

Policy on Protecting Minors

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| Policy Title | Policy on Protecting Minors |
| Policy # | 02.118.1 |
| Policy Owner | Assistant Vice President for Enterprise Risk Management |
| Contact Information | Questions about this policy can be directed to the Assistant Vice President for Enterprise Risk Management (401) 874-5593 |
| Approved By | President of the University of Rhode Island |
| Effective Date | March 1, 2026 |
| Next Review Date | No later than March 31, 2031 |
| Who Needs to Know About this Policy | All individuals and/or entities with involvement of any kind in Covered Activities, including but not limited to Activity Organizers, Activity Staff, Minors, parents and legal guardians of Minors, employees of the University, and University Affiliates. |
| Definitions <i>Defined terms and shorthand references are capitalized throughout.</i> | <p>Activity Organizer. The adult individual recorded as the primary contact and the lead responsible party for ensuring 1) adequate planning and preparation for a Covered Activity, 2) the implementation of planned safety protocols for the protection of Minors as appropriate to the Covered Activity, and 3) compliance with this policy throughout the planning and operation of a Covered Activity.</p> <p>Activity Staff. For the purposes of this policy, all adult individuals who work directly with, supervise, chaperone, or otherwise oversee Minors in Covered Activities, including, but not limited to faculty, staff, undergraduate and graduate students, postdoctoral fellows, researchers, coaches, volunteers, alumni, independent contractors, and any non-University adults associated with a Third-Party Covered Activity. This definition does not include temporary participants in Covered Activities such as guest speakers, nor ancillary support personnel such as URI catering or custodial staff.</p> <p>Covered Activity. Covered Activities are all programs, events, and activities that involve the care, supervision, or control of Minors. This policy defines three categories of Covered Activities:</p> <p>URI Covered Activity. A Covered Activity offered or operated (in whole or in part) under the authority, direction, or auspices of the University, including, but not limited to, activities for academic, educational, pre-collegiate, experiential, athletic, artistic, recreational, or other purposes.</p> |

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| | <p>Third-Party Covered Activity. A Covered Activity offered or operated on University Property by one or more University Affiliates and/or non-University individuals or entities (including University employees when acting outside the scope of their URI employment), and not operated under the direction or authority of the University.</p> <p>K–12 School–Supervised Covered Activity. A Covered Activity conducted on University Property in collaboration with (and under the auspices of) accredited K–12 schools or school districts and approved by the University for streamlined compliance with this policy in accordance with Section I.A.</p> <p>Minor. For the purposes of this policy, any person under the age of eighteen (18) who is <i>not</i> enrolled as a student at the University, and who participates in a Covered Activity. Enrolled URI students under the age of 18 participating in a Third-Party Covered Activity outside their capacity as a student shall be considered Minors solely for the purposes of this policy as it relates to that Third-Party Activity.</p> <p>University Affiliate. Any individual who is not a faculty member, staff, or student who otherwise has a formal relationship with the University, including but not limited to visiting scholars, visiting students, research fellows, professional program participants, club sports coaches, and volunteers as well as employees and associates of the URI Foundation, URI Research Foundation, and members of the University of Rhode Island Board of Trustees. Vendors and contractors are not considered University Affiliates, except for those with an ongoing presence on the University campus as regular operations support staff.</p> <p>University Property. Property belonging to the State of Rhode Island and held in trust by the University of Rhode Island Board of Trustees; property held by the University or any of its component units in its own name; and property owned by third parties but assigned to, occupied by, or managed by URI or any of its component units. University Property includes all real property, including without limitation land, buildings and other structures, fences, driveways and walkways, and other permanent improvements and associated infrastructure.</p> |
| <p>Statutes, Regulations, and Policies Governing or Necessitating This Policy</p> | <p>R.I.G.L. § 16-91-3 (School and Youth Concussion Act)</p> <p>R.I.G.L. § 40-11-3 (Abused and Neglected Children)</p> <p>NCAA Compliance: Managing Youth Sports Programs</p> <p><i>Policy on the Use of University-Owned and Rented Vehicles</i></p> <p><i>Policy on Nondiscrimination</i></p> |

