

PROCEDURES for the *Policy on Protecting Minors*

Policy #: 02.118.1

I. General

The University of Rhode Island (“University” or “URI”) is committed to protecting the health and safety of Minors. The policy on Protecting Minors sets forth the University’s requirements and standards for the protection of Minors while they are under the care, custody, or control of 1) any URI Covered Activity (regardless of location), 2) any Third-Party Covered Activity on University Property, or 3) an approved K-12 School-Supervised Covered Activity.

Questions regarding these procedures should be directed to Daniel Keating, Manager, Risk Control & Insurance at (401)-874-2456 or email at daniel.keating@uri.edu. These procedures, as amended from time to time, have been established to ensure compliance with the policy on Protecting Minors.

II. Covered Activity Registration

Covered Activity Organizers must register with the Risk Control and Insurance Office no less than 30 days prior to the program’s commencement. Continuing Covered Activities must be renewed and re-registered on an annual basis. Depending on the type of Covered Activity, the Activity Organizer must complete the required steps outlined in the corresponding section below.

A. URI Covered Activity: The University hosts camps and programs on a wide variety of themes for all ages, subject to change annually, such as Computer Camp, AI Camp, Learn to Sail, and Learn to Swim.

1. **Covered Activity Registration Form:** Found at the following website: <https://web.uri.edu/riskmanagement/policies-procedures/>
2. **Submit the following to the Risk Control and Insurance Office at daniel.keating@uri.edu and lori_johnson@uri.edu**
 - a. Personnel List
 - b. Covered Activity itinerary
 - c. Marketing material about the Covered Activity

B. Third-Party Covered Activity: For purposes of these procedures, this refers to any camp or program for minors held on University property but operated by an outside group or individual, rather than by the University. This includes activities run by University employees when they are not acting in their official URI role. Examples include, but are not limited to, privately operated basketball or soccer camps and externally run STEM or robotics workshops.

1. **Covered Activity Registration Form:** Found at the following website: <https://web.uri.edu/riskmanagement/policies-procedures/>
2. **Contract with URI Conference Services**
3. **Submit the following to the Risk Control and Insurance Office at daniel.keating@uri.edu and lori_johnson@uri.edu**
 - a. Personnel List
 - b. Covered Activity itinerary
 - c. Marketing material about the Covered Activity

C. K - 12 School-Supervised Covered Activity: Notwithstanding any other provision of the Policy on Protecting Minors, Covered Activities conducted in collaboration with (and under the auspices of) accredited K–12 schools or school districts may qualify for streamlined compliance following submission the following:

1. **Covered Activity Registration Form:** Found at the following website: <https://web.uri.edu/riskmanagement/policies-procedures/>
2. **The participating school or district must submit the K–12 School–Supervised Covered Activities Attestation Form:** Found at the following website: <https://web.uri.edu/riskmanagement/forms/>

III. Participant Forms

Participant forms are not required for K–12 School–Supervised Covered Activities except for the Minors in Labs Consent & Release Form as applicable.

For each registered Covered Activity, the following forms must be completed by the parent or guardian of every Minor participant and provided to the Activity Organizer. All required forms must be maintained by the Activity Organizer for a minimum of three years.

1. **Assumption of Risk and Release of Liability Form:** To obtain parent/guardian acknowledgement for the risks of the activity, assumes full responsibility for injuries or damages, releases and indemnifies URI and related entities from liability, and authorizes emergency medical treatment at the participant's expense.
2. **Health History and Consent to Medical Treatment:** Memorializes any potential health issues, needed medications, as well as providing URI consent to secure any needed medical treatment.
3. **Participant Pick-Up Authorization Form:** *(if applicable)* Authorizes who can pick up a Minor from a Covered Activity.
4. **Minors in Labs Consent and Release Form:** *(if applicable)* To obtain parental/guardian consent for a minor to participate in lab activities at URI, acknowledge and assume associated risks, release the university from liability, and authorize emergency medical care if needed.

