

**PROCEDURE**

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**EMPLOYMENT, SAFETY**

# Protection of Minors Procedures

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RESPONSIBLE OFFICE

**Human Resources**

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These Procedures accompany the University's [Protection of Minors Policy](#), and are intended as more detailed guidance and support for members of the BU community who sponsor, operate, or participate in programs which include contact with Minors. The Procedures are reviewed and updated periodically by Human Resources, Risk Management, and other administrative units, as necessary. They establish expectations for interactions with Minors, and apply to programs and activities that take place both on and off Campus. These Procedures also apply to owners, operators, employees, agents, and volunteers of Third Party Programs. [Terms](#) used in these Procedures are defined in the Protection of Minors Policy.

## A. Training

Members of the Boston University community who participate in programs or activities that include Minors are expected to receive training in the following areas:

- University Recommended Guidelines for Interacting with Minors
- Warning signs for child abuse or neglect

- A review of the process for reporting potential harm to Minors, including obligations of mandated reporters

All University students, faculty, staff, and volunteers in University Activities, including services, programs, and activities occurring on and off Campus, and owners, operators, employees, agents, and volunteers of Third Party Programs should receive such training prior to being permitted to participate in programs that include Minors.

Two levels of training are available: (1) online and (2) policy/document review. The appropriate level of training will vary depending on the type of program, and the level of interaction with the Minor(s). Program Operators are responsible for determining which type of training to provide, and for ensuring the appropriate training is delivered (Human Resources is available to work with Program Operators).

Minimum Training Recommendations:

<b>Type of Service, Program or Activity</b>	<b>Minimum Training Recommended and Timing Examples</b>
Residential or non-residential services, programs or activities operated by the University on University property Examples – campus childcare programs, child development programs, orientation programs, summer school programs for high school students, overnight camps operated by the institution on campus, internships, and student or other programs that bring Minors to Campus.	Online Training Content: Information about working with Minors and a test of the participants’ knowledge of this material. Certification: Upon completion of the session, participants should sign a training certification form (available in the Appendix A of these Procedures.) Program Operators should maintain a record of completion of training. Timing: Upon hire, first-involvement in activities involving Minors, or a change of engagement in activities involving Minors (for example, if an activity/program involving Minors was formerly non-residential, but becomes residential).

<b>Type of Service, Program or Activity</b>	<b>Minimum Training Recommended and Timing Examples</b>
<p>Services, programs or activities operated or formally facilitated by the University off of University property. Examples: outreach or community service programs, projects and activities that involve working with Minors required for academic credit.</p> <p>Services, programs or activities not operated by the University but in which members of the University community participate in their capacity as students, faculty, or staff. Examples: volunteer activities of students, student club activities, activities to support student research projects.</p>	<p>Online Training Content: Information about working with Minors and a test of the participants' knowledge of the material. Certification: Upon completion of the session, participants should sign a training certification form (available in the Appendix A of these Procedures). Program Operators should maintain a copy of the certification. Timing: Upon hire or first-involvement in activities involving Minors</p> <p>Policy/Document Review Content: Review materials on the BU Safety website (Guidelines for Interacting with Minors, Warning Signs of Child Abuse/Neglect, and Reporting Suspected Abuse). Certification: Upon completion of the materials review, participants should sign a training certification form (available in the Appendix A of these Procedures). Program Operators should maintain a copy of the certification. Timing: Upon hire or first-involvement in activities involving Minors.</p>

Type of Service, Program or Activity	Minimum Training Recommended and Timing Examples
<p>Third Party services, programs or activities. For example – summer or other programs to whom the University leases, licenses, or otherwise provides access to the Campus.</p> <p>Minor visitors to campus who are not part of formal services, program, activities or who are accompanied by their parents or teachers. For example, Minors who attend campus events or visit an “open” campus.</p>	<p>Policy/Document Review Content: All owners, operators, employees, agents, and volunteers who will have Direct and Unmonitored or Monitored Contact with Minors should review materials on the BU Safety Website (Guidelines for Interacting with Minors, Warning Signs of Child Abuse/Neglect, and Reporting Suspected Abuse on the Protection of Minors). Certification: Upon completion of review of the materials on the BU Safety website, participants should sign a training certification form and Third Party Program Operators should maintain a copy of the certification (see the Third Party Program Contract Addendum in Appendix C). Timing: Upon hire or first-involvement in activities involving Minors.</p> <p>None</p>

## B. Criminal and Sex Offender Background Checks

Criminal and sex offender background checks are required for any member of the Boston University community who will have direct contact with Minors as part of participation in a service, program, or activity involving Minors unless an exemption is obtained from Risk

Management. This includes:

- University students, faculty, staff, and volunteers;
- Owners, operators, employees, agents, and volunteers of Third Party Programs; and
- Programs and activities occurring on and off Campus

Human Resources administers the processing of criminal and sex offender background checks. Certain Program Operators may be authorized by Human Resources to process these background checks directly. Program Operators are responsible for ensuring that a cleared criminal and sex offender background check status has been received prior to permitting any member of the BU community to participate in University activities that include Minors.