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| Reason for Policy/Purpose | The purpose of this policy is to provide rules, standards, guidelines, and best practices to protect the health and safety of Minors while participating in Covered Activities. |
| Forms Related to this Policy | <i>Assumption of Risk & Release of Liability Form</i> <i>Authorization Permission/Release Form</i> <i>Health History & Consent to Medical Treatment</i> <i>Minors in Labs Consent & Release Form</i> <i>Participant Pick-up Authorization Form</i> <i>Activity with Minors Registration Form</i> <i>Working with Minors Behavioral Expectations Acknowledgement</i> <i>K-12 School-Supervised Covered Activities Attestation Form</i> |

Policy Statement

The University of Rhode Island (“University” or “URI”) is committed to protecting the health and safety of Minors. This policy 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.

All Covered Activities must be registered (Section II). With limited exceptions for approved K-12 School-Supervised Covered Activities as stipulated in Section I.A., all Activity Organizers and Activity Staff must complete training and undergo background checks before taking part in a Covered Activity (Sections V and VI). All individuals with involvement of any kind in Covered Activities are expected to hold themselves to the highest standards of conduct when interacting with Minors (Section VI). The Activity Organizer of any URI Covered Activity must be a University employee.

I. Applicability

For the purposes of this policy, the term Minors includes only those who are *not* enrolled as a student at the University, except for enrolled students under the age of 18 while they are participating in a Third-Party Covered Activity outside their capacity as an enrolled student. Individuals under the age of 18 enrolled in dual-enrollment programs at the University shall be considered enrolled for the purposes of this policy.

This policy applies to all individuals and/or entities with involvement of any kind in Covered Activities, including but not limited to Activity Organizers, Activity Staff, Minors, parents and legal guardians of Minors, employees of the University, and University Affiliates (unless noted under Exceptions below). This includes, but is not limited to, individuals involved in the recruitment of Minor student athletes, Admissions tour guides, theater and music programs that involve Minors, and any programs designed to introduce prospective students to the University.

If a URI Covered Activity takes place in a location with less stringent laws or regulations regarding Minors, this policy shall prevail.

- A. K–12 School–Supervised Covered Activities:** Notwithstanding any other provision of this policy, 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 of an *Activity with Minors Registration Form*, and provided the participating school or district submits the *K–12 School–Supervised Covered Activities Attestation Form* certifying that:
- 1) The school or district accepts full responsibility for, and retains uninterrupted care, custody, and control of, all participating Minors for the duration of the activity while on University Property;
 - 2) The school or district assumes responsibility and liability for the acts or omissions of its employees, agents, volunteers, and chaperones arising from or related to the activity, to the extent permitted by law;
 - 3) A sufficient number of school- or district-provided staff and/or chaperones will be present at all times to ensure the safe operation of the activity; and
 - 4) All such chaperones are employees of the school or district, or school-approved volunteer chaperones designated by the school or district for the activity, and have completed criminal background checks in accordance with applicable law and school district policy, with such background checks maintained on file by the school or district.

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.

All other provisions of this policy, including but not limited to mandatory reporting obligations under Section VII, remain fully applicable.

II. Covered Activity Registration

Covered Activities must register with the Risk Control and Insurance Office no less than 30 days prior to the program's commencement by submitting an Activity with Minors Registration Form. Continuing Covered Activities must re-register annually. In addition to registration, Third-Party Covered Activities must execute a contract with URI Conference Services. Contracts regarding Third-Party Covered Activities require compliance with this policy as a material term of the contract as well as an appropriate indemnification provision.

University employees who fall under NCAA jurisdiction operating sports Covered Activities on or off campus must additionally register these programs as noted in the procedures to meet NCAA compliance requirements.

III. Participant Forms

The parent/guardian of each Minor participating in a URI Covered Activity or Third-Party Covered Activity must complete the applicable forms listed in the accompanying Procedures and provide them to the Activity Organizer. All required forms must be maintained by the Activity Organizer for a minimum of three years. Participant forms are not required for K–12 School–Supervised Covered Activities except for the *Minors in Labs Consent & Release Form* as applicable.