IV. Accommodation and Transportation

It is essential to ensure that accommodation and transportation meet safety, supervision, and compliance standards. This includes providing appropriate housing and dining arrangements and establishing secure procedures for transporting minors to and from Covered Activities.

A. URI Covered Activity Housing and Dining Accommodations:

1. Activity Organizers are required to maintain and provide an up-to-date roster of all participating Minors. Any changes to these rosters within 30 days prior to the start of the Covered Activity must be promptly communicated to the following:
 - a. Designated Activity Staff supervising the overnight activity
 - b. Office of Housing and Residential Life
2. In addition, when utilizing Dining Services, a list of all participants with known or reported food allergies must be provided to the following:
 - a. Designated Covered Activity Staff
 - b. Dining Services

Changes to the food allergy list within the 30 days prior to the start of the activity require timely circulation of the updated list to the same parties.

B. Third-Party Covered Activity Housing and Dining Accommodations:

1. Activity Organizers are required to maintain and provide an up-to-date roster of all participating Minors. Any changes to these rosters within 30 days prior to the start of the Covered Activity must be promptly communicated to the following:
 - a. Appropriate Covered Activity Staff supervising the overnight activity
 - b. Conference Services
2. In addition, when utilizing Dining Services, a list of all participants with known or reported food allergies must be provided to the following:
 - a. Designated Covered Activity Staff
 - b. Dining Services

Changes to the food allergy list within the 30 days prior to the start of the activity require timely circulation of the updated list to the same parties.

C. Activity Organizers and Staff must ensure the following:

1. Compliance with security measures and procedures specified by the Office of Housing and Residential Life and the Department of Public Safety.
2. Separate bathrooms and showers must be provided for adults and Minors wherever and whenever feasible. If such an arrangement is impracticable, Activity Organizers shall make reasonable efforts to provide separation between adults and Minors for the use of these facilities, such as providing separate times for use or other arrangements.
3. Covered Activities involving overnight stays in facilities on or off University property, Minors are not to be permitted to sleep in the same room as an adult other than the Minor's parent(s) or legal guardian(s).
4. Monitor separate youth bathrooms, showers, sleeping, or similar areas separated from adults, but only enter these areas as necessary for health or safety reasons.

D. Transportation of Minors: Whenever possible, the use of private vehicles for transporting Minors must be avoided. If no alternative option is available, private vehicles must have the automobile liability insurance in accordance with Rhode Island law. Documentation of appropriate liability insurance on private vehicles used to transport Minors must be maintained by the Activity Organizer for three years. A fee may be charged to park private vehicles without an existing University Parking Permit on any University campus.

When transporting Minors, at least two Activity Staff and at least two Minors must be present in the vehicle at all times.

A parent/guardian must provide written permission for the transportation of a Minor by executing the Authorization Permission/Release Form found in Section III above.

1. **URI Covered Activity:** Transportation of Minors must comply with URI's Policy on the Use of University-Owned and Rented Vehicles, and also as applicable *URI's Golf Cart Safety Procedures*. Additionally, all Covered Activities that transport Minors must meet the following requirements:
 - a. **Employees of the University:** Activity Organizers and Activity Staff who are University employees must submit a Driver Authorization Request Form, which permits the Office of Risk, Control and Insurance to conduct a driving record background check prior to the

start of the Covered Activity. No transportation of Minors is permitted until formal approval has been issued. Completed motor vehicle driving record reports will remain valid for one year. For ongoing URI Covered Activities or returning Activity Organizers or Activity Staff, the reports must be repeated annually.

b. Non-Employees of the University: Activity Staff who are not an Employee of the University, must provide a motor vehicle driving record report to the Activity Organizer with no adverse results prior to the start of the Covered Activity. Completed motor vehicle driving record reports will remain valid for one year. For ongoing URI Covered Activities or returning Activity Organizers or Activity Staff, the reports must be repeated annually.

2. Third-Party Covered Activity: Transportation associated with Third-Party Covered Activities is the full responsibility of the Third-Party Activity Organizer. If minors will be transported, the Activity Organizer must provide documentation demonstrating appropriate automobile liability coverage.

