

Effective Date: July 1, 2015

RESOURCE

EMPLOYMENT, SAFETY

# Protection of Minors Policy: Administrative Policy Review Questions and Answers

RESPONSIBLE OFFICE

Human Resources

Q: Does every Admissions tour guide and every undergraduate who hosts a high school student/potential BU students need to undergo a background check?

A: Admissions may request an exception to the Policy (through Risk Management) for BU students who host high school students in the dorms as part of their visit to campus. Admissions tour guides do not need to have a background check. Admissions staff currently undergo a background check upon hire.

Q: Is it the University's intent that students, faculty, staff, and volunteers may be suspended, terminated or have other corrective action taken for violations of the Policy and accompanying Procedures? Has a matched list of violations and sanctions been established?

A: Yes, it is the University's intent that students, faculty, staff and volunteers may be suspended, terminated or have other corrective action taken for violations of the Policy and Procedures. Because the University sponsors so many different types of activities that involve

Minors, the appropriate sanctions will be based on the specific nature of the violation; there is no matched list of violations and sanctions. As with other University Policies, each Dean or VP will be responsible for assessing the nature of the violation and making a decision about the appropriate consequence, in consultation with the Provost's Office or Human Resources, depending on who is involved.

Q: Has the University considered that the number of background checks required will increase as a result of this new Policy and Procedures?

A: Yes. In the past few years, background checks have been already been institutionalized in many programs across campus. While they do require some additional administrative work on the part of Program Operators, leadership feels this is a prudent step to take wherever possible to minimize risk.

Q: Does this Policy apply when high school students do an "internship" within a research laboratory (either for a week during school vacation, or during the summer)?

A: Yes. Staff and Faculty who sponsor research lab programs should be familiar with the University's Policy, and ensure that background checks are secured for staff/faculty working with unaccompanied Minors in this capacity. The [Policy on Minors in Laboratories](#) should also be considered.

Q: Is an incoming student under the age of 18 participating in a University operated pre-semester activity (such as FY SOP or pre-season Athletics) considered a Minor under this Policy?

A: No.

Q: Are exceptions to the Policy permitted?

A: Yes, exceptions to the requirements to conduct criminal and sex offender background checks, or to secure waivers of liability, may be requested through the office of Risk Management. There are no exceptions for immediately reporting instances of known or suspected abuse or neglect of a Minor.

Q: Where will materials on the Policy and Procedures reside?

A: The Policy and Procedures will reside on the Boston University Policies website ([www.bu.edu/policies](http://www.bu.edu/policies)). Human Resources also maintains a SharePoint site that HR, Risk Management and Minors Program Coordinators will have access to in order to post forms, the inventory of programs, checklists and other materials.

Q: Are contract organizations such as ARAMARK and Dining Services considered “Third Party Programs” for purposes of this Policy?

A: No; only third parties that specifically operate programs or activities for Minors fall under this Policy. It is up to the third party contractor to enforce the requirements that their staff have criminal and sex offender background checks before being allowed to work with Minors.

Q: Is there a period of time in which a Third Party Program needs to be on campus to fall under this Policy? If the home state of these third parties do not require criminal and sex offender background checks, will the third party be required to comply with the Policy?

A: Regardless of the duration of program or activity, third parties that use Boston University facilities to operate programs for Minors are required to comply with the University’s Policy with respect to protecting Minors.

Q: Are third party providers expected to provide documentation of compliance with this Policy to Boston University?

A: No, Boston University will not be collecting documentation of third party compliance; collecting and maintaining this documentation is the responsibility of the third party. Contracts with third parties should include a “Protection of Minors” Addendum (a sample is provided in the Procedures) which stipulates that the third party program complies with Boston University’s Policy.

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END OF POLICY TEXT

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Categories: Employment, Protection of Minors, Safe Environments and Workplace Safety, Safety, Workplace Keywords: boy, children, girl, mistreat, molest, prevent, teenager, youth