# **Exhibit B**

## **Staff & Volunteer Code of Conduct**

## YOUTH PROGRAMS FOR MINORS

### STAFF & VOLUNTEER CODE OF CONDUCT

The University System of Georgia (USG) is committed to the safety and well-being of minors. Authorized staff and volunteers should be positive role models and treat others with respect, courtesy and dignity. Authorized staff and volunteers must abide by all USG policies and state and federal law.

As an authorized staff or volunteer working in programs for minors, I hereby agree as follows:

- I will maintain appropriate physical boundaries at all times.
- I will immediately report any reasonable suspicion or knowledge of abuse of a minor to the institution police department and the appropriate supervisor or program director who can take immediate action.
- I will not touch or speak to a minor in a sexual or other inappropriate manner.
- If one-on-one interaction is required it will take place in an open, well-illuminated space where I am observable by other volunteers or program staff.
- I will not meet with minors outside of established program locations or outside of established times.
- I will not invite minors to my home or other private location or accept their invitations for the same.
- I will not make sexual comments, tell sexual jokes or allow minors to access sexually explicit materials.
- I will not engage or allow minors to engage me in romantic or sexual conversations.
- I will not engage in private communications with minors to include communications via text messaging, e-mail, phone, internet chat, on-line games or other forms of social media.
- I will not accept or give gifts to minors without the knowledge of their parents or guardians.
- I will not inflict any physical or emotional abuse on minors to include, but not limited to striking, humiliating, ridiculing, or degrading minors.
- I will not use, possess or be under the influence of alcohol or illegal drugs at any time while working with minors.
- I will not provide or knowingly allow minors to possess or consume alcohol, tobacco, or illegal drugs.
- I will not use profanity, vulgarity, or harassing language in the presence of minors at any time.
- I will not provide transportation to minors unless doing so is an acknowledged component of the program. When transporting minors, more than one volunteer or program staff must be present in the vehicle, except when multiple children/teens will be in the vehicle at all times through the transportation.

My signature confirms that I have read and understand this Code of Conduct. My signature further confirms that I agree to abide by this Code of Conduct. Failure to abide by this Code of Conduct may result in sanctions against me, including but not limited to, termination and/or criminal prosecution.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Sponsoring Department