V. Background Checks

The following procedures detail the steps necessary for completing, submitting, and reviewing background checks for all Activity Organizers and Activity Staff in accordance with University policy, with the entire corresponding report yielding no disqualifying adverse results. Completed background checks will remain valid for one year. Following submission of a background check, all Activity Staff of any Covered Activity are required to disclose to the Activity Organizer or supervisor within 24 hours of the occurrence any new arrests or convictions, and the Activity Organizer must immediately alert the Office of Risk Control and Insurance.

A. URI Employees: Every URI employee preparing to participate as an Activity Organizer or Activity Staff for any Covered Activity must either a.) submit a request for a background check from Human Resources (“HR”) no fewer than 30 days before the scheduled start date of the activity, or b.) have in their personnel file a completed background check conducted by HR within the 12 months preceding the scheduled start date. To request a background check please contact Human Resources.

Each certified background check conducted by HR will include the following components:

- Applicant Self-Reported Information
- SSN Trace
- National Sex Offender & Violent Abuse Registry
- County Criminal
- State Criminal Database
- National Federal Criminal Search
- Global Criminal (if applicable)

B. Non - URI Employees: Activity Staff who are not employed by the University are required to obtain a qualifying background check in accordance with the Activity Organizer’s instructions and provide the resulting report to the Activity Organizer. The background will include the following components:

- Applicant Self-Reported Information
- SSN Trace
- National Sex Offender & Violent Abuse Registry
- County Criminal
- State Criminal Database
- National Federal Criminal Search

- Global Criminal (if applicable)
- Driving History Report (if applicable)

If the report contains any adverse results, the Activity Organizer will promptly alert the Risk, Control and Insurance Office and provide the report no fewer than 15 days prior to the scheduled start date to determine if any adverse results are disqualifying for the Covered Activity. All externally acquired background checks must be kept on file by the Activity Organizer for 3 years from the date received.

- C. K-12 School-Supervised Covered Activities:** For K–12 School–Supervised Covered Activities qualifying under this Section, background checks conducted by the school or district shall constitute compliance with Section V, and the training requirements of this policy shall not apply to school- or district-provided staff or chaperones. All requirements of this policy related to background checks and training shall continue to apply to University employees, students, or affiliates who participate in the activity.

VI. Safety Standards and Training Requirements

In recognition of the importance of protecting Minors, the University requires that all Activity Organizers and Activity Staff working with Minors be trained regarding policies and issues relating to interactions with Minors. Activity staff and chaperones provided by a K-12 school or district and participating solely in K-12 School-Supervised Covered Activities are invited to utilize URI's training resource, by are exempted from the training requirement in this section.

- A. Enterprise Risk Management Training:** After a Covered Activity is registered, Activity Organizers and Activity Staff must complete the required training and acknowledgement before participating in the activity. These can be found at the following website:
<https://web.uri.edu/riskmanagement/policies-procedures/>. Documentation of training completion must be maintained by the Activity Organizer for 3 years.
1. **Shine a Light Video:** This video should be reviewed as needed or at minimum on an annual basis.
 2. **Working with Minors Behavioral Expectations Acknowledgement:** This form must be completed annually by returning Activity Organizers and Activity Staff.
- B. Emergency Preparedness:** Activity Organizers and Activity Staff are expected to be familiar with and follow emergency preparedness best practices. Ensuring emergency preparedness is paramount for Minors' safety and well-being. The University's Office of Emergency Management is responsible for emergency planning, response, mitigation, and recovery on all University campuses and serves as the University's liaison with all external emergency management partners.
1. **Refer to the University's Policy on Weather and Other Emergencies:**
<https://web.uri.edu/policies/wp-content/uploads/sites/928/Weather-and-Other-Emergencies-20231107-APPVD-01.110.02-1.pdf>
- C. Athletic-Related Covered Activities:** Review the University's Athletics Emergency Action Plan:
<https://gorhody.com/sports/2020/6/9/information-sports-medicine-emergency-action-plan.aspx>

VII. Insurance Requirements

- A. URI Covered Activity:** Covered under University's auto and general liability insurance to include bodily injury, property damage, and molestation coverage.