IV. Accommodations and Transportation

- A. Housing & Dining Accommodations:** Covered Activities involving overnight stays in facilities on University Property must maintain a roster of all participating Minors. The roster must be maintained by the Activity Organizer, provided to the appropriate Activity Staff supervising the overnight activity, and provided to Conference Services (for Third-Party Covered Activities) or the Office of Housing and Residential Life (for URI Covered Activities) no less than 30 days prior to the start of the activity. Changes to the roster within the 30 days prior to the start of the activity require timely circulation of the updated roster to the same parties outlined above (see the accompanying procedures). Covered Activities must comply with all security measures and procedures specified by the Office of Housing and Residential Life and the Department of Public Safety.

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. For Covered Activities involving overnight stays in any 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). Activity Staff shall monitor any separate youth bathrooms, showers, sleeping, or similar areas separated from adults, but only enter these areas as necessary for health or safety reasons.

Covered Activities utilizing University Dining Services must maintain a list of all participants with known or reported food allergies. The list shall be maintained by the Activity Organizer with a copy provided to Conference Services (for Third-Party Covered Activities) or Dining Services (for URI Covered Activities) no less than 30 days prior to the start of the activity. 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 outlined above (see the accompanying procedures).

- B. Transportation of Minors:** Any URI Covered Activity that transports 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:
- 1) All Activity Organizers and/or Activity Staff that will operate a motor vehicle for the transportation of Minors during a Covered Activity will either a.) if they are URI employees, request a motor vehicle driving record report (see procedures); or b.) if they are *not* URI employees, provide to the Activity Organizer a motor vehicle driving record report 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. See the procedures accompanying this policy for details.
 - 2) Whenever possible the use of private vehicles for transporting Minors must be avoided. If no alternative option is available, private vehicles must have 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.
 - 3) When transporting Minors, at least two Activity Staff and at least two Minors must be present in the vehicle at all times.
 - 4) A Parent/guardian must provide written permission for the transportation of a Minor by executing the Authorization Permission/Release Form (see Section III).

V. Background Checks

Prior to the start of any Covered Activity, all Activity Organizers and Activity Staff must complete (or have completed within the previous 12 months) a criminal background check satisfying the requirements detailed in the accompanying procedures, with the entire corresponding report yielding no disqualifying adverse results. Completed background checks will remain valid for one year for the purposes of this policy.

Activity Staff that are URI employees will have certified background checks conducted through the Office of Human Resources (“HR”). Employee background checks must be requested no fewer than 30 days prior to the scheduled start date of the Covered Activity. HR will promptly a.) alert both the Activity Organizer and the Office of Risk Control and Insurance of any adverse results, and b.) indicate whether any adverse results are disqualifying for the Covered Activity.

Activity Staff that are not URI employees will obtain a qualifying background check as directed by the Activity Organizer or as described in the accompanying procedures, and must provide the report to the Activity Organizer. If the report contains any adverse results, the Activity Organizer will promptly alert the Office of Risk Control and Insurance 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. The University requires all externally acquired background checks to be kept on file by Activity Organizers for three years from the date received.

Activity Staff and chaperones provided by a K-12 school or district participating solely in K–12 School–Supervised Covered Activities as defined in Section I.A. are understood to have background checks on file with the school or district, and those shall constitute compliance with this section.

For the purposes of this policy, adverse results that will render an individual ineligible to work or volunteer in a Covered Activity include, but are not limited to: sex offenses; child abuse, molestation, or any crimes involving minors; drug distribution or any felony drug conviction; crimes of violence; murder; kidnapping; stalking; or any felony or crime involving moral turpitude.

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.

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. The training is available at the University’s Office of Enterprise Risk Management’s website and must be completed prior to working with Minors in any Covered Activity. This training shall be reviewed as needed, but no less than annually. Documentation of training completion must be maintained by the Activity Organizer for three years. Activity Staff and chaperones provided by a K-12 school or district and participating solely in K–12 School–Supervised Covered Activities as defined in Section I.A. are invited to utilize URI’s training resource, but are exempted from the training requirement in this section.