**Background checks** must be conducted by the University, or other external source approved by the University, and consist of a social security number trace, address locator for seven years, a search of federal and state/county databases for criminal history for the past seven years, and a sex offender registry check. If a background check reveals adverse information or unfavorable results, the University’s Chief Human Resources Officer will make a final determination regarding participation in the activity.

Once a satisfactory background check has been received, members of the BU community who participate in University Activities that include Minors must promptly disclose any new felony or misdemeanor conviction(s) to Human Resources. University faculty and staff who have a break in service of more than six (6) months, unless it is an approved leave of absence, and students who withdraw, are suspended or dismissed, or take leaves of absence of more than six (6) months, must undergo a new background check if they reengage in University Activities that include Minors. Except where required by law, the results of criminal and sex offender background checks are kept confidential by the University.

**Criminal and sex offender background checks are required for the following populations, if they will have direct and unmonitored contact with Minors (contact with Minors when there is no background check cleared employee or volunteer present):**

Category	Frequency of Background Check
Boston University Student – Full-time or part-time matriculated	Every 3 years

Category	Frequency of Background Check
Boston University Student – Part-time non-degree	Annually
Faculty/Staff Full-time	Every 3 years
Faculty/Staff Part-time	Annually
Volunteers (excluding BU faculty, staff and students)	Annually

Programs (such as summer camps and others) that are required by law to conduct criminal and/or sexual offender background checks on a more frequent or different basis may have obligations that supersede this Policy.

## Third-Party Programs

Owners/operators of Third Party Programs must conduct criminal and sex offender background checks of owners, operators, employees, agents, and volunteers who will participate in programs that include Minors. A certification that background checks have been completed will be required. No Third Party Program owner, operator, employee, agent, or volunteer may participate in a program/activity until a cleared status has been received by the Third Party Program operator. The University may request any additional information from Third Party Programs it deems necessary to meet the requirements of the Policy and these Procedures.

# C. Reporting Suspected Abuse or Neglect of Minors

## 1. Reporting Obligations

Any member of the Boston University community must immediately report any instance of

known or suspected abuse or neglect of a Minor to BUPD and the Minors Program Coordinator, or, if none, the appropriate University official.

In addition, members of the BU community who are considered mandated reporters under Massachusetts law must also report to the Massachusetts Department of Children and Families (DCF) and University officials any known or suspected mental/physical abuse or neglect of a Minor they have come into contact with through their professional role. Mandated reporters under Massachusetts law include but are not limited to:

- Physicians
- Psychologists
- Clinical social workers
- Medical interns
- Dentists
- Teachers
- Counselors
- Police officers
- Allied mental health and licensed human services professionals
- Early childhood education and childcare staff
- Clergy members

Additional information concerning mandated reporters and their respective reporting requirements is available in the brochure on [Child Abuse and Neglect Reporting](#).

Questions about who is a mandated reporter under Massachusetts laws should be directed to the Minors Program Coordinator or, if none, the supervisor, program director, dean, or vice president responsible for the University Activity or Third Party Program. Human Resources is also available to provide advice and can be reached at 617-353-2380.

## 2. Reporting Suspected Abuse or Neglect of a Minor

a. **Notify BUPD.** Immediately contact the Boston University Police Department (BUPD) at 617-353-2121 or dial 911 if off campus. Remain with the Minor until he or she is safe. A member of BUPD team is available 24 hours a day to respond. The BUPD will coordinate with other areas within and outside the University to investigate the alleged abuse or neglect, and notify parents or guardians, if appropriate. All actions will be handled in a

manner that safeguards minors, protects the interests of victims and reporters, and meets relevant legal requirements.

Mandated reporters must also report directly to the DCF by calling the local DCF office (weekdays, from 9:00 a.m. to 5:00 p.m.) or the Child-At-Risk Hotline at (800) 792-5200 (evenings and weekends) and as additionally required by that agency.

**b. Notify Appropriate University Official.** Promptly notify the Minors Program Coordinator or, if none, the program supervisor, program director, dean, or vice president responsible for the area the program falls under when it is safe and appropriate to do so.

**c. Submit Protection of Minors Safety Report Form.** Submit a Minor Safety Concern Report Form (Appendix B) to the Boston University Police Department, or call 617-353-2121. A member of BUPD team is available 24 hours a day to respond.

