Grinnell College Policy for the Protection of Minors

Edit date: 11/4/2015

I. Purpose and Scope

A. Policy Statement

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.

The Policy for the Protection of Minors provides guidelines for maintaining a safe environment for minors at the College. Areas addressed by the policy include screening and training of Authorized Staff, establishment of communication and transportation plans for programs covered under this policy, child-to-staff ratios, and expectations of appropriate conduct by those who interact with minors. This policy applies to all students, faculty, staff, and volunteers who supervise programs that include minors and are organized by Grinnell College or use College facilities. Other individuals or organizations doing business at or with the College may be required to acknowledge and comply with the provisions of this policy. The policy applies to the Grinnell campus, all properties owned or leased by the College, and all off-campus sites at which students, faculty, staff and volunteers participate in College-sponsored activities.

This policy does not supersede state or federal laws that apply or pertain to minors. Grinnell’s Child Abuse Reporting is a related policy and is applicable to all persons under the age of 18 and is the responsibility of all employees and faculty to comply with the policy. See http://www.grinnell.edu/sites/default/files/documents/child_abuse_reporting.pdf; to check if this policy has been updated, contact the Office of Human Resources.

B. Definitions

- Minor: A child, i.e., any person under the age of 18 years.

- Authorized Staff: Any individual who directs a program covered under this policy and sponsored by Grinnell College.

II. Minors affected by this policy

- Minors involved in an organized activity or event that takes place either on or off campus, is offered by a College office or department, and is led by a person formally acting in their capacity as a Grinnell College student, faculty, staff member, or volunteer.
• Minors involved in an organized activity or event that uses Grinnell College facilities, but is offered by an organization outside the College and is not directed by a member of the Grinnell College community.

When Grinnell College employees, volunteers, or students are not in a supervisory or director role, the sponsoring organization must provide an acknowledgement of Grinnell’s expectations and policies (See Appendix 1).

III. Minors not affected by this policy

Full-time Grinnell College students or volunteers between the ages of 16 and 18 are excluded from the definition of minors under this policy as they instead are governed by policies, rules, and regulations applying to all students.

The Advanced Scholar Program enables outstanding secondary school students to apply to enroll for credit in a College course for which the student is qualified. This program is sponsored by the Admission Office. An Advanced Scholar is held to the same expectations as a full-time College student; by participating in the program, Advanced Scholars acknowledge that they are being permitted to take part in a college-level academic experience not designed specifically for minors.

Visits and tours for prospective students, including visits that involve an overnight stay, are officially organized by the Office of Admission, Athletics, or other departments. 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 enrolled Grinnell College students. All such visitors are expected to behave as adults and to comply with applicable rules and regulations 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 (To see if this policy has been updated, contact the Office of Admission).

Nothing about this section (III) exempts the College or its employees from protecting minors from sexual and physical abuse as well as mandatory reporting of suspected child abuse under federal and state law.

IV. Events and Activities Subject to this Policy

A. College-Sponsored Programs

Throughout the year, Grinnell College offers activities specifically for children, such as family-oriented art workshops, educational programs, tutoring, and mentoring, and community service activities. College-sponsored programs are expected to demonstrate that they have established, in accordance with this policy, appropriate screening and training of Authorized Staff to include approved communication and transportation plans, the proper child-to-staff ratios, and agreement to abide by the code of conduct to be followed by those who interact with minors. (See Appendix 2, 3, 4).
B. Preschool Laboratory and Academic Research

The Grinnell College Preschool Laboratory has well-established protocols that meet or exceed the standards set forth in this policy. The Preschool has several organizations with which it must stay in compliance, including the Institutional Review Board, the Department of Human Services, and the Iowa Quality Preschool Program Standards. The Preschool maintains a handbook of procedures and appropriate conduct for all preschool employees. In addition to these standards, all Preschool Lab employees (including student workers) must undergo a background check and must be fingerprinted.

Grinnell College supports and promotes high-quality, academic research in many areas of human development, learning, and behavior. The College is committed to the ethical treatment of human participants in all research activities conducted at or in the name of this institution, and complies wholeheartedly in safeguarding their rights and welfare. When minors are the subjects of academic research Grinnell College assigns responsibility for specific standards of compliance to the respective academic departments according to best practices in that discipline. As with all research involving human subjects, research protocols involving minors are subject to approval by the Grinnell College Institutional Review Board.

The Psychology Department requires that any student who takes a course which has a component of either observation or interaction with minors must have completed the Institutional Review Board’s Ethics Tutorial for proper conduct when researching human participants. It can be found by logging into Pioneer Web and going to the “Community” tab and clicking on “IRB –Ethics Training.” These standards are required for MAP researchers who work with minors, and normally apply if a student will be engaged in research either on central campus or at the Preschool Laboratory.

C. Classroom Observation and Student Teaching in Preparation for Licensure

As part of a practicum offered through the College’s Education Department, some students will observe classes off campus and in that capacity may have direct contact with minors. Other students, as part of a formal student teaching exercise through the College’s Education Department, will have direct contact with minors. Students who participate in classroom observations are exempt from this policy but are expected to comply with the College’s Code of Conduct and must complete training required by the College’s Education Department.

The Education Department has well-established protocols for training Grinnell College students in preparation for licensure. Most student-teacher interactions with minors occur off-campus at one of the local primary or secondary schools. Although student contact consists mostly of observation, some teachers may allow College students to interact with minors. The College students meet with their Host Teachers in the school system prior to their first observation in the classroom. The College students are required to view a presentation on expectations, appropriate dress, and appropriate behavior while observing. The students are then required to sign an acknowledgement that they understand and will comply with these expectations. The acknowledgement form is available as Appendix 2.