All Activity Organizers and Activity Staff must complete the *Working with Minors Behavioral Expectations Acknowledgement*. The form must be completed annually by returning Activity Organizers and Activity Staff. Activity Organizers must keep these forms on file for three years after the attestation date. All Covered Activities are subject to random inspection for these forms by the University’s Office of Enterprise Risk Management at any time during the operation of the Covered Activity. Activity Staff and chaperones provided by a K-12 school or district and

participating solely in K–12 School–Supervised Covered Activities as defined in Section I.A. are not required to submit the acknowledgement form, but are required to understand and uphold the standards of conduct and emergency preparedness best practices in accordance with this policy.

All individuals with involvement of any kind in Covered Activities must act as positive role models and uphold the highest standards of conduct. This includes maintaining appropriate boundaries, avoiding one-on-one interactions unless observable and authorized, and refraining from any form of sexual, abusive, or inappropriate behavior. Communication with Minors must be professional and program-related, and physical contact limited to appropriate, non-intrusive gestures. The use of drugs, alcohol, weapons, or inappropriate media is strictly prohibited. Any concerns or suspicions of abuse or misconduct must be reported immediately to URI Campus Police and the Activity Organizer (with protections in place for good-faith reporting).

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.

VII. Duty to Report

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:

- **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.
- **Second Report:** To the University's Office of Enterprise Risk Management at (401) 874-2591 or riskmanagement@etal.uri.edu. Alternatively, the second report can be made anonymously through the University's *Rhody Report It* web page.

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.

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.

VIII. Insurance Requirements

- URI Covered Activities** are covered under the University's auto and general liability insurance to include bodily injury, property damage, and molestation coverage.
- Third-Party Covered Activities and K–12 School–Supervised Covered Activities** using University Property are not covered under the University's insurance policies and must procure insurance at their own cost in accordance with University insurance requirements. Required insurance coverage limits can be found in the accompanying procedures. Evidence of insurance is required in the form of a certificate of

insurance (“COI”), and shall include the program name, program dates, and other details as specified in the procedures. COIs must be filed annually or when updated, whichever is sooner. Third-Party Covered Activities will submit required COIs to Conference Services. K–12 School–Supervised Covered Activities will submit required COIs to the Office of Enterprise Risk Management. The Office of Enterprise Risk Management can provide guidance or answer questions regarding insurance requirements, and may, at its discretion, modify, alter, or waive any of the insurance requirements outlined above.

IX. Enforcement

Sanctions for violations of this policy will depend on the circumstances and the nature of the violation but may include suspension, dismissal, termination, and, where appropriate, exclusion from campus. The University may also take necessary interim actions before determining whether a violation has occurred. The University may terminate the Covered Activity or relationships, or take other appropriate actions against non-University entities that violate this policy. Discipline for violations of this policy will be handled by 1) the appropriate personnel processes for violations by URI employees, or 2) the Student Handbook for violations by students.

Exceptions

This policy does not apply to:

- The URI Child Development Center, which is licensed by the Rhode Island Department of Human Services and accredited by the National Association for the Education of Young Children, with rigorous regulations, standards, and protocols employed.
- University students hosting Minor siblings or other family members during campus events or family visits.
- Events hosted by the University that are open to the general public, at which parents or guardians are expected to provide supervision of Minors (e.g. athletic events, concerts, plays).
- Events or programs in which the parent(s) or guardian(s) for each participating Minor are likewise in attendance and are therefore wholly responsible for the care, custody, and control of their Minor(s) (e.g. tours of facilities, visiting a family member at work, etc.).
- The delivery of medical and mental health care services by the University.
- Minors who are subjects of Institutional Review Board-supervised research.
- Programs or activities conducted off University Property that are hosted and operated by (or under the auspices of) any external (non-URI) organization or entity. Any URI employees participating in such activities are required to meet the external entity’s policies and/or standards for interacting with Minors.

Policy Review and Revisions

(Versions earlier than the first policy number may be paper only)

| Policy # | Effective Date | Reason for Change | Changes to Policy |
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| 02.118.1 | March 1, 2026 | n/a | n/a |