B. Third-Party Covered Activities and K-12 School-Supervised Covered Activities: Use of University property by third-party groups is not covered under the University’s insurance policies. Third-Party Activity Organizers must obtain their own insurance and provide a Certificate of Insurance (“COI”). The COI must name as additional insureds: “The University of Rhode Island Board of Trustees, The University of Rhode Island, and the State of Rhode Island,” and must include the name and date of the program or event.

1. For Third-Party Covered Activities, this must be submitted annually to Conference Services.
2. For K-12 School Supervised Covered Activities, this must be submitted annually to the Office of Risk, Control and Insurance.

The Office of Risk, Control and Insurance can also provide guidance or answer questions regarding insurance requirements. At their discretion, they may modify, alter, or waive any of the insurance requirements outlined below:

| Commercial General Liability | Limits |
|--|---|
| Bodily Injury | \$1,000,000 each occurrence \$2,000,000 annual aggregate |
| Molestation Coverage | \$1,000,000 each occurrence |
| Property Damage | \$500,000 each occurrence \$500,000 annual aggregate |
| Medical Expense | \$10,000 |
| Personal and Advertising Injury | \$1,000,000 (with Employee Exclusion deleted) |
| Automobile Liability Insurance – Combined Single Limit | |
| Bodily Injury | \$1,000,000 each occurrence |
| Property Damage, and in addition non-owned and/or hired vehicles and equipment | |
| Worker’s Compensation (Coverage A) | Statutory limits |

VIII. Contact and Reporting Information

This section outlines the essential contact and reporting procedures to ensure the immediate and appropriate response to any concerns involving the safety and well-being of minors. It also highlights the legal obligation to promptly report suspected abuse or neglect as required under state law.

A.

| EMERGENCY (including medical) | NON-EMERGENCY |
|-------------------------------|------------------|
| On/Off Campus Emergency: 911 | (401) 874 - 4910 |

B. For non-time sensitive questions, contact Enterprise Risk Management at (401)-874-2591

C. To report actual or suspected abuse or neglect of minors:

Any person who has reasonable cause to know or suspect that any Minor has been abused or neglected, or has been a victim of sexual abuse by another child, is required by state law (R.I.G.L. § 40-11-3) to report this information to the Department of Children, Youth & Families within twenty-four (24) hours of becoming aware of such suspected abuse or neglect. Any person with reasonable cause to believe that a Minor participating in a Covered Activity may be neglected or abused is required to immediately make two reports:

1. **First Report:** To the Rhode Island Department of Children, Youth & Family Services Child Protection Hotline at (800) RI-CHILD [(800) 742-4453]; or to the University Campus Police at (401) 874-4910 (or 911 for emergencies); or to the Rhode Island State Police or local law enforcement if off campus. The First Report can be made at any time, including evenings and weekends.
2. **Second Report:** To the University's Office of Enterprise Risk Management at (401) 874-2591 or daniel.keating@uri.edu.

Sexual misconduct against Minors, whether perpetrated by University employees, volunteers, contractors, or students, is also a form of discrimination covered by Title IX. Refer to the University's Policy on Nondiscrimination and reach out to tixc@etal.uri.edu with any questions or concerns.

Any doubt about reporting a case of suspected abuse or neglect shall be resolved in favor of making an immediate report. The University Campus Police can assist in determining whether additional reporting may be required. Any reports made in good faith are protected from criminal and civil liability.

D. Did you hear or see someone say or do something that concerns or worries you?

If so, taking action is important. You may be the one who can stop or prevent illegal, unsafe, fraudulent or dangerous activity from harming the University and its community. The University has an Anonymous Reporting Hotline (<https://web.uri.edu/enterprise-compliance/rhody-report-it/>) that provides the opportunity to report concerns in an anonymous manner.

The Hotline is NOT a 911 or emergency service: Do not use the Hotline to report events presenting an immediate threat to life or property. Hotline reports may not receive an immediate response. If you require emergency assistance, please contact your local authorities as listed above.