D. Informal Visits, Private Events, Public Events, External Programs
Visiting minors: Grinnell College offers many educational, cultural, athletic, religious, and other events that are open to the public, and many areas of campus are accessible 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 a parent, legal guardian, or other responsible adult assumes full responsibility for their child’s safety and behavior during such visits or events. In these cases the College expects that an adult responsible for the visiting child takes measures to ensure the child’s safety and sees that the child complies with directions of College personnel.

External Programs and Non-College sponsored activities for minors: External programs include activities sponsored by a local clubs and teams that use the College’s facilities for practice, meetings, or competition; summer sport camps (day and overnight) sponsored by associations outside the College; private not-for-credit music lessons that use College facilities; and on-campus events, tours, activities, or conferences organized by groups external to the College. Such programs will normally be asked to demonstrate that they have established, in accordance with this policy, appropriate screening and training of supervisors, approved communication and transportation plans, child-to-staff ratios, and an agreement to abide by the code of conduct to be followed by those who interact with minors (See Appendix 3, 4, 5, 6).

Student Internships: Grinnell 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.

V. Duties and Responsibilities of Authorized Staff under this Policy

All programs involving minors will be reviewed by the Office of College Services annually. Proposals to establish a new Program that will involve minors or to modify an existing program to include minors for the first time, will be reviewed by the Office of College Services to ensure plans are in place to protect minors in accordance with this policy.

It is the responsibility of the College academic or administrative department head whose unit is sponsoring or overseeing the Program to oversee compliance with these standards. That department head or a designate will work with the Program director or leadership to assure the Program fulfills the terms outlined in this policy. For external organizations not otherwise affiliated with an academic or administrative department, the campus sponsor will be the Director of Conference Operations (under College Services); the Program director should directly contact that office.

Failure to maintain the standards outlined below may result in restrictions being placed on the Program, up to and including discontinuation of the Program. For example, Program staff who do not meet training or background check requirements could be restricted from interacting with minors during the course of the Program. College offices failing to assure compliance of its programs with this policy may be restricted or required to have additional oversight if they seek to offer future activities involving minors.

A. Supervision Training
Programs covered under this policy are expected to follow College policies and procedures such as those regarding facility use, weather emergencies, safety and security measures, and professional staff behavior. The following specific expectations also apply:

- For programs sponsored by Grinnell College specifically for minors, Authorized Staff will undergo and must pass a criminal background check which will be administered and reviewed by Human Resources.

- All Authorized Staff will complete additional training through the United Educators’ course SM-201 [https://www.edurisksolutions.org/learn-to-protect-children/], “A Manager’s Guide to Prevention and Response.”

- For Programs involving fewer than three minors at one time with no overseeing supervisor, the SM-101-H, “How Teachers and Other Educators Can Protect Our Children” course [https://www.edurisksolutions.org/learn-to-protect-children/] or equivalent will be considered sufficient training.

- All Authorized Staff who will be staying overnight in the dorms or transporting minors must complete adequate training, either through SM-101-H, “How Teachers and Other Educators Can Protect Our Children” [https://www.edurisksolutions.org/learn-to-protect-children/] or an equivalent training program.

- 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. Contact with Parents and Guardians

All parents or legal guardians of participating minors should be provided with a means of contacting the Program leadership while the Program is in session. Additionally, program directors should obtain contact information for the minors’ parents or guardians in the event the program needs to communicate with a parent or guardian while the program is in session.

Additionally, program directors may establish a Communication Plan (See Appendix 5) for notifying parents or legal guardians of minors in the event of an emergency. Not all programs will be required to develop a Communication Plan. For example, drop-in programs, or informal programs that make collection or maintenance of contact information impractical or unworkable, would not be required to establish a Communication Plan.

The communication plan should identify what means are available for communicating with participants’ parents or legal guardians in an emergency; how the contact information will be gathered; how the contact information will be made available to Program staff, when necessary; how the information will be kept secure; the appropriate person to contact for emergencies or other scenarios that typically arise and how emergency information will be disbursed in the event the parents or legal guardians are unavailable.

C. Transportation Plan

Program directors should establish a plan (See Appendix 6) for the drop-off/pick-up of participants who are minors. The procedure is expected to specify the times when and locations where participating minors can be dropped off and picked up. The plan should be designed so
that no participating minors are left unattended while waiting to be picked up and no minor will be left alone with a single counselor. Further, the plan should assure that no minor will be released to any person other than a parent or legal guardian without specific written authorization from a parent or legal guardian.

Use of a Grinnell College vehicle to transport minors in College Programs requires the advance approval of the Director of Campus Safety and Security. The driver must be a college employee who meets the college’s driver safety requirements.
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 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.

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:_____________________________
Appendix 2

Grinnell College Student Acknowledgment

In consideration of the Trustees of Grinnell College (“Grinnell College”) permitting me to participate in an organized activity or event taking place either on or off the premises of Grinnell College, I hereby acknowledge and agree to comply with 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.

Date: _______________ ______________________________

Signature of Student

______________________________

Printed Name
Appendix 3

Code of Conduct for Working with Minors

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 from unfounded accusations, be highly aware of situations in which your actions could be misconstrued as inappropriate. 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 always make sure there is another Authorized Staff member present with you, 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 when going to the bathroom, 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.

8. Avoid the appearance of favoritism and partiality; do not give or receive gifts.

---

1 Grinnell College Preschool adheres to a more specific Code of Conduct.
Appendix 4

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

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 with parent or guardians in the event of an emergency?

Are there drop off and pick up times? Who will staff these times?
Appendix 6

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?