**d. Questions.** Questions about obligations or what to do in an uncomfortable situation may be discussed with your Human Resources Consultant (HRC) or call Human Resources at 617-353-2380.

**e. Confidential Reporting.** Boston University's Confidential Reporting Policy protects individuals from retaliation for good faith reports about unlawful or other types of misconduct. More information is available at [Ethics Point](#).

## D. Compliance With Laws

There are several Massachusetts and local laws that apply to services, activities, and programs involving Minors. Ensuring compliance is the responsibility of the sponsoring school, unit, or Third Party Program. Questions concerning the applicability of these laws or regulations to a particular service, program, or activity may be directed to the University's Risk Management Office and Office of General Counsel.

- Massachusetts Department of Public Health's "[Minimum Sanitation and Safety Standards for Recreational Camps for Children](#)" at 105 CMR 430.000
- Massachusetts [Mandated Reporter Law](#), at M.G.L. c. 119, § 51A

- Department of Early Education and Care (EEC) regulations at 606 CMR 7.00

## E. Liability Release

Prior to the start of each University Activity, University schools, colleges, and administrative units will require the parents/guardians of participating Minors to execute the Boston University Parental Acknowledgment, Consent, and Release From Liability form attached as Appendix D: Parental Acknowledgement, Consent, and Release from Liability to these Procedures, unless an exemption is obtained from Risk Management.

Third Party Programs will also require the parents/guardians of Minor participants to execute the form attached as [Appendix D](#) or an alternative waiver form provided such form contains substantially all of the same terms as those included in the University's form at [Appendix D](#), including, but not limited to, specifically releasing the Trustees of Boston University from any and all liability arising out of the operation of the Third Party Program.

## F. Third-Party Programs

Owners/operators of Third-Party Programs are responsible for:

- Ensuring any employee, agent, or volunteer that participates in programs involving Minors receives training;
- Ensuring that cleared criminal and sex offender background checks are secured prior to permitting any employee, agent or volunteer to participate in a program that includes Minors;
- Reporting known or suspected abuse or neglect of a Minor to BUPD and University officials, as outlined in Section C(2) (and to DCF, for mandated reporters)
- Ensuring compliance with federal and state laws, including the Massachusetts Minimum Standards for Recreational Camps for Children, 105 CMR 430.00 and the Massachusetts mandated reporter law, M.G.L. c. 119, § 51A.;
- Entering into a contract with the University prior to operating program involving Minors;
- Obtaining waivers of liability from parents/guardians of all Minor participants as provided

in Section E, above ([Appendix D](#));

- Carrying appropriate insurance that meets requirements designated by the University's Office of Risk Management.

## Appendices

- [Appendix A, Training Materials](#)
- [Appendix B, Reporting Materials](#)
- [Appendix C, Sample Third-Party Program Contract Addendum](#)
- [Appendix D, Parental Acknowledgement, Consent, and Release from Liability](#)

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END OF POLICY TEXT

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## Additional Resources Regarding This Policy

### Related Policies and Procedures

- [Protection of Minors Policy](#)
- [Policy on Minors in Laboratories](#)

### BU Websites and Information

- [Protection of Minors Website](#)
  - [Background Checks](#) for populations working with minors
  - [Minors Policy Training](#)
  - [Reporting on Minors Health, Safety, Abuse, or Neglect](#)
- [Administrative Policy Review Questions and Answers](#)
- [Protection of Minors Sharepoint Site](#) (internal BU website)
- [POM Policy - Appendix A, Training Materials](#)

## Forms and Resources

- Background Checks
  - [BU Ordering Form](#)
- Certification of Training
  - [Word version - Certification of Training, Protection of Minors](#)
  - [PDF version - Certificate of Training, Protection of Minors](#)
- [POM Policy - Appendix B, Reporting Materials](#)
- [POM Policy - Appendix C, Sample Third-Party Program Contract Addendum](#)
- [POM Policy - Appendix D, Parental Acknowledgement, Consent, and Release from Liability](#)
- [Minors Protection Coordinators Toolkit](#) - Note that this document is only available to the BU Community and requires a Kerberos login and passcode

## Training

- See the [Boston University Protection of Minors Website](#) for more information on [Training](#) and to access training materials

## History

- BU Today article about the Protection of Minors initiative, [click here](#).

Categories: Employment, Protection of Minors, Safe Environments and Workplace Safety, Safety, Safety and Safe Environments, University Policies Affecting Student Life, Workplace  
Keywords: boy, children, girl, mistreat, molest, organize, prevent, teenager, youth